Agenda #7 9/22/08

Maryjane Kenney

Subject: FW: W. R. Grace (Acton Plant) Superfund site - Town Comments

Attachments: Additional Comment on ATSDR PHA 14dioxane1.doc

Additional Comment on ATSDR PH...

-----Original Message-----
From: Doug Halley
Sent: Friday, September 19, 2008 3:53 PM
To: Andrew Magee; Lauren Rosenzweig
Cc: Manager Department
Subject: RE: W. R. Grace (Acton Plant) Superfund site - Town Comments

OTO has developed the attached comment regarding 1,4 Dioxane and how the Public Health Assessment should address it.

Additional Comment on ATSDR PHA – 1,4-Dioxane

In 2006, 1,4-dioxane was detected in groundwater samples proximate to the W.R. Grace landfill and the BOC gases property. The detected concentrations of 1,4-dioxane ranged from non-detect (2 ug/L was the detection limit) to a maximum of 36 ug/L in landfill well # LF-06C. Please note that the MassDEP has issued a drinking water guideline for 1,4-dioxane of 3 ug/L. The USEPA has not yet issued drinking water standards for 1,4-dioxane.

In September 2007, 1,4-dioxane was detected in monitoring well AR-30D at a concentration of 4.4 ug/L. Well AR-30D is located directly adjacent to the Acton School Street Christofferson municipal drinking water supply well. The Acton Water District (AWD) has been conducting regular monitoring for this unregulated compound at all Assabet and School Street wells for the past 2 years. The laboratory can detect a Practical Quantitation Limit (PQL) of 0.2 ug/L, and also flags detections between the PQL and Minimum Detection Limit (MDL). The AWD has consistently seen levels of 1,4-dioxane in most of these wells around 0.2 ug/L or just below.

The ATSDR PHA has evaluated only those compounds (VOCs, arsenic, and manganese) that were detected in the Assabet Supply Wells in 1970 to 1978 to evaluate "past" exposures. Current controls on the Supply Wells (i.e., treatment of VOCs) are considered by ATSDR to address "current" exposures.

Given the potential toxicity of 1,4-dioxane, its low rate of natural degradation, its potentially rapid movement in aquifer system, and the absence of treatment processes on the AWD wells capable of removing 1,4-dioxane from raw water, the ATDSR PHA is deficient for failing to address the public health hazard associated with current and future exposures to 1,4-dioxane.