REGION 1
BOSTON, MA 02109

United States Environmental Protection Agency
Lower Neponset River Superfund Site
November 12, 2024 Public Meeting Questions and Answers

1. **Regarding the changes in EPA and new administration, how endangered is funding for each phase of work?**
   EPA is focused on continuing its mission to protect public health and the environment. We are moving forward with our planned work at this site and will not speculate what will happen under an incoming administration.

2. **With the Trump administration coming in, how secure is a funding for these projects?**
   Please see the response to Question 1.

3. **What do you estimate regarding total cost to be for the Non-Time Critical Removal Action?**
   The total cost of the Non-Time Critical Removal Action (NTCRA) has not been determined because the Non-Time Critical Removal Action has not been selected. The Engineering Evaluation and Cost Analysis (EE/CA) will present alternatives and will include projected costs associated with each alternative.

4. **Can you say more about "capping"? What does it mean to cap the river?**
   "In-situ capping" refers to the placement of a covering or cap, beneath the water, with clean material on top of contaminated sediment that remains in place. Caps are generally constructed of materials such as clean sediment, sand, or gravel. A more complex cap design can include geotextiles, liners, and other passable or impassable elements in multiple layers to reduce the force or effect of contaminants.

   Depending on the contaminants and sediment environment, a cap is designed to reduce risk through physical isolation, chemical isolation, and stabilization of the contaminated sediment.

   More information on "In-Situ Sediment Remediation," which includes capping, can be found on the *EPA Superfund Contaminated Sediments: Guidance and Technical Support website.*

5. **What is the square footage that would be remediated at Riverside Square?**
   The site investigation so far indicates that approximately 1.8 acres (76,480 sq ft) need to be addressed (excavated and capped).

6. **How contaminated is the Milton side of the river across from Riverside Square?**
   The *Data Evaluation Summary Memorandum – Phase 1* contains the full data set for the Phase 1 Reach. Specifically, Figure 10 (Total PCBs in Phase 1 Sediment) and Figure 13 (Total PCBs in Phase 1 Floodplain Soil) illustrate the PCB contamination in sediment and soil across from the Riverside Square Time-Critical Removal Action.

Each sample location on the map has a corresponding sample ID (e.g., 23D-0098). Table 11 shows the analytical results for the 196 sediment samples (including 14 field duplicates) from the Phase 1 Reach. Table 15 shows the analytical results for the 147 floodplain soil samples (including nine field duplicates) from the Phase 1 Reach.

To request assistance in reviewing these data tables and figures, please feel free to reach out directly to Natalie Burgo at burgo.natalie@epa.gov or Alexander "Tristan" Pluta at pluta.alexander@epa.gov and we can set up a meeting date and time to review the information with you.

7. **Riverside was dredged to straighten the river. The removal action is $4.9 M. How deep is the contamination and how deep is the excavation?**
   The site investigation so far indicates that soil 1 to 3 feet (deep) is contaminated within the 1.8 acres of the Site.

8. **How well sampled are the first mile of the Lower Neponset riverbanks, and can the first mile Non-Time Critical Removal Action be completed without sampling wells throughout the first mile?**
   Floodplain soil sample collection attempts occurred every 86 feet on both the northern and southern riverbanks of the Lower Neponset River Phase 1 Reach within the Federal Emergency Management Agency (FEMA) 100-year floodplain. This 86-foot sample interval was developed because EPA contracted for 120 boring locations (60 soil boring locations per side of the river) to be collected from surface soil (0-1 feet) and subsurface soil from the deepest 1-foot of the boring, when possible.

   Of the 120 floodplain soil sampling locations, soil was able to be collected from 109 of the locations (11 locations were abandoned primarily due to inaccessibility or refusal). Samples were submitted for analysis of PCB congeners, dioxins and furans, metals and mercury, semi-volatile and volatile organic compounds, and asbestos. More information is available in the *Data Evaluation Summary Memorandum – Phase 1*.

