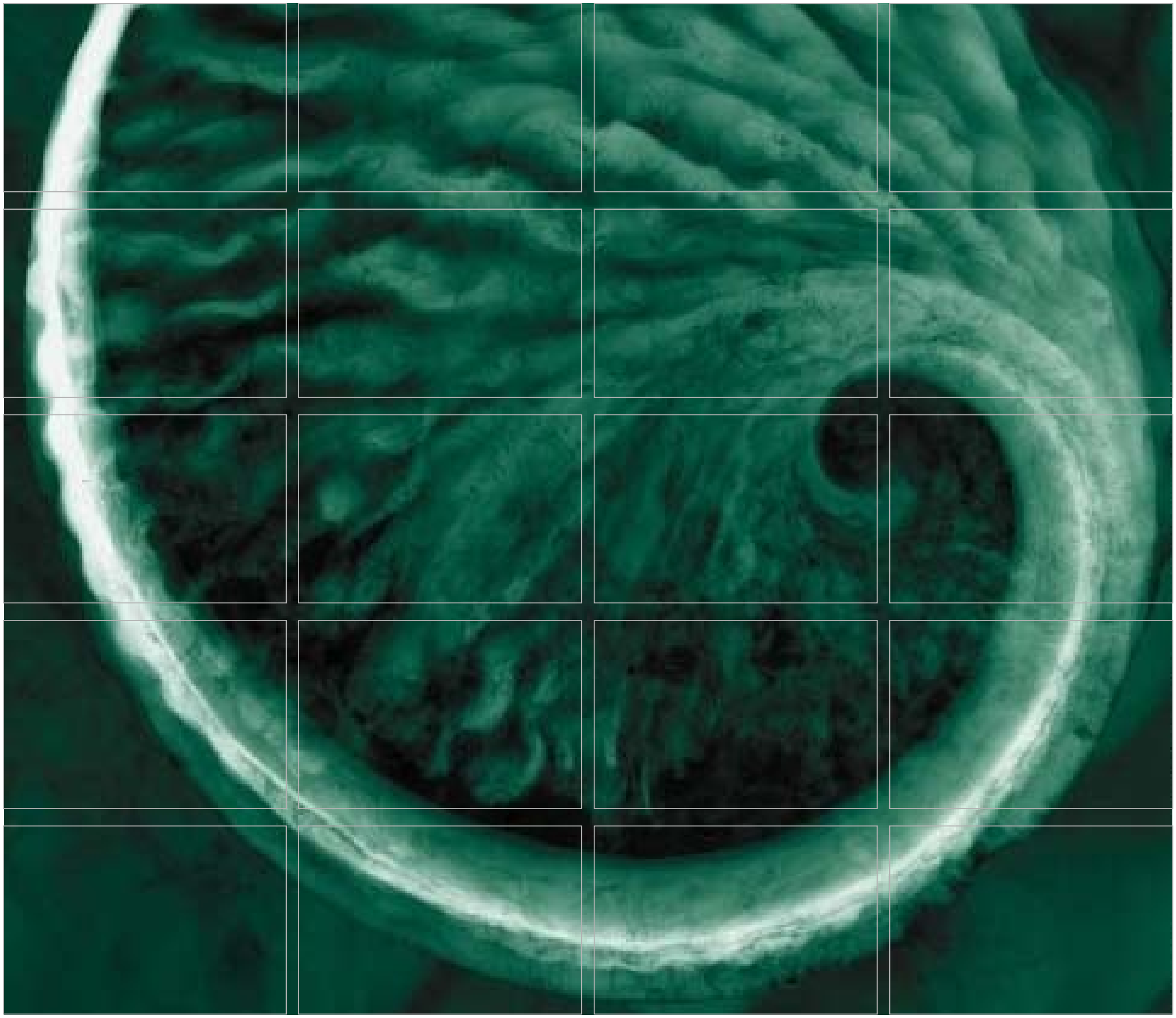

Raytheon Company

DRAFT
Phase IV – Remedy Implementation Plan

Former Raytheon Facility
430 Boston Post Road
Wayland, Massachusetts

RTN 3-22408
Tier 1B Permit Number W045278
ERM Reference 0043601

17 May 2006

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LIST OF ACRONYMS AND ABBREVIATIONS

BVW	Bordering Vegetated Wetland
BWSC	Bureau of Waste Site Cleanup
cDCE	cis-1,2-dichloroethene
CMR	Code of Massachusetts Regulations
CSA	Comprehensive Site Assessment
CSM	Conceptual Site Model
CVOC	chlorinated volatile organic compounds
Department	Massachusetts Department of Environmental Protection
DHE	Dehalococcoides ethenogenes
DPS	Down-gradient Property Status
EPA	United States Environmental Protection Agency
EPH	Extractable Petroleum Hydrocarbon
ERM	Environmental Resources Management
IC	Ion Chromatography
LSP	Licensed Site Professional
MCP	Massachusetts Contingency Plan
MIP	Membrane Interface Probe
MMCL	Massachusetts Maximum Contaminant Levels
MNA	Monitored Natural Attenuation
MTBE	methyl-tert-butyl ether
MW	monitoring well
NOI	Notice of Intent
NOR	Notice of Responsibility
NPDES	National Pollution Discharge Eliminations System
OHM	oil and/or hazardous materials
ORP	oxidation-reduction potential
PCB	Polychlorinated biphenyl
PCE	tetrachloroethene

PID	Photo-ionization Detector
PLFA	Phospholipid Fatty Acid
PP13	Priority Pollutant 13 Metals
PRP	Potentially Responsible Party
RAO	Response Action Outcome
RAPS	Response Action Performance Standard
RC	reportable concentrations
RCRA	Resource Conservation Recovery Act
RGP	Remediation General Permit
RIP	Remedy Implementation Plan
RNF	Release Notification Form
RTN	Release Tracking Number
SPCC	Spill Prevention Control and Countermeasures
SVOC	Semi-volatile Organic Compound
TCE	trichloroethene
TCLP	Toxicity Characteristic Leaching Protocol
TKN	Total Kjeldahl Nitrogen
TOC	Total Organic Compound
TSS	Total Suspended Solids
ug/g	micrograms per gram
ug/L	micrograms per liter
VC	vinyl chloride
VOC	volatile organic compound

1.0 INTRODUCTION

1.1 BACKGROUND

On behalf of Raytheon Company (Raytheon), Environmental Resources Management (ERM) has prepared this Phase IV– Remedy Implementation Plan (RIP) (Phase IV) report, pursuant to 310 Code of Massachusetts Regulations (CMR) 40.0874, for portions of the Former Raytheon Facility located at 430 Boston Post Road in Wayland, Massachusetts (Figure 1). The Site layout is shown in Figure 2.

