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APPENDICES

<i>Appendix A</i>	<i>Inventory of Available Documents</i>
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<i>Appendix C</i>	<i>Community Concerns About the Site</i>

On 24 June 2000, the Massachusetts Department of Environmental Protection (DEP) and Raytheon Company (Raytheon) received a notice from residents of the Town of Wayland, Massachusetts to petition the former Raytheon facility located at 430 Boston Post Road (the "Site") as a Public Involvement Plan (PIP) site, under Section 14 (b) of Massachusetts General Laws chapter 21E (M.G.L. c. 21E). In response, Raytheon officially designated the Site as a PIP site on 24 June 2000, requiring the preparation and implementation of this PIP.

This PIP has been prepared by Environmental Resources Management, Inc. (ERM) on behalf of Raytheon in accordance with the requirements of the Massachusetts Contingency Plan (MCP), 310 CMR 40.0000.

The Site was classified as a Tier IB site on 22 May 1997. Tier IB sites are subject to requirements set forth in M.G.L. Chapter 21 E and in the MCP 310 CMR 40.0000 regarding site assessment, remedial response actions and public involvement. Raytheon, as prior operator at the Site, was required to retain a Licensed Site Professional (LSP) to oversee and approve assessment and remedial activities conducted at the Site. DEP retains the authority to ensure that both technical and public involvement activities are conducted in accordance with state law and regulations.

An LSP is an environmental scientist or engineer experienced in the assessment and cleanup of releases of oil and/or hazardous materials (OHM) to the environment in Massachusetts. The LSP's role is to ensure that actions taken to address releases of OHM at a site comply with the requirements of the MCP (310 CMR 40.000) and protect human health, safety, public welfare, and the environment. LSPs are licensed by the State Board of Registration of Hazardous Waste Site Cleanup Professionals (the LSP Board) based upon demonstrating the required level of education, experience and passing an examination. The LSP Board establishes professional standards (addressing technical ability, decision-making experience and ethical practice) that LSPs must meet to remain licensed. The LSP-of-Record for the Site is John C. Drobinski, P.G., LSP of ERM.

Under M.G.L. c. 21E, the LSP is responsible for oversight and approval of assessment and remedial response actions necessary to satisfy the Response Action Performance Standards of the MCP. Response Action Performance Standards include determining the source, nature and extent of releases of OHM attributable to a site; the potential risk posed by a site to human health, safety, public welfare and the environment; whether cleanup actions are necessary and feasible, and if so, determining and implementing the most appropriate actions. In addition, the MCP process provides opportunities for public involvement throughout the duration of these response actions.

Public involvement during the remedial response action process is undertaken to ensure that the public is both informed of, and involved in, planning for remedial response actions. For sites where the public indicates interest in becoming involved in this process, the site is designated as a "PIP site" and requires the preparation of a plan that identifies specific activities that will be undertaken to address public concerns to the extent possible. Due to public interest at the Site, Raytheon has designated the Site as a PIP site, pursuant to the MCP.

This Public Involvement Plan has been prepared by ERM on behalf of Raytheon. It describes how public involvement activities will be implemented in conjunction with the development and implementation of response actions at the Site. The first draft Plan was presented by Raytheon at a public meeting on Thursday, 28 September 2000 at 7:30 in the Large Hearing Room, Wayland Town Hall. The final November 2000 PIP incorporated public comments or questions received on the draft PIP.

In December 2002, a new release was reported in the northern area of the Site, where chlorinated VOCs were detected in groundwater. This release received a new, separate release tracking number (RTN) from rest of the Site. PIP participants from the Town of Wayland submitted a petition on April 5, 2004 requesting that the new northern area release be incorporated into the Site PIP.

This document therefore is a revised PIP for the Site located at 430 Boston Post Road, Wayland, Massachusetts. The purpose of this revision is to incorporate the northern area into the overall Site plan, update the Site history through January 2004 and document on-going Site activities. Section 2 contains background information on the Site; including environmental assessment and public involvement histories. Section 3

explains how the remedial response action process addresses community questions that have been raised during the development of the Plan. Section 4 explains the proposed public involvement activities for the Site. Section 5 describes how the plan will be revised in the future.

2.0 SITE BACKGROUND

2.1 SITE DESCRIPTION AND HISTORY

2.1.1 Site Description

The Site is an approximately 83-acre property located at 430 Boston Post Road in Wayland, Massachusetts (Figure 1). The Site is comprised of a main complex of eight attached buildings, one exterior building and a series of sheds and outbuildings (Figure 2). The Site also includes approximately 32 acres of either wetlands or wetland buffer zones and 41 undeveloped acres of grass and woodlands.

The Site is bounded to the west by the Sudbury River and the Great Meadows National Wildlife Refuge (GMNWR), to the north by the GMNWR and undeveloped town owned property, to the east by Route 27 and to the south by Route 20. Portions of the Site are zoned for residential and limited commercial uses.

2.1.2 Current and Historical Site Uses

On 4 December 2003, the Wayland Business Center, LLC (WBC) property was transferred to Credit Suisse. Previous to this time, WBC redeveloped the existing structures as commercial office space. The table below summarizes the previous owners and dates of purchases based on records at the Wayland Town Assessor's Office.

OWNER	PURCHASE DATE
Credit Suisse	4 December 2003
Wayland Business Center LLC	15 December 1997
Wayland Meadows	22 October 1997
Continental Assurance	18 June 1968
National Boulevard Bank	14 July 1958
Norman Barnes	Gift from previous owner

According to information received from the Wayland Assessor's Office and the town surveyor, the Site was a privately owned estate prior to 1956.

Raytheon leased the Site from 1955 to 1996. Facility operations included electronic testing and chemical process research to support Raytheon Electronic Systems' prototype manufacturing. Raytheon operations were terminated and the Site was sold in 1997.

While Raytheon occupied the Site, various laboratory processes were performed, including:

- Photographic Development
- Printed Circuit Board Development
- Machining and Welding
- Electronic Testing
- Spray Painting
- Hydraulic Testing

The categories of chemicals utilized and waste generated from the Site and laboratory processes included:

- Volatile Organic Compounds (VOCs)
- Metals
- Heating and Lubrication Oils (some of which contained varying concentrations of polychlorinated biphenyls (PCBs))
- Water treatment and custodial chemicals

2.1.3 Release History

The following is a summary of known releases of hazardous materials at the Site. A more detailed description of each release is included in Section 2.2.