   Regarding well sampling throughout the Lower Neponset River Phase 1 Reach, prior to EPA installing additional monitoring wells, EPA will be utilizing data from historical and existing monitoring wells adjacent to the Site (e.g., there is extensive *groundwater data* at the Former Lewis Chemical Site). There are 49 Massachusetts Chapter 21E disposal sites (21E is a chapter in the Massachusetts General Laws that establishes the process for identifying, assessing, and remediating contaminated properties. It's also known as the Massachusetts Oil and Hazardous Material Release Prevention Act, or the State Superfund Law) and 16 monitoring wells within 1,500 feet of the Lower Neponset River Superfund Site Phase 1 Reach. State records will be reviewed to flag 21E sites that may impact or discharge to the Lower Neponset River. EPA has also contracted for the installation of shallow overburden wells to inform a hydrogeological investigation evaluating groundwater interaction at the Lower Neponset River Superfund Site which is planned to take place prior to the Non-Time Critical Removal Action .

9. **For the Riverside Square removal action, will it be designed in a way that will allow for the Department of Conservation (DCR) to add trails and benches to provide access to the river when the removal action is completed?**
   As summarized in *EPA's October 2024 fact sheet*, EPA's activities at Riverside Square are focused on addressing immediate threats and reducing risks to public health by minimizing exposures to PCB and lead-contaminated soils at the Site. EPA plans to remove and replace contaminated soils with clean soils,

then re-seed areas impacted by EPA's activities, similar to what was done at the Lewis Chemical removal site.

10. **After the public comment period on the Engineering Evaluation and Cost Analysis (EE/CA), are there opportunities for public comments on the draft design of Non-Time Critical Removal Action ?**
While there is not a formal public comment period on the removal design work related to the Non-Time Critical Removal Action, community relations are a useful and vital aspect of the entire removal design and removal action process. Community relations activities serve to keep communities informed of the activities at the Site and help EPA anticipate and respond to community concerns. EPA, as the lead agency, must do the following, according to *40 CFR Section 300.415(n)(3)*:

    i. Conduct interviews with local officials, community residents, public interest groups, or other interested or affected parties, as appropriate, to solicit their concerns, information needs, and how or when citizens would like to be involved in the Superfund process.
    ii. Prepare a formal community relations plan based on the community interviews and other relevant information, specifying the community relations activities that the lead agency expects to undertake during the response.
    iii. Establish at least one local information repository at or near the location of the response action. The information repository should contain items made available for public information. Further, an administrative record file shall be available for public inspection in at least one of the repositories. The lead agency shall inform the public of the establishment of the information repository and provide notice of availability of the administrative record file for public review. All items in the repository shall be available for public inspection and copying.

11. **Is EPA "finished" in the two Time-Critical Removal Action areas when the actions are done?**
After completing the cleanup, EPA will remand control of the property to the state/homeowner. Any further work would be done by the property owner and/or state/city.

12. **Will EPA or the Department of Conservation and Recreation (DCR) remove the dams? How would the two agencies coordinate on removal?**
The EPA has not made a final decision on the Non-Time Critical Removal Action (NTCRA) in relation to the Tileston and Hollingsworth (T&H) Dam. The Engineering Evaluation and Cost Analysis (EE/CA) will state the removal action scope, goals, and objectives; present several relevant and viable removal alternatives for evaluation and comparison of their respective effectiveness, implementability, and cost; and select an alternative as the proposed cleanup plan. The EE/CA will go to a "public comment period" (usually 30 days), during which the public can submit feedback. This allows community members the opportunity to review the proposed cleanup plan and provide their input before a final decision is made. Once a final decision is made, EPA will be able to answer if the T&H Dam will or will not be included in the NTCRA.

    Any action related to the Tileston and Hollingsworth Dam will be coordinated with the Department of Conservation and Recreation (DCR) as the dam owner.

13. **Has there been a decision of the land spaces above the river in addition to the two land spaces that are being upgraded? There is a community garden directly adjacent to the Neponset River in the Edgewater Neighborhood - the Kennedy Community Garden. Is it safe to grow food along the Neponset River?**
    The Kennedy Community Garden is adjacent to the Phase 2 Reach of the Remedial Investigation (which spans from the Tileston and Hollingsworth Dam downstream to the Walter Baker Chocolate Dam). Soil sampling of the riverbank (within the 100-year floodplain at the ordinary high-water mark) was conducted during early Summer of 2024. EPA does not yet have the fully validated data but will share the results once the data is validated.

