

August 30, 2013

Ms. Elaine Stanley  
Remedial Project Manager  
Office of Site Remediation and Restoration  
EPA Region 1, Suite 100, OSRR 7-04  
5 Post Office Square  
Boston, MA 02176

Re: Request for Revision of Final Determination To Increase Final Maximum PCB Concentration Allowed Onsite From 25 mg/kg to Less Than 50 mg/kg

Dear Ms. Stanley,

This letter is submitted in order to request that the Final Determination be revised to increase the final maximum PCB concentration allowed onsite after remediation from a maximum of 25 mg/kg to a maximum of less than 50 mg/kg.

MassCEC has encountered more PCB contamination at the main facility parcels than had previously been anticipated. This contamination was first identified after the topsoil had been stripped and was being tested for characterization for offsite disposal. Although some results are still outstanding, at least 1/3 of the topsoil contained concentrations of PCBs above 50 mg/kg. The remaining topsoil appears to have concentrations of PCBs between 2 mg/kg and 10 mg/kg.

The topsoil is being prepared for offsite disposal and additional characterization of the areas from which the topsoil was removed are being completed (grid sampling on 25 foot intervals) to locate the source of the impacts, which will likely require additional excavation and offsite disposal.

In addition, it appears that the PCB impacts to soil associated with Hotspot Area 1 are more extensive both vertically and horizontally than had been previously indicated with historic data. Also, as EPA is aware, a concrete structure has been located within Hotspot Area 1, and MassCEC requests that post-excavation samples collected from the side-walls and bottom of this structure be allowed to act as end-point samples (if necessary).

As a result of this new information, MassCEC requests that EPA raise the maximum level of PCB contamination that may be left onsite from 25 mg/kg to just below 50 mg/kg. All material tested at or above 50 mg/kg would still be removed and safely disposed of offsite). 50 mg/kg is still well below the Upper Concentration Limits for PCBs within the Massachusetts Contingency Plan (100 mg/kg), and therefore, this change will still be in compliance with state ARARS.

As the site is going to be capped with three feet of Dense Graded Aggregate, fenced, and its future use restricted, we do not see any significant increase in risk for future site users by leaving the higher level of PCBs onsite. Dense Graded Aggregate is a mixture of multiple different types of aggregate material (some level of fines, sands, and gravels) that form a tight matrix that is both capable of supporting the heavy loads that are anticipated at the new facility, and reducing percolation. Therefore, no change in the thickness or composition of the Dense Graded Aggregate cap is currently anticipated to be necessary in order to remain a protective solution.

This change will not alter the post-construction monitoring requirements that MassCEC has committed to within its Long Term Monitoring Plan, including groundwater monitoring.

In addition, MassCEC is in the process of finalizing negotiations with the owners of the Radio Tower property. The Radio Tower property was once similarly part of the former Potomska Mills facility. Portions of that property remained abandoned and unused since the demolition of the Potomska Mills facility, in a similar manner to portions of the main facility parcels. As a result, there is the possibility that similar levels of PCB contamination may be present on the Radio Tower property as well.

Thus, in order to simplify the potential future inclusion of any potential PCB contamination into the existing TSCA determination, MassCEC requests that:

1. If PCB contamination is located on the Radio Tower property, *and*
2. The Radio Tower Property or portion of the Radio Tower Property has transferred ownership to MassCEC;
3. That the Radio Tower Property or portion of the Radio Tower Property that has transferred ownership to MassCEC be included within the TSCA determination as part of the Final Determination.

A drawing showing the potential expansion area is included as Attachment A to this request.

MassCEC sincerely appreciates your consideration of this very important matter. If you have any questions related to this proposed modification to the Final Determination, please do not hesitate to contact me at 617-315-9330.

Sincerely,

*Bill White*

Bill White  
Director, Offshore Wind Sector Development



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SUITE 502  
BOSTON MA 02110  
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REVISIONS

NO.	DATE	DESCRIPTION

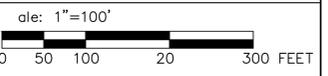
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RADIO TOWER  
PROPERTY  
(POTENTIAL TSCA  
EXPANSION AREA)

AREA FOR TSCA  
DETERMINATION

PREPARED FOR:  
  
COMMONWEALTH  
OF  
MASSACHUSETTS

DRAWING TITLE:  
  
NEW BEDFORD MARINE  
COMMERCE TERMINAL  
AREA FOR TSCA  
DETERMINATION



Date	8/28/13	Drawing No.
Proj. Mgr.		
Design		
Check	CM	
Drawn	T	
Job No.		
Last Rev.	8/28/13	

NEW BEDFORD