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From: Chet Myers <cmyers@apexcos.com>

To: Matt Schweisberg/R1/USEPA/US@EPA

Copy To: Ann Williams/R1/USEPA/US@EPA; Cynthia Catri/R1/USEPA/US@EPA; Elaine T Stanley/R1/USEPA/US@EPA; Dave Dickerson/R1/USEPA/US@EPA; Kimberly Tisa/R1/USEPA/US@EPA; Ellen Weitzler/R1/USEPA/US@EPA; "Kimmell, Ken (EEA)" <Ken.Kimmell@state.ma.us>; Jay Borkland <jborkland@apexcos.com>

Delivered Date: 12/16/2010 06:52 PM EDT

Subject: RE: NBH South Terminal SAP

Matt,

I am just finishing up the edits to the Sampling and Analysis Plan. I will drop off electronic copies tomorrow morning. Please let me know how many you would like. I will assume seven if I don't hear from you (the number of EPA personnel that are on this address list).

While we encourage you to re-review the whole document, we know it is large, so we wanted to highlight the differences between what you just reviewed and what we will be submitting tomorrow. I have documented the areas that have changed from the previous version of the plan below:

- 1). Section 1.2, Section 1.3, and Section 4.4 have updated language addressing USEPA Comments #1 and #2.
- 2). Table 1 has updated the PCB analyses for soil and groundwater to PCB Aroclors by "EPA Method 8082 - With Non-Target ECD Peaks Reported" (which is what our laboratory is calling the extra printouts Kim requested to help identify partially degraded or otherwise non-conforming PCB constituents).
- 3). Table 1 has a media column.
- 4). Table 1 shows that soil, groundwater and geophysics investigations have M.G.L. c.21E as one of the programs the investigations are being conducted to meet.
- 5). Table 1 shows real-time particulate monitoring included for both background sampling and construction monitoring
- 6). Table 1 states frequency of PCB monitoring during construction as "to be determined".
- 6). Section 4.5 and subsections are updated to note particulate monitoring (both background and during construction). They also states that PCB monitoring frequency during construction is "to be determined".

These sections also note that a construction air monitoring plan will be submitted prior to construction that will clarify what will be conducted.

7). Sections 4.4.5.1.1 (soil), 4.4.2.3 and 4.4.5.1.2 (groundwater) have updated methods for PCB analysis: PCB Aroclors by "EPA Method 8082 - With Non-Target ECD Peaks Reported" within the text.

Thanks,

Chet Myers, PE, LSP
Apex Companies, LLC
184 High Street, Suite 502
Boston, MA 02110
O: 617-728-0070 X-113
F: 617-728-0080
C: 617-908-5778

-----Original Message-----

From: Schweisberg.Matt@epamail.epa.gov
[mailto:Schweisberg.Matt@epamail.epa.gov]
Sent: Thursday, December 16, 2010 2:01 PM
To: Chet Myers
Cc: Williams.Ann@epamail.epa.gov; Catri.Cynthia@epamail.epa.gov;
stanley.elainet@epamail.epa.gov; dickerson.dave@epamail.epa.gov;
Tisa.Kimberly@epamail.epa.gov; Weitzler.Ellen@epamail.epa.gov
Subject: NBH South Terminal SAP

Chet,

Following up on our quick discussion this morning after the winter flounder meeting, below is our response to your 12/13/10 email responding to our 1st set of comments on the draft SAP.

Hopefully, this squares it and you can revise and resubmit the SAP, as you mentioned. Let me know if there are any questions. Thank you.

Matt Schweisberg
617-918-1628

Your Revision No. 1: EPA is OK with this.

EPA Comment 1: OK with your Revision No. 3.

EPA Comment 2: OK with your Revision No. 4.

Point of Clarification: The overall concept is that if EPA approves this project, once the CDF is completed, this Site will be completely addressed under 21E, CERCLA, TSCA, RCRA, CAA, CWA and all other federal programs. One TSCA caveat: The draft TSCA determination (which would be attached to an affirmative draft decision for public comment) would be based on certain assumptions to be set out in the draft TSCA

determination; in the event the sampling to be performed brings to light information that is contrary to existing data, EPA may have to review any TSCA determination on the project. I'd guess that would be the same for all federal programs too. All of this doesn't need to be in the SAP since it would be included in an affirmative draft determination should we decide that way, but is stated here to be sure Apex/State understand this overall cleanup concept.

EPA Comment 3: Re Table 1 comment - OK with Revision Nos. 2 and 5, as long as real time particulate matter sampling is included. As we agreed, the frequency of PCB monitoring during construction will be changed to read "To Be Determined" in Table 1 (see discussion below).

Point of Clarification: Re asbestos air monitoring, should EPA issue an affirmative draft decision document, it will include in the performance standards the October 11, 2007 draft regulations referred to in your response to EPA's comment 6. These draft regulations include revisions to incorporate cleanup standards for soil contaminated with asbestos source material and soil contaminated with asbestos source material and one or more hazardous waste. In turn, these draft regulations refer to Mass. Air Quality regs for asbestos cleanups. So, if asbestos is found and requires cleanup under 21E, air emissions will be addressed in accordance with Mass. law. Bottom line is no change needed to the SAP on this issue.

Point of Clarification: Re PCB air monitoring, a good point is raised about receiving and evaluating the data regarding site and dredge material characterization. EPA will review the site and dredge material characterization data, then determine the frequency and need for rapid turn around during the project. It is correct that EPA currently monitors monthly at the Harbor site but that is after years and years of monitoring--there were periods when it was more frequent. As mentioned above, in Table 1 in the column entitled, "Samples to be Collected," for air monitoring for PCBs during construction, you agreed to delete "once per month" and insert "To Be Determined." Other areas of SAP should be made consistent with this change (for example. section 4.5).

EPA Comment 4: For consistency, add to section 4.5 that real-time particulate matter monitoring will be conducted during construction. Also add a sentence reflecting that a construction air monitoring work plan will be submitted after the site and dredged material are characterized.

EPA Comment 5: OK with your response to our comment.

EPA Comment 6: OK with your response to our comment (see EPA Comment 3, above).