    While gardening, the greatest risk of exposure to contaminants is from contaminated soil getting into your mouth or by breathing in contaminated dust. For example, children playing in the garden may directly eat soil through hand-to-mouth play, or people may eat plants without first washing them to remove soil and dust. Skin contact (dermal exposure) with soils containing contaminants can pose health risks.

    In general, the benefits of urban gardening greatly outweigh the risks. By following the recommendations and best practices, such as building and gardening in raised beds, you will decrease your likelihood of exposure to contaminants that are commonly found in urban soils located on or near sites with past industrial and commercial use. Please see the *Reusing Potentially Contaminated Landscapes Growing Gardens in Urban Soils Fact Sheet* for more information.

14. **How deep can riverbank and riverbed excavation go?**
    The "maximum dredge depth" is the physical limitation to reach below a given depth. Wire-supported buckets or pumps can be deployed at substantial depths; therefore, the maximum dredge depth is generally limited by stability of the excavation. The maximum dredge and excavation depth for slope stability largely depends on the sediment, soil type, and site conditions. This detail will be determined during the design phase of the Non-Time Critical Removal Action.

15. **Can capping be made flood proof in the river channel and riverbanks?**
    Capping remedies are vulnerable to climate change. An erosion protection layer can be installed to protect the underlying cap material from erosive forces that scour the surface of a cap over time. Both natural and man-made erosive forces include currents, wind-driven waves, ice scour, propwash, etc. Other climate-related hazards may arise gradually, such as:

    - Drying out of a sediment cap due to drought conditions.
    - Exposure of a cap due to decreases in channel flow.
    - Scour of a cap due to freeze conditions.
    - Increased interaction with groundwater due to more frequent heavy rainfalls generating more discharge.

    Climate resilience planning is recommended for any capping remedy, which would generally involve:

    1. Assessing the vulnerability of the cap's elements.
    2. Evaluating measures to increase the cap's resilience to a changing climate.
    3. Assuring the cap's capacity to adapt to a changing climate, which helps the remedy continue to be protective of human health and the environment.

Please see the *EPA Climate Resilience Technical Fact Sheet* for more information.

16. **Will floods mobilize any remaining contamination if capped and re-contaminated areas?**
    Please see the response to Question 15 above.

17. **When does the comment period start and end?**
    The National Contingency Plan (NCP) requires that EPA provides a public comment period of at least 30 days when the administrative record file is available for public inspection. EPA will announce the public comment start and completion date through numerous communication methods, including but not limited to, website updates, local newspaper ads, email, mailed postcards, distributed flyers, and through communication with the *Community Advisory Group*.

18. **How many new people came in person? How many new online?**
    It is estimated that 30 attendees were in person. There was a total of 70+ attendees online.

19. **How do you plan to involve and engage the youth of Hyde Park and the life of the river?**
    EPA has attended various community events, including but not limited to, neighborhood association meetings, Doyle Park Day, Hyde Park Idea Exchange, Hyde Park community workshops, Hyde Park Juneteenth Joy Celebration, and Neponset Day. EPA has also coordinated with various local educational programs including *KeySteps* and the Massachusetts Coalition for Occupational Safety and Health *Teens Lead at Work* program. EPA is interested in opportunities to collaborate with the communities and youth of Hyde Park, Mattapan, Dorchester, and Milton. EPA is in the process of evaluating various programs, including the *College/Underserved Community Partnership Program* (CUPP), where University students provide technical assistance to communities through planned projects each semester related to the EPA work in their community. Please contact ZaNetta Purnell, the Community Involvement Coordinator, at Purnell.zanetta@epa.gov if you have any ideas for how EPA can get involved.

20. **What types of activities will residences be able to do once the cleanup is finished?**
    The EPA Remedial Investigation and potential Non-Time Critical Removal Action pertains to the river channel and riverbanks within the Federal Emergency Management Agency (FEMA) 100-year floodplain. The Massachusetts Department of Public Health has developed a *Recreational Use of the Neponset River Fact Sheet*. It is important to note that this fact sheet advises not to swim or wade in the Lower Neponset River Superfund Site.

