ENVIRONMENTAL SERVICES



ENGINEERING SERVICES

February 10, 2020

Questions from a Citizen and CMG responses:

1) Has he reviewed the Loker field project plans to get an understanding of the excavation that will be done in the septic system leach field area.

Briefly. The northerly half of the proposed soccer field is in about the same location as the "Upper Septic System Area" as identified by Ransom Environmental Consultants, Inc. and the southeast corner of the proposed soccer field is within their "Underground Storage Tank/Lower Septic System Area," both focuses of Ransom's RAM investigations conducted between October 1994 and January 1998. Data obtained during these investigations was part of the data set which Gradient Corporation used in conducting their Method 3 risk characterization. That means that barring any major surprises uncovered during excavation for the Loker field project, there would be no significant change to the risk characterization conclusions.

2) Has he reviewed the testimony of the former Dow employees to understand what they did with hazardous waste at the site.

No. Dow conducted interviews of "27 former Dow employees and local Wayland residents" and provided that information in a letter to DEP dated April 29, 1994. The 4/29/94 letter is not a separate document in DEP files for RTN 3-3866. It may be buried within the 1,762 pages of documents compiled into DEP's "Correspondence File" but it is not one of the dozens of flagged items in this file. It is possible that the Town's information repository at the Health Department office might contain the 4/29/94 letter, but the Board of Selectmen have not tasked CMG to research that information as yet.

Dow also provided a written response to DEP dated June 9, 1994 (which <u>is</u> a separate document in DEP files), which CMG has reviewed. That (summary) document makes it clear that Dow employees segregated "reaction wastes from lab experiments" for off-Site disposal (initially by "an outside contractor," and later "solely to Dow's Midland, Michigan permitted waste disposal facility").

3) Is there any information in the cleanup record that indicates why the septic system leach field was left in place. For example, did they test for hazardous wastes and determined there were none left or did they believe that the soil cap was sufficient to make the area safe.

Ransom's soil sampling did not identify significant metals contamination within the Upper Septic System Area (nothing exceeding RCS-1 standards), and virtually no organic contaminants (see Section 6.2.1.2 [p.21] and Tables 2 & 3 of 3/31/99 Phase II CSA Report).

4) Did he review the Weston and Sampson test results from samples they took from the bore holes used to determine the depth of the ledge. Was there enough sampling in the leach field area to assure that no hazardous wastes will emerge when the leach field is excavated.

GZA advanced borings GZ-1 (refusal at 17') and GZ-2 (refusal at 8') within the footprint of the proposed soccer field. Anderson-Nichols also advanced boring AN-6 (refusal at 7') and Environmental Science advanced boring PW-2 (refusal at 9'3") within this footprint.

Ransom advanced borings B101 (8' no refusal), B102 (refusal at 6'9"), B103 (8' no refusal), B104 (7'6" no refusal), B105 (6' weathered rock), B106 (6' no refusal), B107 (6' no refusal), B108 (6' no refusal) B111/MW101 (competent rock at 20', well drilled to 29') & B112/MW102 (competent rock at 19', well drilled to 30') within the footprint of the proposed soccer field and B109 (4' no refusal) & B110 (2' no refusal) just west of it. They submitted 14 samples from borings B101 through B110 for laboratory analyses. This seems sufficient analysis to adequately characterize subsurface conditions within the "Upper Septic System Area."

10/30/94 to 12/6/94

a.

