



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND REGION
FIVE POST OFFICE SQUARE, SUITE 100, BOSTON, MA 02109**

September 15, 2020

Bruce Thompson
de maximis, inc.
200 Day Hill Road, Suite 200
Windsor, CT 06095

Re: Approval of de maximis inc. report titled *Remedial Design Work Plan – Appendix L Community Relations Support Plan* (the “CRSP”), dated September 2020.

Nuclear Metals, Inc. Superfund Site

Dear Mr. Thompson:

EPA, in consultation with the Massachusetts Department of Environmental Protection, has completed its review of the CRSP, dated September 2020. The CRSP is subject to the terms and conditions specified in the Consent Decree (CD) for Remedial Design / Remedial Action (RD/RA) for the Nuclear Metals, Inc. Site, which has an effective Date of December 6, 2019.

EPA has reviewed the CRSP and finds that it is acceptable. Therefore, EPA approves the CRSP.

If there is any conflict between the Performance Standards as stated in the CRSP and the Performance Standards as stated in the CD and statement of work (SOW), the CD and SOW shall control.

Please do not hesitate to contact me at (617) 918-1339 or at smith.christopher@epa.gov should you have any questions in this regard.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher Smith".

Christopher Smith
Project Manager

NUCLEAR METALS, INC. SUPERFUND SITE

CONCORD, MASSACHUSETTS

**Remedial Design Work Plan – Appendix L
Community Relations Support Plan (CRSP)**

Prepared by:



de maximis, inc.

200 Day Hill Road, Suite 200
Windsor, CT 06095

September 2020

Contents

1. Introduction.....	1-1
1.1 Remedial Design Work Plan Overview.....	1-1
1.2 Purpose.....	1-2
2. Community Profile.....	2-1
2.1 Key Community Concerns.....	2-1
2.2 Response to Community Concerns.....	2-3
3. COMMUNITY RELATIONS SUPPORT ACTIVITIES.....	3-1
4. ACRONYMS.....	4-1
5. TABLES.....	5-1
Appendix A SDs’ CI Coordinator.....	7
Appendix B LOCAL OFFICIALS AND COMMITTEES.....	8
Appendix D FEDERAL AND STATE ELECTED OFFICIALS.....	9
Appendix E ENVIRONMENTAL AND ACTIVE CITIZENS GROUPS.....	10
Appendix F MEDIA CONTACTS.....	11
Appendix G MEETING LOCATIONS AND INFORMATION REPOSITORY LOCATIONS.....	13

1. Introduction

On October 17, 2019 the United States Environmental Protection Agency (USEPA) lodged a Consent Decree (CD) with the United States District Court for the District of Massachusetts Eastern Division in connection with Civil Action No. 19-12097-RGS. The CD was entered by the Court on December 6, 2019. The CD and the Statement of Work (SOW) provided as Appendix B to the CD describe the Remedial Design/Remedial Action (RD/RA) activities to be performed for the Nuclear Metals, Inc. (NMI) Superfund Site (Site) in Concord, Massachusetts. The RD/RA activities are to be undertaken by the Settling Defendants (SDs) to the CD, with funding contributions from the Settling Federal Agencies (SFAs).

The SD have retained *de maximis, inc.* (de maximis) to serve as the Supervising Contractor (as defined in the CD), and General Contractor (GC) for the performance of all Work required by the CD. The SDs have identified Bruce Thompson of de maximis to serve as their Project Coordinator for the RD/RA.

To efficiently implement the remedy, the work will be divided into five RA projects. RA Projects 1) – 4) below are outlined in Section 1.4 of the SOW. The need for RA Project 5) was identified during the Groundwater RD. The five RA projects are:

- 1) excavation and off-site disposal of contaminated sediments, underground drain lines and debris, and non-HB soils, or “Site-wide Soils and Sediments”;
- 2) In-situ Sequestration of Depleted Uranium (DU) in Holding Basin (HB) soils, of DU in overburden groundwater, and of natural uranium in bedrock groundwater or “ISS”;
- 3) containment of HB stabilized soils with a low-permeability vertical wall and horizontal sub-grade cover or “HB Containment”;
- 4) hydraulic containment and ex-situ treatment of Volatile Organic Compounds (VOCs) and 1,4-dioxane in groundwater; and,
- 5) delineation and treatment of 1,4-dioxane and VOCs in bedrock groundwater.

