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New Bedford  
51840

## Review of:

NEW BEDFORD REMEDIAL ACTION MASTER PLAN  
Draft Report 24 January 1983

<u>Page</u>	<u>Paragraph</u>	<u>COMMENT</u>
✓ 4	2	This says heavy metal contamination will be addressed "in the course of the RAMP," but the RAMP does not address this in further detail.
✓ 7	3	As a part of the feasibility study, mitigation measures should be formulated for each recommended remedial action.
8	5	Enforcement focuses on the two companies while not mentioning the importance of enforcement of the fisheries closure (although this need not be by lead agency).
✓ 12	1	The contamination in the first point of this paragraph (sediments and water column) should also include the biota.
✓ 13	2	We now have 4000+ entries and screening with evaluation is complete. This should also include the fact that we have operable statistical and graphical presentation capability, and have initiated data gap identification.
✓ 14	5	Recent U.S. Coast Guard data reveals concentrations substantially higher than 1000 ppm in the upper estuary hot spots.
17	3	There is no apparent justification for Summerhayes' use of copper as a representative metal given the substantial discharge of copper from Revere Copperware. Another metal would be more representative; however, special concern should be given to copper.
✓ 18	4	The model, discussed in later sections of the RAMP, would be very useful in defining hot spots but would be of less utility in less contaminated areas.
22	2	This should evaluate the development potential of Sullivan's Ledge and evaluate possible alternatives such as capping. --
23	1	Where are the "50 barrels of sediment containing 10,000 - 25,000 ppm PCB's" stored?

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<u>Page</u>	<u>Paragraph</u>	<u>COMMENT</u>
✓ 23	2	This is the first mention of the "industrial park" which does not appear on Figure 1-1. This should be considered in a separate section and not as part of the Municipal Wastewater System.
✓ 23	5	This effort should look for formation of other compounds during incineration of the sludge, and also evaluate the current open piles of sludge stored on the site.
✓ 24	3	The air sampling must incorporate local onsite meteorological data collected concurrently with the air samples.
✓ 26	1	The paragraph should place even greater emphasis on the evaluation of all possible options including <u>in situ</u> treatment.
27	1	The RAMP work statements only address PCB's and fail to comprehensively address PCB degradation products and heavy metals.
30	3	This is only required if <u>in situ</u> treatment is eliminated as a possibility and should be so stated.
34	8	There are insufficient funds included for this task. It should be fast tracked to determine significant areas for fast action.
34	9	This too needs additional funds so that parts of this can be fast tracked to determine if <u>in situ</u> treatment is viable. If so, it will alter subsequent actions.
✓ 38	5	This paragraph ends with an incomplete sentence, and the next page begins with a complete sentence. Something is missing.
39	2	The criteria are already established and in use. This needs to emphasize the task of determining additional data needs using the existing, reliable data base, as input to initial design of data collection programs, not merely amending them.

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<u>Page</u>	<u>Paragraph</u>	<u>COMMENT</u>
39	3	Data collected in hot spot delineation should be useful as input to the model.
40	5	Our copy contains two page "40." One has a fifth paragraph, one does not. Which one is correct?
A-1	3	Dibenzofurans should be included in the air analyses.
✓ A-7	3	Before sediment sampling is initiated to confirm and refine the extent of contamination, the existing data base should be carefully evaluated first.
A-8	3	The 300 analyses to be conducted on 105 cores, each 5 feet in length, needs to specify what horizons will be sampled and what portions of the core will be archived. Perhaps samples should be taken from 0-4cm; 4-8cm; and 8-10cm, and the rest of the core should be archived. This would be consistent with past sampling which showed insignificant PCB levels below 10 cm. There is no apparent justification for collecting any core of over 0.5 meters in depth, based on existing available information. This should be revised. This and following paragraphs do not address the need for split samples and several replicates from selected stations to determine the actual variability.
✓ A-10	1	This task should be integrated with the groundwater resource investigation to maximize data acquisition and minimize cost.
✓ A-11	5	If one of the objectives of the study is to delineate hot spots of PCB's, it is not rational to do the screening from the surface down. Some of the highest concentrations may be covered by relatively clean material. If so, we need to know that and not rule out that spot from further investigation. This also should evaluate capping and lining effects in the landfill in order to evaluate feasibility for future disposal.
✓ A-15 A-16		Same comments as preceding regarding landfill depth sampling.

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<u>Page</u>	<u>Paragraph</u>	<u>COMMENT</u>
✓ A-18	3	Another good source of information regarding historic dumping is the public. Based on the public meeting, they may have a wealth of knowledge regarding this matter.
✓ A-20		This section should include sampling for PCB's and heavy metals. It will do little good to determine possible sites and then not conduct analyses.
✓ A-22	3	This should not require separate sampling but should be conducted in conjunction with work statement 004. This model development should be fast tracked to identify critical pathways.
✓ A-23	3	Additional "bullets" to be added to this section include: <ul style="list-style-type: none"><li>o delineate sediment grain size characteristics and organic content to project PCB affinity</li><li>o evaluate PCB/metal synergistic effects</li></ul>
✓ A-24	2	Additional "bullets" to be added to this section include: <ul style="list-style-type: none"><li>o sex/size variations</li><li>o seasonal migration</li><li>o partitioning within the biota (viscera vs. edible flesh, etc.)</li></ul> In addition, the model description is weak. A more simplistic model should be developed using available field and literature data (where field observations are absent). Then with sensitivity analyses, critical pathways could be identified. Then these critical pathways, coupled with existing data, will help refine additional sampling needs. In addition, the model may be quite different for PCB's contrasted with metals.
✓ A-30	1	This should include evaluation of alternatives in terms of benefits vs. effectiveness.
✓ A-32	1	The fast track remedial action for hot spots should be used as a pilot study for subsequent action.
A-44 A-45		The information outlined for data management is already operational. This section should also address data gap identification, mapping, etc. Similarly, the estimate of computer expenses is insufficient based on existing outside inquiries.

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Page Paragraph

COMMENT

General

The RAMP does not identify public use of the U.S. Army recreational facilities nor the public beach near Clarks Point and potential sampling that may need to be included.