Date	Oil & Hazardous Material Identified	Volume Release	Release Description
10/75	No. 6 Fuel Oil	200 to 250 gallons	Discharged to outfall (OF-01, Figure 2). Release due to failure of heat exchanger and discharge to floor drain. Contained and abated near outfall.
12/89	Insulating oil	60 gallons	Discharge to soil. Release due to failure of primary feeder selector switch. Contained and abated.
3/90	Butyl-cellosolve	>10 lbs. (Reportable Quantity)	Cross-connection of an industrial waste line into the facility stormwater system was discovered. Discharge to OF-01. Cross-connection removed.
10/92	No. 6 Fuel Oil	Unknown	Stained soil was observed during removal of UST. Five (5) cubic yards of soils removed as an Interim Measure.
6/95	Polychlorinated Biphenyls (PCBs), polynuclear aromatic hydrocarbons (PAHs), VOCs, metals.	Unknown	Soil impacts discovered at abandoned dry wells on Site. Limited Removal Actions successfully abated soil impacts.
1/96	No. 6 Fuel Oil	Unknown	Separate phase product was measured at monitoring well adjacent to former location of UST WAY-02. Release Abatement Measure (RAM) completed and Response Action Outcome (RAO) filed in May 1999 (RTN 3-13302).
3/96	Volatile Organic Compounds (VOCs)	Unknown	VOCs were detected in groundwater in excess of reportable concentrations in the southern area of the Site. Release determined to be associated with former process structure. Response actions have been conducted under Phase II/III and are ongoing under Phase IV (RTN 3-13574).

Date	Oil & Hazardous Material Identified	Volume Release	Release Description
5/96	PCBs, VOCs	Unknown	Soil impacts discovered at Test Pit (TP-3) excavation during Phase I-Initial Site Investigation (Phase I). RAM completed in February 1997 (RTN 3-14042).
4/00	PAHs, PCBs, metals, oils	Unknown	Discovered area of stressed wetland vegetative growth associated with impacts to wetland sediments. DEP approved Immediate Response Action (IRA) has been completed under Phase II/III/IV (RTN 3-19482).
12/02	CVOCs, Arsenic, Methyl Tertiary Butyl Ether (MTBE)	Unknown	The following were detected in groundwater in excess of reportable concentrations: CVOCs in the northern area, Arsenic in the western area & MTBE in the southern area. Phase I was completed in December 2003, and additional assessment activities are ongoing under Phase II (RTN 3-22408).
3/03	Chromium	Unknown	Chromium was detected in groundwater above the reportable concentrations. The naturally occurring chromium was released from the soil due to transient conditions created by the chemical oxidation pilot study (RTN 3-22665 linked to and currently under RTN 3-13302).
Note: RTN = Release Tracking Number – Designation used by DEP to track assessment, abatement and closure of reported releases			

Miscellaneous Spills 1990-1993

Based on a review of DEP's files, the following spills have been documented at the Site. The locations of these spills were not identified in the DEP files. DEP requires no further action for closed spills.

Spills on File for 430 Boston Post Road

OHM Released	Quantity Released	Date of Release	Status
Butoxy ethanol	11-50 pounds	12 Feb 1990	Closed
#6 Fuel oil	1-10 gallons	13 Mar 1992	Closed
#6 Fuel oil	Unknown	16 Oct 1992	Closed
Miscellaneous oil	Undetermined	13 Apr 1993	Closed

A complete list of available documentation containing more detailed information about each of the above release(s) and response actions is provided in Appendix A.

2.2

ENVIRONMENTAL ASSESSMENT

The following is a more detailed description of the releases identified in the table in Section 2.1.3 and major documents submitted to state, local and federal agencies. The intent of this section of the plan is to provide the reader with the complete environmental assessment history.

October 1975-Release of No. 6 Fuel Oil

In October 1975, an estimated 200 to 250 gallons of No. 6 fuel oil discharged at the outfall (OF-01, Figure 2). The release was due to failure of a heat exchanger in the boiler room and discharge occurred via a floor drain. Oil was observed to have pooled at the outfall and, due to the low flow conditions, did not reach the Sudbury River. The discharge lines were flushed, and pooled oil and impacted soil were removed for proper off-site disposal. Because of the age of the release, no further details are available.

November 1980-Surface Impoundment Assessment

The United States Environmental Protection Agency (EPA) conducted a Surface Impoundment Assessment in November 1980. The study incorrectly identified two sanitary wastewater treatment surface impoundments as “waste storage impoundments” based on a review of aerial photographs. A Preliminary Assessment was conducted by EPA in

November 1980, and the Site was subsequently listed on the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) List (Site No. MAD990685554). EPA referred the Site to the DEP, and the Site was listed as a Location To Be Investigated on 15 January 1987. The Site currently remains on the CERCLIS List pending follow up by the EPA.

July 1989-US Fish & Wildlife Service Sediment Sampling

In July of 1989 the US Fish & Wildlife Service (USFWS) conducted sediment sampling along the river bank adjacent to the Site and near outfall OF-01 as part of a study of the Great Meadows National Wildlife Refuge (GMNWR). Preliminary results indicated elevated levels of total polynuclear aromatic hydrocarbons (PAHs up to 1,004 parts per million (ppm)), metals (including cadmium, chromium, copper, lead and mercury) and polychlorinated biphenyls (PCBs up to 117 ppm) near OF-01. Contaminant levels were also higher in some of the samples collected along the drainage swale from OF-01 than to those collected upstream or downstream of the Site along the river bank.

ERM conducted sampling in the wetlands in May 1990 to evaluate surface water and sediment quality associated with cross-connection of an industrial waste line (discussed below). ERM conducted additional sampling in the wetland in July 1995 to further evaluate preliminary PCB data reported by USFWS. No elevated PCBs were detected during the 1990 sampling event, and levels less than two parts per million (ppm) were reported during the 1995 event.

December 1989-Switch Gear Failure at Building 12

The primary feeder selector switch failed on 9 December 1989 at Building 12 resulting in a release of approximately 60 gallons of insulating oil. Field screening of the insulating oil indicated the presence of PCBs; however, analyses by a certified laboratory indicated no PCBs at a detection limit of two ppm in the oil. Hazardous waste manifests indicated that soil and concrete were properly transported, handled, and disposed of at a licensed Transfer, Storage, and Disposal Facility. ERM collected a soil sample from this area during the Phase I Investigation to evaluate soil quality as a result of the release and PCBs were not detected. No further action was required.

