



November 16, 2011

Mr. Gerard Martin
Massachusetts Department of Environmental Protection
Southeast Regional Office
Bureau of Waste Site Cleanup
20 Riverside Drive, Lakeville, Massachusetts 02347

Dear Mr. Martin:

Re: Public Comment Drafts
Phase II Comprehensive Site Assessment Addendum
and Response Action Outcome Statement
Former Bird Machine Company
100 Neponset Street
Walpole, Massachusetts
RTN 4-3024222

On behalf of Baker Hughes, Inc. (Baker Hughes), AMEC Earth and Environmental (AMEC) is providing this Public Comment Draft of the Phase II Comprehensive Site Assessment (CSA) Addendum and the Response Action Outcome (RAO) Statement for the Bird Machine Company Site. The Site has been assigned Release Tracking Number (RTN) 4-3024222 and is located at 100 Neponset Street in Walpole, Massachusetts. The attached CSA Addendum updates the nature and extent of contamination for the Demolition Debris Area (DDA) portion of this RTN, based on data collected since the original 2007 CSA for this area. The Addendum includes an updated risk characterization based on the latest data, which finds that a condition of No Significant Risk applies to the DDA portion of the Site.

A Draft Phase III Remedial Action Plan (RAP) for areas of groundwater contamination associated with this RTN was submitted on October 6, 2011. The groundwater contamination is not related to the DDA, and the conclusions of the CSA Addendum do not necessitate revisions to the Draft RAP. A response to public comments on the Draft RAP is being prepared and will be provided shortly. The RAP concludes that a Permanent Solution is feasible through design and implementation of Monitored Natural Attenuation (MNA) for groundwater contaminants. A Final RAP is expected to be completed in December 2011.

The attached Draft RAO Statement indicates that a Temporary Solution (Class C-2 RAO) has been achieved. A Phase III evaluation is nearing completion, a condition of No Substantial Hazard exists, sources of contamination have been identified and eliminated to the extent feasible, and response actions to achieve a Permanent Solution are feasible and will be conducted. MNA will be designed and implemented as an Active Remedial Monitoring Program to advance the Site from a Temporary Solution to a Permanent Solution. MNA is expected to achieve a condition of No Significant Risk at the Site within 5-10 years of implementation. MNA

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has already produced significant reductions in contaminant concentrations at individual wells over the past four years of groundwater monitoring. This alternative appears capable of achieving or approaching background for all contaminants that exceed drinking water standards.

The public comment period for the Draft CSA Addendum and Draft RAO Statement will begin on November 16, 2011 and will extend through December 12, 2011. Comments can be submitted to Chris Clodfelter of Baker Hughes at the following address:

Chris Clodfelter
Senior HS&E Specialist
Baker Hughes Incorporated
2929 Allen Parkway
Suite 2100
Houston, Texas 77019-2118
Office: 713.439.8329 | Fax: 713.439.8383

Copies of the Draft CSA Addendum and Draft RAO Statement will be available at the MassDEP Southeast Regional Office (File Review Telephone Number: 508-946-2718) and at the Walpole Public Library (Telephone Number: 508-660-7341). A copy of the executive summary of the Draft CSA Addendum, which summarizes the findings and conclusions presented in the document, is attached to this letter. A copy of this letter including the summary is being sent via US Mail to the Public Involvement Plan (PIP) Mailing List for the Site.

Baker Hughes will present a summary of the attached documents and be available to answer questions at a public meeting scheduled for Tuesday December 6, 2011, in the Main Meeting Room at Walpole Town Hall. The legal notice for this meeting will be published this week and a copy is attached to this letter. Please contact me if you have any questions regarding the Public Involvement process for this document.

Sincerely,

A handwritten signature in black ink, appearing to read "Kim M. Henry", with a stylized flourish at the end.

Kim M. Henry
LSP No. 7122

cc:

Mr. Michael Boynton, Walpole Town Administrator
Ms. Robin Chapell, Walpole Health Agent
Ms. Landis Hershey, Walpole Conservation Agent
Ms. Deborah Burke, Key Petitioner
Public Involvement Plan Mailing List

Enclosures:

1. Copy of Draft Phase II CSA Addendum – Executive Summary
2. Notice of a Public Involvement Plan Meeting for the Former Bird Machine Site



COPY OF DRAFT PHASE II CSA ADDENDUM - EXECUTIVE SUMMARY

On behalf of Baker Hughes, Inc. (BHI), AMEC Earth and Environmental, Inc. (AMEC) has completed a Phase II Comprehensive Site Assessment (CSA) Addendum for the portion of the former Bird Machine Company (BMC) Property located in Walpole, Massachusetts known as the Demolition Debris Area (DDA). The DDA is an exposure area and a portion of the site assigned Release Tracking Number (RTN) 4-3024222 under the Massachusetts Contingency Plan (MCP). This Phase II CSA Addendum serves as an update to a July 2007 Phase II CSA (Weston 2007). It presents the data collected at the DDA from June 2007 to the present, updates to the Phase II CSA as a result of the additional data collected, and an updated risk characterization. A Phase II CSA addressing three other exposure areas, the manufacturing building area (MBA), the lead release area 3 (LRA3), and the south rail spur (SRS) was finalized on October 18, 2011. These two Phase II CSAs together characterize the "Site," which is represented by the single unclosed RTN (4-3024222) at the property.