On 17 December 2002, Raytheon submitted a Release Notification Form (RNF, BWSC-103) to the Massachusetts Department of Environmental Protection (Department), pursuant to 310 CMR 40.0315(1), for three identified reportable conditions (ERM, 2002). The three reportable conditions were identified based on the detection of constituents in groundwater at concentrations in excess of applicable Reportable Concentrations (RCGW-1) and include the following:

- chlorinated volatile organic compounds (CVOCs): tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2-dichloroethene (cDCE), and vinyl chloride (VC) in the Northern Area;
- methyl tert butyl ether (MTBE) in the Southern Area; and
- arsenic in the Western Area.

The Department issued a Notice of Responsibility (NOR) and Release Tracking Number (RTN) 3-22408 on 16 January 2003 for these release conditions. A Phase I Initial Site Investigation (Phase I) report, including a Tier Classification Submittal, was submitted to the Department on 17 December 2003 (ERM, 2003). The Site is classified as Tier IB, Permit Number W045278.

As detailed in the Phase II report (ERM, 2005a), Raytheon anticipates filing a Downgradient Property Status (DPS) for methyl-tert-butyl ether (MTBE) and a partial Response Action Outcome (RAO) for arsenic. These releases are not discussed in this Phase IV RIP.

The Phase IV is the fourth part of a five-phase process required under the Massachusetts Contingency Plan (MCP, 310 CMR 40.0000) for assessment and remediation of a release(s) of oil and/or hazardous materials (OHM) to the environment. Cleanup will be initiated under Phase IV to abate OHM impacts to Site soil and groundwater that pose a potential risk to human health and the environment, as identified in the Phase II–Comprehensive Site Assessment (CSA, ERM, 2005a). The technologies utilized as part of Phase IV are those selected in the Phase III–Remedial Action Plan (ERM, 2005b). The Phase IV includes design, construction and implementation of the Comprehensive Remedial Response Action identified in Phase III. The Phase IV Transmittal Form BWSC-108 and public notification are included as Appendix A.

Data from assessment activities, presented in the Phase II, suggest the presence of residual and sorbed volatile organic compounds (VOCs) located in the Northern Area soils that represent the source of dissolved phase impacts to groundwater in the Northern Area. The Phase III identified "Excavation of Source Area Saturated Soils" and "Bioremediation in Groundwater" as the preferred remedial approaches for abatement of Site impacts. The Phase III also indicated that pre-remedial characterization activities would need to be conducted to identify chlorinated VOC (CVOC) concentrations in the source area saturated soil.

From 31 January to 1 February 2006, and on 14 April 2006, ERM conducted soil investigations to further evaluate the feasibility of Excavation of Source Area Saturated Soils. Twenty-one soil borings were advanced to a maximum depth of 30-feet below ground surface (bgs). Samples were collected and submitted for analytical analysis of volatile organic compounds (VOCs) by EPA Method 8260B. The results of these investigations are presented in Section 2.2.

Pursuant to 310 CMR 40.0874, this RIP documents the engineering concepts and design criteria to be used for the design and construction of the Comprehensive Remedial Action for the Site. Following construction and implementation of the remedy, an As-Built Construction Report, Final Inspection Report and Phase IV Completion Statement will be prepared in fulfillment of remaining Phase IV requirements.

1.2 PURPOSE & SCOPE

The purpose of the RIP is to ensure that the information, plans and reports related to the design, construction and implementation of the selected remedial action alternative are sufficiently developed and documented to support implementation of the Comprehensive Remedial Action. In accordance with 310 CMR 40.0874, the RIP includes the following:

- A list of relevant contacts including:
  1) names, addresses, and telephone numbers of the responsible party (RP), potentially responsible party (PRP) or Other Persons responsible for submittal of the RIP;
  2) name, address, and telephone number of the licensed site professional (LSP); and
  3) identification of those persons who will own, operate and/or maintain the selected remedial action alternative during and following construction.
- Engineering concepts and design criteria to be used for the design and construction of the Comprehensive Remedial Action including:
  1) goals of the remedial action, including performance requirements of the remedial systems, and/or the requirements for achieving a Response Action Outcome under 310 CMR 40.1000;
  2) any significant changes in or new information related to disposal site conditions which were not included in previous submittals;
  3) disposal site maps showing existing disposal site features and proposed locations of activities associated with the remedial action;
  4) a description of the characteristics, quantity, and location of environmental media or materials to be treated or otherwise managed;
  5) a description and conceptual plan of the activities, treatment units, facilities, and processes to be used to implement the selected remedial action alternative including flow diagrams;
  6) relevant design and operation parameters, including:
     a) design criteria, assumptions and calculations;
     b) expected treatment, destruction, immobilization, or containment efficiencies and documentation of how that degree of effectiveness was determined; and
     c) demonstration that the selected remedial action alternative will achieve the identified remedial goals (may include information from pilot or treatability tests, similar operations, or scientific literature);

7) design features for control of OHM spills and accidental discharge or system malfunction, including without limitation: containment structures, leak detection devices, run-off controls, pressure valves, bypass systems, or safety cutoffs;

8) a description of the methods for management or disposal of any treatment residual, contaminated soils, and other waste materials containing OHM generated as a result of the selected remedial action alternative;

9) identification of site-specific characteristics which may affect or be affected by the design, construction, or operation of the selected remedial action alternative, including, but not limited to:

   a) relationship of the selected remedial action alternative to existing disposal site activities or operations;

   b) drainage features;

   c) natural resource areas, local planning and development issues; and

   d) soil characteristics and groundwater characteristics;

10) a discussion of measures to be incorporated into the design, construction and operation of the remedial action alternative to avoid any deleterious impact on environmental receptors and natural resource areas (including any surface water or wetland), or where it is infeasible to avoid any such impact, a discussion of measures to minimize or mitigate any impact; and

11) a general description of inspections and monitoring which will be performed to ensure adequate construction and performance of the remedial action.

   a) Construction plans prepared in conformance with appropriate engineering and construction standards and practices, and regulations applicable to construction plans and activities including, as appropriate: plans, material specifications, and procedures related to the construction of the selected remedial action alternative; and

12) a schedule for the design and construction of the remedial action alternative.

- An Operation, Maintenance, and/or Monitoring plan including, as appropriate:

1) name and telephone number of the person(s) conducting operation, maintenance and/or monitoring activities;

2) general operating procedures, including start-up, testing, maintenance, shutdown, and emergency or contingency procedures; and

3) specification of the type, frequency and duration of monitoring, and testing or inspections to ensure and confirm that the remedial action is performing as designed. The frequency of monitoring and/or inspections shall be consistent with the Response Action Performance Standard, as described in 310 CMR 40.0191, and in conformance with the terms of applicable permits, approvals or licenses. At a minimum, the results from operation, maintenance and/or monitoring of a remedial action shall be documented and submitted to the Department every six months in report form as described in 310 CMR 40.0892.

- A health and safety plan to be followed during the construction and implementation of the Comprehensive Remedial Action.
- A list of any necessary federal, state or local permits, licenses and/or approvals required for the design, construction and/or operation of the selected remedial action alternative and a description of any additional information needed to meet these requirements.
- A discussion of any property access issues which are relevant to the implementation of the Comprehensive Remedial Action, and a plan and timetable for resolving property access problems, as appropriate.

