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Louis J. Burkhardt
Raytheon Company
Mail Stop 3029-09
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June 16, 2008

Via email

**RE: Public Comment on May 14, 2008 PIP Meeting & Draft Phase IV RIP Addendum
RTN 3-22408, former Raytheon Facility, 430 Boston Post Rd., Wayland, MA**

Dear Chip:

Thank you for this opportunity to provide public comment on the above-named draft document as presented at the May 14, 2008 PIP meeting held in Wayland Town Hall. My comments represent my personal lay opinion and are not related in any way to any organization, board or committee with which I am currently or have been previously affiliated.

The Town's LSP, Ben Gould, of CMG Environmental, Inc., has submitted his expert technical review. I reiterate my gratitude to Raytheon for continuing to support Ben; he provides invaluable independent expertise to the acknowledged benefit of all stakeholders in this matter.

Phase IV RIP Addendum document:

1) page 6, section 2.3 Relevant Contacts. Two years ago, in a similar public comment submittal, I asked that the Town be included as relevant contacts. At that time, I provided the contact info for the Town Administrator and Ben Gould (Town's LSP). Since that time, the Town has signed a contract with CMG Environmental for the firm's expert consulting services as the former Raytheon property is redeveloped. Please consider adding a statement to this section that explains the relationship Raytheon sees the Town having during and post-redevelopment.

2) page 8, section 3.2 Remedial Goals I strongly support that Raytheon achieve a Permanent Solution, given all the time & resources you have dedicated to this project.

3) page 14, section 4.4 Groundwater Monitoring It was stated at the May 14 PIP meeting that it is likely that groundwater monitoring wells would be destroyed by the redevelopment of the property, so Raytheon plans to properly close most, but not all, wells and re-establish new ones to be able to perform the long-term monitoring required by the goals of the cleanup. I assume that applies not just to the wells under this RTN but to the others throughout the property.

I therefore request that Raytheon keep the public informed by publishing and posting on your project website the status of all the groundwater monitoring wells, including clear

redevelopment site plans (same as those submitted to and approved by the Planning Board during the ongoing site plan review) showing the wells to be closed, a closure schedule, which ones must be protected and not destroyed, and the replacement plan. Also please include a rationale for whatever wells get closed that are not replaced.

4) page 15, section 5 Implementation Schedule I personally agree with the comments already submitted by LSP Ben Gould on behalf of the Town on what appears to be an aggressive schedule to submit an ROS before the Tier IB permit expires for RTN 3-22408 on December 23, 2008. It seems in the interest of all stakeholders for the Permanent Solution to be supported by enough credible data for Raytheon to take this step.

A number of PIP meeting attendees at various times asked how Raytheon expects to achieve a permanent solution by December if additional injection rounds will be required.

Please consider seeking a Tier IB permit extension from the DEP for this PIP site. If you include CMG's comment letter with such a request, I would like to think that DEP would give it reasonable and fair consideration.

May 14 PIP Meeting:

1) Thank you again for your effort to be mindful of the "first-timers" who attended PIP meetings. As in the past, there are always new, interested townspeople. There is no downside to including various clear maps to give the overview of where your remediation areas are in relation to the wastewater plant, abutting town land, historical DEP monitoring wells and the location of the town's drinking water wells at Baldwin. For the fall PIP meeting, whatever you can do to make these locations as clear as possible would be greatly appreciated.

2) Two years ago, in my public comment submittal, I asked for more detail in the maps shown in the powerpoint so the angled boundary line would be less confusing by identifying who owns each parcel in the general vicinity. Slide (page) 9 would have been easier for meeting attendees to understand if it had been preceeded by such a map.

3) Q&A

- In response to my question about what would happen in the event this RTN goes into ROS status before the end of the year, I greatly appreciated hearing that Raytheon is willing to continue to offer PIP meetings twice a year to keep the public informed of the status of the cleanup and site activities that affect it. Please include something in your response comments to that effect explaining what you have in mind.
- I welcome your thoughts on what we can/should do to update the PIP Plan accordingly. An informal comment made to me after the meeting prompts me to include this here.
- It appears that the negotiations of the deed restrictions have not been concluded, so there is no new legal agreement describing them available in the public record. Understanding the outcome of those negotiations remains of high public interest
- As of last Friday, the Town still was waiting on EPA/DEP action regarding a long overdue NPDES discharge permit for the town's wastewater treatment plant.

- That said, the ability to locate an additional separate septic system on site that will be acceptable to Raytheon is also of high public interest, particularly given it might be located under what townspeople thought would be a useable open green space ("town green"). While Raytheon does not intend to limit redevelopment, the integrity of the groundwater cleanup must be protected. Based on questions posed at the meeting, the public still seeks to understand how this can be and will be accomplished.
- Meeting attendees asked how key redevelopment details that affect groundwater, e.g. stormwater infiltration, septic, access to gw wells, new wastewater plant, fall demolition of the existing building, etc. will be addressed by Raytheon. It seems there is a great deal of information that is still not available to the public.

All that said, I respectfully repeat my request stated on page 2 herein that Raytheon pursue a Tier IB permit extension rather than seek ROS status for this RTN until a "permanent solution" for the groundwater cleanup is supported by the data.

Thank you again for this opportunity to comment on your Draft Phase IV RIP Addendum and the May 14 PIP meeting. I hope these personal comments and questions are helpful.

If you have any questions about this submittal, please do not hesitate to contact me.

Sincerely,

Linda L. Segal

cc: John Drobinski, LSP, ERM, Boston
Jason Flattery, ERM, Boston
Ben Gould, LSP, CMG Environmental, Inc.