



Rosemary S. Tierney, Mayor

City of New Bedford

OFFICE OF THE MAYOR

DCN# 14  
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Superfund Records Center

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July 9, 1992

Gayle Garmen, Remedial Project Manager  
U.S. Environmental Protection Agency  
Waste Management Division (HRM-CAN3)  
JFK Federal Building  
Boston, MA 02203

RE: EPA's Preferred Alternative for the City of New Bedford's  
Estuary and Lower Harbor.

Dear Ms. Garmen:

The following comments represent the City of New Bedford's concerns pertaining to the EPA's Preferred Alternative for the Estuary and the Lower Harbor:

1. **PCB Contaminated Grit**

The Main interceptor and Bellville Avenue Collector currently contain approximately 10,000cy of PCB contaminated grit. The City's preferred alternative for remediation is to permanently encase the interceptor, install monitoring wells and bypass the contaminated area with the installation of a 2,700 foot force main interceptor, with modifications to three existing pump stations. Work has already begun on the force main interceptor and the modifications to the pump stations, at an approximate cost of 1.8 and 2.6 million dollars respectively.

In the event that the City is mandated to remove and dispose of any PCB contaminated grit, the City requests that space within the proposed Contained Disposal Facilities (CDF's) be reserved for any such mandated disposal.

2. **Future Pier Expansion, Marina Development and Navigational Dredging**

Pier expansion projects, marina developments and navigational areas of the Harbor may require future dredging. These areas and the volume of material to be

dredged will be identified in the Master Plan for the New Bedford Harbor, that is scheduled for completion in August 1992.

The City requests that the disposal of the proposed dredged harbor material as identified in the Harbor Master Plan, be combined with the disposal of the harbor cleanup dredged material in the CDF's. This suggestion was made in preliminary discussions, concerning the disposal of dredged harbor material, with the U.S. Army Corps of Engineers.

The growing concern is that the disposal of contaminated dredged material is too costly or no longer possible, resulting in a hardship for the City. Future dredging is a necessary tool for navigational purposes, pier extension, marina maintenance and development. It is in light of these concerns, that the City requests that EPA provide and insure future disposal capacity for dredged material within the CDF's.

**3. CDF Siting Procedures and Land Acquisition**

The siting of the CDF's may be beneficial to harbor development. Areas such as pier and bulkhead extensions may require filled areas. CDF's, if properly located, may be the base of such extensions and developments. These areas of expansion and development are to also be identified in the Mater Plan for the Harbor.

The siting of CDF's as the base for harbor development may also simplify the legal ramifications of land acquisition for proposed CDF sites. The Harbor Master Plan Committee, consultant and city officials would like an opportunity to discuss the coordination of the two projects with EPA.

**4. Capping of the area at the Wastewater Treatment Plant (WWTP) outfall**

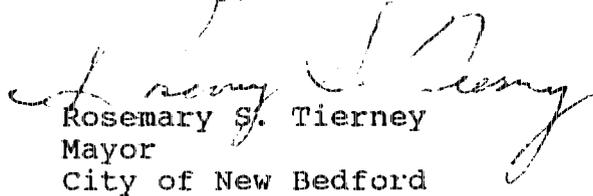
Should Effluent Analysis determine the need for a diffuser to be placed at the end of the outfall, the proposed cap area may require dredging. The dredging, if required, should take place before the area is capped. The City requests the opportunity to discuss the coordination of these two projects with EPA.

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The Master Harbor Plan and the Wastewater Treatment Plant are two projects that require planning efforts corresponding with the cleanup of the harbor. We trust that our concerns have stressed the importance of a cooperative venture.

There are many sub-components of the harbor that will benefit from a joint planning effort. We look forward to working with you towards the common goal of a cleaner harbor. If you have any questions please contact Elizabeth Bettencourt (508) 979-1485.

Sincerely,

  
Rosemary S. Tierney  
Mayor  
City of New Bedford

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