As noted above, an As-Built Construction Report, Final Inspection Report and Phase IV Completion Statement will also be submitted as part of Phase IV, but are not included in the RIP.

1.3 REPORT ORGANIZATION

The report is organized to satisfy the requirements of the MCP (310 CMR 40.0874). The report contains the following sections:

Section 2.0 *New Site Information* – includes a summary of new information obtained since submission of the Phase II and Phase III reports, and relevant Site contacts.

Section 3.0 *Design Basis* – includes the identification of target cleanup levels and areas of OHM impacted media (i.e., soil and groundwater) requiring abatement to achieve remedial goals.

Section 4.0 *Conceptual Design – Soil Removal* - includes the: engineering design; construction plans and specifications; operation, maintenance and/or monitoring plans, as appropriate; health and safety plan; list of necessary permits; and, property access issues pertaining to the wetland remediation.

Section 5.0 *Conceptual Design – Groundwater Treatment* - includes the: engineering design; construction plans and specifications; operation, maintenance and/or monitoring plans, as appropriate; health and safety plan; list of necessary permits; and, property access issues pertaining to the groundwater remediation.

Section 6.0 *Implementation Schedule* – includes a proposed schedule to complete implementation of the Comprehensive Remedial Action.

Section 7.0 *References*

2.0 NEW SITE INFORMATION

2.1 BACKGROUND

Since completion of the Phase II and Phase III reports (ERM, 2005a/b), pre-remedial characterization activities were completed to support remedial design and implementation, and to identify CVOC concentrations in the source area saturated soil.

2.2 ADDITIONAL SITE ASSESSMENT ACTIVITIES

2.2.1 Soil

Methods

The purpose of this task was to characterize soil quality to support Phase IV remedial design activities. A total of 22 soil borings were advanced using a Geoprobe to maximum depth of 30-feet bgs in the source area in the Northern Area of the Site. Soil boring locations were collocated with previously advanced Membrane Interface Probe (MIP) borings and Waterloo Profiler borings. The soil boring locations are shown on Figure 2. The soil boring logs are included in Appendix B.

Soil samples were collected and screened in the field for total VOCs using a photo-ionization detector (PID) and the Massachusetts Department of Environmental Protection (Department) jar headspace method. Twenty soil samples were submitted for analysis of VOCs by EPA Method 8260. Additionally two samples (one grab and one composite) were submitted for analyses of additional analytical parameters, which included:

- Semi-volatile organic compounds (SVOCs) by EPA Method 8270;
- Polychlorinated biphenyls (PCBs) by EPA Method 8082;
- Priority Pollutant 13 Metals (PP13) by EPA Method 6010B/7471; and
- Extractable Petroleum Hydrocarbons (EPH) by MADEP-EPH-98-1.

One sample was submitted for analysis of waste characterization parameters using the toxicity characteristic leaching procedure (TCLP) and included :

- TCLP Resource Conservation Recovery Act (RCRA) 8 Metals by EPA Method SW 1311/6010/7000;
- TCLP VOCs by EPA Method SW1311/8260;
- TCLP SVOCs by EPA Method SW1311/8270;
- TCLP Pesticides by EPA Method SW1311/8081; and
- TCLP Herbicides by EPA Method SW1311/8150.

Laboratory analytical reports are included in Appendix C.

Results

All 20 of the soil samples submitted for analysis of VOCs contained detectable concentrations of various VOCs. PCE, TCE, and/or cis-1,2-dichloroethene (cDCE) were detected in 15 of these soil samples at concentrations greater than the applicable Method 1: S-2 & GW-1 criteria (Table 1).

No PCBs, SVOCs, or EPHs were detected above analytical laboratory method detection limits for either the grab or composite soil sample (Table 2). Various metals were detected in both the grab and composite sample, none above the applicable RCS-1 criteria (Table 2).

Tetrachloroethene (PCE), trichloroethene (TCE), and 2,4,5-trichlorophenol were detected by the analysis of waste characterization parameters under TCLP (Table 3). None of these compounds were detected at concentrations above the regulatory criteria presented in 310 CMR 30.125B, Hazardous Waste Regulations.

2.2.2 Groundwater

Methods

The purpose of this task was to continue the evaluation of hydraulic gradients and groundwater quality at the Site. A comprehensive groundwater gauging event for all accessible Site monitoring wells was conducted in April 2006. A groundwater sampling round was also conducted in April 2006. To date, a total of nine comprehensive gauging and sampling rounds have been conducted at the Site.

On 3 April 2006, depth-to-water measurements were collected from all accessible Site monitoring wells using an electronic water level meter.

From 3 to 7 April 2006, groundwater samples were collected from monitoring wells using low-flow sampling techniques. Physico-chemical parameters (pH, temperature, specific conductance, dissolved oxygen, and ORP) were monitored during purging until equilibration was achieved, at which time groundwater samples were collected for laboratory analyses. Groundwater samples were analyzed for one or more of the following parameters, determined by the contaminants of interest for that area of the Site:

- VOCs by EPA Method 8260B; or
- CVOCs by EPA Method 8021B.

Monitoring wells, for which laboratory analytical results for previous sampling events were either below detection limits or below applicable RC's for all constituents, were excluded from the April groundwater sampling event. A comprehensive groundwater sampling round (i.e., consisting of all Northern Area monitoring wells) will be conducted in July 2006.

Results

For the purpose of evaluating groundwater flow directions across the entire Former Raytheon Facility property, ERM routinely prepares two groundwater elevation contour maps for each gauging round, representing:

- wells with screens set across the water table or with the top of the well screen located within five feet of the water table; and
- wells with screens set in the deep overburden (defined as the lower fine sand and silt unit in the Northern Area and the fine to medium sand unit in the Southern Area). It is important to note that well screens set within this unit vary significantly in depth. However, head data collected from these wells appear to represent a single hydrologic unit and therefore, represent a single piezometric surface. The lower fine sand and silt unit of the Northern Area is particularly significant because it appears to control CVOC migration in this portion of the Site.

Gauging data are presented in Table 4. The upper and lower aquifer potentiometric surface maps for the April 2006 gauging event are shown on Figures 3 and 4, respectively.

In addition to evaluating horizontal groundwater flow, ERM routinely calculates vertical hydraulic gradients for well clusters (i.e., two or more wells installed in close proximity to one another). The vertical gradients are calculated using groundwater elevation data for vertically adjacent monitoring wells. Vertical gradients were also calculated between deep overburden and bedrock wells, where present. The vertical hydraulic gradients calculated using calendar year 2005 potentiometric surface data are presented in Table 5.

Groundwater geochemical parameter data are presented in Table 6. Groundwater analytical results for VOCs are presented in Table 7. Laboratory analytical reports are provided in Appendix C.

2.3 *CONCEPTUAL SITE MODEL*

Based on data collected to date, ERM has developed the following conceptual site model (CSM) for the CVOC release in the Northern Area of the Site.

