

**MALCOLM
PIRNIE**

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Att: [unclear]
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MALCOLM PIRNIE, INC.
ENVIRONMENTAL ENGINEERS, SCIENTISTS & PLANNERS
46698
any comments?
[signature]

October 5, 1983

Merrill S. Hohman, Director
Waste Management Division
Region I
U.S. Environmental Protection
Agency
John F. Kennedy Federal Building
Boston, Massachusetts 02203

Re: New Bedford Harbor
PCBs Cleanup

Dear Mr. Hohman:

It was a pleasure to sit on the panel with you at the Spill Control and Hazardous Materials Conference and Workshop in New Haven on September 29, 1983. I believe that your real world assessment of the limitations and capabilities of Superfund is the most accurate representation I have heard to date. I would greatly appreciate a copy of your notes, if possible.

Unfortunately, the limited time we had to speak did not allow us to discuss the range of concerns associated with New Bedford Harbor in any detail. Therefore, I would like to clarify a few points for you. Our recommendations to remove the hot spot in the upper harbor were based on a rather strict interpretation of the regulatory requirements for dealing with PCB contaminated material. I believe you are in full agreement that the most desirable approach would be to remove the contaminated hot spot and place it in a secure land burial facility at an upland site. Unfortunately, it is increasingly clear that the local community will resist such an activity. The alternative of transporting it off site to some distant disposal site is clearly cost prohibitive. As you recall, we did address in-place stabilization or shoreline disposal of the highly contaminated material in our report. However, we did not believe the placement of highly contaminated material in such locations would be acceptable to the regulatory agencies. If in-place disposal of material in excess of 50 parts per million PCBs stet acceptable, a whole range of options warrant further consideration.

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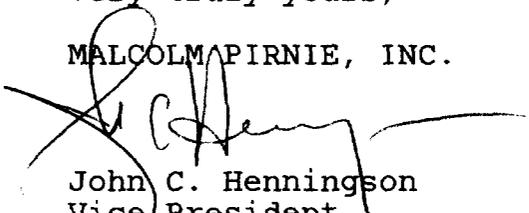
Malcolm Pirnie has recommended in-place stabilization in the past. We designed a stabilization plan for PBC contaminated bank deposits on the upper Hudson River. You may be aware that we recommended sealing off Slip No. 3 in Waukegan Harbor as a relatively low cost and low risk alternative to dredging and off-site disposal. Similarly, we have recently recommended the use of a reinforced dike to separate contaminated sediments in the Niagara River from the main stream until such time a more cost-effective disposal and/or treatment method becomes feasible. Similar approaches could be undertaken in New Bedford Harbor.

I question whether the shoreline stabilization or creation of a filled site in the harbor will be any more acceptable to the local public than building an upland site. It is possible that the application of an in-place treatment technique utilizing chemical means, such as sodium polyethylene glycolate (NaPeG) or potassium polyethylene glycolate (KPeG), might be suitable if the material can be put in a dry upland area. We are currently undertaking demonstration studies at an upland site in the Buffalo area for the destruction of PCBs using these chemicals. If the public believed that the disposal site would be of limited duration and a treatment process would ultimately make the material nonhazardous, they might accept the dredging and disposal concept. If you are interested, I would be glad to meet with you to discuss available information on our demonstration project in upstate New York and the various in-place stabilization recommendations.

In closing, I would like to reiterate how much I enjoyed your presentation. It is clear that we both recognize the difficulties in administrating unique projects such as New Bedford Harbor under the Superfund Program. I am hoping that this project can get moving in the near future and look forward to working with you to develop an implemental solution.

Very truly yours,

MALCOLM PIRNIE, INC.



John C. Henningson
Vice President

ct
cc: G. Sotolongo
T. McMahon
PR3-089-739