



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 1**  
**1 Congress Street, Suite 1100**  
**BOSTON, MA 02114-2023**

**MEMORANDUM**

**DATE:** August 18, 2005

**SUBJ:** Risk-Based Cleanup Request, June 17, 2005  
McCoy Field Site – Site Wetlands, New Bedford, MA

**FROM:** Kimberly N. Tisa, PCB Coordinator  
Office of Ecosystem Protection/CPT

**TO:** Scott Alfonse, Director of Environmental Stewardship  
City of New Bedford

EPA has reviewed the above referenced document and has identified the following issues and/or deficiencies.

**General Comment**

1. Based on discussions with Alan Hanscom, LSP of record, it is unclear if any changes to the cleanup plan have been made based on requirements by other state agencies. As such, EPA is unable to determine if it is reviewing the most current remedial plan. The City should provide any modifications to the plan, including a discussion of why the modification was made, to EPA.

**Specific Comments**

2. Based on a review of the data and shown on Figure 2, there appear to be several data gaps in the contamination delineation. For example, sample location WD.5-2.5 has a PCB concentration of 4.3 mg/Kg in the 0-6” depth interval. However, the contamination is not delineated to the north or west of this sampling location.
  - a. The City should review all data to determine where the contamination has not been fully delineated horizontally. Based on EPA’s review, there are only a few areas and EPA would encourage the City to conduct the additional sampling required to verify the limits of contamination.

- b. Regarding the vertical delineation, the cleanup request indicates that the contamination is limited to surface sediments. No supporting documentation or analytical results have been presented to support this conclusion. However, based on EPA's conversation with Alan Hanscom, LSP of record, additional vertical sampling has been conducted. This information should be provided to support the proposed remediation.
    - c. With respect to the wetlands running along the embankment of McCoy Field, EPA assumes that all wetland materials will be excavated up to the clean fill/geotextile materials located on the embankment. However, it is unclear in the cleanup request. Please clarify.
3. There is an intermittent stream that runs from the wetlands and into the culvert extending under Durfee Street. It is unclear if sampling of the sediments in this stream and culvert have been sampled to determine if there is contamination which requires remediation. Please clarify.
4. Page 11, Section 2.4. Wetlands Data Quality Assessment.
  - a. This section indicates that a data quality assessment will be completed prior to excavation of contaminated sediments. EPA requires that the data submitted to EPA for purposes of supporting a remedial strategy be "validated data". If this validation has not been conducted, the City should proceed immediately with the validation to determine if any data is not useable. If the data has been validated, the findings should be provided for EPA's review. This discussion should include a section on data useability.
5. Page 13, Section 3.1.
  - a. Please provide the current status for the other state permits required under this project.
6. Pages 15 and 16, Section 3.2.5.
  - a. Please provide a copy of the NPDES exclusion letter or the Construction General Permit to EPA.
7. Page 16, Section 3.3.
  - a. The cleanup request indicates that the excavated wetland sediment (PCBs < 50 mg/Kg), will be disposed of in a state-approved non-hazardous waste landfill. This is acceptable provided the wetland sediments contain no free flowing liquid (e.g. the waste passes the paint filter test). EPA understands that the remediation will be done in the dry season to reduce the potential for saturated conditions. However, in the event that the sediments contain free liquids, these liquids must be removed prior to disposal of the sediments in a landfill. As a contingency, this

should be incorporated into the cleanup request.

8. Page 16, Section 3.4.1.

- a. The text indicates that confirmatory samples will be collected from the top six inches following excavation. EPA limits confirmatory sampling to the top 3 inches post-excavation. Please revise.
- b. The text refers to the QA/QC Plan for Cleanup Verification in Appendix D. This is incorrect. EPA found the QA/QC Plan in Attachment D. Please revise for accuracy.
  - i) QA/QC Plan in Attachment D.
    - (1) The first paragraph indicates that the objective for the sampling is to determine whether the sample contains more than 50 mg/Kg PCBs. As this QA/QC Plan supports the confirmatory sampling to verify the 1 mg/Kg PCB cleanup standard, the stated objective is incorrect.
    - (2) The QA/QC Plan indicates that the acceptable surrogate recovery range will be 30-150%. EPA recommends a range of 40-140%.
    - (3) With respect to the MS/MSDs, EPA recommends that the spike mix include the analyte of interest, that is, Aroclor 1254. EPA also recommends that the spiking limit be in the range of the project action limit.

9. Page 18, Section 3.6. Contingency Plan.

- a. See previous comment 7.a. for sediment dewatering.
- b. Subsection 3.6.1.
  - i) The text indicates that “suspect” material will be segregated, temporarily stored, and then sampled for contamination. Under TSCA, samples must be collected in-situ. As such, this should be revised to provide for sampling prior to excavation and temporary stockpiling.
  - ii) Please clarify the location for the “temporary” stockpiling.
- c. Subsection 3.6.2.
  - i) Please see previous comments on confirmatory sampling and on requirements for additional vertical delineation.

10. Appendix C. Construction Specifications

- a. Appendix C1.

- i) Page 02100-2, Section 1.08. The specification refers to soils, debris or similar material on “paved areas.” What does this mean and what paved areas are referred to? In the event contaminated sediment is placed directly on paved areas or in fact on any surface, sampling shall be required to determine if those surfaces have been contaminated. Who will be responsible for this?
  
- b. Appendix C2.
  - i) Page 02200-1, Section 1.02.
    - (1) The drawings showing the temporary driveways, final grades, etc were not provided. Please provide.
    - (2) The text indicates that 4-6 inches of sediment will be removed. This is inconsistent with what is proposed in the Cleanup Request.
  
  - ii) Page 02200-3, Section 3.01.
    - (1) Item A.1. is inconsistent with cleanup plan and may be incorrect based on additional vertical delineation.
  
  - iii) Page 02200-4, Section 3.03.
    - (1) Please clarify the fill testing requirements.
    - (2) The compaction requirement is missing from EPA’s specifications.
  
- c. Appendix C3.
  - i) Section 1.01, Item B. Please see previous comment(s) on vertical delineation.
  
  - ii) Section 1.01, Item C. The work refers to Figure 2, Wetlands Sediment Remediation Area. The Figure 2 provided in the Cleanup Request is titled “Wetlands Remediation Area”. Are these figures the same? If not, please provide the Figure 2 referenced in this specification.
  
  - iii) Section 1.05, Item D.
    - (1) Please see previous comment(s) on vertical delineation.
    - (2) There is no such compound as a “semi-polychlorinated biphenyl”.
  
  - iv) Section 3.01.
    - (1) Item E. Is there a specific design for management of segregated

materials? The specification should refer to the requirements for management of stockpiled materials under 40 CFR §761.65(c)(9).

- (2) Item E. The quantity of wastes to be segregated references a 500 cubic yard volume. The Cleanup Request refers to 100 cubic yards (see Page 18, Section 3.6.1, Unanticipated Conditions). Please revise for clarity and accuracy.

v) Section 3.06.

- (1) Item A. Please see previous comment 10.c.iv.1, above regarding stockpile requirements.
- (2) Item B. Please see previous comment 9.b.i., above regarding the requirement for in-situ sampling.

d. Appendix D. Dewatering.

- i) Contained in this Appendix is a NPDES Permit Exclusion Application. The Application indicates that the dates for the proposed discharge are April 14, 2004 through May 31, 2004 and that this Application is for McCoy Field, not the wetlands. Given that the proposed work is associated with the wetlands, it is unclear why this application has been provided in the cleanup request. Please clarify.