



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912**

Memorandum

Date: April 2, 2014

Subject: Approval of draft Human Health Risk Assessment and Conditional Approval of Draft Remedial Investigation Report for the Nuclear Metals Site in Concord, Ma.

To: Bruce Thompson, Project Coordinator, *de maximis, inc.*

From: Melissa Taylor, Project Manager, Massachusetts Superfund

EPA has no further comments on the draft Human Health Risk Assessment and therefore gives final approval for the aforementioned document. EPA also hereby gives conditional approval of the draft RI Report (dated September 5, 2013) provided the following comments are addressed:

1. Section 3.3.4, Page 3-8, last paragraph (description of the W.R. Grace Site Operable Unit 3).
2. It is understood that the water levels in Muskrat Pond and Turtle Pond were reportedly equalized to reduce the horizontal gradient beneath them; however, there is no indication that the ARS effluent or the uncontaminated supplemental water was discharged to those two ponds. Recommend the 5th, 6th, and 7th sentences of the paragraph be revised as follows:

“One of the wells pumped uncontaminated water at a rate of 230 gpm which was combined with the ARS effluent and discharged to Sinking Pond. Sinking Pond is located between the W.R. Grace Site and the Assabet IA and IIA supply wells (Figure 3.3.3). Discharge to the pond created a groundwater mound and hydraulic barrier intended to prevent migration of contaminants to the supply wells.”

3. Section 4.9.3, Page 4-14, second paragraph of bullet describing AOI 2 and AOI 4. In the first sentence, location TS-RI-02S07 should be added to the list of samples that exceeded RSLs for PCBs. In the last sentence, location TS-RI-02S07 should be added to SB-RI-02006 as an exception to the statement that the vertical extent of PCB contamination exceeding RSLs has been delineated vertically.

4. Figure 4.9.12 (page 13 of file Fig Sec 4 Part 1 updated Sept 2013.pdf) correctly shows TS-RI-02S07 as exceeding the RSL, as listed in Table 4.9.4, page 99 of 177 (page 607 of file Tables Sec 4 Part 1 updated Sept 2013.pdf)
5. Section 4.9.3, Page 4-16, last paragraph of bullet describing AOI 11, and Figure 4.9.23. The last sentence states that PCB concentrations exceeding RSLs are constrained “to the southeast by soil boring SB-RI-11028 (ND).” This location is not non-detect and exceeds the RSLs, and the PCB concentrations are constrained further to the southeast by soil boring locations SB-RI-11007 and SB-RI-11008. The text should be corrected.
6. Figure 4.9.23 (page 9 of file Fig Sec 4 Part 2 updated Sept 2013.pdf) correctly shows SB-RI-11028 as exceeding the RSL, as listed in Table 4.9.5, page 106 of 118 (page 791 of file Tables Sec 4 Part 1 updated Sept 2013.pdf)
7. Section 4.9.4.1, Page 4-23, bullet describing AOI 9. The text states that location SS-RI-14100 is located between AOI 5 and AOI 9, but this sample location is between AOI 5 and AOI 10. Please correct.
8. Figure 4.9.33 (page 4 of file Fig Sec 4 Part 3 updated Sept 2013.pdf) shows the location of SS-RI-14100.
9. Figures 4.9.27 and 4.9.29. The figures incorrectly list AOI 7 (in the lower left corner of the figure) within the building structure outline, and should be listed as AOI 13. Please correct.
10. Figures 4.9.27 and 4.9.29 are on pages 13 and 15 of file Fig Sec 4 Part 2 updated Sept 2013.pdf
11. Figure 4.9.32. The Figure number in the title block should be corrected so it does not obscure the figure title.
12. Figures 4.9.32 is on page 3 of file Fig Sec 4 Part 3 updated Sept 2013.pdf