1.1 Remedial Design Work Plan Overview

Section 3.1 of the SOW requires submittal of a *Remedial Design Work Plan* (RDWP) to summarize pertinent Site information, identify and describe the scopes and procedures for various pre-design investigations, describe the anticipated RD process, and discuss the RD-related deliverables and schedule.

As required by Section 3.3(a) of the SOW, Pre-Design Investigation Work Plans (PDI WPs) have been prepared for the three remedial components (Site-wide Soils and Sediments, ISS, and HB Containment). Hydraulic containment and ex-situ treatment of VOCs and 1,4-dioxane in

groundwater as required by the Groundwater RD is operating and does not require further PDI work to complete. However, the extent of 1,4-dioxane and VOCs in bedrock groundwater in the area up gradient from the extraction well needs further delineation. Separate PDI WPs were prepared for each remedial component, and are attached to the RDWP as follows:

- Site-wide Soils and Sediment PDI WP (Appendix A)
- ISS PDI WP (Appendix B)
- HB Containment PDI WP (Appendix C)
- 1,4-dioxane and VOCs in Bedrock Groundwater (Appendix D)

Section 3.4(a) of the SOW requires performance of Treatability Studies (TS) to support the ISS component of the remedy. Separate studies are needed to evaluate and select treatment materials/reagents, for high concentration DU within the HB, low concentration DU outside the HB, and isotopically natural U in bedrock, respectively. In addition to reagent selection, each media will require evaluation to determine the best means to apply the selected reagent. The overall Treatability Study Work Plan (TSWP) is attached as Appendix E.

The RDWP will also include the following “Supporting Deliverables”:

- To continue the requirements established pursuant to the Building NTCRA, a “Post-Removal Site Control (PRSC) Plan” (PRSCP) is provided as Appendix F.
- Health and Safety Plan (HASP) – Appendix G
- Emergency Response Plan (ERP) – Appendix H
- Sampling and Analysis Plan: Field Sampling Plan (FSP) – Appendix I
- Sampling and Analysis Plan: Quality Assurance Project Plan (QAPP) – Appendix J
- Site Wide Monitoring Plan (SWMP) – Appendix K
- Community Relations Support Plan (CRSP) – Appendix L

Table 1-1 lists the RD Technical Team selected to perform the Remedial Design component of the RD/RA and outlines their roles and responsibilities.

1.2 Purpose

This CRSP has been prepared pursuant to the requirements of Section 2.1(b) of the SOW, which allows EPA to request the SDs participate in community involvement activities. EPA requested the SDs participation in response to comments on the CD provided by the Town of Concord. This CRSP is an update of a CRSP originally prepared for the Remedial Investigation/Feasibility Study, and subsequently updated for the Building NTCRA. Pursuant to Section 2.1(b) of the SOW, the CRSP describes a range of community involvement activities by the SDs, including:

- (1) preparing information regarding the Work for dissemination to the public, including mass media and/or Internet notification, and

(2) participating in public meetings that may be held or sponsored by EPA to explain activities at or relating to the Site.

SDs' support of EPA's community involvement activities will also include providing online access to initial submissions and updates of deliverables to:

- (1) Community Advisory Groups,
- (2) Technical Assistance Grant recipients and their advisors, and
- (3) other interested entities to provide them with a reasonable opportunity for review and comment.

In addition, pursuant to Section 2.1(c) of the SOW, EPA has requested that the SDs designate a Community Involvement Coordinator (CI Coordinator). SDs have designated Bruce Thompson of de maximis as the CI Coordinator. Mr. Thompson has also been designated under the CD as the Project Coordinator for the NMI RD/RA. Mr. Thompson served as the Project Coordinator for the RI/FS, the Building NTCRA, and the Groundwater NTCRA, and has been interacting routinely with the community regarding the NMI Site since 2004.

The CI Coordinator is responsible for providing support regarding EPA's community involvement activities, including coordinating with EPA's CI Coordinator regarding responses to the public's inquiries about the Site.

