



TOWN OF BILLERICA

DEPARTMENT OF PUBLIC WORKS

250 Boston Road

North Billerica, Massachusetts 01862

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October 21, 1981

United States Environmental Protection Agency
Region I Permits Branch
John F. Kennedy Federal Building
Boston, Massachusetts, 02203

Gentlemen:

This is a request for a Public Hearing to reconsider the granting of a National Pollutant Discharge Elimination System (NPDES) Permit to W. R. Grace Company for discharging polluted groundwater from Acton Water Supply District Assabet Municipal Wells #1 and #2 into Assabet River (Permit Application No. Ma 0027421).

The Town of Billerica uses the Concord River, about ten miles downstream from the proposed discharge site, as the raw water source for its drinking water. It is of utmost importance for the Public Health and safety of the 36,000 inhabitants of the Town of Billerica to keep the drinking water source uncontaminated from industrial organic pollutants that are proven to be cancer causing agents or toxic to living organisms.

In order to protect the drinking water quality the supervisory staff of the Billerica Water Treatment Plant requests a Public Hearing for the clarification of the following issues.

1. It is feared that the actual level of pollution in the Assabet Wells 1 and 2 is much higher than the levels indicated by tests performed in 1979, so that if the polluted water is pumped into the Assabet River, the use of the River as a source for drinking water becomes unacceptable.

Any amount of chloro-organics, as 1, 1-dichloroethylene, is a hazard to health as compounds of this type are cumulative poisons. These compounds are not excreted, but remain in the body where they accumulate in fatty tissues and liver of any living organism. (plankton, fish, waterfowl, or man).

2. According to the NPDES Draft Permit Application the discharge to the river is to be monitored by taking weekly grab-samples from the two wells, from the Assabet River just downstream of the discharge, and from the Assabet River 6000 feet downstream of the discharge. We are concerned with the fact that according to the proposed monitoring scheme the pollutants will be in the river before any violation of the discharge limits can be detected. An alternate and for us more acceptable way of monitoring the discharge would be to catch the

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sprayed polluted waterstream in a retention basin for sampling and analysis prior to discharge to the Assabet River. This modification would assure that the water quality of the Assabet and Concord Rivers would be safeguarded.

Based upon the uncertainty in the levels and constituents of the contaminants in Assabet Wells and 1 and 2 and the possible inadequacy of the discharge method and monitoring, further clarification at a hearing is in the Public interest of the users of Concord River water downstream of the proposed discharge.

Respectfully yours,

Leon Garrant ^{RAB}

Leon Garrant, Superintendent Water System

R. A. Bento 663-2235

Richard Bento, Asst. Superintendent

H. Kirsti Valge

Kirsti Valge, Treatment Chemist

cc:
G. McCall
P. Talbot
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R. Sattler
J. MacLeod
A.R. Gilman

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