



S. Russell Sylva
Commissioner

The Commonwealth of Massachusetts

Executive Office of Environmental Affairs

Department of Environmental Quality Engineering

One Winter Street, Boston 02108

7C

[Handwritten signatures]

January 16, 1985

Merrill S. Hohman, Director
Waste Management Division
U.S. Environmental Protection Agency, Region I
JFK Federal Building
Boston, Massachusetts 02203

Superfund Projects Center

SITE: New Bedford

BREAK: 4.6

OTHER: 221005

Dear Mr. Hohman:

The Department is providing additional comments on the two remedial action alternatives preferred by the EPA for the PCB contamination in the Acushnet River Estuary, north of the Coggeshall Street Bridge, New Bedford, Massachusetts:

- 1) dredging with upland disposal, and
- 2) dredging with in-harbor, partially lined disposal.

The comments provided here supplement our comments on all six remedial options submitted in our November 15, 1984 letter.

As stated in the earlier letter, the Department cannot support the option to dredge the sediments with disposal in an upland containment site. The Department feels that it is totally infeasible to support this remedial option that is lacking an integral element of implementation, an upland site. Given this lack, it would be extremely difficult, if not impossible, to effectuate this alternative.

The other EPA preferred alternative, dredging with in-harbor, partially lined disposal, has major deficiencies that would hamper its effectiveness as a remedial alternative. The earlier letter outlined six (6) technical modifications recommended by the Department to render this option more effective.

This preferred alternative, as currently proposed by EPA, cannot fully contain the contaminated sediments. Although this partially lined (unlined on the bottom) containment area may be sufficient to control PCB migration, since PCBs adsorb onto the sediments, it cannot control the migration (leaching) of the heavy metals in the sediments. Chemically fixing the contaminated sediments, as described in our earlier letter, can reduce greatly the potential for this contaminant migration. Otherwise, only a fully lined containment area can be acceptable toward an effective remedial solution. (Literature on this chemical fixation process is submitted for your review.)

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The remedial alternative selected and implemented will most likely disturb or change the ecological system in the area. As stated earlier, it is imperative that the EPA design the selected alternative to minimize the destruction of the wetlands and other natural resources. A restoration plan should be prepared prior to remedial implementation. It would be appropriate for the EPA to calculate and include the costs of this ecological/natural resources destruction and restoration in the total remedial project cost.

Finally, the Department repeats its request to the EPA to expedite research into the permanent destruction of the PCB contaminants (e.g. via biological or chemical agents). Only destruction of the PCB contaminants can render a permanent solution to this gross contamination.

The Department appreciates the level of coordinated efforts of the EPA to move this complex and priority Superfund site. We look forward to the discussion of other technical details (e.g. dredging equipment, silt curtains, etc.) with the EPA during the coordinated project design and implementation phases. If you have any questions or comments, please continue to contact Ms. Yee Cho of the Division of Solid and Hazardous Waste at 292-5591.

Very truly yours,



Thomas F. McLoughlin
Deputy Commissioner

TFM/YC/jp

Attachments

cc without attachments:

Commissioner S. Russell Sylva, DEQE-Boston
Paul T. Anderson, DEQE-Lakeville
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cc: (cont.)

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City Planning, Town Hall, New Bedford
Board of Selectmen, Town Hall, Acushnet
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