

CMG ENVIRONMENTAL, INC.

May 23, 2003

Mr. Ted Lento
U.S. Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742-2751

**Re: Public Commentary on Proposed Wetlands Remediation
Former Raytheon Facility, 430 Boston Post Road, Wayland MA
ACOE File #200300294; CMG ID 2002-003**

Dear Mr. Lento:

Raytheon Company of Sudbury, Massachusetts has requested a Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers (ACOE) to remediate approximately 1½ acres of wetlands at the above-referenced property (the Site). The following is public commentary on Raytheon's proposed remediation, as set forth in the February 6, 2003 "Regulatory Permit Application for Wetland Impacts Resulting from Remediation of Oils and Hazardous Materials in Sudbury River Floodplain Wetlands, Wayland, Massachusetts," prepared by Raytheon's subcontractors Woodlot Alternatives, Inc. (Woodlot) of Topsham, Maine and Environmental Resources Management, Inc. (ERM) of Boston, Massachusetts.

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.

GENERAL COMMENT

Wayland's primary concern is that Raytheon has not adequately delineated the extent of wetlands sediment requiring remediation through excavation and off-Site disposal. Despite numerous sampling rounds comprising well over 100 sample locations throughout the wetland portion of the Site, there is still some question as to the actual extent of the area requiring remediation.

The Town does not want Raytheon to be in the position of having to seek additional authorization from the ACOE should the final area slated for remediation significantly exceed the approximately 1½ acres applied for. Therefore, Wayland seeks clarification from ACOE as to how much additional area would constitute a 'significant' increase in the remediation area extent.

SPECIFIC COMMENTS

CMG has subcontracted Dr. Paul G. Davis from Bay State Environmental Consultants, Inc. of East Longmeadow, Massachusetts to provide expert commentary on the remediation proposed by Woodlot and ERM. Dr. Davis' comments are primarily directed to the Wayland Conservation Commission. I have attached his 5-page letter to this one for your reference. However, we would like to highlight the following to the ACOE:

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- How will Raytheon avoid soil compaction during access through the non-ARAH wetland areas? Woodlot stated that 'natural processes' would reverse any such soil compaction. The Town would like an explanation of these processes.
- Manual removal of 100 cubic yards of contaminated sediment (from the small, isolated remediation area northwest of the ARAH) may not be practical, as this volume of sediment would fill 500-1,000 wheelbarrows.
- BEC recommends additional control of invasive species within 100 feet of the remediation area by manually removing seed heads early in the growing season. Dr. Davis suggests this should be done in the year of remediation activities, and for two follow-up growing seasons.
- The only reseeding program in the upland buffer zone is with annual rye. This is inadequate, and Raytheon should plan on reseeding a diversity of herbaceous plants, and possibly also woody plants.

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

Attachment: May 23, 2003 letter from BEC

cc: Environmental Resources Management (John C. Drobinski, P.G., LSP)
Mr. Devens Hamlen, Wayland
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)
Wayland Water Department (% Donald Hollender)

(no attachment with cc)