

12 June 2003  
Reference: 0001922.03

Ms. Karen Stromberg  
Massachusetts Department of Environmental Protection  
Northeast Region  
205 A. Lowell Street  
Wilmington, MA 01887



Re: Response to Public Comments  
Draft Scope of Work  
Former Raytheon Facility  
430 Boston Post Road  
Wayland, Massachusetts (the "Site")  
Permit No. 133939/RTN 3-13302 and RTN 3-22408

Dear Ms. Stromberg:

On behalf of Raytheon Company, Environmental Resources Management (ERM) has prepared this letter providing responses to comments prepared by CMG Environmental, Inc. (CMG), consultant to the Town of Wayland, and Mr. Stan Robinson regarding the Draft Scope of Work (SOW), dated 18 April 2003. CMG's comment letter, dated 14 May 2003, contains 10 comments. An additional comment was received on 15 May 2003 from Mr. Stan Robinson. This response letter includes relevant portions of each comment in italics and responses in plain text.

***CMG's Comments:***

**1.0 INTRODUCTION**

**1.1 Background**

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*recommends that you mention this fact in either a cover letter to DEP or the introductory section of the final SOW.*

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## **2.0 NORTHERN AREA ASSESSMENT ACTIVITIES**

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round will be conducted in October 2003 (fall). Therefore, the Phase I report will include groundwater data for three rounds of sampling in the Northern Area over three different seasons.

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*VIII) Please confirm in the final SOW that ERM will gauge all monitoring wells before collecting any groundwater samples (to avoid possible drawdown effects caused by sampling).*

Standard Operating Procedures include gauging wells prior to sampling. This will be clearly stated in the Final SOW.

#### **4.4 Prepare Phase I - Initial Site Investigation Report and Tier Classification Submittal**

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- Phase I Report;
- NRS Scoresheet; and
- Phase II SOW.

These tasks will be included in the bulleted list in the Final SOW.

**4.5 Prepare Phase II – Comprehensive Site Investigation Scope of Work**  
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The remediation follows the regulations, standards, and processes set forth in the MCP and remediates the wetland to a level of no significant risk. Remediation of the wetlands to levels below those needed to achieve no significant risk would unduly impact the remaining wetland areas. The extent of the remedial area was confirmed with additional sampling conducted in March 2003. Extending the remediation into areas that would go beyond achieving a level of no significant risk would result in wetland impacts for which regulatory agencies may not issue wetland alteration permits.

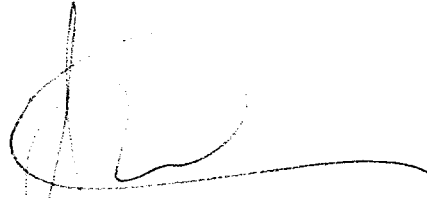


If you have any questions or comments please, contact Mr. Edwin Madera of Raytheon at (978) 440-1813.

Sincerely,



R. Joseph Fiacco, Jr., P.G.  
*Project Manager*



John C. Drobinski, P.G., LSP  
*Principal-in-Charge*

Attachments:

cc: Mr. Edwin Madera, Raytheon Company, Sudbury, MA 01776

Public Repository (Primary Location), Wayland Public Library, Wayland,  
MA 01778

Public Repository (Secondary Location), Board of Health Office, Wayland,  
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Mr. Benson R. Gould, CMG Environmental, Inc, Southbridge, MA 01550

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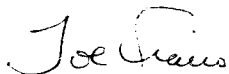
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*Under any cleanup scenario, wetland services will be stunted for a certain period of time (by a combination of delays, first in removal of pollutants and second in development or redevelopment of wetland vegetation). Appropriate analysis of cleanup scenarios should credit my wetland duplication scenario with its introduction of additional relatively-higher-quality wetland services, providing a more positive net benefit than other alternatives. The only bona fide arguable environmental cost would be a brief delay in 1.5 acres of toxics removal. This delay is tolerable in view of (1) the greater net benefit of this scenario and (2) the relative stability of these toxics deposits.*

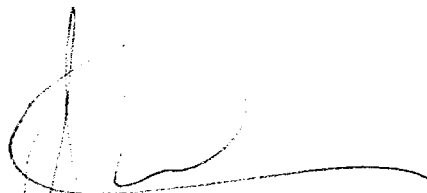
The remediation follows the regulations, standards, and processes set forth in the MCP and remediates the wetland to a level of no significant risk. Remediation of the wetlands to levels below those needed to achieve no significant risk would unduly impact the remaining wetland areas. The extent of the remedial area was confirmed with additional sampling conducted in March 2003. Extending the remediation into areas that would go beyond achieving a level of no significant risk would result in wetland impacts for which regulatory agencies may not issue wetland alteration permits.

If you have any questions or comments please, contact Mr. Edwin Madera of Raytheon at (978) 440-1813.

Sincerely,



R. Joseph Fiacco, Jr., P.G.  
*Project Manager*



John C. Drobinski, P.G., LSP  
*Principal-in-Charge*

Attachments:

cc: Mr. Edwin Madera, Raytheon Company, Sudbury, MA 01776

Public Repository (Primary Location), Wayland Public Library, Wayland,  
MA 01778

Public Repository (Secondary Location), Board of Health Office, Wayland,  
MA 01778

Mr. Benson R. Gould, CMG Environmental, Inc, Southbridge, MA 01550

Mr. Stan Robinson, Wayland, MA 01778