

September 25, 2017

Dear Ms. Hughes and members of the Concord Envision team,

The Concord 2229 Main Street Oversight Committee would like to submit our comments for the Concord Comprehensive Long Range Plan.

The 2229 Main Street Oversight Committee was formed to monitor the cleanup at the Superfund site previously occupied by defense contractor Starmet, formerly Nuclear Metals, Inc. (NMI). The committee's most pressing job right now is to see that this property is cleaned up and redeveloped quickly, before EPA possibly loses the resolve to carry forward with its Record of Decision (ROD) it made in September, 2015, after 15 years of input and pressure from Concord citizens, local environmental groups and Town government. With proper oversight, this property has the potential to be a great asset to the Town.

There are several key ingredients to realizing this asset. The Town needs show plans for the use of this site as soon as possible, but certainly before the final remediation of the site. With a reuse plan it may be possible to leverage a faster cleanup, and to tailor the remediation to the future use of the site. However, if the Town is too slow to get redevelopment plans in order, EPA could decide to reopen the remediation decision process to accommodate other 3rd party reuse proposals. For example, EPA could theoretically decide to landfill contaminated soils and hazardous waste at the site, instead of shipping the removable waste off the site. This could dramatically reduce the usable space at the site, and potentially impact the town in a number of ways including reputational impacts on the Town and of West Concord, in particular leading to possible reduction in property values in the area's residential neighborhoods.

Recently the EPA through the Administrator's Task Force reevaluated its national Superfund program¹ and the Committee believes that the results of that reevaluation provide opportunity for the Town and the Site, as detailed below. This included the possible elevation of the importance of the site to EPA through inclusion as a "Pilot Site" under the recommendations of the Task Force. ***This opportunity can only be realized through more active reuse planning by the Town, possibly taking ownership of the Site by the Town, and through engagement with EPA.***

Background. The superfund site occupies parcel 2970-1, approximately 46 acres along Main Street (Route 62), at the extreme South Western edge of Concord, near Acton and Maynard, two miles from West Concord center. The property also borders residences along Cranberry Lane, Maplewood Circle, Hayward Mill Road, and Border Road. Residences on Black Birch Road, the Thoreau Club, and Minuteman Arc are also close neighbors, with a narrow border of Concord conservation land between the Starmet site and these properties along Forest Ridge Road. There are numerous walking trails through the woods near this site. It is currently zoned for light industrial and limited residential use.

This property at 2229 Main Street was used for development and research of specialized metals, in particular depleted uranium and beryllium, until the site was abandoned in 2011. Currently, all contaminated buildings at the site have been removed. Contaminated foundations and slabs have been coated and covered with tarps. At this point, the construction trailers, sampling well-heads, and fences are the only structures that remain at the site. There are soils contaminated with depleted uranium and PCBs in close proximity to the building slabs that will need to be dug up and removed in addition to the contaminated slabs themselves. There is an old landfill at the site that will need to be

¹ See <https://www.epa.gov/superfund/superfund-task-force-recommendations>

dug up and remediated. But all of the contaminated areas are fenced and tarped, so that a person cannot be accidentally exposed to contaminated materials at the site. In 2015, EPA published their Record of Decision (ROD) specifying that these contaminated soils, slabs, and waste will be dug up and disposed of off-site. EPA is currently in negotiations to secure funding for this remediation project.

Overview of Site Risks. Investigations at the Site have revealed also plumes of depleted uranium and organic chemicals in the subsurface that could eventually threaten water resources and supplies outside the boundaries of the 2229 property, particularly the Assabet River and Acton town wells. There is a large mass of depleted uranium mixed with soil extending down to the bedrock below the old holding basin adjacent to the buildings which is the source of a slow moving depleted uranium plume. The 2015 ROD specifies that this source will be chemically sequestered so that it will not leach into groundwater, surrounded by a waterproof barrier like concrete or bentonite, capped, and covered with 10-15 feet of clean fill.

A more urgent issue is the organic chemical plume that has already moved off the site, in the direction of the Assabet river. The contractors at the site have already installed a remediation well that could prevent 1,4-dioxane in groundwater from impacting the Acton drinking water wells on the other side of the river. But this well does not remove the 1,4-dioxane, it just discharges it into the river. So eventually there will be other wellheads and small treatment buildings that will actually remove the 1,4 dioxane and other volatile organic compounds from the water. Complete removal of the organics from the groundwater is a finite process that could be completed in 20-40 years, so during that time it will be important that pumps and treatment systems be maintained and protected. The ROD requires that that funds will be set aside to maintain and operate the groundwater remediation systems and to test for and prevent contaminated vapors from affecting future buildings at the site before the groundwater remediation is complete. But EPA would like there to be a committed owner who will actively participate in the cleanup process, assure that pipes and wells are not disturbed during the remediation, and enforce restrictions on digging new wells at the site.

Site risks have been mitigated to some extent through interim actions already undertaken or underway in advance of the larger site cleanup as specified in the Record of Decision. All site risks are to be mitigated or eliminated through the full implementation of the ROD.

In 2015, Concord Town Meeting voted to allow the Select Board to take ownership of the property at 2229 Main Street. Negotiations are underway to fully fund the main cleanup. Once the remediation of the depleted uranium at the site begins, it could theoretically take less than five years, so the uranium remediation might be completed and the site could be redeveloped before the volatile organic chemicals have been eliminated from the groundwater. There are also parts of the property that are not contaminated at all, which could be redeveloped even sooner.

