



May 10, 2016

Mr. Derrick Golden
Waste Management Division. USEPA
Region I
5 Post Office Square
Mail Code OSRR07-4
Boston, MA. 02109-3912

Ms. Jennifer McWeeney
Bureau of Waste Site Cleanup
Massachusetts DEP
One Winter Street, 7th Floor
Boston, MA. 02108

RE: 2015 Operable Unit Three Monitoring Report and Recommended Modifications to 2016 Annual Sampling Round, W/R. Grace Superfund Site, Acton, Massachusetts

Dear Mr. Golden and Ms. McWeeney:

Acton Citizens for Environmental Safety (ACES) was incorporated in the late 1980s to, among other things, provide a forum for Acton citizens to help safeguard the health of Acton residents during the cleanup of the W.R. Grace site in Acton. ACES is currently in the process of becoming "Green Acton, Inc." an environmental non-profit in Acton working on environmental issues. These comments are submitted by the Directors of the soon-to-be-incorporated Green Acton.

Green Acton is particularly concerned about the potential for chemicals such as volatile organic chemicals (VOCs) and 1,4-Dioxane to migrate through the overburden and bedrock groundwater to the Assabet and School Street wellfields. Acton's most productive wells are located in the Assabet wellfield, just across the Assabet River and the Acton/Concord town line. The School Street Wellfield is also an important source of water not far from the Acton/W.R. Grace site. Although the Acton Water District has treatment online for VOCs at the Assabet and School Street wells, these current treatment plants were not engineered to remove 1,4-Dioxane and some of the less volatile chlorinated solvents from the water.

We are particularly concerned about 1,4-Dioxane reaching Acton's drinking water. This chemical is a suspected human carcinogen, known to effect the hepatic, ocular, and renal systems. Removal of this compound is quite difficult and expensive. We strongly believe that it is not in anyone's interest to short-cut the process to understanding the extent of 1,4-Dioxane contamination in and around Acton's wells.

Green Acton encourages EPA and DEP to require continued ongoing monitoring for 1,4-Dioxane throughout the site. We are not in support of the reductions in monitoring for 1,4-Dioxane proposed in the December 21, 2015 letter from Tetra Tech, consultant to W.R. Grace for the Acton site. For example, we note that sampling for 1,4-Dioxane is proposed

to be eliminated for wells AR-14B1 and LF-18D, with the rationale that groundwater from this area flows toward the Assabet River and not the Assabet and School Street Wellfields. Green Acton is concerned that this assumption is based upon very limited data set and a somewhat tenuous understanding of groundwater movement in and around the Assabet River.

Additional data will also be important to the cleanup process once state and federal standards for 1,4-Dioxane are established. More information collected on 1,4-Dioxane and associated VOC concentrations are needed to assure Acton's citizens that this highly mobile and toxic contaminant is not headed towards their drinking water. Additionally, we are not in support of a reduction in monitoring for VOCs that may be found in association with 1,4-Dioxane, such as 1,1,1-trichloroethane [TCA]. We believe that TCA and other VOCs may be good indicators of associated plumes of 1,4-Dioxane due to the widespread historical use of 1,4-Dioxane as a stabilizer for several of these chlorinated solvents. And many of these VOCs have health effects themselves, and a better understanding of their presence in groundwater around Acton's drinking water wells is important.

Lastly, we encourage EPA and DEP to investigate a solution to the 1,4-Dioxane contamination at the site. We urge EPA and DEP to ensure that remediation efforts fully address the treatment and removal of these chemicals and halt their migration towards the Assabet and School Street Wellfields. In addition to the thousands of people who could be exposed to 1,4-Dioxane and other chlorinated solvents should they reach Acton's wells, there are individuals on private wells in the area who could be harmed by unmitigated spread of 1,4-Dioxane and other chlorinated solvents.

Thank you for this opportunity to comment,

Jane Ceraso (via email)
on behalf of the Directors of Green Acton

Green Acton is a group of volunteers working to conserve local resources and protect our environment for future generations. Through education and advocacy, we aim to: reduce, reuse, and recycle energy and materials; promote sustainable, environmentally sound practices; and support local food production and consumption.