July 16, 2012

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 IV Final Inspection Report
100 Neponset Street
Walpole, Massachusetts
RTN 4-3024222

On behalf of Baker Hughes, Inc. (BHI), AMEC Environment and Infrastructure (AMEC) is providing this Public Comment Draft of the Phase IV Final Inspection Report (FIR) for the Bird Machine Company Site at 100 Neponset Street in Walpole, Massachusetts. BHI is submitting this FIR pursuant to 310 CMR 40.0870 of the Massachusetts Contingency Plan (MCP). The Site is listed as Release Tracking Number (RTN) 4-3024222 under the MCP.

This Draft FIR documents the construction of a Comprehensive Remedial Action that is expected to be a Permanent Solution for the Site, and that was planned in the Phase IV Remedy Implementation Plan. A Permanent Solution will achieve a condition of No Significant Risk for current and reasonably forseeable site uses. As documented in the Class C-2 Response Action Outcome Statement submitted to the Massachusetts Department of Environmental Protection (MassDEP) on December 16, 2011, the Site already achieves the requirements of a Temporary Solution.

The public comment period for the Draft FIR will begin on July 17, 2012 and will extend through August 6, 2012. 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 FIR are being provided to the MassDEP Southeast Regional Office (File Review Telephone Number: 508-946-2718) and to the Walpole Public Library (Telephone Number: 508-660-7341) in accordance with the Public Involvement Plan (PIP) for the Site. The Draft FIR is also being provided today to the Town of Walpole for upload to their website for this property: http://walpole-ma.gov/BirdMachine.htm. A copy of the executive summary of the Draft FIR, which summarizes the findings and conclusions presented in the document, is attached to

this letter. A copy of this letter including the executive summary is being sent via US Mail to the PIP Mailing List for the Site.

Baker Hughes will present a summary of the Draft FIR and be available to answer questions at a public meeting scheduled for Tuesday July 31, 2012 at 7pm, at the Walpole Town Hall. 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:

Copy of Draft Phase IV FIR Executive Summary

COPY OF DRAFT PHASE IV FIR - EXECUTIVE SUMMARY

On behalf of Baker Hughes, Inc. (BHI), AMEC Environment & Infrastructure, Inc. (AMEC) completed this Phase IV Final Inspection Report (FIR) for the former Bird Machine Company (BMC) Site located in Walpole, Massachusetts. BHI is submitting this FIR pursuant to 310 CMR 40.0870 of the Massachusetts Contingency Plan (MCP). This FIR documents the construction of a Comprehensive Remedial Action that is expected to be a Permanent Solution for the Site, and that was planned in the Phase IV Remedy Implementation Plan (RIP; AMEC 2012). A Permanent Solution will achieve a condition of No Significant Risk (NSR) for current and reasonably forseeable site uses. As documented in the Class C-2 Response Action Outcome (RAO) Statement submitted to the Massachusetts Department of Environmental Protection (MassDEP) on December 16, 2011, the Site already achieves the requirements of a Temporary Solution (AMEC 2011a).

Release Abatement Measures (RAMs) have been conducted at several locations to reduce the mass and concentrations of contaminants at the Site. The Phase II Comprehensive Site Assessment (CSA) reports (AMEC 2011b, AMEC 2011c) indicate 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. The CSA reports found no current pathway between Site contaminants and the Town's water supply wells to the northeast, but the potential for contaminant movement from a portion of the Site warrants further monitoring. Background information including a description of RAMs and Site characteristics is summarized in Section 1 of this FIR.

Areas of groundwater contamination exceeding MMCLs have been identified for arsenic, chlorinated Volatile Organic Compounds (cVOCs), and 1,4-dichlorobenzene (DCB). Monitored Natural Attenuation (MNA) consists of active monitoring of natural processes to ensure attainment of cleanup goals, and was selected for implementation in Phase IV. MNA is considered an Active Remedial Monitoring Program under the MCP and has been designed and constructed to provide a Permanent Solution that achieves a condition of NSR. Section 2 of this FIR presents the results of interim investigations planned in the RIP, rationale for changes to the conceptual MNA well locations proposed in the RIP, and the construction details for the resulting monitoring system that was installed based on these data. The potential areas of groundwater contamination above MMCLs are illustrated in three dimensions using a plan view and cross-sections, and the Conceptual Site Model (CSM) is updated.

Section 3 of this FIR summarizes the Operation, Maintenance, and Monitoring (OMM) program based on the plan presented in the RIP, including sampling methods and locations, analytical parameters, and monitoring frequencies, along with data evaluation and reporting methods. Initially the program will include 42 water quality monitoring wells and 19 additional water level monitoring points (wells or surface water benchmarks) measured on a quarterly basis. Methods of determining MNA effectiveness and procedures for changing this program over time are summarized in Section 3, and a list of permits and regulatory approvals relating to the MNA system is provided.

This FIR documents that a remedial monitoring well network to support an Active Remedial Monitoring Program has been designed and constructed in accordance with the plans and specifications presented in the RIP. This program will be implemented under Phase V of the MCP, and the results of performance monitoring conducted through groundwater sampling and data evaluation will be presented in semiannual Remedial Monitoring Reports.