



Wannalancit Mills  
650 Suffolk Street  
Lowell, MA 01854

978.970.5600 PHONE  
978.453.1995 FAX

[www.TRCsolutions.com](http://www.TRCsolutions.com)

**TRC Reference No. 115058**

September 12, 2013

Ms. Molly Cote  
Massachusetts Department of Environmental Protection  
Southeast Regional Main Office  
20 Riverside Drive  
Lakeville, Massachusetts 02347

**RE: Special Project Designation Annual Report (July 1, 2012 – June 30, 2013)  
Parker Street Waste Site  
New Bedford, Massachusetts**

Dear Ms. Cote:

TRC Environmental Corporation (TRC) prepared this Special Project Designation Annual Report on behalf of the City of New Bedford (City) for the Parker Street Waste Site (PSWS) in accordance with the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000). The site is tracked by the Massachusetts Department of Environmental Protection (MassDEP) under Release Tracking Number (RTN) 4-15685. Due to logistical complexities, the response actions at this disposal site continue to be conducted under a Special Project Designation Permit. Additional RTNs for which response actions have been conducted under the Special Project Designation follow:

- RTN 4-15824 – Former Keith Junior High School (KJHS)/New Andrea McCoy Field (McCoy Field) historic underground storage tank (UST) release.
- RTN 4-21300 – Immediate Response Action (IRA) to address polychlorinated biphenyl (PCB) impacted sediments within Keith Middle School (KMS) wetland.
- RTN 4-21407 – IRA to address arsenic impacted surface soil at the Varsity and Junior Varsity Baseball Diamond portions of the Dr. Paul F. Walsh Memorial Field (Walsh Field).
- RTN 4-21823 – IRA to address lead impacted soil at the Soccer Field portion of Walsh Field.

- RTN 4-21847 – IRA to address PCB impacted soil at the New Bedford High School (NBHS) campus.
- RTN 4-21872 – IRA to address arsenic and chromium impacted surface soil at the NBHS campus.
- RTN 4-22409 – IRA to address a Condition of Substantial Release Migration (SRM) / Critical Exposure Pathway (CEP) at the NBHS campus.
- RTN 4-23223 – IRA to address PCB impacted surface soil within the Ruggles Street right-of-way adjacent to the Nemasket Street Lots.
- RTN 4-23526 – IRA to address PCB impacted surface soil at location Tree Island TI-3 at the NBHS campus.

This Special Project Designation Annual Report, required under 310 CMR 40.0064(2)(i) of the MCP, describes the status of response actions for the above-referenced project, which was granted a conditional two year Special Project Designation Permit Extension on May 2, 2012 through February 25, 2014. The reporting period covered by this letter is July 1, 2012 through June 30, 2013.

## **BACKGROUND**

Environmental investigations of the NBHS campus were initiated by BETA Group, Incorporated (BETA) in 2006. TRC continues to conduct response actions within this portion of the PSWS.

A Partial Response Action Outcome (RAO-P) was filed with the MassDEP by BETA for the KMS portion of the site.

Note that historical information, forensic review of historical aerial photographs, evaluation of soil analytical data, and review of soil boring information associated with environmental investigations conducted by TRC and others, including the Environmental Protection Agency (EPA), near Walsh Field and the New McCoy Field indicate that the area south of Parker Street contains widely distributed historic urban fill that is a background condition. Although the City filed a Class A-1 RAO-P with the MassDEP for the Former KJHS/New McCoy Field historic UST release (RTN 4-15824) on June 28, 2010, and Class A-3 RAO-P's for Walsh Field and the Former KJHS/New McCoy Field on May 26, 2011, the City is presently of the opinion that the area south of Parker Street is not part of the PSWS.

**Basis for the Special Project Designation** – The City's investigation and remediation activities require or have required coordination and site-specific negotiation with private property owners, the involvement of the EPA Regional PCB Coordinator due to Toxic Substances Control Act (TSCA) PCB regulatory jurisdiction, and MassDEP in their oversight role. The implementation of response actions involves work over a large area, coordination of ongoing activities with various stakeholders, and on-going school activities at two school buildings with large student populations.

A five year Special Project Designation Permit Extension was granted on June 2, 2007. Prior to expiring on February 25, 2012, the City submitted a request for an extension and modification of the Special Project Designation Permit. The City was subsequently granted a conditional two year Special Project Designation Permit Extension until February 25, 2014. The following summarizes response actions conducted during the most recent reporting period and provides an updated Special Project Designation response action schedule.

## STATUS OF RESPONSE ACTIONS

### Technical Activities

➤ ***Keith Middle School (KMS)***

- **Long-Term Monitoring and Maintenance Implementation Plan (LTMMIP)** – Long-term monitoring related activities were conducted under the revised LTMMIP during this reporting period. Following a Public Involvement Plan (PIP) meeting on May 2, 2012 (no comments on the proposed changes to the plan were received), the *Revised Long-Term Monitoring and Maintenance Implementation Plan, Revision 5.5* was approved by EPA on August 27, 2012.

