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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

May 26, 1987

Paul B. Galvani
Ropes & Gray
225 Franklin St.
Boston, MA 02110

Dear Mr. Galvani:

This concerns a recent inquiry by E.C. Jordan, Inc., an EPA contractor, to General Electric Company, concerning their research into treatment and destruction techniques for PCBs. E.C. Jordan is studying such technology as part of EPA's Remedial Action/Feasibility Study for New Bedford Harbor. In response to E.C. Jordan's inquiry, G E referred them to John Brown who sent a letter referring E.C. Jordan to you. A copy of that letter is enclosed.

We invite and encourage Aerovox to provide EPA with any information concerning microbial degradation of PCBs you feel we should consider in our Remedial Investigation/Feasibility Study. As you know, EPA is required by §121(b) of the Superfund Amendments and Reauthorization Act of 1986 (SARA) to consider "permanent solutions and alternative treatment technologies...that, in whole or in part, will result in a permanent and significant decrease in the toxicity, mobility or volume of the hazardous substance, pollutant or contaminant." EPA is also required by section 113(k)(2), to "provide for the participation of interested persons in the development of the administrative record on which the President will base the selection of remedial actions." If Aerovox has information which it wishes EPA to consider concerning the destruction or transformation of PCBs through microbial action, it should provide EPA with the necessary documentation for EPA's review and consideration in selection of a remedy. We would also be willing to meet with Aerovox and its experts to allow them to present and discuss their findings.

EPA and E.C. Jordan have received the documents produced by Aerovox in the course of U.S. v. AVX, et al. However, as stated in Dr. Brown's letter, his research has only been disclosed "in part". EPA cannot consider material which it has not received, and it may not be able to evaluate summary conclusions which are not accompanied by sufficient data and documentation. Thus, you may wish to supply additional documentation for EPA's consideration.

The information you submit will be reviewed in the course of EPA's RI/FS. For your information, EPA's contractor, EBASCO, is requesting the following kinds of information for its assessment of treatment and destruction technology:

Effectiveness. Information is needed to evaluate the effectiveness of a technology in detoxifying/destroying the PCBs in the New Bedford Harbor sediments. Treatment goals for New Bedford Harbor have not been established. Possible goals for the treatment of the sediment are to reduce the PCB concentration in the treated sediments to 50 ppm, 10 ppm, 1 ppm, or 0.1 ppm. Information relative to the ability of, and costs or time for, a treatment process to treat the sediments to these various levels is required. If treatment to these levels is not achievable, information relative to the level to which the PCB-contaminated sediment can be treated is needed. The bench testing should also provide information relative to potential air or water effluents from the treatment technology, or harmful byproducts generated during the treatment of the sediments.

Acceptable Engineering Practices. A technology must be feasible for the location and conditions of the site and, in the case of New Bedford Harbor, must be capable of treating large volumes of sediments, potentially between 10,000 and 1,000,000 cubic yards. The operational reliability of the technology and the difficulty in construction and implementation will be considered. Data from the bench testing may be used during the design of a pilot scale test for New Bedford Harbor.

Cost. Cost data is needed for EBASCO to estimate implementation costs including mobilization, site preparation, equipment, capital costs, operation and maintenance costs, demobilization, closure, and disposal of residues.

Please let me know at your earliest convenience if you would like to submit additional material or would like to arrange a meeting with us as I have suggested.

Yours sincerely,

Charles C. Bering
Assistant Regional Counsel

cc: Bill Brighton
Susan Bernard
Frank Ciavattieri
Al Ikalainen