    The Engineering Evaluation and Cost Analysis (EE/CA) will state the removal action scope, goals, and objectives; present several relevant and viable removal alternatives for evaluation and comparison of their respective effectiveness, implementability, and cost; and select an alternative as the proposed cleanup plan. The EE/CA will go to a “public comment period" (usually 30 days) when the public can submit feedback. Once a final decision is made, EPA will be able to answer what types of activities are appropriate based on the cleanup plan.

    Pertaining to the Riverside Square PCB Site, after completing the Time-Critical Removal Action, EPA will remand control of the property to the state and/or homeowner. Future uses would be limited by state regulations under the Massachusetts Contingency Plan. The Massachusetts Department of Environmental Protection will determine whether any formal (deed) restrictions are required on the properties.

21. **Can the standards be changed from 0.88 mg/kg for PCBs given the upcoming change at the executive level and new EPA chief?**
    No, this value is a risk-based value.

22. **Can some traffic come from the Milton side to share the wealth of the burden to the community for the Riverside cleanup work?**
    EPA will coordinate with City of Boston and Milton's Police, Traffic, and Fire Departments to establish a traffic plan.

23. **Is this project in danger of losing funds? What will the implications be on public health and the community?**
    Please see the response to Question 1.

24. **Can a new alternative action be proposed? By whom?**
    Alternatives can be proposed by anyone during the Engineering Evaluation and Cost Analysis (EE/CA) public comment period.

25. **When should we be concerned about implications for residents: indoor air quality, health inequities.**
    The Non-Time Critical Removal Action (NTCRA) will incorporate best management practices to control air quality including, but not limited to, air monitoring, dust suppression, and stockpile covering. Site-specific plans will be developed prior to the start of the NTCRA.

    The Riverside Square Time-Critical Removal Action will incorporate air monitoring and water use to suppress dust throughout the entire removal action process. Additionally, all stockpiled wastes will be secured and covered with polyethylene cover.

26. **Does EPA envision being able to remove the Tileston & Hollingsworth Dam and the Walter Baker Chocolate Dam after the sediment is removed?**
    The EPA has not made a final decision on the Non-Time Critical Removal Action (NTCRA) in relation to the Tileston and Hollingsworth (T&H) Dam. The Engineering Evaluation and Cost Analysis (EE/CA) will state the removal action scope, goals, and objectives; present several relevant and viable removal alternatives for evaluation and comparison of their respective effectiveness, implementability, and cost; and select an alternative as the proposed cleanup plan. The EE/CA will go to a "public comment period" (usually 30 days), during which the public can submit feedback. Once a final decision is made, EPA will be able to answer if the T&H Dam will or will not be included in the NTCRA. To date, EPA does not have any information regarding the fate of the Walter Baker Chocolate Dam.

27. **How is the West Street Urban Wild impacted? Will it be safe there in the Summer 2025 for our youth to do restoration work in the Urban wild?**
    EPA took one soil sample (sample location ID is 23D-0037) near the West Street Urban Wild. The soil sample was taken on the riverbank within the Federal Emergency Management Agency (FEMA) 100-year floodplain. For more information related to this sample, please refer to the *Data Evaluation Summary Memorandum – Phase 1*. The soil sample contained elevated levels of PCBs and will be evaluated for removal as part of the potential Non-Time Critical Removal Action. Only the riverbank would be subject to any potential action; EPA does not have analytical data pertaining to the condition of the upland portion of the West Street Urban Wild. Disturbing the riverbank soil is not advised. For more information on how to minimize potential exposure to chemicals in the soil, please refer to the *Massachusetts Department of Public Health's Community Fact Sheet.*

28. **When will the Non-Time Critical Removal Action begin in the water along river from Lewis Chemical property, the Riverside Square dredge soil, and the Tileston & Hollingsworth Dam?**
A start date has not been set for the Non-Time Critical Removal Action (NTCRA). As we move through the process, EPA will keep the public informed on developments as to when the NCTRA might occur.

29. **Were per- and polyfluoroalkyl substances (PFAS) tested for?**
Yes, per- and polyfluoroalkyl substances (PFAS) were sampled in surface water. Surface water analytical results can be found in Table 17 of the *Data Evaluation Summary Memorandum – Phase 1*.

