



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

13.1-05
Superfund Records Center

SITE: NEW BEDFORD

BREAK: 13.1

OTHER: 47477

September 28, 1995

Honorable Robert M. Koczera
Commonwealth of Massachusetts
House of Representatives
State House, Room 167
Boston, MA 02133-1020

OFFICE OF THE
REGIONAL ADMINISTRATOR

Dear Mr. Koczera,

Thank you for your letter of September 12, 1995, to Carol Browner, Administrator, concerning the long-term storage of untreated PCB-contaminated sediment in shoreline Confined Disposal Facilities (CDFs) at the New Bedford Harbor Superfund Site. Administrator Browner requested that EPA-Region I, New England respond to the issues raised in your letter.

As an alternative, your letter proposes to apply the same (but as yet unselected) treatment technology to be used for the hot spot sediments to the phase 2 sediments. You maintain that such a course of action would be the most prudent expenditure of public funds, and would avoid potential leakage from the CDFs.

The Environmental Protection Agency (EPA) has evaluated potential treatment alternatives to CDFs for phase 2 at great length. However, because of the much larger volume of sediments to be treated for phase 2 (475,000 cubic yards compared to 14,000 cy), and the fact that these sediments are not as highly contaminated as the hot spots, we firmly believe that CDFs represent a protective and cost-effective cleanup approach. Treatment of the phase 2 sediments - about 10 football fields each piled 25 feet high - would cost on the order of \$200 million to \$600 million (the Commonwealth would be required to cost-share ten percent of the final total). More importantly, even if the CDFs leaked at worst-case levels, the amount of PCBs entering the harbor would be decreased by more than 98% compared to the amount that's currently contaminating the harbor ecosystem day in and day out. Given these facts, we have to disagree with your assertion that treatment of the phase 2 sediments would be the most prudent expenditure of public funds.

In addition, there could be important secondary benefits to the local area if the CDF-based plan were implemented. The CDFs could potentially take a substantial amount of navigational dredged material as preliminary cap material. Finding alternative disposal options for this highly contaminated navigational material will be very difficult and time consuming. The CDFs could also be beneficially redeveloped as the local communities see fit (as commercial port facilities, shoreline parks or bird sanctuaries, for example). It's also important to remember that even if the phase 2 sediments were treated, CDFs for the same amount of volume would still be required since the sediments would have residual levels of contamination.

The EPA is committed to working with the harbor communities to build consensus for a cleanup plan that everyone can live with. We have been meeting with the mediated community Forum group every two weeks in an attempt to discuss and explain the many issues associated with a project of this magnitude. Your participation at the Forum meetings would be greatly appreciated.

Thank you again for your concern in this matter. We look forward to working with you in the future in search of viable solutions for the harbor cleanup. If you need further assistance or information, please do not hesitate to contact me or Al Frezza, Office of Congressional Relations at (617) 565-3162.

Sincerely,

A handwritten signature in black ink, appearing to read "John P. DeVillars". The signature is stylized with a long horizontal stroke at the beginning and a wavy line at the end.

John P. DeVillars
Regional Administrator