

# Water Supply District of Acton

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VIA HAND DELIVERY  
(Copy by US Mail)

Mr. Andrew Wheeler  
Administrator  
United States Environmental Protection Agency  
Headquarters  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, N.W.  
*Mail code:* 1101A  
Washington, DC 20460

October 22, 2019

**RE: Support of Request to Reopen the Record of Decision (ROD) for the Acton/Grace Superfund Site, Acton and Concord, Massachusetts**

Dear Administrator Wheeler:

The Acton Water District (AWD) is a community public water system serving the approximately 22,000 inhabitants of Acton, Massachusetts. We operate 22 groundwater wells through five water treatment plants. Of note, approximately 45% of our source of supply is obtained from groundwater sources that are impacted by two Superfund sites, the Acton/Grace (Grace) site and the Nuclear Metals, Inc. (NMI) site. We are writing this letter in support of the request being made by a local environmental advocacy group, Green Acton, through the Center for Health, Environment & Justice organization. The elected Board of Water Commissioners unanimously voted on October 7, 2019 to support Green Acton's request and authorized this letter to be submitted.

Monitoring for 1,4-dioxane has been occurring at the Grace site and in the AWD supply since the mid-2000's. During that time, we have been proactive in understanding the laboratory analytical methods, health concerns, cleanup actions, and treatment technology developments. As an emerging contaminant, all of these areas have been evolving since we first learned of this contaminant of concern. During 2015 and again in 2016, we requested of Region 1, that the ROD be reopened to include 1,4-dioxane as a site contaminant with appropriate characterization and remedial actions.

It should be obvious to the United States Environmental Protection Agency (US EPA), as it is to the AWD, that the groundwater sampling results demonstrate a critical need to establish an enforceable cleanup standard for 1,4-dioxane at this site. When the ROD was approved by US EPA in 2005, the presence and concentration of 1,4-dioxane were not understood at the Grace site nor at the AWD public water supply wells. 1,4-dioxane is commonly a byproduct of the chlorinated solvent contamination at this site and, therefore, the responsibility of Grace.

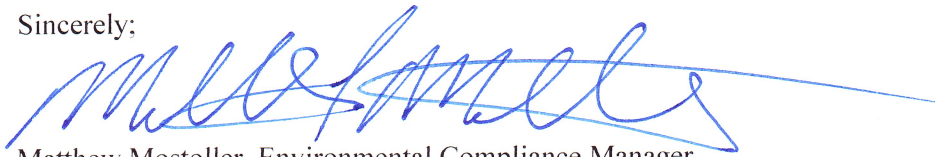
The current 1,4-dioxane data post-dates the ROD, and the threat to the AWD drinking water wells is ongoing. The Massachusetts Department of Environmental Protection (MassDEP) Fact Sheet dated May 8, 2015 describes the Office of Research and Standards Guideline (ORSG) value of 0.3 ug/L, or parts-per-billion (ppb), for 1,4-dioxane set by using the most current US EPA toxicity information. The Massachusetts Contingency Plan cleanup level is 0.3 ppb. The closest thing to an enforceable cleanup standard for the Grace site is the 3.0 ppb discharge limit at the landfill area treatment system which extracts contaminated groundwater from the bedrock, partially treats it, and discharges it back to the overburden aquifer. Following the Remedial Investigation/Feasibility Study for the NMI site, a preliminary remediation goal of 0.46 ppb was set for that neighboring site. This was developed using US EPA's own risk data and processes for the same sensitive receptors, the drinking water supply for Acton.

It should be noted that Monitored Natural Attenuation (MNA) is, to some extent, supplemented by the active pumping and treating of site groundwater by the AWD wells. Additionally, 1,4-dioxane is not remediated through MNA as demonstrated by US EPA. A stated objective of the current ROD is "to protect the municipal water supply by reducing the areal extent of contamination". The AWD views 1,4-dioxane as a site contaminant and therefore again, requests that the ROD be amended to be consistent with Massachusetts standards, or at least the PRG for the NMI site, and include active cleanup to protect all of our impacted source waters from further impacts.

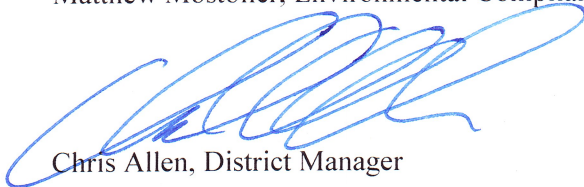
Ongoing work at the NMI site shows how establishing a ROD and including 1,4-dioxane as a part of the remedial actions can be beneficial. Under a Non-Time Critical Response Action (NTCRA), the NMI site management team has investigated, designed, and begun operating a pump and treat system to cut off a plume of 1,4-dioxane that was impacting two of our public water supply wells located in the vicinity of the Superfund sites. This proactive approach took cooperation between the US EPA, State regulators, and responsible parties prior to the consent decree being finalized.

As an advocate for our customer's concerns, AWD emphatically states that better efforts to understand this dynamic site are required now and in the future despite the major improvements in site conditions over the past two decades. As an emerging contaminant, 1,4-dioxane cannot continue to be separated and excluded from the ROD-related activities, especially in this area in proximity to a large number of public groundwater supply wells where no reasonable alternative exists to provide drinking water to the residents of Acton. It is our hope that you will thoroughly consider the request being made by Green Acton.

Sincerely;



Matthew Mostoller, Environmental Compliance Manager



Chris Allen, District Manager

Cc: Acton Board of Health  
Acton Board of Selectmen  
Acton Water District Commissioners  
Green Acton