

6.3.25



TOWN OF BILLERICA

DEPARTMENT OF PUBLIC WORKS

250 Boston Road

North Billerica, Massachusetts 01862

January 29, 1982

U. S. Environmental Protection Agency
Region I - Permits Branch
J.F.K. Federal Building, Room 2109
Boston, Ma 02203

Attention: Veronica Harrington

We have reviewed the draft permit and proposed solution submitted by W.R. Grace & Company on January 18, 1982. The permit referred to is Federal Permit No. MA 0027 421.

We also have attended several meetings since the hearing in Acton on January 6, 1982, in order to arrive at a solution that is acceptable to all parties involved. Before commenting on the draft permit and presently proposed solution we present a solution that will be acceptable to all the downstream public water supply users, EPA, The Commonwealth of Massachusetts, The Town of Acton and the Acton Water District.

Current data available shows that the Erikson Wells being presently used by the Acton Water District contain higher levels of the same organics that are present in Assabet Well No. 1. Most of the organics in the Erikson Wells are double the levels found in Assabet No. 1. The people of Acton are presently drinking the water from Erikson Wells.

We submit that the present proposed solution be revised by not pumping Assabet No. 1 into the Assabet River but by putting in back on line as a source of supply for the Acton Water District. Since the well is less contaminated than the Erikson Wells it will improve the quality of water presently being used by the Acton Water District. It will also not waste a valuable resource in the area.

By making this minimal change in the presently proposed solution the downstream water supply users will be satisfied and no NPDES permit will have to be issued as their will be no discharge to the River.

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W.R.GRACE
ADMINISTRATIVE RECORD

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We have reviewed the area and found that if any treatment is found to be necessary in the future it can be contained on less than an Acre of adjacent land.

This solution will also eliminate the testing of the Assabet River during the 90 day test.

Following are our comments on the existing draft permit and existing solution which we are requesting to be revised.

DRAFT PERMIT

Page 1 of 7 Part I

Reference to well number 2 should be deleted.

Page 2 of 7 Part I

- a. All references to well number 2 should be deleted.
- b. Under discharge limitations all references to numerical limits should be deleted and either none detectable or zero be substituted, we feel that each term means the same.

Page 3 of 7 Part I

- a. Delete reference to Assabet Well No. 2.
- b. Add requirement of testing monitoring wells around Well No. 1.
- c. Delete optional from testing program entirely.
- d. Add requirement of daily testing for first two weeks.
- e. Add that Town of Billerica will be given copy of sampling plan prior to approval and be involved in approval of plan.

Page 4 of 7 Part I

- a. Delete reference to Well No. 2.
- b. Delete reference to May 14, 1981 plan and substitute January 18, 1982 submittal.

Page 5 of 7 Part I

We feel that monitoring results should be available daily and that releases to the Public be made on a weekly basis. The Town of Billerica be added to the reporting list.

Page 7 of 7 Part I

Add a statement to the effects that the pumping test program shall be suspended immediately upon violation of any of the requirements of this permit.

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Pages 1 thru 19 Part II

Appears to be the standard Boiler Plate of the EPA and we find nothing objectionable in Part II.

January 18, 1982, Proposal

This proposal was reviewed on the basis of our comments at the January 6, 1982, hearing in Acton, Massachusetts.

Review of test results made available to us shows that by pumping only Assabet Well No. 1 to the River and using spray aeration should provide the results that we request under discharge limitations; that is substitution of either none detectable as it is commonly known that if a test is being run looking for a certain organic chemical it is common practice to say none was detected instead of saying zero.

By pumping both Assabet Well No. 2 and Grace Well No. 3 back to Sinking Pond you not only remove the more contaminated of the Wells from the River discharge but you set up a system that created a barrier between the river and the contaminated aquifer. The pilot treatment facilities is an excellent step in determining a good Aquifer cleanup program.

The monitoring well ring around Assabet Well No. 1 is a good early warning system. The gap in the ring should be filled in with another well. From our discussions we understand why the gap was left there, but we feel it is more acceptable if this gap is filled.

The question of quicker analysis and availability of test results is one of our main concerns. By locating a gas Chromatograph on the site and testing daily it will insure proper operation of the proposed pump testing scheme. We expect that this gas chromatograph will be the most sophisticated type of equipment currently on the market.

The one or two day trial run spraying the water over land will give us a good perspective of the test and enable any corrections or changes that may have to be made to be done prior to discharging to the river.

We feel it is extremely important that test results be available to the Town of Billerica almost immediately. This way we can be assured and in turn we can assure our citizens that the test is conforming to the issued permit. The ability to be involved with the review of the testing program prior to acceptance would greatly enhance our ability to accept the entire permit program.

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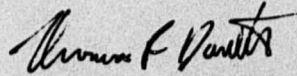
CONCLUSIONS

Our review of the proposed permit (from the beginning) has been based on two areas; first that the proposed process will have no detrimental effects on the drinking water supply of the Town of Billerica, that the present treatment process used by the Town of Billerica will not have to be altered, that there will be no hazard to the users of Billerica's water and no increased costs to the residents of Billerica; and secondly that steps must be taken to clean up the Aquifer before the contaminants travel through the ground and get into the river in such quantities that Billerica's water supply would be in jepordy.

From the beginning we have not been opposed to the cleaning of the wells and the Aquifer only to the proposed solutions.

You can respond to the legitimate fears of the downstream users by adopting the solution presented in the first few paragraphs of this correspondence.

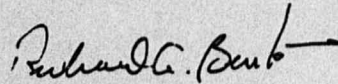
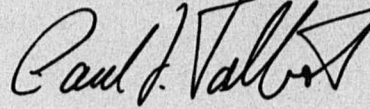
Very truly yours,

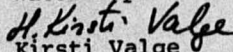


Thomas F. Doucette, P.E.
Superintendent, Public Works

Approved:

Paul Talbot, Town Administrator



cc; Richard A. Bento,
Water Superintendent

Kirsti Valge
Treatment Chemist

W.R.GRACE
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JAN 29 1982
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