



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

NBH  
11/17  
584101

December 1, 1988

Charles A. Dill, President  
AVX Corporation  
60 Cutter Mill Road  
Great Neck, NY 11021

Dear Mr. Dill:

At our November 16, 1988 meeting with your representatives a number of agreements and understandings were reached concerning your remediation proposal. These are summarized as follows:

1. You will provide EPA with a detailed written explanation and justification of your proposal along with appropriate documentation. Particular emphasis should be given towards responding to concerns raised by EPA, the MA DEQE and the COE regarding the acceptability of capping the most highly concentrated "hot spot" areas and the proposed capping thickness. Additional issues mentioned in my November 1 letter and discussed at the November 16 meeting should also be addressed. This information will be the major topic of discussion at our next meeting on Wednesday, December 14, 1988 from 1:30 to 4:00 P. M. in Room 1900A of the J.F.K. Federal Building. Any information you can provide us for review prior to that meeting will contribute to a more productive session.

2. Assuming agreement can be reached on your proposal or a modification thereto, EPA would incorporate it as a remedial alternate in its Feasibility Study (FS). The alternate would then be subjected to the same evaluation and review process as for those now under consideration. As agreed at the meeting, I am enclosing a sample outline which will be used by EPA to describe a remedial alternative in our FS. Upon any agreement to include the alternate in our FS your support group will provide the necessary description and support information to EPA for transmittal to our Contractors.

3. EPA presently plans to have its FS ready for internal review by March 1989. Items 1 and 2 above must therefore be completed before that time.

If you have any questions or comments concerning this matter please feel free to call me at 617-573-5711.

Sincerely yours,

*Frank J. Ciavattieri*

Frank J. Ciavattieri  
New Bedford Harbor Project Manager

cc: Malcolm Spaulding  
Richard Hughto

Enclosure: Report outline

**FEASIBILITY STUDY REPORT FORMAT  
FOR THE DETAILED EVALUATIONS OF REMEDIAL ALTERNATIVES  
(SAMPLE SECTION)  
NEW BEDFORD HARBOR SUPERFUND PROJECT**

**8.0 DETAILED ANALYSIS OF REMEDIAL ALTERNATIVES IN THE ESTUARY**

**8.1 Introduction**

**8.1.1 Alternative Evaluation Process**

A general discussion of the nine CERCLA criteria and how the alternative(s) are evaluated.

**8.2 Alternative # \_\_\_\_\_ : \_\_\_\_\_**

**8.2.1 General Description**

This section includes a discussion of all technical components of the given alternative and the general sequence for how the alternative will be implemented.

**8.2.2 Reduction of Mobility, Toxicity, or Volume**

This section focuses on the anticipated performance of the specific treatment technologies that may be used in a given alternative. This criterion addresses the statutory preference for selecting remedial actions that permanently and significantly reduce toxicity, mobility, or volume of the hazardous substances as their principal element. The factors considered are:

- o The treatment process(es) to be used
- o Materials to be treated
- o Quantity of material to be treated
- o How principal threats will be addressed
- o The degree of expected reduction of toxicity, mobility, or volume
- o The degree to which the treatment is infeasible
- o The type and quantity of residuals

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NEW BEDFORD HARBOR SUPERFUND PROJECT  
(continued)**

**8.2.3 Short-term Effectiveness**

Short-term effectiveness addresses the effects of the alternative during construction and implementation until the response objectives are met. Factors to be considered include:

- o Protection of the community
- o Protection of the workers
- o Environmental impacts
- o Time to achieve remedial objectives

**8.2.4 Long-term Effectiveness**

Long-term effectiveness addresses the risks remaining after response objectives have been met. The primary focus is the extent and effectiveness of the controls that may be required to manage the risk posed by treatment residuals and/or untreated wastes. The following factors should be considered:

- o Magnitude of residual risk
- o Adequacy of controls
- o Reliability of controls

**8.2.5 Implementation**

Implementation encompasses a number of factors relative to the technical and administrative feasibility of installing, operating and maintaining, and monitoring a remedial alternative. Factors which should be included in this discussion include:

- o Technical feasibility
  - o Reliability
  - o Support and installation
  - o Availability of services and materials
  - o Potential future remedial actions
- 
- o Monitoring

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(continued)**

**8.2.6 Cost**

This section presents a discussion of the capital and O&M costs for the alternative. A sensitivity analysis is included for those components of the alternative which have the greatest impact on the overall cost. Costs of monitoring (including the 5-year remedial review if the alternative does not remove contaminated materials from the site) and additional remedial action that may be required if the alternative fails should also be included.

**8.2.7 Compliance with ARARs**

This section discusses how the alternative complies with applicable or relevant and appropriate Federal and State requirements in the following categories:

- o Chemical-specific ARARs
- o Location-specific ARARs
- o Action-specific ARARs

**8.2.8 Overall Protection of Human Health and the Environment**

Evaluation of the overall protectiveness should focus on how the alternative achieves protection over time and how site risks are reduced.

**8.2.9 Community Acceptance**

This section discusses public input into the analysis of the alternative. Although there is no formal opportunity for public comment during the preparation of the RI/FS, EPA is working with the New Bedford Environmental Community Work Group in an on-going process.

This section discusses the technical and administrative issues and concerns the state may have regarding the alternative.