

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

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Brian Cote, LSP
APTIM
150 Royall Street
Canton, MA 02021

March 15, 2018

RE: General Chemical Corporation Site, 133 Leland Street, Framingham, RTN 3-19174
Focused Remedy Evaluation Letter Report

Dear Mr. Cote:

The Massachusetts Department of Environmental Protection (MassDEP) has reviewed the Focused Remedy Evaluation Letter Report dated January 31, 2018, and follow-up information to MassDEP questions dated February 14, 2018. Additionally, MassDEP received technical comments on the Remedy Evaluation Report from Eva Davis of EPA National Risk Management Research Laboratory in Ada, Oklahoma.

The Focused Remedy Evaluation Report evaluates remedial technologies to effectively remove contaminant mass from the General Chemical facility in a reasonable timeframe. The report recommends implementation of in-situ thermal treatment in two areas of the facility. In consideration of the available limited budget, MassDEP hereby requests that APTIM proceed with the design phase of the proposed thermal treatment remedy with the following adjustments.

1. Eliminate the in-situ bioremediation technology and allocate that funding to expanding thermal treatment of Area #2, if possible. This technology will be reserved for potential use if additional funds are procured for additional cleanup.
2. Reduce the treatment time by operating the heat treatment to target temperature, and then until the rate of contaminant removal drops significantly from the maximum removal rate

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

TTY# MassRelay Service 1-800-439-2370

MassDEP Website: www.mass.gov/dep

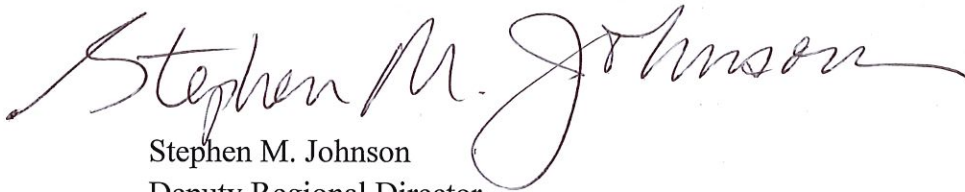
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achieved. (See graph appended to EPA comments) The cost saved from reducing the length of treatment should be applied to expanding treatment Area #2.

3. Reduce monitoring of soil and groundwater to baseline and one round following termination of the operation of the treatment system. As recommended, daily vapor stream monitoring with a photoionization detector should be implemented. Summa canister samples of extracted vapors should be collected weekly for laboratory analysis to determine when the contaminant removal rates drop significantly.

If you have any questions regarding this letter, please contact Rodene Lamkin at 978-694-3354 or by email at rodene.lamkin@state.ma.us

Sincerely,

A handwritten signature in black ink that reads "Stephen M. Johnson". The signature is written in a cursive, flowing style.

Stephen M. Johnson
Deputy Regional Director
Bureau of Waste Site Cleanup

Cc: MassDEP file
Jim Collins, APTIM