

## 2229 Main Street Oversight Committee

*Members: Paul Boehm, Ray Bruttomesso, Kerry Diskin, Len Rappoli, Pam Rockwell, Fred Seward, Steve Verrill, Board of Selectmen liaison Elise Woodward*

The 2229 Main Street Oversight Committee was formed to monitor the cleanup at Starmet, formerly Nuclear Metals, Inc. (NMI), a former defense contractor that is now a superfund site. The Environmental Protection Agency (EPA) is the agency in charge of the cleanup. Currently EPA is overseeing a Remedial Investigation and Feasibility Study (RI/FS). The investigation will determine the extent of the contamination at the site and the pathways by which the public and wildlife may be exposed to risk. The feasibility study will develop possible cleanup strategies. The EPA has hired the consulting firm *de maximis inc.* to conduct the RI/FS.

The first part of the Remedial Investigation is mostly completed and has determined that the site is contaminated with depleted uranium, beryllium, and other laboratory chemicals. There are also PCBs located in most of the areas where there is uranium contamination in surface soil, which means that these areas will definitely trigger a remediation action. (These areas are all close to buildings and enclosed by fences.) A major plume of uranium in the ground above the bedrock has also been identified heading from the former holding basin, under the buildings, and towards the Assabet River.

The committee began its work in the first few months of 2010 reviewing the first draft of the work plan for the Human Health Risk Assessment – a document that describes how the information about the contamination at the site will be used to develop a Risk Assessment for the site. Committee members recommended that risk from volatile organic compounds to future residents be evaluated in more areas, and that a large exposure area be divided up into smaller areas of consideration, so that no areas would be averaged out. Astrophysicist Fred Seward also pointed out a calculation error in the radiological equations.

There is also radioactive contamination in all parts of the buildings, including offices, at the site - due mostly to a leaky roof and standing water. In some areas, water is above the level of the electrical outlets. This is a particular danger to emergency workers who might have to respond at the site. The EPA has decided that the buildings must be removed and is negotiating with the principal responsible parties to pay for the removal actions. Starmet must actually vacate the site for this to happen. The committee has been involved in numerous discussions about safety at the site when the premises are vacated. The Massachusetts Department of Public Health will take over security at the site the day that it is vacated. *de maximis inc.* will set up a safe power supply and lighting, and will provide an alternative system to decontaminate sump water.

There have been underlying lawsuits related to the property. The first lawsuit in State Court involves requiring Starmet to vacate the property. The second lawsuit, in Federal District Court, relates to cost associated with the clean-up. Committee member Ray Bruttomesso has been following these lawsuits as they proceed slowly through the court system.

The Commonwealth of Massachusetts filed a complaint in Suffolk Superior Court against Starmet alleging that Starmet violated a 2007 Administrative Consent to permanently vacate the site. The complaint sought a permanent injunction ordering Starmet to vacate the site by June 30, 2009. At the end of 2010, Starmet had still not complied. The state had filed a Summary Judgment motion in early 2010 with the Court to have Starmet comply. A judge at the Suffolk Superior Court agreed with the Commonwealth. Starmet appealed the judge's Final Judgment to the Court of Appeals. Written arguments were filed by both parties in late 2010. As of the end of 2010, the Massachusetts Court of Appeals has not ruled.

In February 2009, the United States District Court determined that Starmet was responsible for the remediation costs. The EPA is negotiating with the principal responsible parties (mostly the US Army) to pay the costs of the removal of the buildings, since Starmet itself does not have the means to cover the meet these expenses.

The committee also began reviewing the first draft of the Baseline Environmental Risk Assessment for the site. Most contamination that affects wildlife at the 2229 Main Street location also poses a risk to human beings, and will be cleaned up, but the site possesses a unique ecological feature – a sphagnum bog. This is an acidic wetland with a thick mossy mat suspended in it that is the home to frogs, turtles, bugs, and fish. It is also a food supply for birds and mammals. There is also a man-made cooling pond on the site that is currently classified as wetlands, but will need to be dredged in order to be cleaned. Committee members discussed with EPA how future plans for the use of the site could impact the methods used to clean up these special areas.

More information about the Starmet cleanup can be found at the following websites. The committee does not have control over the content of these sites:

- [www.nmisite.org](http://www.nmisite.org) is the website created by the contractor *de maximis inc.* It includes a list of the current activities at the site, including data and maps from the sampling that has been completed.
- The EPA also has a website with historical information. Go to [www.epa.gov/region1/superfund/findsite/fndindex.htm](http://www.epa.gov/region1/superfund/findsite/fndindex.htm) and search for "Nuclear Metals".
- [www.crewconcord.org](http://www.crewconcord.org) is the website for the environmental advocacy group CREW.