

REPORT



LSP Opinion

Linking of Release Tracking Number 3-28282 to Release Tracking Number 3-0518

CDM Smith Inc. (CDM Smith), serving as the environmental consultant for Lockheed Martin Corporation (Lockheed Martin), has prepared this Licensed Site Professional (LSP) Opinion to support the linking of Release Tracking Number (RTN) 3-28282 to the main site RTN 3-0518. Both RTNs are associated with coincident releases appearing to have originated due to activities and actions at the former GE Facility located at 50 Fordham Road in Wilmington, Massachusetts (the Site). RTN 3-0518 is classified as a Tier IA site with Permit Number 83052. RTN 3-28282 is classified as a Tier IC site with Permit Number E283132. As the main site RTN is classified as a Tier IA site, the addition of the secondary RTN will not require any change in the Tier Classification of the Site.

This opinion is being submitted to the Massachusetts Department of Environmental Protection (MassDEP) via eDEP in conjunction with a Tier I Minor Permit Modification, which serves to link RTN 3-28282 to RTN 3-0518. For a more comprehensive property and release and remedial history than provided herein, please refer to historical reports for both RTNs.

1.0 Release Tracking Number 3-0518

Analytical data have shown that six primary types of organic and inorganic compounds are associated with RTN 3-0518. These include chlorinated volatile organic compounds (CVOCs), total petroleum hydrocarbons (TPH), BTEX compounds (sum of benzene, toluene, ethylbenzene, and xylene isomers), methyl tert butyl ether (MTBE), metals, and light non-aqueous phase liquid (LNAPL) identified as Stoddard fuel (solvent). The Site was divided into four separate Operable Units as follows:

1. Eastern Parking Lot: localized occurrence of trace amounts of LNAPL (Stoddard fuel) in soils under the water table, localized areas of TPH-impacted soil, and periodic occurrence of LNAPL in monitoring wells between the Tank Farm and Eastern Parking Lot;
2. Impacted Groundwater: CVOCs associated with a release in the Tank Farm area;
3. Outfall 001 and 002: possible remnant metals and petroleum hydrocarbons in sediments; and
4. Tank K: gasoline-related BTEX and MTBE compounds in shallow groundwater.

In 1994, MassDEP classified the Site as Tier IA and provided a permit to authorize comprehensive remedial response actions to meet the requirements of the Massachusetts Contingency Plan (MCP).

While each of the four Operable Units at the Site was addressed under separate MCP response actions until 2006, a Remedy Operation Status (ROS) Opinion was submitted for the entirety of RTN 3-0518 in April 2006. Since that time, semi-annual Status Reports to Maintain ROS have been submitted to MassDEP.

Partial Response Action Outcomes have been submitted for Outfall 001 and 002 and Tank K since the 2006 ROS Opinion was submitted, and work on these two Operable Units is complete. Work under

RTN 3-0518 continues with respect to the Eastern Parking Lot and Impacted Groundwater. A summary of current work under ROS can be found in the Status Report to Maintain ROS submitted to MassDEP on March 08, 2012.

2.0 Release Tracking Number 3-28282

In November 2007, groundwater sampling and analysis for arsenic was conducted at the Site at the request of Lockheed Martin to evaluate emerging contaminants. Sample results from the November 2007 sampling event were transmitted to Lockheed Martin in a TRC report in September 2008. These results identified total arsenic concentrations in excess of the arsenic RCGW-1 Reportable Concentration in groundwater samples collected from four wells at a maximum concentration of 84.4 micrograms per liter (ug/L), which constituted a 120 day Reporting Condition. The groundwater collected from these four wells also exhibited mildly reducing groundwater chemistry, with redox potentials ranging from +3.9 to -83.5 millivolts. These four wells are located in areas with historical petroleum hydrocarbon contamination from gasoline, Stoddard fuel, other

potential due to high organic carbon content coincident with this high arsenic soil/bedrock can cause arsenic dissolution from the soil/bedrock into groundwater to increase the arsenic groundwater concentrations to above background.

- MCP Method 1 GW-1 Groundwater Standard exceedances for arsenic have been detected in

