

DECOULOS & COMPANY

ENVIRONMENTAL ENGINEERING & LAND PLANNING

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DEP
NORTHEAST REGIONAL OFFICE

Tuesday, June 22, 2004

Bureau of Waste Site Cleanup
DEP - Northeast Region
One Winter Street
Boston, MA 02108

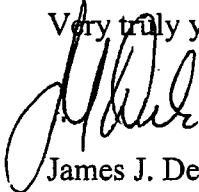
SL = Cerchione

RE: RAO filed for 633 North Main Street, Randolph, MA;
DEP RTNs 3-15188 and 3-15653; NON-NE-03-3A108

Dear Sir or Madam:

Last Friday, June 18, 2004, a Response Action Outcome was hand delivered to your office for the above referenced site. An error has been identified on page 24 of the RAO supporting documentation. Please replace page 24 in the report with the attached page. Thank you.

Very truly yours,



James J. Decoulos, PE, LSP
jamesj@decoulos.com

cc: Speedy Lube, Inc.

6.7 Comparison with Method 1 Standards

6.7.1 Soil

Method 1 S2/GW2 and S2/GW3 Soil Standards are met for all the Contaminants of Concern when averaged over the Site and two rounds of soil sample collection as shown in Table 1. An Activity and Use Limitation has been applied and recorded for the Site. The Activity and Use Limitation allows for the evaluation of Contaminants of Concern using Method 1 S1/GW2 and S1/GW3 standards. Based on a comparison with the Method 1 S2/GW2 and S2/GW3 Soil Standards, a condition of *No Significant Risk* exists for soil exposure under current uses of the Site. The results from the soil investigation represent the exposure point concentrations for the soil points.

6.7.2 Groundwater

Applicable Method 1 GW2 and GW3 Standards are met for many Contaminants of Concern as shown on Table 3. However, the Method 1 Groundwater Standards are exceeded for the following contaminants:

Method 1 GW2 Exceedance:

- C5-C8 Aliphatics in DMW-1, DMW-2, MW-3R
- C9-C10 Aromatics in DMW-2, MW-3R
- Benzene in DMW-1, MW-3R
- Toluene in MW-3R
- m,p-Xylenes in DMW-2, MW-3R

Method 1 GW2 standard exceedances within 30 feet of the commercial building have occurred at DMW-1. The exceedance of the C₅-C₈ Aliphatic range was based upon elevated laboratory reporting levels – not actual laboratory measurements. However, the benzene exceedance at DMW-1 has consistently exceeded the GW2 standard. As described in Section 4.0 on page 14, surface water has been identified flowing directly into monitoring well MW-3.

6.8 Development of Method 2 Standards for Groundwater

To more accurately evaluate site-specific risks, we developed a Method 2 Standard for the VPH fractions and target analytes that exceeded the applicable Method 1 Standard. Development of the Method 2 Standard was conducted according to guidance provided in DEP Policy WSC #02-411: *Characterizing Risks posed by Petroleum Contaminated Sites: Implementation of MADEP VPH/EPH Approach, Final Draft*, October, 2002.

6.8.1 Method 2 GW-2 Standards

Table 4 presents development of the Method 2 GW-2 Standard for the C5-C8 aliphatic range and the C9-C10 Aromatic range. Air data is not currently available for characterizing site specific risks of exposure to MTBE using the Method 2 procedure. The risks associated with MTBE will be evaluated assumed to be incorporated into the C9-C10 Aromatics analysis (the only MTBE exceedance of the Method 1 GW-2 Standard occurred on June 4, 2002).