- An apparent historical release of primarily TCE occurred in the vicinity of B-529 (Source Area, Figures 2 and 5). The source signature also includes lower levels of PCE and toluene. Historically, the Northern Area of the Site has been filled and only transient radar equipment testing was known to have been conducted in this portion of the Site. Therefore, the release mechanism was likely transient and no longer exists. The historical release of chlorinated solvents is estimated to be approximately 100 gallons, and to have occurred between 1955 (i.e., when the site was initially developed) and the 1970s (i.e., approximate time of filling in the Northern Area).
- The presence of residual and sorbed VOCs, located in the low hydraulic conductivity fine sand and silt soils, represent the source of dissolved phase impacts to groundwater in the Northern Area. TCE appears to migrate via flushing by recharge events or diffusion out of the upper fine sand and silt unit into the underlying, higher hydraulic conductivity, medium to fine sand unit. When the TCE reaches the medium to fine sand unit, it migrates via advective groundwater flow initially to the northwest and ultimately to the west (Figure 6). The predominant groundwater flow direction within the Northern Area is to the west.
- The medium to fine sand unit fines and dips to the west becoming the lower fine sand and silt unit in the western portion of the Northern Area. The moderate conductivity lower fine sand and silt

unit is overlain by a lower conductivity silt and clay unit. The relative difference in hydraulic conductivities between the two units, combined with downward vertical hydraulic gradients, have minimized or prevented CVOC impacts to the silt and clay unit along the axis of the plume. The moderate conductivity lower fine sand and silt unit is underlain by a higher hydraulic conductivity gravel unit. This relatively higher conductivity gravel unit appears to minimize downward vertical plume migration, as evidenced by significantly lower or non-detectable CVOC concentrations in and beneath this unit. In general, Northern Area vertical hydraulic gradients within the shallow portion of the overburden are downward, while vertical gradients within the deep overburden are upward. These gradients converge toward the fine sand and silt and/or gravel portions of the overburden, which are downward-dipping to the west (Figure 6).

- As the TCE migrates away from the source area and vertically downward within the lower fine sand and silt unit, intrinsic biodegradation converts TCE to cDCE and VC, resulting in enrichment of cDCE relative to TCE in the westernmost wells. These processes act to limit the distance over which a CVOC plume can travel by naturally reducing concentrations in groundwater until a steady-state condition is achieved. Analytical data indicates that the plume has reached a steady-state condition (Appendix G of ERM 2005a). The presence of ethene in groundwater indicates that complete intrinsic biodegradation of CVOCs is occurring under natural Site conditions. This degradation of parent constituents is evidence of intrinsic biodegradation within the Northern Area of the Site. CVOCs may be transformed through biological and abiotic reactions. Parent compounds within the Northern Area of the Site (PCE and TCE) make up the majority of contaminant mass near the source area, but daughter products (cDCE and VC) are dominant within the downgradient extent of the plume.

2.4 RELEVANT CONTACTS

The following table provides contact information for Site owners and those persons who will operate and/or maintain the selected remedial action alternative(s) during and following construction.

Name	*Role*	*Contact Information*
John C. Drobinski	ERM LSP-of-Record	ERM 399 Boylston St., 6th Fl Boston, MA 02116
Louis J. Burkhardt	Raytheon Company Senior Environmental Engineer Responsible Party	Raytheon Company 528 Boston Post Road MS-1880 Sudbury, MA 01776
Paula S. Phillips	The Congress Group, Inc. Vice President of Operations Property Owner	The Congress Group, Inc. 33 Arch Street, Suite 2100 Boston, MA 02110
To be named later	Wayland Meadows Limited Partnership; C/O Levco Inc. Property Owner	Wayland Meadows Limited Partnership; C/O Levco Inc. 145 Rosemary Street, Needham, MA 02494

3.0 DESIGN BASIS

3.1 IMPACTED AREAS

3.1.1 Soil

Soil is impacted primarily by PCE, TCE, and cDCE, associated with suspected transient release(s) of chlorinated solvents in the Source Area. These CVOCs have been detected in Site soil at concentrations above RCS-1. CVOC concentrations for the soil boring program are shown in plan view (Figure 5).

Although not included in the Risk Characterization, presented in the Phase II CSA, the CVOCs in soil will contribute to a condition of "significant risk" to human health because the Site is located within a Department-approved Zone II Aquifer Protection Zone. The presence of residual and sorbed VOCs, located in the low hydraulic conductivity fine sand and silt soils, represent the source of dissolved phase impacts to groundwater in the Northern Area. The boundary of the Northern Area CVOC soil residual area was delineated to levels below applicable regulatory standards to the south and west of the Source Area. The northern and eastern boundary of the CVOC soil residual area will be delineated during additional soil sampling conducted during the Source Area soil excavation.

Under current land use conditions, risks to human health by impacted soil are considered negligible since the impacted soil is at depths greater that 5 feet bgs. Additionally, a Deed Restriction was filed on the Former Raytheon Facility property on 21 October 1997. Activities and uses specifically allowed by the Deed Restriction include commercial or industrial uses. Activities and uses specifically prohibited include residential, childcare, daycare, agricultural, groundwater uses (except for remediation purposes) and subsurface activities and/or other activities that could render contaminated media accessible.

3.1.2 Groundwater

Groundwater is impacted primarily by TCE and associated degradation products, likely to be associated with suspected transient release(s) of chlorinated solvents. Five VOCs have been detected in Site groundwater at concentrations above Method 1 GW-1 standards: PCE, TCE, cDCE, VC, and toluene. CVOC concentrations for the most recent monitoring round are shown in cross-section (Figure 6) and plan view (Figure 7).

Toluene was detected for the first time above the RCGW-1 standard within a single sample collected from Waterloo Profiler boring WP-520 during the source area characterization activities. Toluene has not been detected above its RCGW-1 standard in groundwater samples collected from monitoring wells located in the Northern Area. The absence of additional groundwater monitoring data to support the detection of toluene above RCGW-1 leads ERM to conclude the detection of toluene above RCGW-1 is not representative of Site conditions.

Chloroform was detected above its RCGW-1 concentration at MW-556S during groundwater sampling events in September and October 2005. Additional groundwater data did not confirm the detection of chloroform in groundwater at this well. A RNF for this condition was not submitted to the Department.

VOCs in groundwater pose a condition of "significant risk" to human health because the Site is located within a Department-approved Zone II Aquifer Protection Zone where groundwater quality must meet Massachusetts Maximum Contaminant Levels (MMCLs) for drinking water. Groundwater in the Northern Area flows to the west toward the Sudbury River and associated wetlands, which represent the regional hydrologic discharge boundary. The Northern Area CVOC plume migrates from east to west toward the Sudbury River and associated wetlands. The western boundary of the CVOC plume was delineated to levels below applicable RCs within the wetlands east of the Sudbury River. The northern boundary of the CVOC plume was delineated to levels below applicable RCs approximately 0.4 miles south of the Baldwin Pond Wellfield. The plume is currently in steady state. Thus, future potential risk to the Baldwin Pond Wellfield is considered to be minimal.