March 1990-Cross Connection of Industrial Waste Line

In March of 1990, a cross connection of an industrial waste line from a former photoetching laboratory into the stormwater system was discovered. Review of OHM used in the photoetching process indicated that quantities of butyl cellusolve in excess of Reportable Quantities were potentially released through the line. Raytheon notified the DEP, and disconnected this cross-connection.

Raytheon contracted with ERM to evaluate the potential for environmental impact from the butyl cellusolve release from OF-01. Sediment and surface water samples were analyzed for volatile organic compounds (VOCs including butyl cellusolve), PAHs, PCBs, pesticides and metals. Samples were collected from the discharge line, at the outfall, along the discharge swale and upstream and downstream of the Site along the Sudbury River. Butyl cellusolve, PCBs and pesticides were not detected; however, metals and PAHs were identified. The study concluded that the contaminants posed negligible risk to human health and the environment, and therefore, remediation was not recommended. A Class-B1 Response Action Outcome (RAO) Statement was submitted to DEP to close out this release in July 1995.

October 1992-Removal of Underground Storage Tank (UST) WAY-01

On 13-16 October 1992, Badger Engineers, Inc. (Badger) monitored removal of a 20,000-gallon fiberglass UST (WAY-01) used for the storage of No. 6 fuel oil. The tank was installed in the early 1980s adjacent to the boiler room. Limited oil staining of soil was observed around the access port at the top of the tank and at the return line. The DEP was notified of the release and assigned Tracking No. ERB-N92-1340. Badger monitored removal of approximately five cubic yards of oil-contaminated pea stone. Additional sampling was conducted to confirm clean closure of the excavation. A Release Categorization Form was submitted to DEP. The DEP responded that no further remedial actions were required.

January 1996-Release of No. 6 Fuel Oil From WAY-02 Reported to DEP

As part of the Phase I - Initial Site Investigation (Phase I), a monitoring well (MW-11) was installed downgradient of a former 20,000-gallon steel underground storage tank (UST) (WAY-02). The tank was installed in 1956 and used for storage of No. 6 fuel oil. Raytheon records indicate that

the tank was relined in 1970 and 1983 before it was pumped out and abandoned in place in 1988. Tetrachloroethene (PCE) was reportedly used as an occasional fuel conditioner (5 gallons of PCE for every 20,000 gallons of oil). Oil-contaminated soil was encountered from depths of five to nineteen feet below ground surface (bgs) during boring advancement and well installation. Subsequent gauging of MW-11 with a petroleum interface probe indicated 0.12 feet of petroleum product in the well. On 2 January 1996, Raytheon verbally notified the DEP of the presence of product in accordance with MCP requirements for 72-hour release notification. Raytheon requested approval for implementation of an Immediate Response Action (IRA) consisting of additional assessment and soil removal, if appropriate. The DEP granted approval of the IRA and issued RTN 3-13302.

ERM conducted additional assessment during January 1996 to further evaluate the nature and extent of hydrocarbon compounds in soil and groundwater, and to determine if additional time-critical response actions were warranted under the IRA. Based on the results of this assessment, an IRA Completion Report was submitted on 4 March 1996 and, at DEP's request, an amendment to this report was submitted on 28 March 1996. Results of the IRA indicated:

- Hydrocarbon compounds consistent with No. 6 fuel oil were located beneath the paved courtyard and Building 3 at depths ranging from 5 to 22 feet bgs.
- Separate phase petroleum product was identified in two wells near the former UST, and low concentrations of dissolved phase VOCs were detected in areas immediately downgradient.
- Site conditions do not pose an Imminent Hazard to human health, safety, public welfare or the environment at the present time, or for the time period likely to be required until Comprehensive Response Actions can be completed.
- The unmitigated migration of OHM at the site, at present and for the time period until Comprehensive Response Actions can be completed, does not warrant a time-critical response under an IRA.
- Additional response actions were conducted in 1998 under a Release Abatement Measure (RAM).

March 1996-Release of OHM to Groundwater Reported to DEP

In conducting the Phase I, the presence of VOCs in groundwater in excess of applicable Reportable Concentrations (RCGW-1) was discovered, requiring submittal of written notification to the Department.

Compounds detected included: 1,1-dichloroethene (2.0-4.8 µg/L); benzene (11-25 µg/L); naphthalene (30 µg/L); tetrachloroethene (6.1-17 µg/L) and trichloroethene (8.6-72 µg/L). Raytheon submitted a Release Notification on 14 March 1996 to the DEP. The DEP responded issuing a Notice of Responsibility (NOR) and assigned RTN 3-13574 on 28 March 1996.

Forty additional groundwater monitoring wells were installed at the Site under the Phase II Site Assessment. A total of 33 shallow and medium overburden, 5 deep overburden and 2 bedrock monitoring wells were installed to evaluate the vertical and lateral extent of impact. Groundwater monitoring results indicated that the plume was limited to the shallow overburden and extended to the south of the source area.

These activities are described in detail in the Phase II and III documents. Response actions have been conducted and are ongoing under Phase IV.

May 1996 – Phase I Initial Site Investigation

A Phase I - Initial Site Investigation was completed to determine the general environmental conditions at the Site and to determine if Site operations have resulted in a release of OHM to the environment in excess of Reportable Concentrations per 310 CMR 40.0000. The results of the Phase I included:

- Release(s) of No. 6 Fuel Oil from WAY-02 (UST) have impacted soil and groundwater.
- Dissolved phase groundwater contamination maintains a low potential to impact current public water supplies.
- Impacted soil at test pit location TP-3 required a release abatement (see below).
- PAHs, PCBs and metals were detected in drywells and wetland sediments.

May 1996 – Soil Impacts at Test Pit (TP-3)

As part of the 1996 Phase I, test pit locations were selected based on a review of historic aerial photographs. Test pits were excavated to depths ranging from five to nine feet. Analytical results at one of the six locations excavated (TP-3) indicated elevated levels of an unknown hydrocarbon and PCBs. A Release Notification Form was submitted to the DEP on 25 July 1996. The DEP issued a Notice of Responsibility (NOR) to Raytheon on 8 August 1996 and assigned Release Tracking Number 3-14042 to the Site.