2. Community Profile

Concord, settled in 1635, is located approximately 20 miles northwest of Boston, Massachusetts. The town is situated around the confluence of the Concord, Sudbury, and Assabet Rivers, and has a population of approximately 19,400 people. Concord is a predominantly white, middle-upper class, well-educated community with minorities representing approximately eight percent of the population (Census Bureau Data, 2018). Surrounding towns include Lincoln, Sudbury, Hudson, Acton, Maynard, Bedford, and Lexington. Concord's town government includes a Board of Selectmen and Town Manager. There are five members on the Board of Selectmen, each serving a three-year term. The Board of Selectmen appoints more than 20 permanent and ad hoc boards or committees to assist with the Town's services and business. One such committee, the 2229 Main Street Committee, was appointed by the Board to work with EPA and other local, state, and federal agencies to address any issues related to the cleanup of the Site. Another is the Nuclear Metals/Starmet Property Re-use Planning Committee; whose purpose is to assist the town with identifying possible ways to reuse the property at 2229 Main Street for the maximum public benefit.

2.1 Key Community Concerns

EPA conducted both formal and informal interviews during the summer and fall of 2000 with citizens, town officials, Site neighbors, state-elected officials, and members of the Concord Business Partnership relating to the listing of the NMI Site on the National Priorities List. Members of several active citizens groups were also interviewed. The groups included Citizens Research and Environmental Watch (CREW), the Organization for the Assabet River (OAR), and Grassroots Action for Peace. During this same time, EPA held a seminar in Concord to discuss information about depleted uranium (DU) and to address the community's questions and concerns. Through these meetings, EPA gained a great deal of insight regarding the community's issues and concerns. Based on EPA's interviews and community contacts, key community concerns at this point in the project were identified and summarized into the following five issues:

- **Issue 1. Lack of Community Trust:** there is a lack of trust in the community regarding NMI/Starmet Corporation and earlier technical contractors that performed work at the Site. The community has limited knowledge of previous company owners and historical operations at the Site;
- **Issue 2. Health Risks and Concerns:** concern exists about radioactive and chemically toxic Site contaminants and the uncertainty of long-term health effects from exposure to them. In addition, the potential for airborne DU from Site emissions to pose a risk to human health and the environment is a key community concern;

- **Issue 3. Communications and Access to Technical Data:** the community wants to ensure that communication channels are open, and that technical data and documents are accessible. The public emphasizes the need to be kept informed about Site activities, and to have meaningful opportunities for involvement throughout the cleanup and decision-making process;
- **Issue 4. Nature of Contamination and Environmental Impacts:** the community is concerned about the extent of contamination on the entire property, not just at the Holding Basin, and the potential risks from using the adjacent property to the west of the Site for recreational activities. A key concern relates to the persistence of radionuclides in the environment and the ultimate goal of cleaning up the Site for future residential use. Water quality and potential impacts to the Assabet River, local groundwater system, and municipal water supply wells for Concord and Acton are also key issues, and
- **Issue 5. Superfund Program Activities:** with placement on EPA's National Priorities List community concerns include the Superfund cleanup process, total cleanup costs, the effect on property values, surrounding neighborhoods' potential exposure to site contaminants during the removal action and cleanup, and the health and safety of site workers performing the cleanup.

A significant effort has been made since 2000 to improve community relations. This has included public meetings and regular meetings with community groups through the course of planning for and conducting the Remedial Investigation / Feasibility Study, and Non-Time-Critical Removal Actions (NTCRAs) to remove the site buildings and contents and dispose of those materials at an off-site location and to hydraulically contain and treat impacted groundwater. These meetings were attended by representatives of the community groups, EPA, Massachusetts Department of Environmental Protection (MassDEP), *de maximis*, and as needed, sub-contractors of *de maximis*.

The community's satisfaction with the efforts since 2000 are noted in the Town of Concord's letter to EPA providing comments on the CD. This letter also reflects:

- a desire to continue the direct, regular communications with the EPA Remedial Project Manager and SD's Project Coordinator;
- a request for continued access to data and deliverables; and,
- a request that EPA formalize a process for the community to review and comment on RD/RA deliverables.

