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*The Commonwealth of Massachusetts*  
*Executive Office of Health and Human Services*  
*Department of Public Health*  
*150 Tremont Street*  
*Boston 02111*

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Ms. Gayle Garman  
Remedial Project Manager  
U.S. Environmental Protection Agency, Region I  
Waste Management Division (HRM-CAN3)  
JFK Federal Building  
Boston, MA 02203

Dear Ms. Garman:

We have reviewed both the proposed plan for the remainder of the New Bedford Harbor site (Estuary/Lower Harbor/Upper Bay) and its addendum detailing the remediation of the contaminated sediments detected in these areas. Currently, our chief health concerns associated with the site are those resulting from the ingestion of PCB and metal contaminated seafood harvested from harbor and upper bay waters. We support any efforts aimed at mitigating such exposure. Simply enforcing the current ban on fishing does not address long-term ecologic and public health concerns. We believe that removal of PCB, cadmium and lead contaminated sediments is an important first step in achieving these ends. We also agree with EPA that it is not currently possible to determine the impact of the proposed sediment dredging and disposal on the immediate quality of the seafood harvested from these waters. Continued and extensive monitoring of aquatic organisms harvested from harbor and bay waters is necessary in order to determine when such seafood is again safe to eat. We would appreciate the opportunity to provide input into the design of such monitoring and we ask that you keep us apprised of these results.

It is also our opinion that in addition to the removal of contaminated sediments, continued enforcement of the fishing ban in harbor and upper bay waters is necessary in order to protect public health until such time that the harbor seafood has been determined to be safe for consumption. It has been our experience, however, that such institutional controls are only partially effective in reducing hazardous exposure via ingestion of contaminated seafood. Based on the results of the questionnaire administered during the Greater New Bedford Harbor PCB Health Effects Study, approximately 15% of the residents of the greater New Bedford area reported consuming locally caught contaminated seafood. We therefore believe that the public awareness program proposed by USEPA in the

addendum to the remedial plan is essential in order to alert the Greater New Bedford communities of the hazards associated with such activities.

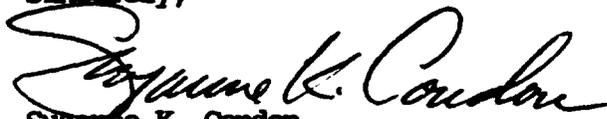
While we are supportive of USEPA's efforts to address the concerns associated with the ingestion of PCBs in contaminated seafood, we would also like to call to your attention our concerns stemming from the ingestion of possibly hazardous levels of metals, notably cadmium and lead also detected in seafood indigenous to harbor and bay waters. We reviewed the results of seafood metal contamination monitoring conducted for EPA. At this time, it was noted that elevated cadmium and lead levels were detected in clams that were harvested from waters distant to the harbor. This poses a health concern when it is considered that these metals accumulate in the gut of this organism which is normally consumed. The lack of a relationship between metal contamination levels in clams with distance from harbor waters may be a statistical anomaly as suggested in Volume III of the transport modelling report released by the Battelle Memorial Institute in September of 1990. The possibility that metal contamination of harbor sediments may negatively impact the quality of seafood harvested from harbor and bay waters can not, however, be currently ruled out. Much of the metal contaminated sediment detected in the harbor also contains PCB contamination of 50 parts per million or greater and will be removed during the proposed dredging. Residual metal contamination may remain, however, and might continue to negatively impact the quality of seafood harvested from these waters. Monitoring of aquatic organisms harvested from these waters is therefore essential. In the event that metal levels in aquatic organisms do not subside over time and metal contamination levels in harbor sediments continue to remain elevated, additional removal of metal contaminated sediments should be considered.

The selected alternative also proposes that the dredged sediment be buried in on-site Confined Disposal Facilities (CDFs). Since PCBs have demonstrated to be relatively immobile in soil environs, minimal, if any, PCB migration from these facilities should occur provided that their structural integrity remains intact. It is possible that metals may be more mobile in a soil environment than PCBs. The placement of water-impermeable caps at these facilities is proposed in order to minimize the possibility of contained metals leaching from them. In the absence of adequate maintenance, these caps may lose their effectiveness over time. The environmental media around these facilities should be monitored on a regular basis in order to determine that the dredged PCBs and metals continue to be adequately sequestered.

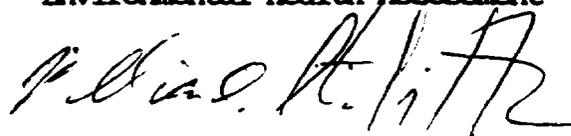
Lastly, the plan for the remediation of the upper bay calls for the placement of a cap over the PCB-contaminated sediment near the outfall of the City of New Bedford's Waste Water Treatment Plant. It is possible that the effectiveness of this cap in reducing the migration of this contamination through the food chain may be compromised by the water flow created by the plant's discharge. Dredging and disposal of these sediments should be considered in lieu of the proposed cap placement.

We appreciate the opportunity to comment on the proposed plan for the remediation for the remainder of the New Bedford Harbor site. If you have any questions or concerns regarding the contents of this letter, please do not hesitate to contact us at 617-727-7170.

Sincerely,



Suzanne K. Condon,  
Director, Bureau of  
Environmental Health Assessment



William C. Strohsnitter,  
Environmental Analyst, Bureau of  
Environmental Health Assessment

cc: Louise House, ATSDR  
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