A Release Abatement Measure (RAM) Plan was prepared and submitted on 4 October 1996. Removal by excavation resulted in off-site disposal of 71 tons of remediation waste. Post-removal concentrations of PCBs in soil at TP-3 were below the MCP Method 1 Standard of 2 ppm. A RAM Completion Statement was submitted to the DEP on 19 February 1997.

January 1997 – Tier Classification

The Numerical Ranking Score Sheet (NRS) and Tier Classification were submitted pursuant to 310 CMR 40.0510. The Site was designated as a Tier IB site and assigned permit number 133939. This designation allows Raytheon to perform response actions pursuant to the MCP without prior approval from the DEP.

March 1998 – RAM Plan for WAY-02 (UST) Historic Impacts

As discussed above, UST WAY-02 was a 20,000-gallon No. 6 Fuel Oil tank that was abandoned in place in 1988 because a portion of the tank was located under the building. On 2 January 1996, Raytheon notified the DEP of the presence of separate phase fuel oil in groundwater (MW-11). An IRA Plan consisting of additional assessment was submitted to the DEP. The IRA plan was approved by the DEP and RTN 3-13302 was assigned to the fuel oil release. ERM submitted an IRA Completion Report and Amendment dated 4 and 28 March 1998, respectively. ERM recommended additional remedial response actions be conducted as a RAM or as comprehensive response actions. These response actions were likely to include in-situ remediations with DEP approval.

In March 1998, the property owner (WBC) elected to independently conduct a RAM in an effort to hasten cleanup for the WAY-02 release. The RAM included:

- Removal of a wooden structure for access to the tank.
- Installation of structural support and sheet piling to secure the building during excavation up to but not beneath the building.
- Removal and segregation of approximately 2,000 cubic yards of clean soil.
- Excavation, characterization, segregation, staging, removal and off-site disposal/recycling of 3,300 cubic yards of petroleum impacted soil.
- Field screening with HNu photo-ionization detector (PID), olfactory and visual observation. Petroleum-impacted soils were typically described as black, saturated sands. Sampling and laboratory analysis were conducted to confirm residual impacts following removal.
- No evidence of impact was detected inside the abandoned tank therefore the 20,000 gallon tank (filled with concrete) was left in place and used as backfill.
- Backfill of remedial excavation with clean fill.

A Partial Class A-3 RAO was filed by Haley & Aldrich on behalf of WBC in May 1999. A Class A-3 RAO was achieved as a result of RAM activities completed at the Site and based on the results of a Method 3 Risk Characterization and constitutes a Permanent Solution for RTN 3-13302.

April 2000 – Imminent Hazard Condition

As part of the Phase II Comprehensive Site Assessment (Phase II) further evaluation of wetland sediments was conducted. Correlation of areas of sediment impact with the results of vegetative mapping and analysis of plant tissue defined an area of the wetland as having the potential for an Imminent Hazard (IH) condition. Pursuant to 40.0321, Raytheon and ERM verbally notified DEP of the potential IH condition on 26 April 2000 and agreed to file an Immediate Response Action (IRA) Plan pursuant to 310 CMR 40.0412. DEP approved the IRA Plan that included continued

assessment of the nature and extent of impact in the wetlands and further evaluation of potential risks to human health and the environment consistent with the existing Phase II Scope of Work (SOW).

The DEP issued a NOR and RTN 3-19482 to Raytheon on 9 May 2000. On 26 June 2000, the Release Notification Form, IH Evaluation and IRA Plan were submitted to the DEP. Further assessment was completed as part of the Phase II and IRA Plan as described below.

May 2000 - Major Permit Modification Application

Pursuant to 310 CMR 40.0530, a Major Permit Modification Application was filed on 25 May 2000 to upgrade the Site tier classification and permit from IB to IA following the re-evaluation of the Site Numerical Ranking Score (NRS) based on the discovery of the IH conditions described above.

October 2000 – Notice of Permit Decision

On 30 October 2000, Raytheon received a Notice of Permit Decision from the DEP. Based on its review of the Major Permit Modification Application, the DEP determined that OHM within the wetland does not pose a threat to potable supplies, and as such, the Site remained classified as Tier IB. The DEP issued a new Tier IB permit (#133939) with special conditions. The first of the three conditions required Raytheon to install fencing and post signage around the wetland area to deter trespassers from fishing or consuming any plant or animal species. The second and third conditions, respectively, require Raytheon to submit the Phase II Comprehensive Site Assessment and Phase III Remedial Action Plan within one year of the effective date of the permit and submit the Phase IV Remedy Implementation Plan no later than 1.5 years of the effective date of the permit.

11 September 2001 – RAM Plan – Groundwater Pilot Studies

In September 2001 a RAM was initiated to evaluate the feasibility of in-situ chemical oxidation as a means to achieve a Permanent Solution with respect to the VOC contamination in the southern area of the Site. Injection of potassium permanganate was conducted as a pilot study in the Southern Area. The results of the pilot study are summarized in the RAM Completion Statement that was submitted on 17 December 2003 (see 17 December 2003 in this chronology).

27 November 2001 - Phase II Comprehensive Site Assessment Report

Raytheon submitted a Phase II Report that described assessment and remedial response actions completed since submittal of the Phase I; updates use, ownership and regulatory history of the Site; described the nature and extent of residual OHM impact in affected media; and characterized the potential risk posed by the Site to human health, safety, public welfare, and the environment. Results of the Phase II Report were:

- All past identified sources of OHM release have been abated.
- The extent of site OHM impact appears limited to soil, groundwater and wetland sediment.
- Site groundwater and wetland sediments pose a condition of “significant risk” under future conditions.
- The site does not pose a “significant risk” of harm to human safety and public welfare.
- A Phase III Remedial Alternative Evaluation is necessary.

Environmental Risk Characterization of the Wetlands Adjacent to the Former Raytheon Facility

As part of the Phase II assessment and characterization activities, Raytheon retained Entrix, Inc. (Entrix) to conduct the Phase II Environmental Risk Characterization for the Site. The purpose of a MCP Environmental Risk Characterization is to “characterize the potential risk of harm to habitats and biota from OHM at, or from, the disposal site.” The results of the risk characterization were:

- Evaluation of site conditions indicated that significant environmental harm is “readily apparent” for a limited portion of the Site.
- There is no evidence of potential risk from on-site chemicals of potential ecological concern (COPECs) to aquatic, avian or mammalian receptors or wetland plants in areas outside of the area of readily apparent harm (ARAH).

