

SIERRA CLUB • New England Chapter

3 JOY STREET, ROOM 12, BOSTON, MASSACHUSETTS, 02108 • 617-227-5339

July 13, 1984

Mr. Gerald Sotolongo
EPA Region 1
JFK Federal Building
Boston MA

Site: New Bedford
4.4
222712

Dear Gerry:

Thank you for the efforts you are making to keep interest groups and the community informed on the progress of clean-up plans for the New Bedford PCB sites. We appreciate all the trouble you are taking.

I am writing to express some concerns about EPA-NUS's development of alternative remedial actions to clean up the "hot-spots" in the Acushnet River. These concerns are based on the "draft-draft" you circulated to us, and the information you presented to the citizen's group meeting on June 26 in New Bedford.

If I understood you correctly, EPA-NUS will probably narrow the field of alternatives mentioned in the "draft-draft" to four: no-action, hydraulic controls, dredging of contaminated material for "containment" at a near-shore site; and dredging of contaminated material for "containment" at an upland site to be designated by the state.

Other alternatives which were described in the preliminary draft will probably be dropped. Various methods of incineration and chemical destruction will no longer be considered because of cost factors, time factors, or "infeasibility."

While the elimination of those alternatives may in the end be justified, I would like to urge EPA-NUS not to drop them without exhaustive consideration. We are concerned that PCBs are persistent in the environment and the proposed "containment" alternatives may simply represent a postponement of the problem, one that staves off the immediate threat of migration of PCBs downstream (good!), but leaves a monument to the potential for future escape of toxic material. It is difficult to imagine what kinds of liners or containers will dependably withstand hundreds of years of Massachusetts' climate without permitting leaching of contaminants into the environment. Is EPA assuming that a site with permanent integrity can be found? Are you assuming, instead, that a future generation will come up with the technology and dollars to deal with this contaminated material more effectively?

A closer look at incineration and chemical destruction alternatives may well be justified because they may eliminate the dangers to future generations, not simply hand the problem over to someone else. In the last few years, I have been involved in both the chemical and radioactive waste disposal issues. With radioactive waste, we appear to

continued



page 2 -- Sierra Club on New Bedford Clean-up

have no choice but to find the securest form of containment and hope the radioactivity decays to harmless levels before any material leaks out. With much chemical waste, however, we seem to have an advantage because technology is available to destroy or at least substantially decrease the chemical toxicity. Let's not discard this advantage unless we absolutely have to!

It is not clear to me how costs which future generations will have to spend on remedial actions are figured into EPA's "fund-balancing" system, but this is an important factor that must not be overlooked, as well as the mammoth regulatory burdens and responsibilities which we seem to be leaving every time we allow the siting of a "secure landfill." I hope these factors will be seriously considered in EPA-NUS's clean-up alternatives for the Acushnet River.

I am also enclosing a copy of a letter to Bill Cass on another aspect of this issue which we discussed on the 26th.

Thanks again for your efforts.

Sincerely,

Priscilla

Priscilla Chapman
Executive Director, New England Sierra Club

cc: Michael Deland, Regional Administrator
Gil Woolley, New England Sierra Club Hazardous Waste Chair

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Mr. William Cass, Director
Division of Hazardous Waste
1 Winter Street
Boston MA

Dear Mr. Cass:

The New England Sierra Club has been following the issue of the clean-up of the New Bedford Superfund sites with intense interest for several years. On June 26, I attended a meeting in New Bedford at which Gerry Sotolongo of EPA presented an update to citizens on the development of alternative remedial action plans for the "hot spots" in the Acushnet River.

Two of the potential alternatives, as you are probably aware, involve dredging of the contaminated material from the river for "containment," either at a near-shore site or at an upland site "somewhere in Massachusetts." I asked Gerry at that point whether the designation of either site would have to go through the established Massachusetts process for siting hazardous waste facilities and whether the site would have to meet the criteria in Phase II of the Massachusetts regulations. Gerry responded that this question had been posed to DEQE, but that at that time, no response had been received.

We would like to know what DEQE's response is. The answer to this question will obviously be a major factor in the ongoing discussion of EPA's proposals for clean-up alternatives which will probably be taking place in August and early fall.

Thank you very much for your attention to this matter.

Very sincerely,

Priscilla Chapman

Priscilla Chapman
Executive Director, New England Sierra Club

cc: Tony Cortese, DEQE Commissioner
Michael Deland, Regional Administrator, EPA
Gerry Sotolongo, EPA
Gil Woolley, New England Sierra Club Hazardous Waste Chair