30. **Where does the soil go after removal?**
Pursuant to Section 121(d)(3) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), any off-site transfer of any hazardous substance, pollutant, or contaminant (CERCLA wastes) may only be placed in a facility operating in compliance with the Resource Conservation and Recovery Act (RCRA) or other applicable Federal or State requirements.

The landfill(s) have not been selected yet for the Riverside Square PCB site or for any removal action pertaining to the Phase 1 Reach. Please see the *Off-Site Rule Fact Sheet* for more information.

31. **What's your best insight about what happens to funding for this site under the new regime?**
See response to Question 1.

32. **Are there related health issues from the Superfund Site in this area over the years?**
The Agency for Toxic Substances and Disease Registry (ATSDR) conducts public health assessments at Superfund sites on the National Priorities List (NPL). EPA performed a streamlined risk evaluation (SRE) to support the engineering evaluation and cost analysis for a potential Non-Time Critical Removal Action (NTCRA) in the upper one mile stretch of the Lower Neponset River Superfund Site. The SRE was performed to identify current or potential exposures that could be prevented by the implementation of the NTCRA.

33. **Is there a concern downstream of the Walter Baker Chocolate Dam to Dorchester Bay with PCBs?**
EPA is in the now in process of the Remedial Investigation throughout the Phase 2 Reach (from the Tileston and Hollingsworth Dam downstream to the Walter Baker Chocolate Dam). EPA has **not** sampled downstream of the Walter Baker Chocolate Dam at this time.

Generally speaking, the extent and nature of a release becomes more refined as information from the Remedial Investigation (RI) is gathered. During the RI stage, EPA samples the Site more extensively. This investigation frequently results in finding or verifying additional contamination that was unknown or undocumented in the site inspection. After the RI is complete, enough information is generally available to determine areas to which contamination has spread and, therefore, determine site boundaries. The *Clarifying the Definition of "Site" Under the National Priorities List Fact Sheet* is a resource for more information.

EPA has also reviewed the *Lower Neponset River Dredge Feasibility Study* report published by Tighe & Bond in May of 2023, and is aware of the low-level PCB concentrations near Milton's Landing (see page 15/225 of Tighe & Bond study).

Please note that EPA's efforts are to address contamination from upstream to downstream. At this time, there are no plans for the area downstream of the Walter Baker Chocolate Dam. EPA funding and efforts are currently being utilized to develop an Engineering Evaluation and Cost Analysis (EE/CA) for the Phase 1 Reach and complete the sampling in the Phase 2 Reach.

34. PCB are in water and soil, are PCBs in the air?

EPA has not analyzed particulate matter in air for PCBs at this point in time. The Removal Program continuously monitors for particulates in air using a DustTrak. Since PCBs tend to cling to soils, by monitoring for particulates in air, the Removal Program can use particulates as a proxy for PCBs in air. The Removal Program continuously sprays water for dust suppression to prevent particulates from becoming airborne. However, if the DustTrak does measure particulates in the air, work will be stopped and revaluated.

35. What is the sediment transport and surface water flow data over time?

There has not been a site-specific sediment flume test, which determines erosional rates in bedded sediment. There are several stream gages along the Neponset River Watershed owned and operated by the United States Geological Survey. A Hydrologic Engineering Center River Analysis System Model (HEC-RAS Model) was created using average mean monthly flow records from the USGS stream gage (#011055566) in the Neponset River at Milton Village. The results of the HEC-RAS model were used to model and estimate sediment stability. The results from the sediment stability analysis will be published with the Engineering Evaluation and Cost Analysis.

36. Do the contaminants in the river and mud go into the air?

The Agency for Toxic Substances and Disease Registry (ATSDR) has prepared toxicological profiles for hazardous substances most commonly found on National Priorities List sites. ATSDR's publication, *The Toxicological Profile for Polychlorinated Biphenyls (PCBs)*, has a robust section explaining the contaminant's fate and transport in the environment. ATSDR's Toxicological Profile for PCBs states that PCBs can enter the atmosphere from volatilization from both soil and water surfaces. For more information on the other contaminants that EPA sampled for during the Phase 1 Remedial Investigation, please refer to *ATSDR's Toxicological Profiles* webpage. To date, EPA has not performed any contaminant-specific air sampling.