28 November 2001 – Phase III Remedial Action Plan Report

Raytheon submitted a Phase III Report that describes and documents the information, reasoning and results used to identify and evaluate remedial action alternatives in sufficient detail to support selection of the “preferred” remedial action alternative. The Phase III is used to identify remedial alternatives that are reasonably likely to achieve a level of “No Significant Risk”, and where feasible, a Permanent Solution. The results of the Phase III Report were:

- Excavation and off-site disposal is the preferred remedy for abatement of wetland soil/sediment.
- Based on benchmark comparison, remediation of wetland soil/sediment to approach or achieve background is considered infeasible. Also, in an effort to minimize wetland disturbance, current state regulations prohibit remedial measures that would abate OHM in a wetland below a level necessary to achieve a condition of “no significant risk.”
- Chemical oxidation is the preferred remedy for abatement of groundwater.
- DEP guidance indicates that the “achievement” of background concentrations is considered infeasible for chlorinated ethenes in groundwater. The implementation of chemical oxidation for groundwater abatement will attempt to “approach” background concentrations.

November 2001 – DEP Baldwin Pond Wellfield Project

In November 2001, the DEP began an assessment of groundwater quality within the Town of Wayland’s Baldwin Pond wellfield due to low level (below drinking water standards), sporadic detection of chlorinated and petroleum VOCs since 1997. Summarized below are the four DEP memoranda regarding their field investigations (full texts are available in the Phase IV Report dated 30 December 2002):

- December 2001 through April 2002 – DEP installed 28 wellpoints and collected 70 groundwater samples at Town-owned properties including the Community Garden, Conservation Land, along Old

Sudbury Road, and near the Baldwin Pond supply wells. DEP also collected groundwater samples from two of the Baldwin Pond supply wells.

- March 2002 - Split sampling of six monitoring wells on Site with DEP and ERM.
- July 2002 – DEP installed seven wellpoints and collected 20 groundwater samples at the Town’s Baldwin Pond Facility.
- August 2002 – DEP resampled 12 previously installed wellpoints.

The investigation concluded that there are several possible sources of VOCs in proximity to the Baldwin Pond wellfield.

17 December 2002 - Release Notification

Raytheon submitted a Release Notification Form in response to the discovery of arsenic, MTBE, PCE, trichloroethene (TCE), cis-1,2-dichloroethene (c1,2-DCE) and vinyl chloride (VC) in groundwater at the Site at concentrations above applicable Reportable Concentrations (RCGW-1), triggering release notification pursuant to 310 CMR 40.0315(1). The following release conditions were identified at the Site:

- Chlorinated volatile organic compounds (CVOCs: PCE, TCE, c1,2-DCE and VC) in the northern portion of the Site;
- Arsenic in the western portion of the Site; and,
- MTBE in the southern portion of the Site.

The DEP responded issuing a NOR and assigned RTN #3-22408 on 16 January 2003.

23 December 2002 - Application for Risk-Based Disposal Approval

Raytheon submitted an application for risk-based disposal approval to the EPA Region I Administrator, in accordance with the requirements of 40 CFR 761.61(a)(3) of the Toxic Substance Control Act (TSCA). The application was submitted to obtain EPA approval of proposed risk-based remedial actions involving the management of remediation waste, specifically wetland soil/sediment containing PCBs and thereby classified under 40 CFR 761.3 as “PCB remediation waste.” The application

presents the remediation, closure sampling and restoration plan for the wetland.

The application was revised and resubmitted in September of 2003 following an EPA review of the document.

30 December 2002 - Phase IV Remedy Implementation Plan

The Phase IV Remedy Implementation Plan (RIP) includes design, construction and implementation of the Comprehensive Remedial Response Action identified in the Phase III Report. The RIP documents the engineering concepts and design criteria to be used for the design and construction of the Comprehensive Remedial Action for the Site. In accordance with 310 CMR 40.0874, the RIP includes:

- Conceptual design for wetlands excavation and management of impacted material for off-site disposal.
- Restoration plan for wetlands including soil and plant specifications, erosion control measures and diversification of species efforts.
- Five year monitoring plan for wetland restoration success.

February 2003- Wetland Remediation and Restoration Permitting

The following permit applications and reports were filed in compliance with the various regulatory agencies to authorize excavation activities associated with wetland remediation and restoration at the Site.

6 February 2003 - Environmental Notification Form and Regulatory Permit Application

7 February 2003 - Department of the Army Permit Application
401 Water Quality Permit Application

19 May 2003 – Single Environmental Impact Report (SEIR)
Notice of Intent

23 October 2003 – Request for NPDES Permit Exclusion

March 2003 – Release Notification

On 11 March 2003, Raytheon submitted a Release Notification Form (RNF) in response to the discovery of chromium in groundwater at the Site at a concentration above the applicable Reportable Concentration (RCGW-1), triggering release notification pursuant to 310 CMR 40.0315(1). In consideration of the chemical oxidation pilot study, the RNF stated that chromium detected in groundwater in MW-104 is a transient condition and will likely naturally attenuate once the aquifer returns to ambient oxidation-reduction conditions. The DEP issued a NOR and assigned RTN #3-22665 on 2 April 2003.

9 December 2003 – Linking RTN 3-22665 to 3-13302 & Tier Permit Number 133939

This document eliminated RTN 3-22665 by assigning all ongoing and future activities to RTN 3-13302 and Tier Permit Number 133939.

17 December 2003 - Phase I Initial Site Investigation Report

Raytheon submitted the Phase I Report for Northern Area groundwater impacts (RTN 3-22408) in accordance with 310 CMR 40.0480. The Phase I Report included a review of historic and current facility operation, chemical use and storage and an extensive field investigation including geophysical surveys, characterization of the nature and extent of groundwater impacts in overburden, and evaluation of potential receptors. Results of the Phase I Report were:

- Release of TCE from an unknown historical source has impacted groundwater quality in the Northern Area.
- Release of MTBE from an upgradient property has impacted groundwater quality in the Southern Area.
- Naturally occurring arsenic has impacted groundwater quality in the Western Area.
- Initial results indicate that impacts to groundwater at the Site maintain a low potential to impact Site occupants or nearby receptors. A full risk assessment, including evaluation of risk under current and potential

future use scenarios will be conducted as part of the Phase II investigation.

