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Superfund Records

SITE: New Bedford

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September 12, 1990

Balsam Project 6002

Ms. Mary Sanderson
United States Environmental Protection
Region I
John F. Kennedy Federal Building
Boston, Massachusetts 02203-2211

RE: Draft Final Feasibility Study of Remedial Alternatives for the Estuary and Lower Harbor, New Bedford Harbor, Massachusetts

Dear Ms. Sanderson:

I recently received a copy of the United States Environmental Protection Agency's (EPA's) "Draft Final Feasibility Study of Remedial Alternatives for the Estuary and Lower Harbor/Bay, New Bedford Harbor, Massachusetts," (LHB FS) and have completed a preliminary review of this document. What is most notably absent from the EPA feasibility study is the use and application of technical concepts developed and presented in the remedial action program report submitted by Balsam Environmental Consultants, Inc. (Balsam) on behalf of AVX Corporation (AVX); indeed, the entire concept of capping as a remedial alternative is given little serious consideration.

Two aspects of the LHB FS in particular were surprising. First, in EPA's development of remedial alternatives for the site, a capping alternative for a PCB target clean-up level (TCL) of 10 parts per million (ppm) was proposed. However, in the LHB FS an alternative TCL of 50 ppm, no similar capping remedial alternative was included; rather, capping was considered only as a single component of a hybridized alternative (SW-7).

Second, the LHB FS suggests that capping does not reduce the mobility of contaminants. Such a conclusion is contrary to many of the studies undertaken in support of the LHB FS itself, as well as detailed analyses presented in the Balsam remedial action program report. In particular, work performed by the United

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States Army Corps of Engineers (USACE), as well as by Dr. Louis Thibodeaux, demonstrate how capping can successfully reduce the mobility of PCBs at the New Bedford Harbor site. Furthermore, in response to stated concerns about the long-term effectiveness of capping, the Balsam report on capping presented detailed discussions demonstrating why concerns about potential mechanisms which could conceptually affect the integrity of the cap were unfounded.

What is most surprising about the extremely limited consideration that Ebasco appears to have given to the capping alternatives is that representatives from AVX and Balsam met on many occasions during 1988 and 1989 with representatives of EPA and its contractors to discuss remedial alternatives for the New Bedford Harbor Superfund Site. The focus of these discussions centered on a remedial action plan which Balsam developed for AVX. During these meetings, the EPA New Bedford Harbor project staff expressed interest in the proposed in-place containment remedial alternative, and provided Balsam with an outline of how to prepare a report presenting that alternative so that EPA would be able to utilize the considerable work undertaken on behalf of AVX in its feasibility study. In order to assist EPA in that effort, Balsam prepared its report substantially in accordance with the outline provided by EPA, with the understanding that EPA intended to utilize significant portions of the technical work undertaken. Indeed, the Balsam report presented a very detailed level of technical information, demonstrated by a 30-plus percent remedial design effort and the comprehensive nature of the in-place containment remedial alternative which included, among other things, detailed remediation plans for the eastern salt marsh area. In view of this extensive cooperation, the failure of the LHB FS to fully utilize the potential of a capping remedial alternative is disappointing.

Given the voluminous nature of the LHB FS, as well as the unavailability of critical supporting materials such as the report on the Battelle and Hydroqual models, these comments are necessarily preliminary in nature. AVX Corporation anticipates filing more detailed comments on the Proposed Plan at a later date. Nonetheless, given EPA's intention to announce its preferred remedial alternative for the site on or before the public meeting on September 26, I wanted to communicate my initial thoughts as soon as possible, so you may give these issues further consideration in the selection of EPA's preferred remedy, as well as any further revision to the final LHB FS.

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These comments are submitted on behalf of AVX Corporation. Please include this letter in the Administrative Record.

Sincerely,



Leonard C. Sarapas, P.E.
Vice President

tb/S4307

cc Ellen Mahan, Esquire
Department of Justice

Mary K. Ryan, Esquire
Nutter, McClennen & Fish