2.2 Response to Community Concerns

de maximis is aware of the community's concerns and will continue to support EPA in maintaining a responsive community involvement program. In addition, de maximis realizes that additional community issues may arise as the RD/RA proceeds. de maximis encourages the community to share any concerns when they develop by contacting the Community Involvement Coordinator or other project representatives.

de maximis' Point of Contact for all Site information is:

Mr. Bruce Thompson
RD/RA Project Coordinator and Community Involvement Coordinator
de maximis, inc.
200 Day Hill Road
Suite 200
Windsor, CT 06095
860-298-0541
brucet@demaximis.com

Mr. Thompson will ensure prompt, accurate, and consistent responses to community inquiries. He will work with the Concord and Acton communities, EPA's Remedial Project Manager, and EPA's Community Involvement Coordinator to address community issues and plan appropriate community involvement activities throughout the RD/RA. Table 2-1 lists the EPA Region 1 and MassDEP representatives that are Points of Contact for information regarding the cleanup activities at the Site.

3. COMMUNITY RELATIONS SUPPORT ACTIVITIES

This section summarizes de maximis' strategy for supporting the EPA's Community Involvement Program at the Site. EPA's overall goal is to promote an ongoing, constructive dialogue among the citizens of Concord, Acton, and surrounding towns, local leaders and citizen advisory groups, representatives of the responsible governmental agencies, the SD's General Contractor (de maximis), and key RD/RA sub-contractors to de maximis, as well as to encourage the community's involvement in understanding Site activities. By using the community involvement communication support activities outlined in this plan, de maximis will assist EPA in keeping the public informed about Site activities and progress and by providing opportunities for the community's meaningful and active involvement in the decision process throughout the RD program.

de maximis shares these important community involvement goals with EPA and will actively work, in partnership, with the EPA and the citizens of Concord and Acton to establish and maintain an open, candid, and honest dialogue throughout the cleanup program. de maximis will help facilitate communication, both technical and procedural, among the government agencies, local officials and leaders, and environmental groups involved with the cleanup. de maximis will provide the appropriately qualified technical specialists, when needed, to meet and discuss project information with Concord and Acton residents, officials, and Site neighbors, and will always strive to provide timely and factual information in all communications with the public.

As stated earlier, EPA's plan established three primary areas as the focus for its Community Involvement Plan:

- Maintain a working relationship with local and state leaders;
- Maintain a working relationship with local citizen advisory groups; and
- Produce documents and oral presentations in plain and easy to understand language.

Representatives from EPA, MassDEP, and de maximis will meet with the community groups during the RD/RA to discuss site issues. These community groups include: the (Concord) town-appointed 2229 Main Street Advisory Committee and Nuclear Metals/Starmet Property Re-use Planning Committee, the Technical Assistance Grant recipient Group CREW (Citizens Research and Environmental Watch), and a community group based in Acton, Green Acton.

In addition to discussing site data and progress, a key focus for these meetings is expected to be to discuss comments on draft deliverables (e.g., workplans, reports, and design documents). The expected process for sharing and then discussing project deliverables with the community is expected to be as follows:

- de maximis submits draft deliverable to EPA and MassDEP.

- EPA conducts initial quality review. Once EPA is satisfied the deliverable meets minimum quality standards, EPA will direct de maximis to share the deliverable with the community groups. When shared with the community groups, the deliverable will be accompanied by a disclaimer pointing out “This deliverable is a draft undergoing EPA and MassDEP review but is being provided for community group review in the interest of expediting progress”.
- A meeting or meetings will be scheduled for ~60 days after the deliverable is provided for community group review. At these meetings, representatives from EPA, MassDEP, and de maximis will respond to questions regarding and comments on the deliverables.
- To avoid receiving comments on draft documents that are duplicative of those provided by EPA and MassDEP, it is assumed that community questions and concerns will be primarily raised in these meetings, rather than provided in writing. EPA and MassDEP representatives will attend these meetings and consider community feedback in drafting comments on deliverables. Once finalized, these comments will be provided to the community groups.

To support EPA in maintaining a working relationship with local and state leaders and citizen advisory groups, de maximis will help facilitate the flow of project information to appropriate parties. EPA and de maximis will enlist the support and cooperation of local leaders and citizen advisory groups to “get the word out” to the people of Concord and surrounding areas. These individuals and groups have a long-standing familiarity with the area and its residents and hold visible positions of responsibility within the community.