Opportunities

Cleanup, restoration, and reuse of the Site should be a very high priority for the Town in order to realize the potential assets that sustainable development of a 46 acre parcel of ecologically and economically valuable land in the Town. One opportunity to accelerate and realize that value would be for the Town to engage EPA in the designation of the Site as one of its "Pilot Sites" under the Superfund Task's Force's recommendations. The Site combines many ingredients that specifically received high priority as recommendations by the Task Force among which include the following:

- It has a Record of Decision (ROD) in place

- It is expensive (>\$50 million) placing it squarely on the Administrator's list of site requiring his oversight and approvals.
- A number of interim actions have already been undertaken or are in progress
- Innovative technologies to expedite cleanup are proposed for use at the site to stabilize the uranium plume
- There is a keen interest by the Town in Site reuse and development
- The Site has involvement of Federal parties
- The Town is in need of "comfort" and to reduce its risk and uncertainty if it takes ownership of the site. The recommendations are clearly focused on providing these assurances through "comfort letters"

So, this is a gateway opportunity to facilitate the realization of other specific opportunities.

The Starmet property formerly had large industrial buildings and extensive parking in level lots, so there is a lot of buildable area at the site. The site includes wooded areas and a sphagnum bog. The Comprehensive Long Range Planning Committee should consider these potential future uses of the site:

- **Residential Uses**– the ROD specifies that soils at the site will be cleaned up to an extremely protective interpretation of the residential cleanup level. While that is theoretically safe for babies, it might not be particularly inviting for growing families. But this site is less than half a mile from the Acton Stop & Shop and Rite-Aid, and close to the Thoreau Club – a great location for adults who might not be able to drive, like disabled or elderly adults. With good access to the main road, this property still backs up to the Thoreau Hills community. This is an ideal site for an assisted living facility, a nursing home, a group home, or a retirement community.
- **Outdoor recreation & Recreation buildings** – the large flat spaces at the site lend themselves to playing fields or a field house. The site is almost adjacent to Minuteman Arc, whose clients are in need of indoor exercise space – a field house could be used by MMA and the Council on Aging during the day, by CCHS in the afternoon for sports, and by Concord Recreation in the evening for exercise classes or basketball.
- **Conservation & Education** – the wetlands at the site provide a natural setting for outdoor classrooms for environmental education. A thousand year old sphagnum bog on the site provides a unique opportunity to study this rare ecosystem. There are walking paths from the Thoreau Hills community that could be extended through the property to provide access to the bog and other beautiful wetlands.
- **Transportation hub** – This site is on Main Street. If Concord is considering connecting up with other local towns for transportation, this is close to the road, but isolated. It is a great place for vehicles to connect at the end of their routes – and especially well located if any of the other potential uses of this site are planned.
- **Truck/bus parking & maintenance** – the site has plenty of large flat spaces for vehicle parking and maintenance facilities, further from the Assabet River and Mill Dam than many of the other vehicle parking facilities that Concord already operates.
- **Energy production** – buildings and parking at the site can be configured easily with solar panels.
- **Dog Park** – the site is easily accessible by trails from Thoreau Hills. Residents already use these trails to walk their dogs and would appreciate a designated, dog friendly area. There are locations at the site that could be used for this purpose almost immediately without disturbing potential remedial activities.

The current CLRP SWOT considers many of these opportunities by listing the 2229 Main Street site as a potential site of a new village center, as a site for transit oriented development, as a mixed land-use site, and as a place with natural beauty. ***The committee would like to point out that ALL of these options could be realized at this site.***

Threats

The current CLRP SWOT also considers the 2229 Main Street site as a possible brownfield and a potential source of exposure to toxins, if the remediation does not proceed according to the established plans (i.e., the ROD). But the SWOT does not adequately express just how much of a threat to Concord this site could become if the Town continues to put off our plans to redevelop this site.

This site has great potential for Concord, but a lot depends on the remediation happening fast. The current plan is that contaminated soils will be shipped to a proper mixed waste disposal area and not buried at the site. But given the political atmosphere right now, there is concern that the plan might change. If this site becomes a hazardous waste landfill, it could dramatically impact the property values in West Concord, and affect the reputation of the community. If Concord takes too long to take possession of this site, our Town risks that another potential owner could come forward, who might want to use this site as a radioactive waste transfer or disposal site. EPA might simply take so long to get this site cleaned up that the property remains contaminated for our lifetimes, at the bottom of a list cleanups that EPA will never get around to.

While the contamination at 2229 Main Street does not directly threaten Concord's town water supply, it does threaten the availability of drinking water in neighboring towns. Concord's main water supply is a reservoir in another town. The Town needs to consider that drinking water supplies are a limited resource, and support efforts to restrain and remove contaminants that are travelling off the site as we expect other towns to protect our water supply.

The 2229 Main Street Oversight Committee cannot stress enough how important it is that clear, definitive plans for redeveloping the superfund site are spelled out in this Concord Comprehensive Long Range Plan. If we wait another decade to plan for the use of this site, we risk undoing all of the work we have done to prevent this site from impacting our West Concord neighborhood.

Thank you,

Pam Rockwell and Paul Boehm for the Concord 2229 Main Street Oversight Committee