The Phase II CSA Addendum addresses volatile organic constituents (VOCs), semi-volatile organic constituents (SVOCs), extractable petroleum hydrocarbons (EPH), polycyclic aromatic hydrocarbons (PAHs), dioxin/furan congeners, and various metals detected in soil and groundwater samples collected from the DDA. The Phase II CSA also includes evaluations of asbestos in soil (AIS) identified within this exposure area.

Data from site investigations completed by AMEC, site assessment activities completed by Weston Solutions, Inc. of Concord, New Hampshire (Weston), and information from other sources (e.g., Massachusetts Department of Environmental Protection [MADEP] and United States Environmental Protection Agency [U.S. EPA] guidance documents), were used to complete the CSA.

In accordance with the requirements of 310 CMR 40.0000 Subpart I of the MCP, a Method 3 risk characterization (RC) of harm to human health, public welfare, safety, and the environment was completed. This RC replaces a Method 1 RC that was prepared by Weston. The Method 1 RC addressed soil and groundwater at the DDA and was not able to conclude NSR. Additionally, Weston determined that a Method 3 RC would eventually be necessary to support a response action outcome (RAO) statement due to the presence of dioxins (which are bioaccumulative) in the top two feet of soil, and the presence of asbestos. This Method 3 RC has been conducted assuming that an Activity and Use Limitation (AUL) will be implemented at the Site prohibiting disruption of the ground surface. The risk characterization therefore does not evaluate any Site use or development other than incidental trespassing.

The Phase II investigations presented in this Phase II CSA Addendum consisted of ground water sampling in and around the DDA and soil sampling for asbestos within the DDA.



The nature and extent of soil contamination at the DDA was previously documented in Weston's 2007 Phase II CSA. Additional asbestos sampling has demonstrated that asbestos could be present within the footprint of the DDA fill area both horizontally and vertically. Groundwater sampling results are consistent with Weston's characterization in the 2007 Phase II CSA. Groundwater contains metals and sporadic PAH detections. Weston's 2007 Phase II CSA determined that these groundwater contaminants do not represent a significant source of contamination to river sediment or surface water.

The results of the human health and environmental risk characterization indicate that a condition of No Significant Risk (NSR) of harm to health, safety, public welfare, and the environment has been achieved at the DDA.

Notice of a Public Involvement Plan Meeting for the Former Bird Machine Site, 100 Neponset Street, Walpole, MA, RTN 4-3024222

A public meeting will be held on Tuesday December 6, 2011 at 7:00 p.m. in the Main Meeting Room at Walpole Town Hall, 135 School Street. This meeting will present the results of the Draft Phase II Addendum and Response Action Outcome (RAO) Statement prepared by AMEC Earth and Environmental, Inc. (AMEC) for the Former Bird Machine Site located at 100 Neponset Street in Walpole, MA.

This meeting is being conducted in accordance with the Public Involvement Plan (PIP) prepared for the Bird Machine Site. Baker Hughes Incorporated (the Responsible Party) received a petition from 10 Walpole townspeople requesting that all Massachusetts Contingency Plan (MCP) Sites at the Property be designated PIP sites. In accordance with Massachusetts General Laws Chapter 21E (M.G.L. c. 21E) these sites have therefore been designated as PIP sites.

Under M.G.L. c. 21E, the Massachusetts Department of Environmental Protection (MassDEP) is responsible for ensuring the public is informed of response actions at sites at which oil or hazardous materials have been released to the environment. In addition, the response action process provides opportunities to ensure that the public is both informed of and involved in planning for response actions. Interested parties are encouraged to attend the public meeting on Tuesday December 6 and may view related reports at the information repositories established by the PIP. These include the MassDEP Southeast Regional Office (20 Riverside Drive, Lakeville, 508-946-2718) and the Walpole Public Library (65 Common Street, 508-660-7340). Many reports are also available on the Town of Walpole website for this property: <http://walpole-ma.gov/BirdMachine.htm>.

Questions pertaining to the Bird Machine Site at 100 Neponset Street may be directed to Kim M. Henry, AMEC Earth and Environmental, Inc., 2 Robbins Road, Westford, MA 01886, 978-392-5334, kim.henry@amec.com.