

May 18, 2005

Ms. Kimberly Tisa
EPA New England, Region 1
1 Congress Street
Suite 1100 (CPT)
Boston, MA 02114-2023

Re: McCoy Field Site
225 Hathaway Boulevard
New Bedford, MA 02740

Dear Ms. Tisa:

This letter addresses supplemental review comments discussed during the telephone conference on May 11, 2005 with you, Yoon-Jean Choi, Jackie Huggins and me, as well as the comments you and I discussed on May 12, 2005. The supplemental review comments are related to the Risk-Based Cleanup Request, Rev. 1, dated May 3, 2005, for the new Keith Middle School Site at the referenced location, submitted by BETA Group, Inc. on behalf of the City of New Bedford.

EPA Comment #1 – Related to terminology of “Engineer” vs. “Architect”.

This response supersedes and replaces responses to General Comment # 3 and Specific Comment # 5 (1) in BETA's response letter to Mr. Choi's April 5, 2005 Memorandum. Engineers from BETA Group, Inc. are responsible for directing “excavation, removal, segregation, handling, temporary stockpiling, loading, transportation, and offsite management of the fill layer and unsuitable subgrade soils”. Specifically, Alan D. Hanscom and Robert W. Kelly are in responsible charge of site activities dealing with contaminated soil management activities.

EPA Comment #2 – Related to density testing.

With respect to Risk-Based Cleanup Request Attachment G, Specification 02200, Earthwork, 3.04 Fills, Backfills and Compaction, sand cone density tests have been performed in accordance with ASTM D1556-00 *Standard Test Method for Density and Unit Weight of Soil in Place by the Sand-Cone Method*.

For each day of utility trench installation, a field engineer from Miller Engineering generally performed one test per lift per day. For example, if 40 feet of trench was excavated and only 4 lifts were installed, then 4 tests were performed. The frequency of the tests was increased if variability of the backfill materials (percentage gravel, moisture levels) was noted from one load to another. If the granular backfill was fairly consistent for a particular day across all lifts, then the test frequency might have been decreased slightly.

Documentation of the sand cone density tests is provided on a CD-ROM included in Attachment I of Risk-Based Cleanup Request Revision 2.

EPA Comment #3 – Related to documentation of compliance with Contract Specifications.

Documentation (test records) that contract document specifications have been met to date is included in Attachment I of Risk-Based Cleanup Request Revision 2.

Please note that compaction requirements have been closely monitored in subgrade preparations for utility lines and within paved areas, but not in the landscaped areas. Extensive in-situ test results for subgrade areas under utility lines are contained on a CD included in Attachment I; gradation curves for materials furnished to the site are also included.

Placement of compacted granular materials under the current contract will include in-situ density testing with a nuclear density meter. As provided in the geotechnical recommendations by Miller Engineering, testing will be performed in accordance with the following guidelines:

- **ASTM C136 Gradation Test** - Recommended frequency = 1 test per material source and 1 per material change
- **ASTM D-1557 Proctor** - Recommended frequency = 1 test per material source and 1 per material change
- **ASTM D-2992 Field Density Test** - Recommended frequency with Nuclear density gauge = 1 per lift/ per 2500 sq. ft.

Engineers from Miller Engineering will be responsible for coordinating and reviewing the results of in-situ testing of subgrades prior to paving.

EPA Comment #4 – Related to gas vapor barrier 60 dry mils vs. 80 mil strip at joints.

Risk-Based Cleanup Request Section 3.3.1 (Building Footprint) has been revised to clarify that the thickness of the spray-on gas vapor barrier will be 60 mils. The 80 dry mil thickness refers to a strip applied to the edge of grade beams and pile caps to help effect a vapor tight seal. The gas vapor barrier (60 dry mil) will then completely cover the joint. Reference is made to Figure 4 of the RBCR Revision 2 discussed below.

EPA Comment #5 – Related to Figure 4 - Gas Vapor Barrier & Venting Plan Details.

The following revisions have been made to Figure 4:

- The geotextile protection course will overlap the gas vapor barrier (60 dry mil) applied over the grade beam/pile cap.
- Labeling deficiencies have been corrected (i.e. In Details 2 and 3, geotextile has been labeled and arrow from compacted fill label is pointing to the right place).

The revised Figure 4 is included in Risk-Based Cleanup Request Revision 2:

EPA Comment #6 – Related to data sheet for LBI Technologies Ultrashield G-1000.

The technical data sheet for LBI Technologies Ultrashield G-1000 is included in Attachment B of Risk-Based Cleanup Request Revision 2.

EPA Comment #7 – Related to consistency between text, figures, and attachments.

The response letters, text of Risk-Based Cleanup Request, the attachments, and figures have been revised to achieve consistency with respect to the following:

- Root removal is limited to one foot below ground surface.
 - Risk-Based Cleanup Request Attachment E, Long-Term Cap Monitoring Plan, has been revised to limit excavation and/or removal of existing root systems to one foot below grade.
 - The DRAFT Activity and Use Limitation, Attachment A, has also been changed to limit excavation and/or removal of existing root systems to one foot below grade.
- Landscape and Asphalt Cap Construction.
 - Risk-Based Cleanup Request Section 1.4 has been revised to eliminate reference to warning barrier beneath paved areas.
 - Risk-Based Cleanup Request Figures 4, 5, and 6 have been revised to make the details consistent with the text.
- Exposure risk calculations for PCBs in indoor air.
 - Risk-Based Cleanup Request Section 2.2.3 Soil Gas has been revised to incorporate language from the response letter, dated May 2, 2005, to EPA's comments on the human health risk assessment.
 - Exposure risk calculations, presented in Tables 3.1 through 3.3, have been added to Risk-Based Cleanup Request Revision 2.
- Amended action level of 0.06 µg/m³ for PCBs in indoor air.
 - Risk-Based Cleanup Request Attachment F Environmental Monitoring Plan has been revised to reference this amended action level. The "Action Level" represents 20% of the maximum acceptable concentration of 0.3 µg/m³, as determined in accordance with

EPA Comment #8 – Related to Risk Assessment Memo dated May 9, 2005 - Attachment A.

The Memo dated May 9, 2005 refers to "Attachment A", which is actually "Appendix A", which was provided with the original submittal.

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EPA Comment #9 - Related to vent stack locations with respect to HVAC units.

Figure 4 has been revised to indicate locations of vent stacks with respect to HVAC units. The nearest HVAC unit to any of the subslab vents is at least 20 feet away.

EPA Comment #10 - Related to analyses for asbestos.

No overt signs of asbestos containing materials (ACM) were detected in any of the test borings, nor were suspect ACM observed during excavation activities.

EPA Comment #11 - Related to empty folder in Risk-Based Cleanup Request Rev. 1 Attachment D.

The two CDs of laboratory analytical reports provided herein are to be inserted in the pockets provided in Risk-Based Cleanup Request Revision 1 Attachment D.

We believe that our responses adequately address the questions and concerns raised during EPA's supplemental review of the Risk-Based Cleanup Request Revision 1; however, please call either Jackie Huggins or me with any questions related to the contents of this letter or any further concerns that may arise.

Very truly yours,

BETA GROUP, INC.

Alan D. Hanscom, P.E., LSP
Associate

Cc: Gerard Martin, MADEP
Scott Alfonse, City of New Bedford
Jacqueline Coucci, City of New Bedford
William DoCarmo, City Project Manager
Larry Oliveira, School Department
Evan Warner, Mount Vernon Group Architects
Jackie Huggins, BETA