



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

October 2, 1997



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Dennis Perry
Project Manager
Commonwealth Electric Company
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Re: Acushnet River Cable Crossings - 7/09/97 Meeting Minutes

Dear Mr. Perry,

This letter serves to record the meeting of July 09, 1997 between EPA, COM/Electric, the Army Corps of Engineers and the Massachusetts Department of Environmental Protection regarding the proposed and existing cable crossings in the PCB-contaminated Acushnet River.

The meeting started with approval of the minutes from the previous May 21 meeting. It was clarified that the \$334,334 difference in estimated cost between segment 19A and 19B in the Cost Analysis Matrix attached to those minutes was for the one horizontally-drilled borehole and casing that would be required for a subsurface crossing of the new 115 kV cable.

Next a video regarding a horizontal directional drilling project in France provided by COM/Electric was viewed. Based on the construction process documented in the video, there was reason to believe that four horizontally-drilled borings could suffice for both the proposed and existing cables (one for the new 115 kV cable, one for the two existing 115 kV cables, and two for the other 13 existing cables). This issue will need further assessment, however, before a final approach is arrived at.

Discussion then turned to COM/Electric's schedule for the design and installation of the new 115 kV cable. Based on estimates of future power system need, COM/Electric believes that this new cable should be installed by 1999. To accomplish this, COM/Electric would like the design for this cable to be completed by the end of 1997. It was recognized that this design milestone may be in jeopardy pending further evaluation of the horizontal directional drilling technique. EPA gave COM/Electric a copy of EPA's comments regarding the MEPA Environmental Notification Form for the new cable project, which voiced EPA's concern against the proposal to lay the new cable directly on the highly PCB-contaminated sediments. EPA also maintained (at the meeting) that EPA should not be held responsible for funding an alternative route for the new cable.



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Discussion then moved to the \$8 million cost estimate previously provided by Com/Electric to reroute the existing cables under the river. That estimate forecasted \$3 million for four borings (at \$750,000 each, NOT including any for the new 115 kV cable), and \$5 million for the associated labor and materials to instal the replacement cables once the boreholes are complete. It was agreed that COM/Electric would provide greater detail for this \$5 million labor and material estimate. It was also understood that the \$3 million originally estimated for the drilling component could decrease if indeed only three borings were required for the replacement cables (e.g., from \$3 million to \$2.25 million if each boring cost \$0.75 million).

Inquiry was made as to any plans to replace any of the existing cables. COM/Electric indicated that there were no plans to do anything with the existing cables in the way of replacement: the cables are working fine and, since they are properly maintained and monitored, their life expectancy can essentially be unlimited. Thus there is no need to replace any of the existing cables at this time.

In response to questions, COM/Electric briefly discussed the engineering to design the "cut-over" of any cables installed to replace the existing cables on the river bottom. COM/Electric explained that it would take two to three years to accomplish this task. In other words, once the replacement cables were installed, it would take two to three years before they would be completely energized and ready for use, with the old cables then being abandoned. This time frame is due to the difficulties in working with live circuits, the need to continue service to customers on effected circuits, as well as engineering and logistical issues. Coordination would be a critical issue.

Since existing cost estimates for the horizontal directional drilling technique vary widely, the discussion next turned to the need for and process to obtain a more accurate cost estimate for the subsurface cable crossings. It was agreed that COM/Electric should hire a consultant specializing in this field to obtain a better cost estimate for subsurface crossings of both the new and existing cables. It was also agreed that EPA and COM/Electric should share in the cost of this consultant, since the estimate would pertain to both types of cable. Discussion about the process to implement this cost sharing included the potential use of a letter agreement between EPA and COM/Electric to initiate the process, and perhaps an EPA-funded contract between the Army Corps of Engineers and COM/Electric detailing the specific terms of the agreement (e.g., product, cost, and schedule).

EPA very much appreciates COM/Electric's continued cooperation in this matter, and looks forward to COM/Electric's summary of the most recent meeting on this issue which took place on August 26, 1997. If you have any questions please do not hesitate to call me at 617/573-5735.

Sincerely,



David Dickerson
Remedial Project Manager

cc: M. Beaudoin (USACE)
C. Catri (EPA) ✓
L. Brill (EPA)
P. Craffey (DEP)
A. Fowler (FWEC)
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