



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

April 25, 1984

Mr. Joe Yeasted
NUS Corporation
Parkwest 2, Cliff Mine Road
Pittsburgh, PA 15275

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56166
U.S. v. AVX Corp.
Litigation Document

Dear Mr. Yeasted:

As part of the Interagency Task Force Work Group, Edward Reiner of my staff has reviewed the Interim Working Document for the Initial Ranking of Potential Disposal Sites, New Bedford Siting Study, NUS Project No. 0725.06 (March 1984). I hope the following comments will be useful in your further analysis of disposal options for the PCB contaminated harbor sediments.

The four marine disposal sites that are to be retained for more detailed evaluation all involve special aquatic sites composed of saltmarsh and/or mudflats. These special aquatic sites would be irreversibly destroyed by land filling with contaminated sediments and properly covering these sediments to create a safe containment site.

The 404(b)(1) Guidelines require that the least environmentally damaging practicable alternative be chosen. Therefore, if sites are available which do not involve special aquatic sites--particularly saltmarsh--these would be preferred from an environmental point of view.

The degree of PCB contamination at these special aquatic sites is uncertain. Coring analyses should be performed to determine how far down PCB contamination exists in these saltmarsh and mudflat areas. Results of previous testing performed in these areas should be discussed and referenced.

Mitigation if at all possible, for the loss of saltmarsh should be investigated. The following suggestion may allow for PCB disposal and saltmarsh development to coexist at any of the four disposal sites to be investigated in detail (Sites 1, 1A, 2, and 3). I will use Site 2 as an example.

Investigate as stated above, the vertical component of PCB contamination at the Site. If clean sediments are found one to three feet below the surface the following can be done:

1. Use steel sheet pile to separate the disposal site from the Achushnet River.
2. The Site can be further divided into two cells by steel sheeting (Cells 1 and 2).

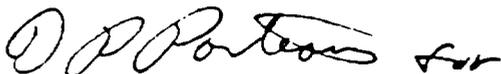
3. Excavate the contaminated surface layer of sediments from Cell 1 and temporarily dispose of it in the Cell 2. Excavate sufficient sediments such that the remaining sediments are clean.
4. Dredge out the clean sediments in Cell 1 to a depth of 35-50 feet below mean low water or whatever is possible and desirable for purposes of containing the contaminated sediments. Constantly maintain this Cell in a dewatered state by pumping and associated effluent treatment if working in the dry is preferable.
5. These clean sediments can be stockpiled at a separate location for use as cover material, used beneficially in some other manner, or barged out to an ocean disposal site. Any combination of the above or temporarily disposing of them on top of a impermeable liner placed in Cell 2 would be possible.
6. Cell 1 which now is a deep hole can be used to dispose of the heavily contaminated sediments (19% PCB) that exist adjacent to Site 2 in the mudflats near Aerovox.
7. Clean sediments temporarily stockpiled can then be used to cover Cell 1 to provide for a clean cap. The final grade could be designed in order to allow for the replanting of a saltmarsh at Cell 1.
8. This process can then be repeated in Cell 2 using a different site such as Site 3 or 1 to temporarily dispose of contaminated sediments as in Step 3 above.

I am suggesting this option be investigated because it would allow for saltmarsh redevelopment to be compatible with the PCB disposal. As long as a sufficient depth of clean soils and perhaps some sort of liner or clay cap is present, the PCB contaminated sediments would be effectively contained below the saltmarsh.

A similar method of disposal was used in Norwalk Harbor on March 14, 1981, on a small scale for Nitrobenzene pollution; although this was entirely subtidal being performed below the harbor bottom.

The cost of this type of proposal may not be much more costly than the landfill approach since certain costs of landfills such as leachate collection and treatment would not be required with this proposal. I believe this option deserves investigating in detail. Variations of this disposal option should also be investigated which may involve intertidal mudflat sites or subtidal sites.

Sincerely yours,



William J. Butler, Chief
Planning and Standards Section (WR/PS-2103)

cc: See attached list