- The Site has been classified as Tier IB.
- A Phase II Scope of Work will be prepared, pursuant to 310 CMR 40.0830.

17 December 2003 - RAM Completion Report

Raytheon submitted the RAM Completion Report for the Southern Area pilot studies (RTN 3-13302) in accordance with 310 CMR 40.0480. The report presented a chronology of RAM activities and the following conclusions:

- High-pressure injection techniques were more effective than gravity feed injection techniques in that they achieved a significantly larger radius of influence.
- Low volume, high concentration sodium permanganate injections were more effective than high volume, low concentration potassium permanganate injections to treat source areas. This approach minimized the potential for displacement of contaminants from the treatment zone and enhanced reaction rates by applying a stoichiometrically appropriate amount of permanganate to satisfy the natural oxidant demand and contaminant demand.

Raytheon proposed to transition remedial activities from this RAM to Comprehensive Response Actions. Raytheon will develop a remedial design for implementation of additional in-situ chemical oxidation (ISCO) activities and submit an Addendum to the Phase IV Report.

Summary

The following summarizes the nature and extent of impact, as identified above, to the Raytheon site:

- All identified releases to soil have been closed under the MCP. There are no significant impacts to soil remaining at the Site.
- The impacts to groundwater in the Southern Area are limited to the overburden that has been defined during Site assessment activities.

Further assessment activities are planned and comprehensive response actions will be conducted under Phase IV activities.

- The wetlands restoration will be monitored over the next five years.
- Assessment activities to determine the nature and extent of groundwater impacts in the Northern Area are on-going. Phase I results indicate that the chlorinated VOC impacts are limited to the overburden. A Phase II Scope of Work is being prepared and will be submitted to the DEP Summer/Fall 2004.

2.3 PUBLIC INVOLVEMENT HISTORY

On 24 June 2000, DEP and Raytheon received a petition from residents of Wayland requesting that the Site at 430 Boston Post Road in Wayland be designated a PIP site, in accordance with M.G.L. c. 21E. Therefore the Site has been designated as a PIP site, and Raytheon has developed this PIP.

In developing this proposed PIP, Raytheon conducted interviews on 22 August 2000 with key officials and individuals interested in the Site. Identified concerns are presented in Appenix C.

A public meeting was held on 28 September 2000 to present general Site information and an update on site assessment activities. It also provided PIP participants and the general public an opportunity to question and comment on the draft PIP. Written comments received at the end of the public comment period were incorporated into the Plan as appropriate.

Further PIP Meetings were held on the following dates:

- *30 August 2001* – Summary of chemical oxidation groundwater pilot studies, (Southern Area) conducted under the RAM.
- *24 October 2001* – Review of Draft Phase II and Phase III documents
- *14 May 2002* - Overview of previous site investigations, (groundwater and sediment), presentation of additional assessment activities conducted under the Phase II/III Addendum.

- *17 July 2002* - Notice of Intent presentation, overview of proposed assessment activities in wetlands buffer zone and resource areas.
- *3 October 2002* – Presentation of draft Application for Risk-Based Disposal Approval, modifications to RAM plan for southern area groundwater chemical oxidation, and site update on current groundwater assessment activities.
- *12 December 2002* – Presentation of draft Phase IV Remedy Implementation Plan, including wetland and groundwater remediation plan.
- *7 May 2003* - Northern Area investigation update, presentation of wetland status and SOW for investigation in northern area. Discussion of upcoming reports.
- *1 October 2003* – Kick-off meeting for wetland excavation.
- *19 November 2003* – Presentation of Northern Area Phase I, RAM Completion Report for chemical oxidation injections in southern area, wetland status and discussion of upcoming reports.
- *3 March 2004* – Presentation of Phase IV Addendum for Southern Area remediation, update regarding Northern Area activities, wetland excavation and remedy status and discussion of upcoming events.

3.0 ADDRESSING PUBLIC CONCERNS

3.1 THE SITE CLEANUP PROCESS

The process for assessing and cleaning up “disposal” sites as set forth in the MCP is designed to address the potential effects of a site on health, safety, public welfare, and the environment. Once a release of OHM has been confirmed at a disposal site, the MCP includes options for immediate abatement when and where feasible, including:

- Limited Removal Actions (LRAs) to address small quantities of soil or sediment impacted by relatively minor releases of OHM.
- Immediate Response Actions (IRAs) to address sudden or other time critical releases that have or could result in adverse impacts to human health or the environment;
- Release Abatement Measures (RAMs) to remediate localized releases and/or mitigate the impacts of larger releases until more comprehensive remedial actions can be taken at a site;

If a release cannot be sufficiently addressed to meet MCP requirements within one year of discovery (Phase I), additional assessment and remedial response actions proceed over an additional five years. At this time the site must be tier classified pursuant to 310 CMR 40.0500. The tier classification process includes assessing site conditions using the Numerical Ranking System (310 CMR 40.1500). Based on the score determined, a tier classification (Tier IA, IB, IC or II) is assigned and if appropriate, a permit is issued by the DEP to provide for the following:

- Comprehensive field investigation of the nature and extent of impact of OHM to potentially impacted media (i.e., soil, groundwater, sediment, surface water and air), and an evaluation of the potential risk posed to the public and the environment from a site (Phase II);
- Identification and evaluation of remedial response action alternatives and selection of feasible measures that will achieve a level of no significant risk at a site (Phase III);

- Implementation of the selected remedial response actions (Phase IV);
- Operation, maintenance and monitoring of the implemented remedial actions (Phase V); and
- Submittal of a Phase V Completion Statement and Response Action Outcome (RAO) Statement.

Physical work at a disposal site includes sampling and other environmental field testing, and the implementation of the selected response action(s). It may also include the implementation of measures designed to stabilize conditions to prevent the continued migration of contaminants or eliminate an imminent threat to public health, safety, welfare or the environment until planning for remedial response is underway.

At each step of the remedial response action process, plans for work are developed, the work is conducted, and reports describing results of each phase (Phases I through V reports) and recommendations for the next step are prepared. The documents, which describe each of these steps, are the cornerstone of the remedial response action planning process, since they provide the information necessary to make decisions about how a site should be addressed.

As noted in Appendix C, the public has raised some questions about the Site. The remedial response action planning process is designed to address the concerns about the nature and extent of site impacts; potential risks posed to health, safety, public welfare, and the environment; and the feasibility and adequacy of proposed cleanup measures. The public involvement process allows public concerns to be addressed as part of the preparation and submittal of the Phase I through V investigation reports, remediation plans, and other reports to DEP.

