



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

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October 5, 1990

Mr. Leonard C. Sarapas  
Balsam Environmental Consultants, Inc.  
5 Industrial Way  
Salem, NH 03079

RE: Preliminary Comments on the Feasibility Study;  
New Bedford Harbor

Dear Mr. Sarapas:

This letter is in response to your letter dated September 12, 1990 which provides preliminary comments on the Feasibility Study (FS) for the Estuary and Lower Harbor/Bay portion of the New Bedford Harbor Superfund Site. As EPA understands them, your comments focus on the extent to which Balsam's work was incorporated into the FS.

You argue that "the entire concept of capping as a remedial alternative is given little serious consideration." EPA disagrees. The fact that capping is included in two alternatives in the feasibility study speaks for itself; capping is given serious consideration as a remedial alternative and as a component of a remedial alternative. Volume II of the FS presents an alternative which calls for capping of the estuary and portions of the lower harbor where PCB levels exceed 10 ppm. Volume III contains an alternative that remediates portions of the estuary where PCB levels exceed 50 ppm, and capping is a major component of this alternative.

EPA carefully considered the Balsam Report. For example, Balsam's conceptual design and studies of the physical processes affecting the feasibility of installing a cap and the integrity of a cap were used in developing the capping alternatives. The technical point on which we differ is on the cap thickness. EPA believes that a cap thickness of 55 cm minimum, with an allowance for up to three feet of material is necessary at this site. The alternatives presented in the FS reflect the costs and impacts associated with this cap thickness.

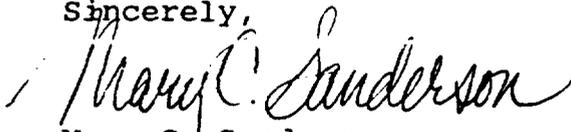
Finally, EPA would like to clear up an apparent misunderstanding of how the capping alternative has been evaluated. The FS evaluates alternatives against seven National Contingency Plan (NCP) evaluation criteria, one of which is reduction of mobility, toxicity, or volume of wastes through treatment. While a



containment remedy (capping) may in fact reduce the migration potential of the contaminants, this fact is not sufficient basis for a conclusion that the remedy satisfies the relevant evaluation criterion.

Thank you for providing these preliminary comments on the FS. We look forward to receiving your formal comments on the FS during the public comment period later this year. I can be reached at (617) 573-5711 if you have any questions.

Sincerely,

  
Mary C. Sanderson  
Remedial Project Manager

cc: Paul Craffey, MA DEP  
Mark Lowe, ORC  
Mark Otis, COE/NED