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September 18, 2020

Mr. Christopher Smith
Remedial Project Manager
EPA Region 1
5 Post Office Square, Suite 100
Mail Code OSRR 07-4
Boston, MA 02109-3912

Subject: Nuclear Metals, Inc. Superfund Site, Concord, Massachusetts
Remedial Design Work Plan – Implementation Plans
Responses to Comments and Revised Implementation Plans

Dear Mr. Smith:

Enclosed for your review and approval are Responses to Comments (RTC) received from EPA on the Implementation Plans dated September 7, 2020.

Please let me know if you have any questions.

Sincerely,

Bruce Thompson

Attachment – Responses to Comments

cc: Garry Waldeck, MassDEP
Settling Defendants
Mark Kelley, PE, Haley & Aldrich, Inc.
Carl Elder, PE, Geosyntec Consultants

Responses to Comments on Implementation Plans dated September 7, 2020

Cooling Pond, Sphagnum Bog, Septic Field and Landfill Excavation Evaluations Implementation Plan

Section 2.1, Paragraph 2: Typo, change "determine" to "determined."

Section 2.2, Paragraph 2: Remove reference to the “Overall” drilling implementation plan.

Section 2.2. Paragraph 3: Update the dates of these RDWP documents to revised/approved dates.

Section 3.1, last Paragraph: Change "Up to 2 rounds" to "Up to 4 rounds" based on response to EPA's comment discussing capturing seasonable variability (Appendix A, comment 28)

Section 3.3, First Bullet: Correct typo "can be access safely."

Response: Comments have been addressed.

Depleted Uranium Penetrator Investigation

Overall: No specifics are provided on how the top 6 inches of soil will be scraped back. Additional details are needed (e.g., how will excavation be performed, will equipment not be allowed to travel over excavated sections, how will the depth of excavation be confirmed to be 6 inches, etc.)

Overall: By calculation, approximately 3,000 cubic yards of material will be excavated. No information is provided on how samples will be collected (frequency, composite of multiple points, etc.). Additionally, a plan is needed for if soils do not pass PRGs and are not suitable for use as backfill. For example, PAHs may exceed PRGs in areas of soil that are adjacent to asphalt parking areas and subject to runoff.

Response: Comments have been addressed.

Soil and Sediment Sampling Implementation Plan

Section 1: Update the dates of the RDWP documents to match revised/approved dates.

Section 2.2, Paragraph 2: Remove reference to “Overall” drilling implementation plan.

Section 4.2, Paragraph 2: Consistent with the response to EPA's comments on Appendix A of the RDWP, correct the depth intervals listed so that the missing depths are included (EPA Appendix A Comment #25).

Response: Comments have been addressed.

Holding Basin Investigations Drilling and Sampling Implementation Plan

Section 2.2, Paragraph 2: Update the dates of the RDWP documents to match revised/approved dates.

Response: Comments have been addressed.

Treatability Study Sample Collection and Holding Basin Geotechnical Boring Implementation Plan

The only mention of a how a drill rig would be mobilized into the Holding Basin is presented in Section 1.1, item 5.

The driller will mobilize the drilling rig into the HB via the ramp along the southeastern slope of the basin (or propose other means for approval). This ramp has historically been used to mobilize drilling equipment in and out of the basin, and it is expected that mats (ex. Mabey mats) will need to be placed to provide additional traction for the drilling rig and protect the liner along the ramp. If the driller determines that drilling equipment cannot be safely driven into the HB via the ramp, the project team will explore other means, such as using a crane to lift and place the drilling rig in the HB.

More detail appears to be needed, including but not limited to: an evaluation of whether of this “ramp” remains sufficient to mobilize equipment in and out of the basin, more detail regarding how equipment and personnel would actually move in and out of the basin during operations, and more specifics regarding how a crane would be used if necessary.

Response: Comments have been addressed.

Implementation Plan For Drilling and Pump Testing in Bedrock

No comments

Response: Noted.