4.0 PUBLIC INVOLVEMENT ACTIVITIES

4.1 PURPOSE

In accordance with the MCP (40.1400), activities undertaken to involve the public in response actions serve two purposes:

- to inform the public about the risks posed by a disposal site, the status of remedial response actions, and the opportunities for public involvement; and
- to solicit the concerns of the public about the disposal site and response actions, and shall consider, address and, where relevant and material to the response action, incorporate these concerns in planning remedial response actions.

To meet each of these objectives, Raytheon has undertaken specific activities during the remedial response process at the Site. These activities are described below.

4.2 INFORMING THE PUBLIC

Raytheon provides Site-specific information to the public by establishing information repositories; maintaining a Site web page, developing and maintaining a mailing list to distribute information about the Site; and providing advance notification to local officials and residents about Site activities, as appropriate under the MCP.

4.2.1 Information Repositories

Publicly Available Site Files: Files on the Site are maintained at the Northeast Regional DEP Office. Appointments to view these files can be made by contacting the DEP Northeast Regional File Facility in the Department of Transitional Assistance Building at 35 Congress Street, Shetland Office Park, Salem, Massachusetts 01970 at (978) 740-0809.

Local Information Repositories: Raytheon has established and will maintain a local information repository and dedicated site web page to provide Wayland residents with easy access to information about Site investigations and proposed remedial plans. The Site information repository contains a complete copy of the DEP files on the Site including: the Tier Classification and permit application; the Public Involvement Plan Interim Guidance for Waiver Sites (and DEP's update); work plans; sampling and field testing plans; technical reports and documents summarizing results and recommendations; relevant correspondence; press releases; public information materials; the Public Involvement Plan; public meeting summaries; summaries of responses to comments received; and copies of public notices about the Site. Raytheon will send information to the repository as it is developed.

The information repository for the Site is located at:

Primary Location

Wayland Public Library
5 Concord Rd
Wayland, MA 01778
(508) 358-2311

Library Hours:

Mon-Thur 9am to 9pm
Friday 9am to 6pm
Saturday 10am to 5pm
Sunday 2pm to 5pm (closed
in summer)

Secondary Location

Board of Health
Wayland Town Hall
41 Cochituate Road
Wayland, MA 01778
(508) 358-7701

Please call Board of Health
for an appointment

Site Webpage:

Raytheon Extranet
www.ermne.com
username: raytheon
password: wayland
(note: case sensitive)

4.2.2

Mailing List

Raytheon has established a mailing list for the Site (the “Mailing List”). The Mailing List includes: petitioners, interested residents, Site abutters, local and regional news media, municipal officials (specifically the Chief local Municipal Officer and the Board of Health), state legislators, DEP, and anyone else indicating an interest in receiving information about the Site.

The Mailing List will be used to distribute notices of upcoming public meetings, fact sheets, notices of public comment periods on, and the availability of documents in, the information repositories, and any other information about the Site. Raytheon will maintain the Mailing List and update it as necessary. Raytheon will also provide DEP with a copy of the Mailing List.

Anyone wishing to be added to the Mailing List may call or write to:

Edwin P. Madera
Raytheon Company
Mail Stop 1880
528 Boston Post Road
Sudbury, MA 01776
Phone: (978) 440-1813
Fax: (978) 440-1800

Raytheon will notify the Mailing List and the public through notification letters, newspaper legal notices and/or postings on the Raytheon Extranet. However, meetings with regulatory agencies such as the Conservation Commission are scheduled and publicized by the regulatory agency. Regulatory agencies publish notices in the Wayland Town Crier and some, such as the Conservation Commission, also post notices on the town’s website.

A notification letter will be sent upon the submittal of a Request for Determination of Applicability or a Notice of Intent to the Conservation Commission. The notice will detail the initial meeting time and location scheduled by the Conservation Commission, if available at that time. Changes in meeting time and location and notices of follow up meetings will be posted on the Raytheon Extranet.

4.2.3

Municipal Notifications

Chief Municipal Officer and Board of Health

The Chief Municipal Officer and the Board of Health will be notified if any of the following activities are conducted:

- the purpose, nature and expected duration of any field work related to the implementation of Phase IV remedial activities;
- the use of respirators and other personal protective equipment (PPE) required under Level A, B or C as defined in the site specific Health and Safety Plan (HASP); and
- sampling of any drinking water supply wells, indoor air or surface soils at any residential property at, adjacent to or downgradient from the Site.

Notification will be made at least three days prior to the commencement of field work. Notification will be based on plans for field work. If plans are modified or the level of protection is upgraded during the course of work to Level C or above, notification will be made as soon as possible.

Additionally, the Chief Municipal Officer and Board of Health will be notified of the implementation of any RAM. Notification will include information about the purpose, nature and expected duration of the RAM. Notification will be made at least seven days prior to the implementation of the RAM.

All of the above notifications may be made orally or in writing. Oral notification will be followed by written notice within seven days of the oral notification. A copy of each written notice will be submitted with its filing to the Chief Municipal Officer, the Board of Health and the DEP.

The Chief Municipal Officer and Board of Health will also be notified of the availability of any RAO Statement. Notification may take the form of copies of correspondence to the DEP, which contain or summarize the decisions regarding the Statement or a notice of availability of the Statement. Notifications of the availability of any RAO Statement will be made in writing. A copy of each written notice will be submitted to the DEP concurrently with its filing with the Chief Municipal Officer and Board of Health.

Fire and Police Departments

If issues of public safety are involved, the Wayland Fire and Police Departments will be notified of any threat to public safety prior to the implementation of remedial actions, unless prior notification is impracticable.

4.2.4 Notification to Local Officials and Residents of Major Milestones and Events

The MCP (310 CMR 40.1403) requires community notification of major planning and implementation milestones at disposal sites. Major milestones include:

- 1) field work involving any IRAs for Imminent Hazards, implementation of any RAMs, the use of personal protective equipment (Level A, B or C protection) or use of respirators, residential sampling, Phase IV remedial actions and Phase V operating, maintenance and/or monitoring activities; and
- 2) the completion of each phase of the remediation process including IRA Completion Statements for Imminent Hazards, RAOs, and Activity and Use Limitations (AULs).