The condition of significant risk is based on the potential for future exposure by hypothetical receptors (i.e., assumes that drinking water wells are located within the Northern Area, and that groundwater from within the area of impact is withdrawn for consumption). Under current land use conditions (e.g. Deed Restriction), risks to human health are considered negligible since the area of impact is remote from Baldwin Pond Wellfield so that there is currently no complete exposure pathway to impacted groundwater (i.e., groundwater within the zone of impact is not currently utilized as a source of drinking water).

3.2 REMEDIAL GOALS

3.2.1 Soil

In accordance with 310 CMR 40.0933, Site soil is classified based on land use characteristics and exposure potential. The MCP includes three categories for classification of Site soil (i.e., S-1, S-2, and S-3) based on MCP criteria for accessibility, frequency, and intensity of use. Category S-1 soils are associated with the highest potential for exposure, while Category S-3 soils have the lowest potential for exposure.

Based on current uses, Site soil is classified as Category S-2 because:

- adults (e.g., office workers) are potentially present at the Site at high frequency, but low intensity;
- children (e.g., trespassers and visitors) are potentially present at the Site at low frequency and low intensity;
- some soils are considered to be "accessible" since portions of the Site are unpaved;
- some soils are considered to be "potentially accessible" since portions of the Site are paved;
- Deed Restriction filed for the portions of the Site where soil is impacted prohibits activities and use that would result in classification of Site soil as S-1.
- based on potential future uses and the limitations of the Deed Restriction, the soil classification is not expected to change and certain areas of the Site should be classified as S-2 under future conditions while others may have the Deed Restriction removed.

Proposed remedial action objectives for source area soils are summarized in the following table and represent the arithmetic average concentrations of selected residual OHM following remediation.

Source Area Saturated Soil Target Cleanup Goals

Parameter	*MCP Method 1: S-2 & GW-1 (µg/g or ppm)*
PCE	0.5
TCE	0.4
cDCE	2
VC	0.4

A source area saturated soil target cleanup goal is not presented for toluene since previous soil sampling conducted in the source area of the Northern Area has not identified toluene at concentrations above RCS-1.

3.2.2 Groundwater

Since the Site is located within a current drinking water source area (i.e., Zone II aquifer protection zone for the Baldwin Pond Wellfield), abatement measures must reduce the concentrations of VOCs in groundwater to applicable MMCLs in order to achieve a Permanent Solution. A reduction in VOC concentrations to MMCLs would achieve a condition of "no significant" risk to human health under future conditions.

The level and extent of PCE, TCE, cDCE, or VC in groundwater is not anticipated to adversely impact down-gradient surface water quality or potential environmental receptors. A reduction in the concentrations of VOCs to MMCLs would meet Response Action Performance Standards (RAPS, 310 CMR 40.0191) for achievement of a condition of "no significant risk." Therefore, MMCLs are adopted as initial target cleanup goals for VOCs in groundwater and are summarized in the table below.

Groundwater Target Cleanup Goals

Parameter	*MMCLs (µg/L or ppb)*
PCE	5
TCE	5
cDCE	70
VC	2

A groundwater target cleanup goal is not presented for toluene since groundwater monitoring data has not identified toluene in the Northern Area monitoring wells.

To achieve a permanent solution, Response Action Performance Standard (RAPS) also requires consideration of abatement to background levels, if feasible. Department guidance indicates that "achievement" of background is considered "generically infeasible" for chlorinated hydrocarbons in groundwater, but indicates that a reduction in contaminant concentrations should "approach" background, if feasible (Department, 2004). Therefore, as a secondary target cleanup goal, abatement of PCE, TCE, cDCE and VC in groundwater will attempt to "approach" background, if feasible. The feasibility of abatement of CVOCs in groundwater to "approach" background will be evaluated based on the success of remedial measures at reducing CVOC concentrations in groundwater to MMCLs.

4.0 CONCEPTUAL DESIGN – SOIL REMOVAL

4.1 OVERVIEW

Remedial activities will require the excavation of an estimated 6,500 yd^3 of soil material from the source area in the Northern Area (Figure 8). The surface area that will be directly disturbed encompasses approximately 8,000 square feet (ft^2) down to an average depth of 25 feet bgs.

4.2 DESIGN AND CONSTRUCTION

The Phase III was conducted under the requirements of the MCP and submitted to the Department in December 2005, (ERM, 2005b). Based on the results of the Phase III comparative analysis, excavation of source area saturated soils and bioremediation in groundwater are the preferred remedies for abatement of Site impacts. These remedies were selected based of the following criteria: effectiveness, reliability, feasibility to implement, cost-effectiveness, posing minimal risk, and timeliness.

ERM anticipates that the sequence of remedial activities will be as follows:

- excavation and off-site disposal or treatment of saturated source area soils;
- install recharge gallery for future carbon substrate amendment;
- backfill the excavation with clean fill;
- monitor the effects of source area abatement on near-source groundwater quality;
- initiate carbon substrate amendments to abate CVOC impacts to groundwater, as appropriate; and
- Continue monitoring groundwater quality over time.

4.2.1 Pre-Construction Activities

Pre-construction activities included collection of soil samples to characterize soil quality to support Phase IV remedial design activities. This activity was discussed in Section 2.2.

4.2.2 *Design of Coffer Dam*

Hartman Engineering of Clarence, New York has completed a design of a two coffer dam system to enable the excavation of an approximately one 80-foot diameter area and one 60-foot diameter area, each to a depth of approximately 25 feet. Sheet pile will be driven with a 100-ton crane with a 100-foot boom or equivalent to a depth of 55 feet holding a coffer dam in place with a system of concrete walers acting as compression rings, holding open the circular sheet pile configuration (Figure 9). The coffer dam system will eliminate the need for traditional sheet pile and cross bracing, which can restrict accessibility and equipment movement within an excavation.

The depth to water at the site is approximately 10 to 12 feet bgs. The design of the system also takes into account pressure from 20 to 25 feet of water and soils above the bottom of the excavation to minimize upwelling of groundwater from the bottom of the coffer dam to ensure safe work within the cofferdam.

The concrete walers will be spaced seven to eight feet apart by design and will be constructed using 4,000 pounds per square inch (psi) concrete. Hanger bars will be installed as concrete dries to hang the walers from the driven pile. Electrical strain gauges will be installed in the concrete walers to provide information on stress to the coffer dam during the excavation due to load changes. Data from strain gauges will be collected to verify actual loads in the concrete rings do not exceed design loads. Supporting design calculations are included as Appendix D.

There are aboveground and belowground utilities in the vicinity of the excavation, which will be confirmed to be deactivated prior to construction.

