

Alewife Neighbors, Inc. Cambridge, MA 02140

info@ AlewifeNeighbors.org

Alewife Neighbors, Inc.

Cambridge MA 02140

c/o Michael Nakagawa
Madison Avenue
Cambridge, MA 02140

24 October, 2005

RTN 3-0277 Tier 1C Permit No. 118529

William Beck Haley & Aldrich, Inc. 465 Medford St. Suite 2200 Boston, MA 02129-1400

Re: Suggested Revisions to Public Involvement Plan for

W. R. Grace & Co.
62 Whittemore Avenue
Cambridge, Massachusetts
P.T.N. 2, 0277, Tion 1C Pormit N

RTN 3-0277, Tier 1C Permit No. 118529

Dear Mr. Beck:

Pursuant to Section 7.0 of the Public Involvement Plan (PIP) for Release Tracking Number 3-0277, W.R. Grace & Co. - Conn., 62 Whittemore Avenue, Cambridge MA, Alewife Neighbors, Inc., on behalf of the North Cambridge neighbors which it represents, requests a change in the PIP for the site in response to the discovery of asbestos at the site and the handling proposed in the draft Release Action Outcome (RAO) statement.

It should be noted that the site was designated a PIP site in September 1995, more than ten years ago, and the original PIP was drafted before additional contaminants, including asbestos, were found widely dispersed and before the site was reclassified to Tier IC. Because the asbestos contamination will be left unremediated and other contaminants will not be fully remediated to a level of No Significant Risk for all foreseeable future activities and uses, the public should continue to be informed and involved in any site activities that may present a potential risk, up to and including any and all landscaping improvements or other soil disturbing activities. Continued involvement is particularly important because the Responsible Party for the contamination has not been able or willing to provide a credible Comprehensive Site Model for the contamination.

Therefore, we request that the PIP be modified to ensure public information and involvement at the current level for ongoing site activities under the Massachusetts Contingency Plan (MCP) until such time as the site no longer presents a potential Significant Risk for all current and foreseeable activities and uses.

We request the following issues to be covered in a revised PIP for the site (with section numbers as used in the current PIP dated 1995):

Alewife Neighbors, Inc.

- 1. There should be specific wording that this PIP will apply to all site activities covered by the MCP, including residual activities that may occur after submission of the RAO statement.
- 2. Section 4.1 The address of the Publicly Available Site Files at DEP should be corrected.
- 3. Section 4.2 The contact information of three representatives from neighborhood groups will be maintained and kept current through annual mailings to the addresses of these contacts on file. The mailings will request confirmation of the contact information, or an update to a new contact person. Complete copies of all draft and final documents submitted as part of the MCP will be sent to these three individuals as well as to the Public Information Repositories.

Because of the transient nature of Cambridge residents, the proximity of the Site to heavily used public recreation and transportation areas, and the permanent nature of the AUL and possible long intervals of inactivity, the site mailing list will also include notification of availability of site information and documentation to every resident within a one-half mile radius from the site to ensure future residents, who may have particular health concerns, are appraised of the potential Significant Risk of Site Activities.

The Director of Environmental Health of the Cambridge Public Health Department should be specifically included by title on the distribution list, in addition to the Cambridge Public Health Commissioner.

- 4. Section 4.3 In order to allow adequate time to review plans, have a public comment period, revise plans, and prepare for implementation of the plans, notification time for any Site Activities will be a minimum of 90 days from desired start date. Furthermore, an additional notification of the start of work will be given after the final version of such plans is submitted to the Public Repositories and at least 30 days from the beginning of such work.
 - Please understand that some neighbors feel strongly enough about the potential for health problems caused by a deviation from site plans, whether intentional or not, that they would remove themselves or family members from the area for the duration of some activities and would need time to prepare such arrangements.
- 5. Section 4.4, Public Comment Period Amendments to Activity and Use Limitation (AUL) statements will be subject to the stated provisions, as well as all site activity, monitoring, and/or maintenance plans referenced in the AUL or amended AUL, in addition to any plans required by the MCP, such as Release Abatement Measure (RAM) Plans
- 6. Section 6.0 If the Licensed Site Professional (LSP) for this site or for activities on a portion of this site is changed, then the new LSP will be responsible for carrying out the public involvement activities listed in the PIP during the site MCP process, or for activities in the AUL referencing the PIP. The public, including the PIP notification list and neighborhood group representatives, must be notified immediately of a change in LSP.
- 7. Section 7.0 This PIP may be revised as necessary during the course of the remedial response action process or as long as it applies by reference in any AUL for the site.

Alewife Neighbors, Inc.

Alewife Neighbors appreciates your continued attention to these proposed changes, and look forward to the draft for comment when available.

Sincerely,

Michael Nakagawa Alewife Neighbors, Inc.

cc:

Robert Jenkins, W. R. Grace & Co.

Patricia Donahue, MADEP

Jack Miano, MADEP

Sam Lipson, Cambridge Public Health Department

Cambridge City Council

State Senator Seven A. Tolman

State Representative Anne M. Paulsen

State Representative Alice K. Wolf

State Representative Marty Walz

State Representative Rachel Kaprielian