Providing timely and accurate project information to the community will be a priority for the team. This process will utilize both web-based and personal communications. de maximis established a Project Web Site (www.nmisite.org) during the RI/FS and NTCRAs, and used it to post deliverables (once approved by EPA), and to provide updates on the progress of the work. That web site will be updated and continue to be used for the RD/RA. During the RI/FS and NTCRAs, representatives from EPA, MassDEP, de maximis and necessary members of the team met routinely with the community groups to update them regarding the progress of the work, and to discuss data and review comments on draft deliverables. These meetings will continue under the RD/RA; a Projected schedule of Community Involvement Support Activities is provided in Table 3.1. In addition, de maximis will also support EPA, as requested, at any public meetings that may be needed during the RD/RA.

When requested by EPA, de maximis will prepare draft articles for newsletters and technical summaries for fact sheets. Documents developed to inform the public about Site activities will be written with minimal scientific terminology and acronyms so an audience without technical training will find the material easy to understand. Technical specialists making presentations at



meetings will strive to prepare material in a similar manner. Presentations will be clear, concise, and geared to a non-technical audience.

de maximis is aware that community issues and concerns will change over time. However, the activities listed above provide a strong foundation for the team's Community Involvement Support Program and will be used to address new issues or concerns that arise during the RD.

4. ACRONYMS

ARAR	Applicable or Relevant and Appropriate Requirement
CD	Consent Decree
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CRSP	Community Relations Support Plan
CREW	Citizens Research and Environmental Watch
<i>de maximis</i>	<i>de maximis, inc.</i>
DU	Depleted uranium
EPA	United State Environmental Protection Agency
ERP	Emergency Response Plan
FSP	Field Sampling Plan
HASP	Health and Safety Plan
MassDEP	Massachusetts Department of Environmental Protection
NMI	Nuclear Metals, Inc.
NTCRA	Non Time Critical Removal Action
POP	Project Operations Plan
QAPP	Quality Assurance Project Plan
RDWP	Remedial Design Work Plan
SOW	Scope of Work
Site	Nuclear Metals, Inc. Site
VOC	volatile organic compound

5. TABLES

Table 1-1
RD Technical Team Roles and Responsibilities

FIRM	ROLE/RESPONSIBILITY
<i>de maximis, inc.</i>	Project Coordinator and General Contractor, responsible for managing all Work required under the RD/RA CD and SOW
Haley & Aldrich, Inc.	Responsible for drafting and implementing Pre-Design Investigation (PDI) Work Plans, preparing PDI Reports, and preparing Remedial Design for Sitewide Soils and Sediment and Holding Basin Containment aspects of remedy.
Geosyntec Consultants	Responsible for drafting and implementing Pre-Design Investigation (PDI) and Treatability Study (TS) Work Plans, preparing PDI and TS Reports, and preparing Remedial Design for In-Situ Sequestration and 1,4-Dioxane in Bedrock aspects of remedy.
DDES	Responsible for radiation protection program

Table 2-1
EPA Regional Contacts and MassDEP Representatives

Contact Name	Agency	Mailing Address	Telephone Number	E-mail Address
Christopher Smith	EPA New England	5 Post Office Square, Suite 100 Mail Code 07-4 Boston, MA 02109-3912	617-918-1339	Smith.christopher@epa.gov
Sarah White	EPA New England	5 Post Office Square, Suite 100 Mail Code 07-4 Boston, MA 02109-3912	617-918-1003	White.sarah@epa.gov
Garry Waldeck	MassDEP	One Winter St. Boston, MA 02108	617-348-0417	garry.waldeck@state.ma.us

Table 3-1

Projected Schedule for Community Involvement Support Activities

Activity	Schedule
Distribute Informational Fact Sheets on the Team and NMI operations	Early in the RD
Develop and Maintain Project Web Site	Established in August 2003, updated for RD/RA in January 2020
Conduct public availability sessions, small group meetings, and workshops	As needed, based on consultation with EPA, throughout RD

Appendix A SDs' CI Coordinator

de maximis, inc.

