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United States Coast Guard

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U.S. v. AVX Original
Litigation Document

16450
16 March 1983

Mr. Merrill Hohman
Director
Waste Management Division
United States Environmental Protection Agency
John F. Kennedy Federal Building
Boston, MA 02203

Dear Mr. Hohman:

The New Bedford PCB problem is a complex one that is inherently fraught with unknowns, firm and flexible standards, and alternatives that are exorbitantly expensive. Your draft Remedial Action Master Plan (RAMP) is an excellent first step in putting order to the worthwhile, but wide-ranging efforts of many organizations that have been involved with the problem over the last ten years.

As you know, the OSC's efforts in the New Bedford area have been directed at the PCB hot spot problem in the Upper Acushnet River. The Coast Guard under the direction of the Commanding Officer, Marine Safety Office Providence, RI and with the assistance of EPA's Environmental Response Team has just completed an immediate response in this area. The results of their work indicate that the Upper Acushnet area is a source of PCB contaminants for the lower estuary with total yearly input estimated to be approximately 1500 pounds per year.

My recommendation is that the Hot Spot Remediation Plan (project 016) be started immediately. The other Fast-Track projects should proceed concurrently with the Hot Spot Remediation work.

The Hot Spot Remediation Plan should be directed specifically at diking the heavily contaminated area off the Aerovox property west of the channel and dredging highly contaminated sediments from eastside of channel and placing them in this diked area adjacent to the river. These mud flats would be a particularly good site for diking because the very high concentrations near the Aerovox outfall could be impounded at minimal cost and disturbance.

The Fast Track Implementation Plan for the Hot Spot Remediation should include a plan for land acquisition, landfill design, dredging techniques and permit requirements. Enclosed is the proposed landfill location.

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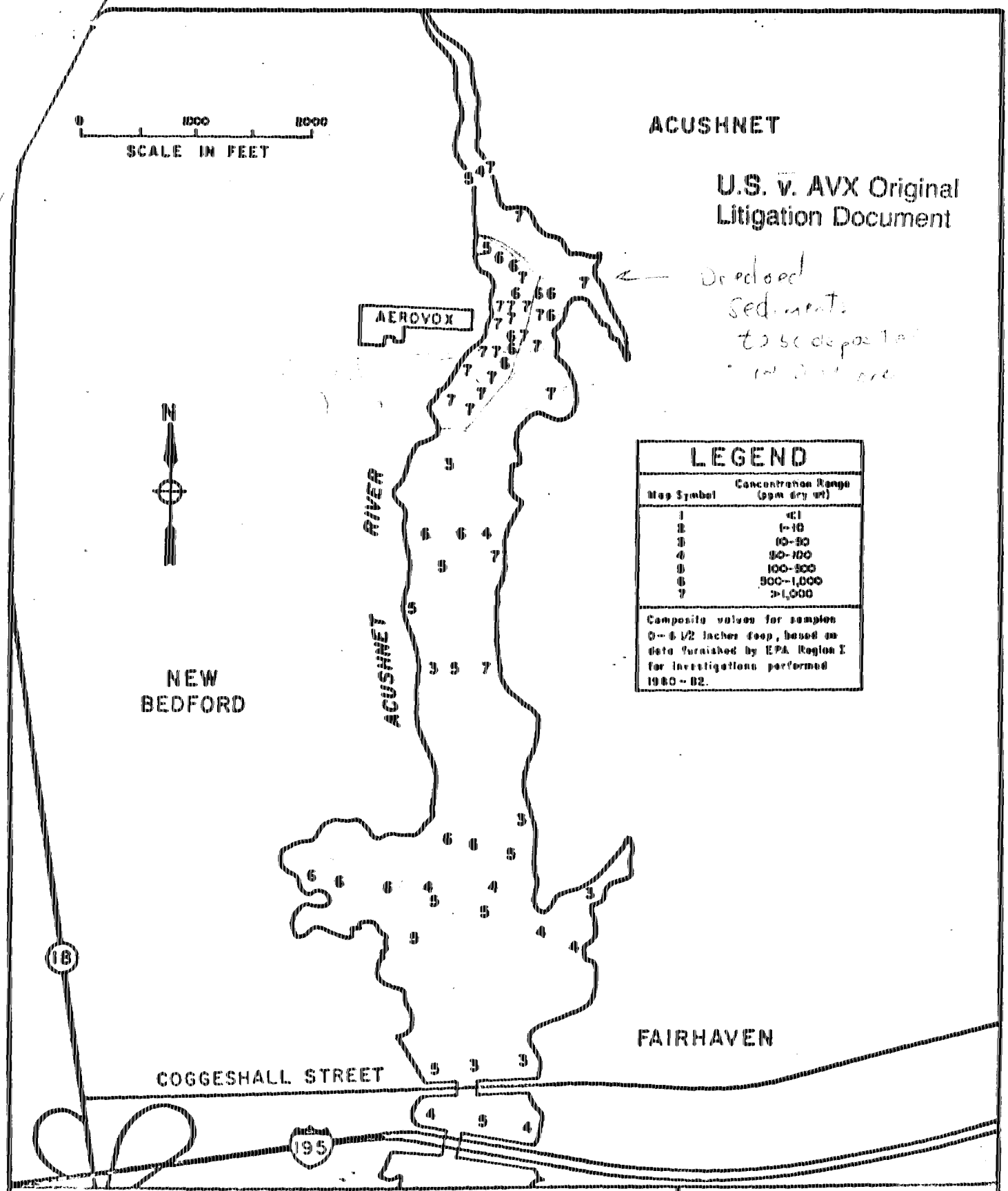
SDMS DocID 51780



USEPA CONTRACT No. 68-03-1613
WORK ASSIGNMENT No. 2-2-14.11

WESTON

NEW BEDFORD REMEDIAL ACTION MASTER PLAN

FIGURE 2-1a
PCBs IN BOTTOM SEDIMENTS (UPPER ESTUARY)

ENCLOSURE 1

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While the Hot Spot Remediation Plan is proceeding, data gained from other RAMP work projects can be utilized. If any of these show that implementation plan is less than optimal, its efforts can be redirected. However, given the considerable data that has already been accumulated for this area, I feel that the landfill approach, adjacent to the Aerovox plant is the best alternative to provide immediate reduction in PCB migration in New Bedford Harbor.

Sincerely,

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R. BARRY ELDRIDGE
Captain, U. S. Coast Guard
Co-Chairman, Regional Response Team