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SIERRA CLUB · New England Chapter

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MAR 15 1983

REGION I
WASTE MGMT. DIVISION

March 15, 1983

Merrill Hohman, Director
Waste Management Division
U. S. Environmental Protection Agency
JFK Federal Building
Boston MA 02203

Dear Mr. Hohman:

On behalf of the Hazardous Wastes and Substances Committee of the New England Sierra Club, I would like to offer some comments on the draft Remedial Action Master Plan for New Bedford.

First of all, we appreciate the enormity of the problem which EPA is now attempting to address. The simple fact that the plan is directed at an entire city, rather than at one or two specific sites, is an indication of the overwhelming nature of the New Bedford situation. At the outset, we would urge that the New Bedford plan be divided into several separate projects: for example, the municipal landfill, Sullivan's Ledge, the sewer system and wastewater treatment plant, the "hot spots" in the upper estuary, the harbor and Buzzard's Bay. We are concerned that by treating all of these elements as "one project," remedial action at one or more sites might be delayed pending completion and submission of a final RAMP and Feasibility Study for all the components.

Even given the magnitude of the problem, it is dismaying to review a Remedial Action Plan which contains no proposals for action, only proposals for further study. The draft states, "The New Bedford situation is one of the most extensive -- and one of the most studied -- cases of environmental contamination by PCBs." Then the RAMP goes on to describe more studies which are allegedly necessary before any remedial action can begin.

The Sierra Club is not questioning the usefulness of further study of some aspects of the PCB contamination in New Bedford; in fact, we believe that some of the studies proposed in the RAMP are likely to reveal extremely important information, such as Project 3C8, "Investigation of Biological, Chemical and Geophysical Pathways in New Bedford Harbor." But we are alarmed that, of the one and a half to two and a half million dollars estimated as the cost of the proposed work in the RAMP, apparently not one cent is for actual clean-up action.

While we acknowledge the need to evaluate the extents of contamination and the possible remedial alternatives before proceeding to clean-up, we suggest that the seemingly endless study of some aspects of the New Bedford situation now constitutes a Remedial Action Stalling Plan, a RAMP rather than a RAMP. We urge that EPA move immediately to identify areas where a course of remedial action is now clear and move to implement these actions. Below are some comments and suggestions on where these areas might be.

1. New Bedford Municipal Landfill. Assessments of contamination

continued

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escaping from the landfill have been made by the Office of Toxic Substances ("Environmental Assessment of PCBs Near New Bedford, MA, Municipal Landfill," May 1978) and recommendations for remedial measures and a monitoring system have been made by Gidley Laboratories ("Final Summary Report," 1980). Could these two documents be used as a basis to proceed immediately to recommendations for remedial action alternatives?

Furthermore, the "purpose" given for Work Project 005 indicates that EPA is more interested in considering the landfill as a future dumpsite for PCB contaminated soils than in securing the area against further escape of contaminants. The landfill comprises approximately 65 acres in swampy terrain. It is not an appropriate candidate for a future PCB dumpsite. This suggestion should be stricken altogether, and the "purpose" should be revised to make clear that the goal of this project is isolation of the present contaminants from the environment and surrounding community.

2. The Wastewater System. A mass balance was done on the incinerator by GCA in 1977, revealing that the incinerator's efficiency for destroying PCBs varied from 46% to 77%. Why must this investigation be repeated? Why hasn't EPA required some technical modifications of the facility to prevent or at least reduce PCB discharge in the intervening period of time? Also, could the information about sewer system "hot spots" in the October 1982 DWPC memorandum (E. Dunn) supply a sufficient basis to propose remedial action now?

3. Acushnet River Estuary. Figure 2-1a of the RAMP appears to indicate that PCB hot spots in the estuary have already been identified, and more data from GCA is due momentarily. Why does further study need to continue through September? We suggest that EPA move immediately to formulate action alternatives for hot spot clean-up, while continuing with the proposed studies of transport of contamination through the harbor to Buzzard's Bay.

There has already been investigation of dredging alternatives in reports by Geotechnical Engineers, Inc., August 1979 and by Malcolm Pirnie, Inc. for DEQE in September of 1982, which concluded that dredging is a technically feasible alternative. EPA wants to consider alternatives to dredging at this time. It is not clear whether this position is motivated by an attempt to reduce the costs to the polluting parties (presuming that EPA intends to move to establish liability) or by the actual existence of a feasible, preferable alternative.

It is crucial however, that EPA move immediately to a presentation of the alternatives available (whatever they are) and to public discussion of the possibilities, so that action can be taken to minimize further transport of contaminants into Buzzards Bay. Particularly since the solution is likely to involve location of a site for disposing of the dredged spoils, it is important to get this discussion underway immediately, with the public, relevant government agencies, etc.

We also point out that information is already available about contamination in the harbor and around Clark's Point, and urge consideration of possible remedial action on the basis of present

information.

4. Sullivan's Ledge and Undisclosed Sites. There appears to be no reason why further investigation of contamination at Sullivan's Ledge and investigation of possible other sites should not go forward immediately.

5. Air Quality Monitoring. We would like to see the monitoring program carried out this summer as proposed, but point out that some data on air quality is already available; therefore remedial action in some areas could go forward without waiting for this summer's data.

All in all, since funding for studies and/or remedial action has to be dispersed from the Washington EPA headquarters, and since Superfund is a limited fund on which many demands are going to be made, it is clear that significant further delays in submitting proposals are likely to result in expiration of funding possibilities. Therefore a proposal which combines requests for funding of studies and for remedial action where possible will be greatly in the interest of protecting the environmentand public health of the greater New Bedford area.

Finally, further delay appears to be resulting from the fact that a "lead agency" has not been designated, and therefore a number of questions and determinations are pending, awaiting this designation. We note in particular that the sheet for Work Project 215, "Community Relations Program," is blank. We urge that bureaucratic hassles not be allowed to obscure the need to move quickly to protect the health and environment of the citizens of the New Bedford area. We urge that a "lead agency" be determined immediately, and that a public meeting in New Bedford be scheduled to discuss the entire situation as soon as possible.

Thank you for the opportunity to comment. We would welcome the opportunity to be involved in whatever further discussion of the New Bedford problems are to occur.

Truly yours,

Priscilla Chapman

Priscilla Chapman
Executive Director, New England Sierra Club
(on behalf of the Hazardous Wastes and Substances Committee)

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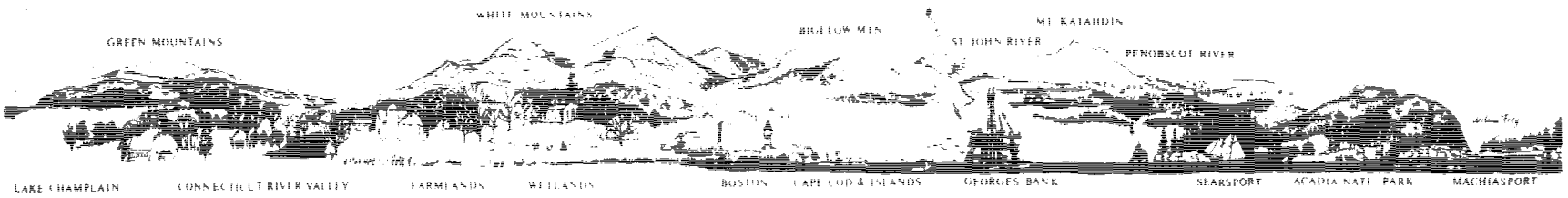
Mr. Jerry Sotolongo
Waste Management Division -- [illegible]