

EPA REQUEST

OUR RESPONSE

DISCONNECT THE TERMINAL FROM THE CLEAN UP OR THE NAV DREDGING

IF DISCONNECTED, HOW CAN IT BE APPROVED UNDER CERCLA?

Superfund Records Center
SITE: New Bedford
BREAK: 3.1
OTHER: 509562

WHAT IS RATIONALE FOR DISCONNECT?
FOR PROJECT PURPOSE, WHOLE IS GREATER THAN SUM OF PARTS;
DON'T HAVE TO DEMONSTRATE LEDPA FOR EACH PART.

BUT—WE CAN LINK IT TO THIS ONE TERMINAL, RATHER THAN ALL THE OTHERS
WILL NOT ARGUE THAT THIS IS ESSENTIAL TO REMEDY, RATHER THAT IT ENHANCES THE REMEDY BY PROVIDING FOR BENEFICIAL RE-USE OF SAND AND POTENTIAL STAGING AREA WHEN CAD'S ARE CREATED. CAN SUPPLY MORE FACTS ABOUT ACREAGE, USE, AND ABILITY TO SERVE MORE THAN ONE PURPOSE

RULE OUT QUONSET-SHOW THAT WIND INDUSTRY NEEDS 2 PORTS

TERMINAL IS NOT JUST FOR WIND

GOAL IS GREEN JOBS/ENVIRO JUSTICE TERMINAL AND BENEFICIALLY REUSE OF SAND, QUONSET CAN'T DO THAT

EXAMINE FALL RIVER AND BOSTON

WHY? CAN'T BENEFICIALLY RE-USE SAND

LOOK AT 3 OTHER NEW BEDFORD SITES

YES

IN-DEPTH IMPACT ANALYSIS OF SOUTH TERMINAL

NEED AGREEMENT ON SCOPE AND FEDERAL RESOURCE AGENCY BUY-IN, ASAP WE CAN AGREE TO DO ACREAGE OF IMPACT USING FEDERAL RESOURCE AREA DEFINITIONS

IN DEPTH ANALYSIS OF EACH ALTERNATIVE

SHOW PCB CONCENTRATIONS IN AREAS OF WORK NOT NECESSARY IF OTHER ALTERNATIVES



ARE IMPRACTICAL; WE SHOULD ONLY CHARACTERIZE THOSE SITES
IN NEW BEDFORD THAT ARE PRACTICAL

DO AIR EMISSIONS MODELING TO SHOW THAT IT'S
UNDER THRESHOLD

CAN DO THAT NOW. IF WE ARE OVER THE LIMIT WE WILL
DEMONSTRATE OFFSETS POST-APPROVAL, PRE -CONSTRUCTION

STORMWATER RUNOFF

CAN IDENTIFY POTENTIAL BMPS NOW, TO BE FLESHED OUT AT
DESIGN STAGE

FLESH OUT MITIGATION AND SHOW HOW IT
ADDRESS THE IMPACT

NO—LOTS OF MITIGATION IDEAS PUT ON TABLE EPA CAN APPROVE
NOW BASED ON THE IDEAS GENERATED TO DATE BECAUSE IT
SHOWS THAT MITIGATION IS OUT THERE, WITH MITIGATION
COMMITMENTS NAILED DOWN POST-APPROVAL BUT PRE-
CONSTRUCTION

DON'T PUT CONTAMINATED SAND INTO THE
SOUTH TERMINAL

OK