



October 6, 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 Draft
Phase III Remedial Action Plan
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 III Remedial Action Plan (RAP) for the Bird Machine Company Site, Release Tracking Number (RTN) 4-3024222, which is located at 100 Neponset Street in Walpole, Massachusetts. The RAP describes and evaluates remedies for areas of groundwater contamination that were identified in the July 2011 Public Comment Draft of the Phase II Comprehensive Site Assessment (CSA) for this RTN. A response to public comments on the CSA is being prepared and will be provided shortly.

The public comment period for the Draft RAP will begin on October 6, 2011 and will extend through October 28, 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 RAP 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 RAP, 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.

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Baker Hughes will present a summary of the Draft RAP and be available to answer questions at a public meeting tentatively scheduled for Tuesday October 25, 2011. Please contact me if you have any questions regarding the Public Involvement process for this document.

Sincerely,

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

Enclosure:

Draft Phase III RAP Executive Summary



COPY OF DRAFT PHASE III RAP - EXECUTIVE SUMMARY

On behalf of Baker Hughes, Inc. (BHI), AMEC Earth and Environmental, Inc. (AMEC) completed this Phase III Remedial Action Plan (RAP) of the former Bird Machine Company (BMC) Site located in Walpole, Massachusetts. BHI is submitting this RAP pursuant to 310 CMR 40.0850 of the Massachusetts Contingency Plan (MCP). This RAP documents selection of a Remedial Action Alternative (RAA) which is a likely Permanent Solution for the Site, and evaluates the feasibility of achieving or approaching background levels of oil or hazardous material. A Permanent Solution will achieve a condition of No Significant Risk (NSR) for current and reasonably foreseeable site uses.

The Site includes multiple RTNs due to the discovery of various releases at the property over a period of several years. Three separate exposure areas were identified and evaluated in the Draft Phase II Comprehensive Site Assessment (CSA) Report (AMEC 2011). Release Abatement Measures (RAMs) were conducted at several locations to reduce the mass and concentrations of contaminants at the Site. The CSA indicates that a condition of NSR exists for all areas of the Site except groundwater, where some monitoring well concentrations exceed drinking water criteria (Massachusetts Maximum Contaminant Levels or MMCLs). It is unlikely that groundwater at the Site will be used for drinking water, but the Site is within a Potential Drinking Water Source Area designated by the Town of Walpole (Walpole 2007). Considering this designation, groundwater at the Site is categorized as GW-1 under the MCP. Background information and remedial action objectives for the Site are summarized in Section 1 of this RAP.

Areas of groundwater contamination exceeding MMCLs have been identified for arsenic, chlorinated Volatile Organic Compounds (cVOCs), and 1,4-dichlorobenzene (DCB). Response actions and technologies to remove these contaminants have been evaluated and three RAAs have been identified that are reasonably likely to be feasible Permanent Solutions for the Site. These three RAAs are (1) Monitored Natural Attenuation (MNA) for all contaminants; (2) In-Situ Chemical Oxidation (ISCO) for organic contaminants and MNA for arsenic; and (3) Pump & Treat for organic contaminants and MNA for arsenic. A conceptual design of each alternative is provided in Section 2 of this RAP, including key components, a conceptual layout, treatment residuals or wastes requiring disposal, permit requirements, and a discussion of limitations, assumptions, and uncertainties.

A detailed evaluation of the three RAAs using eight criteria established under the MCP is provided in Section 3 of this RAP. The alternatives are compared and ranked based on estimates of their effectiveness, reliability, implementability, costs, risks, benefits, timeliness, and other impacts. Alternative 1 (MNA) received the highest rankings as indicated in Section 4, and has been selected for implementation in Phase IV. Alternative 1 is expected to provide a Permanent Solution that achieves a condition of NSR. MNA has already produced significant reductions in arsenic and cVOC concentrations at individual wells over the past four years of



groundwater monitoring. Alternative 1 appears capable of achieving or approaching background for cVOCs -- which are expected to require the greatest reductions in groundwater concentrations -- and for the other contaminants.

A schedule for activities leading up to and including Phase IV is provided in Section 5. Following public comment and a meeting to discuss this RAP, this document will be finalized, and design of the groundwater remedy will be initiated. Completion of construction is expected by June 2012, at which time operation of the remedy in Phase V will be initiated. The estimated timeframe for achieving a condition of NSR is 5-10 years from the start of operations.