February 6, 2023

Raymond Cadorette, Project Manager
APTIM
150 Royall Street
Canton, MA, 02021

Re: Public Comment, Massachusetts Contingency Plan Phase III Remedial Action Plan, MassDEP Site #3-0485

Dear Mr. Cadorette,

We are writing to submit our comments on the Phase III Remedial Action Plan recently presented to stakeholders at a public meeting on January 24, 2023.

In public comments responding to the Phase II report, we urged Varian and APTIM to work closely with the impacted neighborhood to develop appropriate remediation in the area of Stream A; to prioritize remediation plans that address residents' and commercial property owners'/users' concerns about previously under-addressed risks, including down-gradient migration; and to prioritize remediation plans that address migration of dense nonaqueous phase liquid (DNAPL) in bedrock. We are grateful that Phase III Remediation Action Plan includes a remediation strategy for the seep area and groundwater flow path. We remain concerned about the selection of remediation strategies, and are writing to encourage more ambitious action.

Specifically, we ask that Varian and APTIM consider and address the following concerns:

1. For remediation at the **PSL-10 area**, where CVOCs have been identified and there is a risk of downgradient migration in groundwater, we are deeply concerned about the selected alternative (monitored natural attenuation, MNA) and urge Varian/APTIM to reevaluate this strategy. The report states that the timeframe of 12 years "is not unacceptable." Waiting 12 more years to see whether the contamination dissipates on its own is unacceptable to the impacted community. We strongly urge you to consider alternatives 1 and 2, which are estimated to see progress in as little as 14-17 months and reach target reductions in 3-6 years. The main goal of this treatment is to reduce concentrations in the groundwater flow area to the west - the homes and businesses whose welfare is of the utmost importance to us. Alternatives 2 and 3 have similar total scores in the report's methodology, with the driver of Alternative 3's one-point-higher ranking over Alternative 2 being the cost of implementation, despite Alternative 2's greater effectiveness, timeliness, and green benefits. It appears that Alternative 3 has been selected primarily to save the responsible parties money, which we as the impacted community do not find a compelling reason to wait an additional decade to reduce the risk of groundwater contamination. It is also puzzling that MNA was not selected as a strategy for the downgradient plume, but is deemed acceptable for the PSL-10 area.
2. We are alarmed by the estimated remedial timeframes presented in the report for the **Building 3 site**, and urge Varian/APTIM to act with more urgency than the proposed strategies. The estimated timeframes of 4-10 years for any of the alternatives to reach the desired level of treatment suggest a "business as usual" approach rather than the solution we as a community

and MassDEP are expecting. What other steps could Varian/APTIM take to reduce these timeframes?

3. For remediation of the **Building 5 site**, Alternative 1 appears to be the only alternative that meets the community's goal of a timely solution, since Alternatives 2 and 3 are estimated to take 4-7 years to reach target levels of remediation. It appears that costs being 65-150% higher is the sole reason for selecting Alternative 3 over Alternative 1, which would be completed within one year, potentially meeting the date set by MassDEP for a permanent solution to the contamination at this site.
4. The Phase III report states that soil vapor extraction (SVE) systems in Building 3 and Building 5 have succeeded in lowering the impact of VOCs to "No Significant Risk." Will the remediation plans for Building 3 and Building 5 reduce the pathways for VOC exposure to the point where workers can safely be present without SVE systems in operation, or is the intention for SVE systems to remain necessary on site permanently? The Phase III report also notes that further monitoring is needed in at least one property on Tozer Road and one property on Longview Drive. We urge you to implement remediation plans at these sites to ensure that the workers, customers, and residents of these properties are not at risk.
5. The report notes that there is a potential significant risk of harm to individuals, such as future construction workers, exposed to groundwater in one area of the 150 Sohier Road property. The remediation plan suggests that instead of reducing that risk by setting a target of 0.56 mg/L TCE in the shallow groundwater, Varian/APTIM plan to set a treatment goal of 5 mg/L TCE in groundwater. We would appreciate further discussion of why treatment should stop there, at a point that would require continued Activity and Use Limitation-specified protective measures for future workers. We would encourage the lowest feasible treatment goal - ideally, a treatment goal of making the site safe for workers.

As elected officials, we are relying on technical expert reviews. We would like to highlight two reviews that suggest the current Phase III report is insufficient:

- A MassDEP review of the Phase III report (dated January 18, 2023) found deficiencies in the level of detail and justification provided by Varian/APTIM, particularly with respect to the selection of MNA as the strategy for PSL10, the implementation plans for ISCO where selected, the cost estimates for alternatives at Building 3, and the cost estimates for alternatives at the Downgradient Plume. We echo the MassDEP's concerns and expect they will be addressed in a revised Phase III report.
- The results of an independent study of the downgradient stream by Brown and Caldwell, commissioned by community members, do not appear to have been factored into the Phase III report. Given that data gaps have been an impediment to reaching a permanent solution to date, this additional information is particularly valuable and we encourage Varian/APTIM to make use of this information in weighing the risks to community members and designing remediation strategies.

Thank you for your consideration.

Sincerely,