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Site: <u>New Bedford</u>
Serial: <u>46</u>
Other: <u>222674</u>

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United States - E.P.A.  
Att: Gerard Sotolongo  
MA/CT/ VT - Site Response Section  
Superfund Branch  
Waste Management Division  
J.F.K. Federal Building  
Room 1907  
Boston, MA 02203

Gentlemen:

Re: New Bedford Draft Feasibility Study

I have read the Draft Environmental Impact Study and I have the following comments.

All contemporary dredging methods result in turbidity plumes. Silt curtains contain a greater portion but some percentage of the suspended matter is not trapped and always escapes. The dredging is proposed to take some four years so the proposed silt curtains will have to function in all types of weather and function during significant storm events. These silt curtains must then be more substantial than curtains currently employed in other dredging projects.

The dredging methods described will result in turbidity plumes being created during the excavation of the PCB laden muds. Some of the water-borne sediments or soil particles will be composed of or have a portion of organic matter. The PCB's will probably be bonded to these floating organic suspended solids. While some may be trapped by the siltation barriers, some proportion will not be trapped and will pass through to Buzzards Bay.

What portion of the suspended matter will be trapped by the barriers described? How much, in pounds, of PCB will then be transported into Buzzards Bay?

The construction of the sand blanket shown on Figure 2-2 will result in subsurface water flow from the containment area into New Bedford Harbor. While the sand filter will probably trap PCB's bonded to dissolved solids, waterborne oils may pass through this sand barrier into the harbor. Additional silt barriers or silt curtains should be emplaced and maintained to trap any such transport. Portions of the sand barrier may also become contaminated so those portions must be buried also at the containment site.

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Whether a three foot cover layer is sufficient to protect the contaminated soil is questionable near the shore. Storm events may cause significant changes in the bottom topography near the shore. The three foot cover should be increased.

Incineration is preferred by the author since it results in a complete destruction of the PCB's. Not discussed at all is the potential of recycling of some metals in the dredged spoils if incineration takes place. Some recycling of the metals surely could take place which would alleviate the high economic costs.

New Bedford Harbor is not the only PCB contaminated site, so a portable, shipborne, or semi-portable incinerator should be designed, developed, constructed and used to destroy the sediments; then the facility could be moved to the next contaminated site and reused again. Significant savings could be developed. A nationwide problem could be addressed and solved with the best available solution.

If you have any questions, please write me.

Sincerely,



Michael B. McGrath

MBM/gd

cc: Falmouth Board of Selectmen