Notification of field work will include information on the type of work and its approximate duration. Raytheon will notify people on the "Notification List" in advance in writing or by telephone the day before activity is scheduled to begin. A written notice will follow any notification given by telephone. Notification at the end of a remedial phase will include a summary of the phase report and information on where the report can be reviewed. The Notification List is as follows:

Notification List

<u>Name</u>	<u>Affiliation</u>	<u>Address & Phone</u>
Jeff Ritter	Executive Secretary	Town Building 41 Cochituate Road Wayland, MA 01778 (508) 358-3620
Steven Calichman	Board of Health	Town Building 41 Cochituate Road

Wayland, MA 01778
(508) 358-3616

Linda Segal	Citizen Representative	9 Aqueduct Road Wayland, MA 01778 (508) 655-0724
Susan Pope	State Representative	Room 237 State House Boston, MA 02133 (617) 722-2305
Scott Brown	State Senator	Room 504 State House Boston, MA 02133 (617) 722-1572
Megan Kane	Property Owner	Credit Suisse/First Boston 11 Madison Avenue New York, NY 1001

In addition, Raytheon will provide written notice to citizens who have requested to be on the PIP mailing list, of the availability of documents for review and of scheduled public meetings.

4.3 *ACTIVITY AND USE LIMITATIONS*

An Activity and Use Limitation restricts use of a site or portion of a site with the intent of reducing the risk a site poses to human health, the environment or safety. Within 30 days after recording and/or registering any original, amended, released or terminated Activity and Use Limitations (AUL), local officials and the public will be informed of the limitations which apply to activities and/or uses of the Site.

A copy of the recorded and/or registered AUL will be provided to the:

- Chief Municipal Officer;
- Board of Health;
- Zoning Official; and

- Building Code Enforcement Official.

A legal notice, which indicates the recording and/or registering of any original, amended, released or terminated AUL will be published in the Wayland Town Crier. The notice will be in the form established by the DEP and will include the name and address and RTN for the Site; the type of AUL, information about the project file and where the AUL can be reviewed; and the name, address and telephone number of the person recording and/or registering the AUL from whom the public may obtain additional information. A copy of this legal notice will be submitted to the DEP within seven days of its publication. The portion of the Site affected by the current AUL recorded and registered in 1999 is shown on Figure 3.

A deed restriction could also be modified or added to the property to limit future site occupants, activities, construction or modification to property access. A deed restriction is different from an AUL, as it can be done independently of the MCP. A new restriction can only be placed on the Site by the property owner. There is currently a deed restriction on the property that only Raytheon can modify. The deed restriction affects the areas of the Site shown on Figure 3. The current deed restriction prohibits the following activities at the Site:

- Residential, childcare, daycare, recreational, agricultural, horticultural, gardening or for public access purposes.
- Groundwater use except for assessment or remedial purposes.
- Subsurface activities or land development, unless certified by a LSP.
- Any activity, in the opinion of the LSP, that may result in significant risk from exposure to contaminated media.

4.4 TECHNICAL RESOURCE FUNDING

Raytheon provides the Town of Wayland Board of Selectmen with funding to retain a technical expert to review documentation from Raytheon, submit written public comments on behalf of the Town and provide oversight on activities they deem appropriate. The Board of Selectmen oversees disbursement of the funding.

4.5 SOLICITING PUBLIC INVOLVEMENT

Raytheon will provide opportunities for public input regarding Site cleanup decisions by holding public comment periods and preparing summaries of all comments received during the public comment period and responses to them.

4.5.1 Public Meetings

Raytheon will brief the public about the status of the Site during the remedial action process. Meetings will take place at the time when any of the following events occur:

- Draft Public Involvement Plan
- Phase I Initial Site Investigation
- Phase II Comprehensive Response Action
 - Scope of Work (already submitted)
 - Report
 - Risk Assessment Scope of Work (already submitted)
- Phase III Remedial Action Plan
- Phase IV Remedy Implementation Plan
- Phase IV Completion Report
- Phase V Operation Maintenance and/or Monitoring Report
- IRA and RAM Plans
- RAOs (including AULs)

Meetings will serve two purposes:

- 1) to provide community officials and the general public with progress reports regarding remedial response actions at the Site; and
- 2) to provide an opportunity for the public to question and comment on remedial action plans for the Site.

Raytheon will send notices announcing public meetings to individuals on the Mailing List 14 days prior to any meeting dates. Meetings will generally take place at the Wayland Town Hall. Raytheon will prepare meeting summaries in the information repository.

4.5.2 Public Comment Periods

Raytheon will provide specific opportunities for the public to submit comments about documents concerning the Site. When key documents are available in draft form, they will be provided to the information repositories, and a notice of their availability will be sent to the Mailing List. The notice will include the title of the document, where it is available for review, and information about how to submit comments to Raytheon, and when the public comment period ends. Raytheon will be responsible for providing document copies to the information repositories and to the DEP Site file, as well as sending out notices of availability of any documents it prepares under the MCP. Raytheon will allow thirty days for public review and comment after posting the document to the repositories.

Documents available for public comment will include:

- Draft Public Involvement Plan and any subsequent revisions;
- Phase II Comprehensive Response Action
 - Scope of Work
 - Report
 - Risk Assessment Scope of Work
 - Final Risk Assessment
- Phase III Remedial Action Plan;
- Phase IV Remedy Implementation Plan
 - Final Inspection Report
 - Phase IV Completion Statement
- Phase V Operating, Maintenance and/or Monitoring Plan
 - Six-Month Inspection and/or Monitoring Reports
 - Phase V Completion Statement
- IRA and RAM Plans and completion statements;
- RAOs (including AULs).

4.5.3 *Response to Comments*

Raytheon will prepare a summary of all comments received for each document available for public comment, and Raytheon's responses to each. A copy of this response summary will be sent to all those who submitted comments and will be placed in the information repository and the DEP Site files within thirty days of the end of the public comment period. Raytheon will also send a notice of availability of the response summary to the Mailing List.

5.0

REVISIONS TO THIS PLAN

This Public Involvement Plan may be revised as necessary during the course of the remedial response action process. If revisions are proposed, Raytheon will place copies of any proposed changes in the local information repository, and will send a notice of the availability of recommended changes to the Mailing List. Raytheon will hold a thirty-day public comment period on the proposed revised PIP. Raytheon will review any comments received and revise the PIP as appropriate. The final revised plan will be placed in the information repository and a notice of availability will be sent to all on the Mailing List.