Bruce Thompson

200 Day Hill Road

Suite 200

Windsor, CT 06095

(860) 298-0541

brucet@demaximis.com

Appendix B LOCAL OFFICIALS AND COMMITTEES

Concord, MA

Stephen Crane
Town Manager
Concord Town House
22 Monument Square
Concord, MA 01742
978-318-3000

Michael Lawson, Chair
Concord Select Board
Concord Town House
PO Box 535
Concord, MA 01742
978-318-3001

Thomas M. Judge
Fire Chief/Emergency Management Director
Town of Concord Fire Department
209 Walden Street
Concord, MA 01742
978-318-3450

2229 Main Street Committee
Pamela R. Rockwell
141 Keyes Road
Concord, MA 01742
Telephone: 978-369-8512
pam@tiac.net

NMI-Starmet Re-use Planning Committee
Gary Kleiman and Paul Boehm, Co-chairs
gakleiman@gmail.com
pboehm@exponent.com

Acton, MA

John S. Mangiaratti
Town Manager
472 Main Street
Acton, MA 0172
(978) 929-6611
Manager@actonma.gov

Joan Gardner
Selectwoman
472 Main Street
Acton, MA 0172
joangardner@acton-ma.gov

Acton Water District
Chris Allen
District Manager
693 Massachusetts Avenue
P.O. Box 953
Acton, MA 01720
978-263-9107
chris@actonwater.com

Acton Water Resources Advisory
Committee
Ron Beck, Chairman,
Acton WRAC Committee
wrac@acton-ma.gov

Appendix D FEDERAL AND STATE ELECTED OFFICIALS

1. Federal Elected Officials

Senator Elizabeth Warren
2400 JFK Federal Building
15 New Sudbury Street
Boston, MA 02203
Telephone: 617-565-3170

Senator Edward Markey
975 JFK Federal Building
15 New Sudbury Street
Boston, MA 02203
Telephone: 617-565-8519

Congresswoman Lori Trahan
126 John Street
Lowell, MA 01852
Telephone: 978-459-0101

2. State Elected Officials

State Senator Michael Barrett
State House, Room 109-D
Boston, MA 02133
Telephone: 617-722-1572

State Representative Tami Gouveia
State House, Room 146-B
Boston, MA 02113
Telephone: 617-722-2011

Appendix E ENVIRONMENTAL AND ACTIVE CITIZENS GROUPS

Citizens Research & Environmental Watch (CREW)

Robert E. Van Dyck
17 Orchard Rd, Concord MA, 01742
revandyck@aol.com
978-369-0636.

Technical Assistance Grant Consultant (through CREW)

Michael J. Webster, P.G., L.S.P.
Principal
O. 978.679.1600 | C. 978.835.6547
One Monarch Drive, Suite 201, Littleton, MA 01460
MJWebster@geoinc.com

Green Acton

Kim Kastens, Ph.D.
kastens@ldeo.columbia.edu
info@greenacton.org

Appendix F MEDIA CONTACTS

1. Newspapers

Concord Journal
Cheryl Lecesse, Editor
Telephone: 978-371-5742
Fax: 978-371-9058
concord@cnc.com

Betsy Levinson, Reporter
Telephone: 978-371-5796
Betsy.levinson@cnc.com

Boston Globe
Telephone: 617-929-3100
Fax: 617-929-2019
Davis Bushnell, Globe Northwest
Telephone: 978-369-3151

AP-Boston
Telephone: 617-357-8100
Fax: 617-338-8125

Wall Street Journal
Michael Orey
Telephone: 212-416-2371
michael.orey@wsj.com

MetroWest Daily News
Telephone: 508-626-4412
Fax: 508-626-4400

The Boston Herald
Telephone: 617-426-3000
Fax: 617-542-1315

Lowell Sun
Telephone: 978-772-0333
Fax: 978-772-0054

2. Radio Stations

WBUR radio
Telephone: 617-353-0770
Fax: 617-353-9380

Appendix G MEETING LOCATIONS AND INFORMATION REPOSITORY LOCATIONS

1. Meeting Locations

Concord Town House
22 Monument Square
Concord, MA 01742
Telephone: 978-318-3000

NMI Site Trailer
2229 Main Street
Concord, MA 01742

2. Information Repository Locations

Concord Public Library, Main Branch
129 Main Street
Concord, MA 01742
Telephone: 978-318-3347

EPA Records Center
One Congress Street
Boston, MA 02114
Telephone: 617-918-1440