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Comment on Remedial Action Alternatives
Jan 15, 1985

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REGION 1
WASTE MGMT. DIVISION

The following remarks will be brief for my major comments were submitted at the last hearing.

I neither agree nor approve of the narrowing of the alternatives for want of content & proper procedures.

The decision for major alterations of community environs either lies with the communities or necessitates a shared decision with the local authorities responsible for their welfare. This is especially appropriate when options are available. If it is true that some level of government assume final responsibility (the lead agency) but this need not preclude the above, for it can accomodate an interim choice, which can then be finalized by the responsible agency.

I simply find it enigmatic, & even contemptuous, at least politically (& personally) that levels or people remote from can presume to decide for others, when those others have to live with & bear the long term consequences of the decision. This modus operandi has become habitual since the Federal agency assumed its role as the lead agency, a point simple to document by virtue of this author's experience as a local delegate.* I am especially surprised at the State's subservience in this regard.

For want of content, the physical analysis is not sufficiently generic nor complete in terms of specifics. While I have no objection to ~~the~~ specific proposals, they must be subarmed in terms of the full disposal capacity of the area North of the Coggeshall St Bridge, the only area capable to serve as a disposal site. That capacity must be assessed for the remaining material in the inner harbor. While it is mentioned that one (two) alternative(s) can be extended to accomodate the Southern area, no (critical) assessment was made, no cognizance of substantial cost savings if both areas were done at the same time. Further, the sediment cap method, as modified, may be able to accomodate the material from the Southern area. It also appears shortsighted to exclude consideration of a (coffer) dam to prevent tidal flow, & thus

*Documentation is available & may be submitted later as an Attachment (Appendix)

make more land available to contain displaced (dredged) materials. It should be noted any extension of the Western shoreline is consistent with the land use of the affected community. Further, there is considerable land that is open South of the Cove + East of the mills that can serve as a containment site if the solid unaffected land is displaced. Further this alternative prevents treatment of material near populations. Sufficient attention has not been given to variants of this proposal, + it may be judicious to assign an evaluation to local authorities so they can employ directly engineers who will be considerate of their sense of needs for the area. The latter approach is simply called participation.

As noted in my prior testimony, testing is incomplete in respect to the depth of contaminants (admittedly so by the engineers + staff), both for PCBs + other chemicals. It would seem only natural + prudent that this testing be exact before committment to any specific proposal since such information is essential to determine the volume of dredged material. I might note that as a local official at the time of RAMP, this was recommended. This is especially important if an assessment is to be made of the rest of the inner harbor.

Further, no borings of consequence have been made in the area of concern (the report cites 6 borings by the Cogg. St. Bridge + some at the cove). This is especially wanting if an area has been earmarked to contain all of the material. A bedrock profile is necessary. This would also be helpful in assessing the geology of the area, + the possibility of intrusion into groundwater sources. While the Williams report of the 2565 (1976) is cited in this regard, it is unclear whether specific measurements were made to make the determination, or whether it is an outline of expected conditions based on general samples distinct from the site. No assessment of the ~~geol~~ geology was made in terms of the adjacent quarry, which is highly faulted, an assessment made by Geotechnical Services for the SPR. While I have no reason to question the analysis, for a specific proposal of such magnitude there is necessitated specific testing. No references were made to such testing in the report.

While both the State + the Legislative staff of the Hazardous Waste Commission mention the need + value of alternative methodologies + this should be pursued, the procedures of the EPA appear to preclude pilot-testing to determine feasibility. The Federal agency will only accept methodologies demonstrably proven, + hence excludes a trial analysis. It would appear a reevaluation is in order in respect to the integration of research relative to local applicability. I might note the author, as a local delegate, made efforts in this regard 2 years ago, a more appropriate time, + was told that later the matter would be considered. And by arrangements I mean the visitation of authorities specialized in this area, arrangements for testing with MERC (URI), as well as at Vicksburg. Funding + responsibility were the problem, + this distinct from the Regional EPA. If efforts + an effective authority were available from the latter, the pilot testing may have occurred. (See Memo to Governor's Task Force + Minutes, as well as to EPA from Local Official). If the EPA has current interest, the same research institute (URI, Franklin Research Institute, R. Kyllonen, Phila, Pa), recently inquired in respect to incineration, a method distinct from that proposed at the time).

At any rate, what is pertinent is the timing of the determination of the viability of such procedures, namely, early in the process.

In general, the following must be done before a specific action proposal is selected:

#1. Complete the data base:

1) depths to bedrock of the Northern Area
2) Specific testing of the geology, relative to groundwater intrusion
3) depth of contaminants for both the Northern + Southern inner harbor

#2. Based on the above, a generic + specific assessment of the Northern Area's disposal capacity, not to exclude the Southern area.

#3. The availability of the above alternatives to the affected communities for their decision, whether interim or final.* The local authorities can then adopt the above, for they admit variants, working with their own engineers in cooperation with the Corps contractor (NUS). Out of it may come a selection tailored to the needs of the locality.

If the local area is to assume responsibility (liability), then it would only seem natural + respectful to follow the above procedures.

Later, I shall submit attachments relative to some of the observations in the Comment.

Sincerely,
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* I might note this is not only consistent with but fulfills the policies of the executive offices to which the Regional EPA + State agency (DEQE) are obligated to serve, not to mention the Act. Ruckelshaus had explicit policies in this regard.

The following are some observations on the Feasibility Study (28-1843; 68-01-6699), August, 1984.

In the citation of fish levels (p 3-7), distinction should be made of levels in the inner harbor vs the outer harbor, the latter being the area of common consumption. While many (most) of the values are for the outer harbor, the distinction should be made & medians (means) determined for such. The report mentions no testing of clams in the inner harbor North of the Coggeshall St. Bridge. Early testing did, I believe, & the value was about 22 ppm, though I am relying on memory for this. The report (3-34, 3-35) says no shellfishing is permitted in the Outer Harbor due to PCBs. This is false.

Further, such data should be made available (access to the computer) within the region. Initial attempts were made in this regard by WHOI & the local official, but apparently such data is in the private sector. The arrangement is peculiar given that the data sources are public.

The report mentions the decline of air levels, comparing the recent measurements with measures in the mid-seventies. The decline is in the high area (upper river). I am most gratified at this but note this was the 1st time it has been mentioned. It should be publicly communicated. However, the report did not identify the locus (specifically) of the early measurements. Further, there are other regional air measurements, which the consultant did not avail themselves of. When the EPA issued the latter measurements (1982 c.) the above context, including their low level relative to plant exposure, should be been communicated.

The report mentions water depths near the Cogg. St bridge & upper river (p 2-10) but does not give the source nor specifics (Nadeau, C. Guard?). The measurements should be compared with the Survey by NOAA (NOS), c. 1978.

The maps or table which gives sediment levels should specify that they are maximum values. Otherwise, the exhibit can be misleading.

The maps of heavy metals (p 3-14) should also be given for the Southern Inner Harbor, for some of the metals are much higher there. This will illustrate the need of cleanup of this area.

Marvin Holman

Could you please Xerox &
forward me a copy. I asked this
& maildropped on the 15th

Bob Davis