McCoy Field

June 2005

EPA New England

Proposed Keith Middle School Site

EPA Proposes Approval of McCoy Field Cleanup Plan

What is EPA's Role in Redeveloping the McCoy Field?

Locating the new middle school at the McCoy Field is a local decision over which EPA has no authority. EPA's involvement with this school project is triggered by the presence of PCBs. Under the Toxic Substances Control Act, EPA is required to oversee the cleanup and disposal of PCBs at this site. The MA Department of Environmental Protection is addressing the other contaminants of concern including metals and semi-volatile organics.

EPA's oversight at the McCoy Field includes the following:

- requiring a cleanup plan from the City of New Bedford;
- reviewing the cleanup plan;
- rendering a decision on the cleanup plan's technical merits that is either: approval, approval with conditions, or denial;
- providing implementation and maintenance oversight of the cleanup plan.

Want More Information?

Come to an informational meeting 7 pm, Wednesday, June 22, 2005 at the Keith Middle School Library, 70 Hathaway Blvd., New Bedford.

Copies of EPA's proposed approval and all relevant site documents are available for review at the New Bedford Free Public Library (613 Pleasant St., New Bedford) and at EPA (One Congress St., Boston).

What Does it Mean that EPA has Issued a "Draft Approval" for a Risk-Based Cleanup and Disposal Plan for the McCoy Field?

At this point in the process, EPA has completed its review of the cleanup plan submitted by the City of New Bedford. Based on the technical components, EPA has issued a draft approval of the plan. Final approval is pending public input on the plan's technical merits and long-term monitoring and maintenance plan.

What are PCBs?

PCBs (polychlorinated biphenyls) are man-made chemicals which are typically oily liquids, ranging from colorless to light yellow in color. They have no smell or taste. PCBs were widely used as coolants and lubricants in transformers, capacitors, and other electrical equipment until 1977 when the manufacturing of PCBs was banned.

Although PCBs are no longer manufactured, they are persistent chemicals and once in the environment, do not break down easily. Due to their limited volatility and solubility, PCBs they tend to remain attached to particles of soil, although any process that moves soil can also move the attached PCBs. Airborne PCBs are a health risk only when one breathes HIGH airborne levels of PCBs for a LONG time.

The health effects from PCBs may include liver and immune system damage; neurological, developmental, and reproductive effects; and cancer.

What Input can Citizens Have at this Point?

- EPA welcomes comments on the technical merits of the cleanup plan. If new technical information is presented which was not included in the Application, was not considered in EPA's decision-making process, and would impact EPA's determination on the safety of the proposed plan, EPA could direct the cleanup plan to be modified or decline final project approval.
- EPA is also soliciting comments regarding the site's long-term monitoring and maintenance implementation plan (MMIP). The MMIP shall also include a communications component which details how the maintenance and monitoring results will be communicated with all site users. Public comment will be considered in determining the final requirements for the site's monitoring program.
- Comments must be received or postmarked by Friday, July 15, 2005 and can be sent to:

  Kimberly Tisa, PCB Coordinator
  U.S. Environmental Protection Agency
  One Congress Street, Suite 1100 (CPT)
  Boston, MA 02144-2023

  By e-mail:
  tisa.kimberly@epa.gov
  By fax: Attn: Kimberly Tisa at 617-918-0527

How is this Cleanup Plan 'Risk-Based'?

The risk-based cleanup plan, submitted to EPA on March 21, 2005, is designed to address all known soil contamination at the site, but focuses primarily on the most prevalent and toxic contaminants including PCBs, PAHs, and metals. In order to have health risks from chemicals, one has to have exposure to those chemicals at levels that can be harmful. A Human Health Risk Assessment determines what possibility there is that chemicals from a site will cause current or future health risk to individuals who come into contact with them. Risk assessments are conservative, to prevent

underestimating the health risks to the public. These risk assessments are used to develop cleanup plans that protect human health and the environment.

The City conducted a Human Health Risk Assessment for the McCoy Field with the future reuse being a school. In performing the assessment, it evaluated a number of activities that could result in exposure to humans. Direct contact exposure could occur if contaminated soil comes in contact with skin or if contaminated soil is ingested through unintentional hand-to-mouth transfer. The possible activities were evaluated with students, school employees, visitors, municipal employees, and current workers, such as construction and utility workers as part of the scenarios.