4.2.3 *Excavation and Staging*

Erosion Control

A small portion of the excavation area will include a Bordering Vegetated Wetland (BVW) and 100-foot Buffer Zone. ERM has filed Notice of Intent with the Town of Wayland Conservation Commission to conduct the excavation with these protected areas. All field work will be conducted in accordance to the Order of Conditions issues by the Commission.

Erosion control practices will be implemented to protect the resource area from sediment entering the BVW adjacent to the area to be excavated.

Figure 8 shows the location where the erosion controls will be installed and maintained until stabilization by vegetation occurs following the excavation. Standard erosion control methods using a staked silt fence and entrenched hay/straw bales will be deployed to protect against runoff into the adjacent BVW (Figure 10).

Dewatering

Groundwater and precipitation entering the excavation will require de-watering including pumping, collection and discharge. Suspended solids will be removed by directing withdrawn water to a settling tank and/or filtration system consisting of bag filters. Sediments and water will be analyzed prior to off-Site disposal, reuse and/or discharge. Water treatment may include OHM removal via activated carbon or other appropriate technologies. A flow diagram of the water treatment train is attached as Figure 11. The discharge will be to the site stormwater conveyance system and eventually to the Sudbury River.

Under the National Pollution Discharge Elimination System (NPDES) regulations, all water discharge associated with a remedial activities require a Remediation General Permit (RGP). Raytheon will apply for a RGP for site activities prior to discharge of treated water to the stormwater system.

At a minimum, influent, intermediate and effluent water from the treatment system will be analyzed for the presence of VOCs, Total Suspended Solids (TSS) and pH. Any other analytical parameters required by the RGP will be added to the analytical schedule. Water will be analyzed on Day 1, 3 and 6 and then weekly thereafter. The Wayland Conservation Commission will receive copies of all analytical data. Under the Paper Work Reduction Act, the EPA will not receive discharge monitoring reports, but Raytheon will retain these records in accordance with the RGP.

Excavation

The top five feet of soil in the targeted approximately 80-foot diameter remedial area will be removed and screened and staged as “clean soil” for re-use as backfill in later stages of the project. The sheet piling for the coffer dam will be installed at five feet bgs to a total depth of 55 feet bgs. The sheets will be installed using traditional pile driving equipment.

Following the installation of the coffer dam sheets, the excavation within the coffer dam will continue in seven to eight foot lifts. Soils will be screened and segregated by contaminant levels and staged in appropriate areas. At the end of each lift, a concrete waler will be installed prior to continuing to the next lift. A total of three to four lifts will be excavated to a total depth of approximately 25 feet bgs.

Heavy equipment such as cranes, excavators, front-end loaders and bulldozers will access the remedial area via temporary roadways shown in Figure 8. Based on the delineation of the impacts to source area, it is anticipated that approximately 53 feet of the identified BVW will be temporarily impacted by the excavation and by supporting activities.

Soil removal is estimated to be approximately 6,500 yd^3 of material from both coffer dams, and up to 5,500 yd^3 of remediation waste will be generated. Dump trucks will be loaded on the temporary roadways to transport impacted material to the staging area. The top five feet of soils from each excavation area has been field screened and is considered to be "clean" material. This top 1,200 yd^3 will be staged in the "Clean Soil Staging Area" next to the excavation areas. The remaining material will be field screened with a PID and segregated in the parking lot staging areas (Figure 8).

Staging

The staging area for management of remedial waste will be located outside the Buffer Zone in the parking area; 300 feet landward of the wetland edge to meet state and local Buffer Zone setbacks (Figure 8). Two remedial waste staging areas, approximately 150 feet by 150 feet in size, will be constructed. A minimum of one water collection trench and/or sump will be excavated in each area, which will collect water runoff from the contaminated soil. Concrete jersey barriers and/or hay bails will be placed around the perimeter of each area and lined with a heavy-duty poly-liner. Piles will be covered in plastic at the end of each work day.

Water will be collected in a sump, and pumped to a settling tank. Water samples will be collected and analyzed for VOCs by EPA Method 8260. Collected (and treated, if necessary) water will be discharged to the stormwater conveyance system under a Remediation General Permit, if it meets the NPDES discharge criteria. If water treated on-site does not meet discharge criteria, it will be contained and shipped off-site for disposal. Workers in this area will be required to follow the Site-specific Health and Safety Plan (Appendix E).

New soil will be placed at approximate final grade (Figure 9a) as soon as excavation is completed.

Cleaning and Decontamination of Equipment and Sampling Equipment

Any non-dedicated manual sampling equipment used to collect soil samples will be cleaned and decontaminated prior to its initial use, between each sampling location and after the final use. Samples collected using the mechanical coring device will be collected in dedicated new PVC liner tubes. The following general procedures will be followed concerning decontamination efforts:

1) If visual signs (i.e., discoloration) suggest that decontamination was insufficient, the equipment will again be decontaminated. If the situation persists, the equipment will be taken out of service until the situation can be corrected.

2) Verification of the non-dedicated sampling equipment cleaning procedures will be documented by the collection of field blanks (equipment rinsate).

3) All properly decontaminated equipment will be stored in aluminum foil and plastic bags during storage and transport.

The following step-by-step decontamination procedures will be followed for all non-dedicated sampling tools:

i) Non-phosphate detergent wash

ii) Tap water rinse

iii) Methanol rinse

iv) Triple deionized/distilled water rinse

v) Air dry

Heavy equipment will be decontaminated inside the Contamination Reduction Zone and in the parking lot, as necessary. Heavy equipment will be parked on a decontamination pad, which will collect liquids generated during cleaning, and steamed clean. Liquids generated during any decontamination process will be collected, contained and appropriately labeled for disposal or discharged via the NPDES exclusion permit discharge. Waste liquids will be stored on-site until potential hazard class identification and final disposition have been determined.

Decontamination protocols will be strictly adhered to in order to minimize the potential for cross-contamination between sampling locations and contamination of off-site areas. More specific decontamination procedures are addressed in the Health & Safety Plan (Appendix E).

4.2.4 *Management of Remedial Waste*

Transportation and Disposal

Stockpiled material will be shipped to the designated disposal facility via truck and/or rail. When segregated material has been released from the stockpile area, it will be loaded into dump trailers or roll-offs utilizing front-end loaders and other earth-moving equipment as needed. Trucks will transport this material to the destination facility or to a rail facility. If the material is transported via rail, the excavated soil will be transferred to rail containers at the rail facility prior to shipment. All necessary transportation permits and approvals will be acquired prior to off-site transport.

All hazardous material shipped from the Site will be properly manifested or shipped under a bill of lading if the material is non-hazardous. A log will be maintained to track all shipments that leave the Site. The following information will be tracked:

- Container ID, Date, Time container left Site
- Hauler
- Approximate volume
- Weight (when measured)
- Waste Classification
- Manifest Number
- Date of Receipt of Manifest Copy

All material from the excavation areas will be disposed of at the appropriate regulated disposal facility. Any treated water that does not meet discharge requirements will be containerized and shipped off-site for treatment and disposal.

