



December 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: Final 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 submitting the Final Phase II Comprehensive Site Assessment (CSA) Addendum and a 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 Final Phase III Remedial Action Plan (RAP) for areas of groundwater contamination associated with this RTN was submitted on December 14, 2011. The groundwater contamination is not related to the DDA, and the conclusions of the CSA Addendum do not necessitate revisions to the RAP. The RAP concludes that a Permanent Solution is feasible through design and implementation of Monitored Natural Attenuation (MNA) for groundwater contaminants.

The attached RAO Statement indicates that a Temporary Solution (Class C-2 RAO) has been achieved. A Phase III evaluation is complete, 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 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.

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A paper copy of the Final CSA Addendum and the Final RAO Statement is being provided to the PIP repository at the Walpole Public Library (Telephone Number: 508-660-7341). The electronic version of each report has been uploaded to the MassDEP website (<http://db.state.ma.us/dep/cleanup/sites/Search.asp>) and is being provided to the Town of Walpole for upload to their website for this property: <http://walpole-ma.gov/BirdMachine.htm>. The final reports include responses to public comments on the draft versions issued in November, which were the subject of our public meeting in Walpole on December 6, 2011. Please contact me if you have any questions on this document.

Sincerely,

A handwritten signature in black ink that reads "Kim M. Henry". The signature is fluid and cursive, with a long horizontal stroke 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

Enclosure: Copy of Final Phase II CSA Addendum -- Executive Summary



COPY OF FINAL 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.