

**Former Lewis Chemical
Public Comments Response Summary
May 3, 2005**

The City of Boston, Department of Neighborhood Development (DND) received written comments from the Neponset River Watershed Association (NRWA) on April 25, 2005 on the draft Phase II Comprehensive Site Assessment Scope of Work, and the draft Public Involvement Plan. No other comments were received for any of the other documents that were available for comment. Below is a summary of the comments and DND's response. A copy of the comments from the NRWA is attached.

Phase II Comprehensive Site Assessment Scope of Work Comments

1. Site boundaries should be clarified and a better explanation of the term "site" is needed:

The boundaries of the site have not yet been determined. The purpose of the Phase II work is to investigate the extent of contamination at the disposal site. The boundaries of the "site" cannot be clarified until the extent of contamination is defined. The MCP and other applicable guidance will be used to define the boundaries of the site, and the definition of the term "site" is contained in the MCP. The Department of Conservation and Recreation (DCR) property is delineated on the site map. The DCR property is labeled as "Commonwealth of Massachusetts (D.C.R.)" and is located between the Lewis Chemical property and the river. The map legend has been edited to more accurately identify the property boundary.

2. The need for clarification of when a Phase II addendum would be issued:

An addendum will be issued only when we do additional work which substantially alters or extends the scope of work.

3. The Phase II Report and Statement of Conclusions should include any Phase II addendum work, if such an addendum is necessary:

The referenced section of the Phase II Scope of Work will be edited to say "If a Phase II addendum is necessary, the findings gathered from that work will be included in the Phase II Report and Statement of Conclusions."

4. Timing of Stage I Environmental Screening relative to Phase II addendum:

The Phase II field work will be initiated, as outlined in the Scope of Work. If the results of the investigation outlined in the Scope of Work indicate that additional assessment which substantially alters or expands the Scope of Work is warranted, a Phase II Scope of Work addendum will be prepared. The results of this addendum may be used in an

ecological risk characterization, either under Stage I or Stage II. If it is determined that further assessment is not warranted, then a Stage I ecological risk characterization of the river will be performed as part of the Phase II.

Public Involvement Plan Comments

1. Section 4.4 of the PIP should list all documents that may be available for public comment:

The second paragraph of Section 4.4 of the PIP will be edited to state "Documents available for public comment will include but not be limited to the following list of documents and any other submittals required under the MCP:". The intension of the PIP is to make available for comment any document that is submitted to DEP under the MCP.

2. Public comment periods should be extended if requested by the public:

Section 4.4 will also be edited to state the following: "DND will determine the length of the comment period, which will typically be 20 calendar days, but may be longer if warranted by the complexity of a particular document or if requested by the public (any public comment period may be extended, if requested by the public, for a minimum of an additional 20 days)".

3. Exhibit II of the PIP should note activity description and timeframes for activities, even those that may not occur:

The table in Exhibit II intentionally did not address this because it is impractical to include a date and a timeframe for activities that might not occur beyond the Scope of Work currently proposed. If additional submittals are made, the activity description and timeframe will be addressed at that time.

4. Additional comment regarding clarification of site boundaries:

As stated in a previous response, the boundaries of the site have not yet been determined. The purpose of the Phase II work is to investigate the extent of contamination at the disposal site. The boundaries of the "site" cannot be clarified until the extent of contamination is understood.