

CMG ENVIRONMENTAL, INC.

January 20, 2005

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

**Re: Public Commentary on Draft Water Quality Certification Closure
Former Raytheon Facility, 430 Boston Post Road, Wayland MA
CMG ID 2002-003**

Dear Mr. Madera:

The following is my public commentary on the December 20, 2004 Draft Water Quality Certification (WQC) Closure for the former Raytheon facility in Wayland, Massachusetts (the Site) regarding Massachusetts Department of Environmental Protection (DEP) File No. 322-553, 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.

Wetland Remediation and Restoration Activities

I) Regarding the extent of wetlands excavation at the Site, ERM states "the total area excavated was approximately 2 acres." This is correct but imprecise. In keeping with the "original estimation of 1.7 acres," Wayland requests that you provide this information to at least two significant figures (three would be better, since ERM has determined the total area excavated to at least that degree of accuracy). Section 2.4 of the November 24, 2004 Phase IV Completion Report for the Site indicates the total excavated in Area A, Area B, and Area C was 88,828 square feet, or 2.04 acres; however, this does not incorporate the 3,500 square feet of wetlands 'temporarily disturbed' by excavation to form an earthen berm around Area A and Area C. Thus the total area of wetlands disturbed by excavation was 92,328± square feet, or 2.12 acres.

The Town believes that this information is pertinent, since in Section 2.3.2 of their Phase IV Completion Report ERM asserts that "the creation of earthen berms to prevent erosion from flooding is acceptable under the Department Water Quality Certification." To wit, Special Condition 10 of the September 15, 2003 WQC states (in pertinent part): "The applicant shall be responsible for anticipating the need for and the installation of additional erosion controls during construction. Such controls may include ... berms." Therefore, Wayland requests that Raytheon note in the WQC Closure document that the professional judgment of your contractor dictated

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that construction of the earthen berm (and the concomitant disturbance of additional wetland area) was necessary to control erosion.

II) Unlike areal extent, the WQC Closure is silent regarding comparing comparison of the total amount of wetland soil excavation (7,955 cubic yards) versus the amount called for in the original WQC (3,700 cubic yards). This appears to be a greater deviation from the original plan than the increase in areal extent was, since the actual volume excavated was 115% greater than proposed (versus a 25% increase in areal extent excavated). The Town requests that Raytheon provide a summary comparison of the final volume excavated versus the original estimate.

III) Special Condition 8 of the WQC stipulates that any natural soil used for wetlands remediation must contain at least 12% organic carbon by weight, and manufactured soil must consist of equal volumes of organic and mineral materials. Furthermore, Special Condition 8 requires submittal of “a statement from a qualified individual” certifying the compliance of remediation soils to these requirements. No such statement is included in the WQC Closure, nor was Wayland made aware of any previous submittal of such a statement.

Furthermore, the Town has not received any documentation of soil quality for the manufactured wetlands soil used in restoration to date. Section 2.7.1 of the Phase IV Completion report indicates the “engineered soil was a sandy loam with approximately 20 percent organic matter.” However, Section 3.2.1 of “The Wetland Remediation Site at the Former Raytheon Facility, Wayland, Massachusetts 2004 Wetlands Restoration Monitoring Report” prepared by Woodlot Alternatives, Inc. states the “soils used for restoration were a mixture of sand, loam, silt, clay, and 12% organic matter, which is consistent with the variable composition of floodplain soils.” Section 7.2 of the February 2003 “Regulatory Permit Application for Wetlands Impacts Resulting from Remediation of Oils and Hazardous Materials in Sudbury River Floodplain Wetlands, Wayland, Massachusetts” indicated that “Manufactured soil will meet the specifications for high quality compost and soil material. These specifications stipulate that the soil must be free of weed seeds, have at least 12% organic content, be of a relatively balanced pH, be reasonably high in nutrient value, and not contain excessive salts.”

Wayland requests that Raytheon provide documentation of laboratory analyses on the manufactured soil for percent organic matter, pH, nutrients, and salts in the final WQC Closure. The Town also requests that this document include a copy of the statement required pursuant to Special Condition 8.

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)