This human health risk assessment and the proposed cleanup actions were reviewed by EPA and were found to be consistent with EPA methodologies and risk guidelines. EPA has determined that the City's proposed plan is acceptable and there will be no unreasonable risk to site users when the cleanup is completed. As an added safety measure, a long-term monitoring and maintenance program will be implemented to insure continued protectiveness of the cleanup actions.

Cleanup Plan Overview

EPA's draft Approval is only for the McCoy Field site and does not address contamination to adjacent wetlands, on residential properties, or at the existing High School. In general, the proposed cleanup plan includes the following:

- Removal of PCBs of greater than or equal to 100 parts per million within the excavation areas.
- Installation of a surface cover outside the building footprint, which includes:
  landscaped areas: a geotextile liner and a minimum of a 3-foot soil cap;
  parking areas: a geotextile liner and a minimum 2-foot soil cap with an asphalt cover.
- Construction of the school building on pile caps/grade beams above ground surface.
- Installation of a passive vapor collection system and solid vapor barrier beneath the building footprint.
- Establishment of a long-term monitoring and maintenance plan for the surface covers and indoor and groundwater monitoring.
- Development of a communications plan as part of the long-term monitoring and maintenance implementation plan (MIPP).

While the MIPP has not been fully developed, the application does provide a proposed plan for monitoring and maintenance for the surface covers, indoor air, and groundwater. More detailed information on the clean up plan can be found in the site documents at the New Bedford Free Public Library (613 Pleasant St., New Bedford) and at EPA (One Congress St., Boston).

What Additional Safeguards are being Included in the Cleanup Plan?

EPA believes the excavation of the most contaminated soil and the installation of the surface covers are protective of human health, and has determined that there will be no unreasonable risk to site

users when the cleanup is completed. However, the following required additional protective measures will provide an added level of safety. These include:

- indoor air monitoring;
- solid vapor barrier;
- passive ventilation system.

Have Other Contaminated Sites been Redeveloped for Reuses that Include Children?

Yes. Throughout the country, there are many examples where contaminated sites have been redeveloped in ways that protect human health and the environment. Schools, educational, and municipal buildings have been built in Everett, Lowell and Springfield, MA; New Haven, CT; and Providence, RI. These serve as examples where contaminated sites now safely host children.

For More Information Contact:

U.S. Environmental Protection Agency
Boston, MA
Doug Gutro
Special Assistant to the
Regional Administrator
617-918-1021
Toll Free 1-888-372-7341, ext. 81021

MA Department of Environmental Protection - Lakeville Office
Gerard Martin
508-946-2799

Additional information on PCBs may be found on EPA's website at www.epa.gov/pcb and on the City's website at www.ci.new-bedford.ma.us.

EPA's draft approval is posted at: http://www.ci.new-bedford.ma.us/mccoy.htm

Background

The proposed site for the new Keith Middle School occupies approximately 7 acres and is bounded by Hathaway Blvd, Ruggles, Summit and Durfee Streets. The site is owned by the City of New Bedford and was previously used as a recreational field. Historic dumping and burning activities from the operations at the former municipal burn dump (located at the existing New Bedford High School) is likely responsible for the PCBs, metals, (including lead and barium) and polyaromatic hydrocarbons (PAHs) contaminating the site.

In March 2004, the City determined that PCBs were present in soil samples collected from the site and along the proposed utility corridor at greater than 50 parts per million. As a result, EPA and the City entered into a Consent Agreement and Final Order (CAFO) on May 21, 2004. This agreement:

- allowed excavated soil disposal based on existing PCB concentrations;
- required the City to conduct sampling to characterize the site's contaminants in areas proposed for utility corridors and within the proposed building footprint;
- Required the City to cleanup the PCBs in accordance with the requirements of federal PCB Regulations.

EPA amended the CAFO on October 16, 2004 to incorporate additional areas for characterization and soil removal.

As the party responsible for conducting the cleanup, the City of New Bedford officially designated the site as a Public Involvement Plan Site on March 30, 2004 after the MA Department of Environmental Protection received a request to have the site designated as such. The City has established information repositories and has held regular public meetings to provide site activity updates.