4.3 OPERATION PARAMETERS

4.3.1 Sampling

Soil sampling will be conducted for the purposes of establishing residual concentrations of VOCs. Grab samples will be taken from the bottom of the excavation using a crane and clamshell bucket. Perimeter samples will be taken around the circumference of each coffer dam, approximately every 25 feet. All soil samples will be analyzed for VOCs by EPA Method 8260.

4.3.2 Structural Monitoring

Electrical strain gauges in the concrete walers provide information for computing levels of stress due to load changes. Data from strain gauges will be collected to verify actual loads in the concrete rings do not exceed design loads.

4.4 IMPLEMENTATION PROGRAM

4.4.1 Spill Prevention Control and Countermeasures

A copy of the Spill Prevention Control and Countermeasures Plan is located in Appendix F.

4.4.2 Site and Environmental Impacts

The proposed remedial activities will be conducted in a floodplain wetland, adjacent to the Sudbury River. A Notice of Intent has been submitted to the Town of Wayland Conservation Commission and the Department.

The remedial actions proposed are limited to a minor portion of the property in primarily an upland setting adjacent to the parking areas. Wetland jurisdiction within the proposed work zone consists of a narrow swale considered BVW and its associated 100-foot Buffer Zone. The 200-foot Riverfront Area to the Sudbury River does not encompass the proposed work area. The proposed excavation area and supporting layout areas are not located within the 100-year floodplain as shown on Figure 8.

The remedial activities are proposed at the most upgradient portion of this BVW finger where a shallow swale is discernible; however, no signs of flow or surface water are present. This narrow wetland is a linear feature that slopes slightly to the west but no apparent inlets or outlet are in place. The BVW finger lacks a tree canopy in the work area.

To mitigate for the temporary disturbance to the BVW finger and 100-foot Buffer Zone, the approximate pre-existing grades will be reestablished and vegetative cover accelerated by broadcasting seed mixes such as New England Conservation/Wildlife Mix or equivalent.

4.4.3 Inspections and Monitoring

Inspection and monitoring of the excavation is described in Section 4.3. of the text. Wetland restoration monitoring requirements will be conducted in accordance with the Order of Conditions to be issued by the Town of Wayland.

4.4.4 Health and Safety Issues

The Site specific Health and Safety plan was prepared in accordance with 310 CMR 40.0018. A copy of the plan is included in Appendix E.

4.4.5 Required Permits

An Notice of Intent (NOI) is required by the Wetlands Protection Act. The completed application was submitted to the Conservation Commission on 27 April 2006 for approval of the proposed work. The Conservation Commission will issue an Order of Conditions outlining measures to be taken during excavation activities to minimize the impact to the BVW and 100-foot Buffer Zone.

A RGP is required if treated water from the project is to be discharged to the wetland or river. Water from dewatering activities, and/or effluent generated from the treatment of remedial wastewater, will require treatment prior to discharge as described in Section 4.2.3.

4.4.6 Property Access

Raytheon is in the process of securing access to the properties listed below to enable implementation of remedial measures. Raytheon intends to secure access to these properties by Summer 2006.

Property Owner	*Town Parcel #*
Twenty Wayland LLC	23-52C
Levco	23-52D

5.0 CONCEPTUAL DESIGN – GROUNDWATER TREATMENT

5.1 OVERVIEW

Following the completion of the source area removal, one year of quarterly monitoring for CVOCs will be conducted to establish new steady-state conditions of the groundwater plume. These new site conditions will be used to develop of a detailed implementation plan for bioremediation of the groundwater plume. A general explanation of the technology and site activities are provided in this section.

5.2 BACKGROUND

In situ bioremediation is a remedial technology that, through a series of chemical reactions, transforms CVOCs into neutral by-products, resulting in production of carbon dioxide, water and salt. Site groundwater and monitored natural attenuation (MNA) analytical data provide evidence that intrinsic bioremediation is occurring at the Site. A treatability study was conducted to evaluate the potential for enhancing intrinsic biodegradation of PCE, TCE and cDCE by amending groundwater with an additional carbon source, as well as introducing bacteria known to degrade these compounds completely to ethene (ERM, 2005b). Terra Systems Inc., (Terra Systems) of Wilmington, Delaware performed the treatability study and was present during the collection of the representative groundwater and soil samples for use in the microcosm. The objectives of the treatability study were to:

- determine if and to what extent the native microbial population can degrade the chlorinated solvents with and without additional substrate; and
- evaluate potential substrates, such as lactate and soybean oil, to determine which substrate may work best at this Site.

The addition of substrates such as lactic acid and emulsified soybean oil by themselves led to the dechlorination of TCE to cDCE, but did not lead to the complete dechlorination of TCE to ethane.

The treatability study results are not reflective of in situ conditions, based on geochemical data collected in the plume. The heterogeneity of the subsurface is likely the reason for the different assessment outcomes. In situ, the most reducing zones are located in the fine silty sand layers. A physical difference in the redox chemistry was noted during the review of the soil samples during drilling. The increased surface area of the fine particles also creates a more favorable environment for dehalogenating microbes. Intrinsic reductive dechlorination is likely occurring in these zones and discharging this "treated" water to the coarser sand layers below.

These coarser sand layers are where the downgradient groundwater monitoring wells are screened and where samples were taken for the microcosm studies and during routine groundwater monitoring activities. The difference in the redox states of the silty sand and the coarser sand units is likely the reason for the difference in microbial activity in situ and therefore the reason the microcosm results were improved by the addition of a dechlorinating enrichment culture.

A complete discussion of the microcosm treatability study was provided in the Phase III (ERM, 2005b).

5.3 DESIGN AND IMPLEMENTATION

5.3.1 Pre-Remedial Design Activities

Implementation of bioremediation requires the installation of application points to apply substrate to the formation. These points are typically located upgradient of the target treatment area to allow advective groundwater flow and diffusion to distribute the substrate and provide a natural conveyance throughout the target treatment area. These points can also provide baseline information to confirm the Site conditions prior to the start of applications.

An infiltration gallery will be installed in the fill area of excavation. This infiltration gallery will be used to passively introduce large quantities of substrate to the subsurface.

ERM installed monitoring wells downgradient of the source area to monitor groundwater quality. These monitoring wells (i.e., MW-261S, MW-551, MW-552, and MW-553) will be used to monitor the impact of excavating source area residual soils on groundwater. These wells may potentially be used as injection wells during bioremediation.

A baseline round of groundwater sampling will be conducted prior to initiating bioremediation, including both the injection and monitoring points. The following monitoring wells will be designated as monitoring locations for bioremediation remedial activities:

- DEP-19M, MW-261S, MW-262S, MW-264M, MW-265M, MW-266Ma/Mb, MW-267S/M, MW-268M/D, MW-551, MW-552, MW-553.

