



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 Congress Street, Suite 1100
BOSTON, MA 02114-2023**

MEMORANDUM

DATE: April 18, 2005

SUBJ: Risk-Based Cleanup Request, March 21, 2005
McCoy Field, New Bedford, MA

FROM: Kimberly N. Tisa, PCB Coordinator
Office of Ecosystem Protection/CPT

TO: Scott Alfonse, Director of Environmental Stewardship
City of New Bedford

SUMMARY

The following summary identifies items and/or deficiencies found during review of the above referenced document. Comments on the Human Health Risk Assessment and proposed engineered cap design will be provided separately.

1. The text indicates that the proposed warning layer would be placed only in the paved areas. EPA's recommendation included all areas (outside the building footprint) to provide a warning before contaminated material. Please clarify why the City is not proposing the warning barrier in the landscaped areas.
2. In correlating sample analytical results from the data tables to the figures, the figures are unclear with respect to sampling locations. There is no explanation on the figures themselves regarding symbols, color changes, etc.
3. In comparing the figures, (e.g. Figures 1.1 and 1.2 versus 1.3 thru 1.5), it is difficult to determine where the 1.3 thru 1.5 are on Figures 1.1 and 1.2. This could possibly be eased by using the same color scheme on each of the Figures or the City could provide some other alternative.
4. For the PCB analytical results for the Landscaped Area (Appendix C), the shading for exceedances is missing. Please correct.

5. In reviewing the sample data tables (Appendix C), there is no distinction on sample post-removal versus confirmatory samples (e.g. following excavation those PCB concentrations remaining).
6. The sample data tables for the PCBs (Appendix C) are expressed in $\mu\text{g}/\text{Kg}$ units. Given that the narrative is expressed in mg/Kg , the units should be consistent for ease of understanding and data interpretation.
7. Table 4 provides PCB Aroclor results in groundwater. As previously indicated, a review of the raw chromatograms is necessary to assess partitioning concerns.
8. The QA/QC discussion on data useability is missing. Upon review of the PCB data provided in Appendix C, specifically the duplicates, MS, and MSDs, there appears to be significant variations in the data. For example, at PC191-L the MS and MSD results are lower than the original sample results; at PC198-B the MS is 100% greater than the MSD; at PC255-1-4', the duplicate was ND while the sample had approximately 10 ppm PCBs; at PCB1006-1-3', the original sample showed 468 ppm PCBs while the duplicate showed 12.5 ppm PCBs; etc. Based on EPA's review, the data as presented requires a complete discussion with respect to acceptability and useability. Please note that EPA provided only select sampling locations and that a comprehensive evaluation of all the data by the City is required.
9. With respect to the information provided in Appendix C, EPA noted that for some of the duplicate, MS, and MSD samples, the associated reference sample was not identified. Please correct.
10. Further details are needed on the proposed long-term monitoring and maintenance plans. Conceptual information has been provided and for this project EPA will require a more detailed discussion on the engineered cap maintenance and the indoor air monitoring, including methodologies and action limits.