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64035

Buzzards Bay Project

July 10, 1992

Ms. Gayle Garman
U.S. EPA Waste Management Division
JFK Building
Boston, MA 02203

Dear Ms. Garman,

The Buzzards Bay Project would like to submit the following comments on the "Addendum Proposed Plan" (May 1992) and the "Proposed Remedial Action Plan" (January 1992) released by the U.S. EPA as part of the Superfund program being implemented in New Bedford Harbor.

"Proposed Plan" comments and questions:

1) 50 ppm target cleanup level not adequately protective

The Buzzards Bay Project does not feel that the proposed 50 ppm target cleanup level is adequately protective to human health and the environment and we recommend a target cleanup level of 10 ppm be adopted as is the case for the outer harbor. Our concern is based on the following points:

a) The upper estuary is closed to shellfishing (i.e. clams) because of fecal coliform contamination levels in the water, not PCB contamination. In fact the Massachusetts Division of Marine Fisheries has in the past allowed shellfisherman to harvest quahogs in New Bedford upper harbor and relay them to unpolluted waters to depurate coliforms to allow the quahogs to be sold at market. We believe there will be a greater human health risk to these shellfisherman with a 50 ppm target cleanup level than a 10 ppm target cleanup level.

b) Whenever recreational and commercial boaters anchor in the upper harbor, they have the potential of coming into contact with contaminated sediments clinging to the anchor and anchor chain. We believe there will be a greater human health risk to the boaters with a 50 ppm target cleanup level.

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The Buzzards Bay Project is sponsored by the U.S. Environmental Protection Agency and the Massachusetts Executive Office of Environmental Affairs through the Coastal Zone Management Office

c) The Buzzards Bay Project is initiating herring restoration projects around Buzzards Bay. The Acushnet River once had a significant herring run to the New Bedford Reservoir and beyond. Today, because of obstacles in the river and the lack of fish ladders, few herring make it to the reservoir, (although some citizen have recently begun assisting herring migration here). The Buzzards Bay Project has initiated discussion with Acushnet town officials about improving the herring migration up the Acushnet River. Since herring migrating upstream are often collected for human consumption, and because fish with high oil content like herring rapidly accumulate PCBs, consumption of herring migrating up the Acushnet River estuary could pose a human health risk, especially if concentrations up to 50 ppm PCBs are allowed to remain in the sediments.

d) Juvenile herring migrating down the Acushnet River and those juvenile herring that migrate along the coast and spend time in the upper harbor can be expected to accumulate PCB's. Herring are a very important food source for many species and one of the primary food sources for terns. Brain tissue of dead terns found on West Island showed exceptionally high PCB concentrations. Bird Island, Marion is the site of the largest tern colony in North America of the Roseate tern (*Sterna dougallii*), a U.S. endangered species. Contamination of their principal food source by PCBs is a potential threat to this population. Moreover, the U.S. Fish and Wildlife Service will soon attempt to establish a new Roseate tern colony on Ram Island, Mattapoisett. Failure to reduce PCBs in the upper harbor to a protective level could pose a threat to the success of the U.S. Fish and Wildlife Service effort.

e) Juvenile and adult bluefish and striped bass may spend time in the lower harbor. We believe that a 10 ppm target cleanup level for sediments will result in a lower PCB body burden for these commercial and recreational species.

f) Illegal fishing is common in the upper harbor, despite signs and warnings, and some of this fish may be consumed. This occurs in part because of language and educational barriers to New Bedford's large immigrant population. Reducing sediment levels to 10 ppm would reduce the risk to this population.

2) PCB disposal at Cornell-Dubilier site was ignored

EPA documents indicate that a very substantial amount of PCBs were buried at the Cornell-Dubilier site, less than 200 m from the estuary, yet this issue does not appear to have been addressed. Although PCBs were mined immediately under the site, surrounding contaminated groundwater was not treated. Through groundwater migration and possible infiltration into stormwater and sewer lines, this site may remain as a chronic source of contamination to the outer harbor and Buzzards Bay. Was this PCB contamination considered in the clean-up strategy?

3) PCB contamination in hurricane barrier drainage canal was ignored.

Along the backside of the New Bedford hurricane barrier lies a drainage canal that is 20-40 feet wide and extends from Cornell-Dubilier to the upper estuary, a length of about a mile. The upper portion of this canal floods with each high tide, and during spring tides, floods nearly to the Cornell-Dubilier site. In addition, this site probably receives groundwater inputs and stormwater flowage. Because the canal may have received groundwater from the Cornell-Dubilier site and sediments from the lower harbor, it is very likely the drainage canal sediments are contaminated with moderately high levels of PCBs. Has EPA collected PCBs in the sediments of this drainage canal? Since the hurricane barrier drainage canal is not fenced off and dogs and children have been observed crossing it, it represents a human health risk.

4) The construction and selection of CDFs sites should incorporate goals of the New Bedford-Fairhaven harbor planning effort.

The CDFs could be constructed and placed in a way to provide additional public access, boat ramps, dock space, mooring areas, or expansion of other water dependent uses as identified in the Harbor Planning Study.

"Addendum Proposed Plan" comments and questions:

1) Remediation of Clarks Cove ignored.

EPA has limited the proposed remediation of the E/LH/B to sites A, B, C, yet ignores the sites in Clarks Cove and Apponagansett Bay that are potentially greater than 10 ppm. These areas should be resampled, and if appropriate be included as sites of remediation. Clarks Cove was recently opened to shellfishing for the first time in 100 years. Areas with sediments greater than 10 ppm could pose a greater health risk to the shellfisherman coming in contact to these sediments.

2) Capping around the outfall may be impractical

Through the New Bedford facilities planning process, the New Bedford sewage treatment facility outfall is being considered to be moved further out into Buzzards Bay. If this does not occur, however, adding 6 feet of capping material around the outfall may be impractical unless infilling and blockage of the outfall pipe can be assured. If this is not the case, then dredging of this site (as in Bay-2 alternative) may be the most practical solution.

3) Monitoring strategy not well defined.

On page 17 EPA notes that "long term monitoring would be conducted to confirm water column and biota concentrations achieved as the result of remedial activities...", but does not specify the exact spatial or temporal extent of the monitoring or the species to be monitored. What are the specifics of this monitoring effort and what are the costs? The Buzzards Bay Project believes this monitoring should be conducted bay wide on flounder and lobsters because the superfund has resulted in low level seafood contamination throughout Buzzards Bay, and because these species migrate, and there is the possibility of animals that have spent time in New Bedford harbor being caught elsewhere. Some monitoring of herring roe (egg masses) should also be conducted since this product is sold on local markets, and the egg masses have a high lipid content which should accumulate PCBs. This monitoring is vitally important if EPA is to demonstrate that the millions of dollars spent on legal action and remediation is actually reducing PCB levels in commercial and recreational species in the Bay.

Thank you for the opportunity to review these documents. If I can be of further assistance, please call me.

Sincerely,

Joseph E. Costa, Ph.D.
Project Manager