Each monitoring and injection point will be analyzed for the parameters listed below:

Bioremediation Monitoring Parameters

Analysis	*Method of Analysis*
VOCs	Method 8021B (chlorinated compounds only)
Dissolved gases (methane, ethene, and ethane	EPA Method GC Screen
Chloride	EPA Method 325.2 Ion Chromatography (IC)
Nitrate	EPA Method 300.0 IC
Dissolved Iron	EPA 6010
Dissolved Manganese	EPA 6010
Sulfate	EPA Method 375.4 IC
Alkalinity	EPA Method 2320B
Total Organic Carbon (TOC)	EPA Method 415.1
Phospholipid Fatty Acid (PLFA)	IC
Total Phosphorus	EPA Method 365.2 and SM 4500P-E
Dehalococcoides ethenogenes (DHE)	Gel Electrophoresis
Total Kjeldahl Nitrogen (TKN)	EPA Method 351.3/.1 and SM 4500N-C

Additional monitoring/injection well(s) may be installed to implement and evaluate the bioremediation remedial activity or to replace monitoring wells destroyed during the source area soil excavation.

5.3.2 *Development of Remedial Design*

Results of the treatability study and the results of groundwater sampling events following the saturated soil excavation will be used to design the type and dosage of substrate for addition in the Northern Area. Injection rates of the remedial additives will be based on the hydraulic characterization data from the injection wells. Currently, the following options are under consideration:

- Passive Injection – The passive approach would involve introducing remedial additives in an infiltration gallery and/or injection wells and monitor at the monitoring well(s). A passive approach would require more extensive monitoring and necessitate a longer monitoring period to allow the natural groundwater gradients to convey nutrients and biomass.
- Semi-Active – The semi-active approach would introduce remedial additives into each injection well as described above. To enhance groundwater flow rates and substrate distribution within the target treatment area, the downgradient monitoring well will be pumped periodically to impart pulsed-pumping on the aquifer. With this approach, groundwater will be extracted from the monitoring well on a monthly or bi-monthly basis to promote downgradient movement of remedial additives. This pulsed method could reduce the evaluation period due to reduced travel times of the remedial additives.

If a semi-active system is used, all extracted groundwater would be collected, mixed with additional substrate and re-injected into the injection wells.

5.3.3 Injection Program

Remedial additives consisting of nutrients and carbon source(s) will be injected into the overburden in the injection wells at the Site to promote reductive dechlorination of PCE, TCE, cDCE, and VC.

Based on results of the treatability study (ERM 2005), preferred carbon source(s) and quantities of substrate will be identified. Batches of the carbon and nutrients will be added to the injection well approximately weekly. Nutrients will be stored in shipping containers, drums or portable tanks and mixed in batches as needed. The infiltration gallery and/or injection wells will be provided with sealed well heads and an injection tube within the screened interval of the injection well. If the injection rate is sufficient, gravity additions directly from a mixed tank may be implemented for injection. After approximately one month of operation, the benefits of automating the addition will be evaluated and the system upgraded if deemed appropriate.

5.3.4 *Post-Injection Monitoring*

The designated monitoring locations will be checked periodically during the injection program. The monitoring locations identified (see Section 5.2.1) will provide designated monitoring points for bioremediation remedial action.

Monitoring will consist of the weekly measurement of field parameters (e.g., oxidation-reduction potential, dissolved oxygen, pH, temperature and conductivity), with the monthly analysis of volatiles (PCE, TCE, cDCE, and VC) and the parameters as shown on the above table.

After approximately three months of operation, the monitoring schedule will be reviewed against the impressed impacts on the aquifer and the schedule of future monitoring were adjusted accordingly.

5.4 *IMPLEMENTATION PROGRAM*

5.4.1 *Spill Prevention Control and Countermeasures*

A copy of the Spill Prevention Control and Countermeasures (SPCC) Plan is located in Appendix F.

5.4.2 *Residual Material Management*

Any contaminated groundwater, drilling cuttings or drilling fluids generated as part of the bioremediation treatment will be containerized and disposed of properly.

5.4.3 *Site Impacts*

Implementation of the bioremediation remedial system involves advancement of soil borings and injection of a substrate beneath undeveloped portions of the Site. The substrate will likely migrate to the west along the same flowpath as groundwater.

The bioremediation remedial activities will not affect local drainage features, natural resource areas, or local planning and development issues.

5.4.4 *Environmental Impacts*

The bioremediation remedial activities will be conducted within a mapped Zone II aquifer protection district for the Baldwin Pond Wellfield.

Pursuant to 310 CMR 40.0046(3), since the application of Remedial Additives (i.e., substrate) will not be conducted within 100 feet of any private water supply well or within 800 feet of any public water supply well, well field or tributary thereto, Department approval is not required to conduct the remedial activities within this resource area. ERM does not anticipate any adverse impacts to the Sudbury River and its associated wetlands or the Baldwin Pond Wellfield from the bioremediation remedial activities as intrinsic bioremediation is currently occurring at the Site.

5.4.5 Health and Safety Issues

The Site-specific Health and Safety plan was prepared in accordance with 310 CMR 40.0018. A copy of the plan is located in Appendix E.

5.4.6 Required Permits

Pursuant to 310 CMR 40.0046, no permits are required from the Department to complete bioremediation remedial activities within the proposed treatment areas.

5.4.7 Property Access

Raytheon will have to secure access with the current property owner to enable implementation of remedial measures. Property owner and land parcels requiring approval for access are listed in Section 4.4.6.

6.0 IMPLEMENTATION SCHEDULE

The anticipated schedule for remedial activities at the Site is presented below.

Implementation Schedule for Phase IV RIP

Date	*Event*
1 August 2006	Prepare Site and Install Coffer Dam
15 August 2006	Begin Excavation
15 September 2006	Complete Excavation and Commence Backfill
16 October 2006	Restoration Activities
January 2007	Submit Phase IV Completion Report
May 2007	Initiation of Wetland Restoration Activities
2007	Conduct Quarterly Groundwater Monitoring
2008	Conduct Substrate Injections
2008	Conduct Quarterly Groundwater Monitoring
2008	As-Built Construction Report
2008	Final Inspection Report

7.0 REFERENCES

ERM-New England, Inc., December 2002, "Release Notification Form, Former Raytheon Facility, 430 Boston Post Road, Wayland, Massachusetts," Letter report submitted to the Department.

ERM-New England, Inc., December 2003, "Phase I – Initial Site Investigation, Former Raytheon Facility, 430 Boston Post Road, Wayland, Massachusetts, RTN 3-22408," report submitted to Raytheon Company.

ERM, December 2005, "Phase II - Comprehensive Site Assessment, Former Raytheon Facility, 430 Boston Post Road, Wayland, Massachusetts, RTN 3-22408," report submitted to Raytheon Company.

ERM-New England, Inc., April 2005, "Phase III – Remedial Action Plan, Former Raytheon Facility, 430 Boston Post Road, Wayland, Massachusetts, RTN 3-22408," report submitted to Department.

Massachusetts Department of Environmental Protection, Conducting Feasibility Evaluations under the MCP. Policy #WSC-04-160, 16 July 2004.