

60225

Mark W. Machado  
P.O. Box 623  
Swansea, MA 02777-0623

10 December, 1996

Mr. David Dickerson  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Region I, HBO  
JFK Federal Building  
Boston, MA 02203-0001

Mr. Dickerson,

First, let me offer my thanks for the Agency's solicitation for public comment on the Proposed Cleanup Plan for New Bedford Harbor. In general, I believe the Agency has done a magnificent job in detecting, assessing and proposing remedial action for this site. However, I would like to express some reservations and provide some general comments on the Proposed Plan.

General comments;

1) The Proposed Plan's " hybrid " PCB-TCL of 10 ppm and 50 ppm in the upper and lower harbor, respectively, does not provide for adequate ecosystem protection. At best this provides a TCL which is an order of magnitude higher than the Agency's own suggested TCL promulgated in the ecological risk assessment. I am willing to accept the fact that cleanup at the 1 ppm TCL presents a monumental logistical, as well as, financial problem and I agree that the plan would not be cost-effective. Yet, it seems that a cleanup plan with a PCB-TCL of 10 ppm for the entire upper and lower harbor would be the next-best plan which would not place an undue financial and logistical problem on the Agency. I do not agree at all that the upper harbor is any more important from an ecological perspective than the lower harbor especially since the lower harbor is far more important from a recreational and human exposure view. I favor a cleanup plan with a harbor-wide TCL of 10 ppm.

2) The Proposed Plan suggests the use of CDF's to contain the contaminated sediments. Again, although I believe that this is currently the best available technology to immobilize the further transport of PCB's into the harbor, I believe that we are doing nothing more than relocating PCB " Hot Spots " and referring to them by a more benign term ...CDF's. The Agency must reassure the community that the transport and mobility of the PCB's in the contaminated sediment will be contained.

Questions;

1) The Proposed Plan calls for CDF's having " impermeable " liners on the sides and, eventually, an impermeable cap on the surface. Why not assure the immobility of the PCB's by placing the liner at the bottom of the CDF's ?

2) The Proposed Plan calls for the CDF's to be monitored and maintained on a permanent basis. How stable are the PCB's under the proposed cond-

itions ? Will the PCB's undergo any transformations i.e., biodegradation ?  
If so, will they break down into even more hazardous by-products which  
could become bioavailable ?

3) Is there any value to investigating the use of reactive-wall technology  
as is currently under investigation at the Massachusetts Military Reserv-  
ation (MMR) as a potential means to assure the containment of the PCB's  
in the Proposed Plan's CDF's.

4) What acute effects can be expected by the process of dredging and  
how will they be mitigated ?

Again, I would like to thank the Agency for the opportunity to comment  
with respect to this issue and I look forward to the opportunity to  
review the answers to my comments as well as those of others in the  
Responsive Summary.

Thank you.



Mark W. Machado

P.S. Please add my name to the mailing list.