April 11, 2005

Mr. Edwin P. Madera
Raytheon Integrated Defense Systems
528 Boston Post Road
Mail Stop 1880
Sudbury, MA 01776

Re: **Public Commentary on Draft Phase II Comprehensive Site Assessment – Scope of Work (Phase II SOW)**
Former Raytheon Facility, 430 Boston Post Road, Wayland MA
CMG ID 2002-003

Dear Mr. Madera:

The following is my public commentary on the March 8, 2005 Draft Phase II SOW for the former Raytheon facility in Wayland, Massachusetts (the Site) regarding Massachusetts Department of Environmental Protection (DEP) release tracking number (RTN) 3-22408, prepared by Environmental Resources Management (ERM). For the record, the Wayland Board of Selectmen has retained me to provide technical review of document submittals and other activities at the Site on behalf of the Town of Wayland, especially those that pertain to compliance with DEP requirements.

As in past document reviews, I have prefaced my comments with ERM's heading designations for ease of comparison, and used uppercase roman numerals to identify each comment.

1.1 BACKGROUND

I) On Page 1 of the Draft Phase II SOW, ERM defines "the Site" (DEP 'disposal site' for RTN 3-22408) as limited to the property boundaries of the two parcels that comprise the former Raytheon facility plus the former Hamlen parcel. This is entirely adequate for delineation of the arsenic reporting condition in the 'Western Area' wetlands, and may be sufficient for the MTBE reporting condition in the 'Southern Area.' However, studies ERM has conducted to date clearly demonstrate that chlorinated volatile organic compounds (VOCs) have migrated beyond the parcel property boundary in the Northern Area. To wit, ERM has reported chlorinated VOCs in off-Site sampling points as tabulated on the following page ("B" series modified Waterloo sampler results are from ERM field investigations conducted February through April 2004; "DEP" series temporary sampling points are from DEP sampling and screening analyses conducted December 2001 through April 2002).

600 Charlton Street, Southbridge MA 01550
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CHLORINATED VOCS OFF-SITE (µG/L)

SAMPLE LOCATION	PCE	TCE	cDCE	VC
B-411	0.78	6.0	8.1	BRL
B-412	3.9	45	130	4.9
B-413	38	850	1,600	BRL
B-414	BRL	2.2	13	1.7
B-417	BRL	0.56	8.2	BRL
B-419	BRL	BRL	4.7	BRL
B-422	BRL	BRL	2.8	BRL
DEP-10(S)	BRL	3.4	4.8	NT
DEP-20	1.1	12	6.2	NT
DEP-21	2.3	146	52	NT

PCE = TETRACHLOROETHENE; TCE = TRICHLOROETHENE; cDCE = CIS-1,2-DICHLOROETHENE; VC = VINYL CHLORIDE;
BRL = BELOW LABORATORY REPORTING LIMIT; NT = NOT TESTED FOR THAT PARAMETER

Wayland does not assert that all of these sample points must be included in the definition of 'Site' since some of the detections are clearly discontinuous and de minimus. However, the Town believes that, at a minimum, sample points B-411, B-412, B-413, DEP-20, and DEP-21 should be included because together they form a contiguous area north of the property boundary, and individually they each exhibit one or more exceedances of the applicable GW-1 groundwater criteria.

2.3 SOURCES, NATURE, AND EXTENT OF CONTAMINATION

Soil

Western Area

II) On Page 9 of the Draft Phase II SOW, ERM asserts that "the presence of arsenic in soil samples, especially samples collected within or near the wetlands, is prevalent and naturally occurring." Wayland agrees that this is very likely the case, but requests that Raytheon provide a suitable citation to published information to properly document that arsenic is 'prevalent and naturally-occurring' in the region.

2.4 CONCEPTUAL SITE MODELS

Northern Area

III) On Page 12 of the Draft Phase II SOW, ERM notes that "historically, the area has been filled." The Town requests that Raytheon provide an approximate date of when this filling occurred, as it is relevant to the likely time that chlorinated VOC contamination has existed in 'Northern Area' groundwater.

3.3 SURVEY, GAUGE, AND SAMPLE MONITORING WELLS

3.3.2 Groundwater Sampling

IV) On Page 20 of the Draft Phase II SOW, ERM indicates they will sample 'Southern Area' wells for MTBE and benzene. Wayland believes it is important that Raytheon continue to monitor for other gasoline-constituent VOCs as well. Furthermore, while testing for gasoline-constituent VOCs may be sufficient for the purposes of assessing RTN 3-22408, the Town is concerned that Raytheon continue to monitor chlorinated VOC contamination in this area for assessment of the Release Abatement Measure conducted under RTN 3-13302. Therefore we

request that ERM specifies VOC testing via EPA Method 8260B for groundwater monitoring in the 'Southern Area.'

As always, I thank you in advance for your timely response to this commentary on behalf of the Town of Wayland.

Sincerely,
CMG ENVIRONMENTAL, INC.

Benson R. Gould, LSP, LEP
Principal

cc: Environmental Resources Management (John C. Drobinski, P.G., LSP)
Mr. J. Andrew Irwin, Wayland
Ms. Anette Lewis, Wayland
Massachusetts DEP (Pat Donahue, Larry Immerman, Karen Stromberg)
National Parks Service (% Jamie Fosberg)
Mr. Lewis Russell, Wayland
Mr. Harvey and Ms. Linda Segal, Wayland
Ms. Kimberly Tisa, U.S. EPA Region I
Wayland Board of Health PIP Repository (% Steve Calichman, Health Director)
Wayland Board of Selectmen (% Executive Secretary Jeff Ritter)
Wayland Business Center, LLC (% Paula Phillips, Congress Group Ventures)
Wayland Conservation Commission (% Brian Monahan)
Wayland Public Library PIP Repository (% Ann Knight)