On May 14, 2012, the New Bedford School Committee voted to accept transfer of the KMS, newly constructed Andrea McCoy Field Athletic Complex and Joaquim “Jack” Nobrega Athletic Building from the City. On June 12, 2012, the New Bedford Public Schools authorized the City’s Office of Environmental Stewardship to coordinate and oversee the environmental monitoring activities related to the LTMMIP. These activities were implemented during the most recent reporting period and included the following:

- Cap Inspection (April 2013)
- Groundwater monitoring (September 2012 and May 2013)
- Wetland Inspection (May 2013)
- Wetland Sediment Sampling (May 2013)
- Indoor Air & Vent Stack Monitoring (January 2013)

Employee refresher training was not required during the most recent reporting period in accordance with the revised LTMMIP.<sup>1</sup> The Office of Environmental Stewardship will continue to oversee environmental monitoring activities, including coordination with the EPA, through June 2014.

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<sup>1</sup> The City will provide worker training in 2014 to refresh school employees on the background, contents and requirements of the Activity & Use Limitation (AUL) and the LTMMIP.

The City also issued an additional fact sheet in August 2012 discussing the LTMMIP requirements and environmental monitoring activities.

**KMS Wetland Phase III** - Pursuant to the MassDEP Special Project Designation Permit Extension conditional approval and associated interim deadline schedule, the City drafted a Phase III Identification, Evaluation and Selection of Comprehensive Remedial Action Alternatives (Remedial Action Plan; RAP) for the KMS wetland. In accordance with the City's Public Involvement Plan, the RAP was posted by the City for public comment on August 31, 2012. No comments were received during the public comment period. The Phase III RAP was submitted to MassDEP on October 23, 2012.

The City also issued an additional fact sheet in August 2012 discussing the KMS wetlands.

➤ ***New Bedford High School***

- **Interior PCB Source Mapping, PCB Air Monitoring and Remedy Implementation** - TRC continues to support the City in the investigation and remediation of PCB-containing building materials consistent with EPA regulations. Please refer to the City's website for additional documentation on the interior PCB effort conducted under EPA oversight.

Three rooms (i.e., A-110-1, A-203-2 and A-315-1) within the NBHS remain closed as a precaution until testing determines that PCB levels in air are below the Acceptable Long-Term Exposure Concentration (ALTEC) of 0.3 micrograms per cubic meter. The collection of additional indoor air samples from rooms A-110-1 and A-315-1 for PCB analysis took place in August 2013, and the City is awaiting receipt of the validated results.

- **NBHS Campus Release Abatement Measure (RAM) Plan Modification** - As part of MassDEP's Conditional Approval for the Campus RAM dated April 15, 2011, a RAM Plan Modification was prepared prior to conducting activities "where pavement will be increased and/or for the installation of storm water utilities." A RAM Plan Modification was submitted to MassDEP on July 22, 2011. MassDEP issued Conditional Approval of the RAM Plan Modification on August 1, 2011.

RAM Status Reports were previously submitted to MassDEP on August 5, 2011 and February 3, 2012. During the most recent reporting period, RAM Status Reports were submitted on August 6, 2012 and February 13, 2013.

Construction of the Solar Park in the area between the two northern parking lots (Exposure Point HS-8) per the currently approved RAM Plan Modification is was underway at the time of report preparation. The City's Department of

Public Infrastructure (DPI) led the preparation of the property for installation of the solar panels by operation and maintenance lessee. RAM-related activities generally included:

- Installation of erosion and sediment controls;
- Removal of trees and stumps;
- Excavation, re-grading and preparation of subgrade;
- Installation of utility conduits;
- Placement of geotextile fabric;
- Backfilling, reseeding and placement of imported crushed stone;
- Installation of perimeter fencing; and
- Offsite transportation of asphalt and tree stumps for reuse, recycling and/or disposal.

The City's consultant will provide environmental oversight and monitoring, including Storm Water Pollution Prevention Plan (SWPPP) inspections, throughout implementation of DPI's construction activities. RAM-related Solar Park construction activities will be described in other regulatory submittals.

- **NBHS Mechanical Room IRA** - The IRA Status Report submitted on November 22, 2011 described supplemental Total Fluid Extraction events, indoor air sampling and site investigation activities, including the detection of presence of PCBs in the dense non-aqueous phase liquid (DNAPL) in the vicinity of monitoring well MW-27R. As a result, a second IRA Plan Modification was submitted to MassDEP on February 24, 2012 to specify remedial measures to address the NAPL encountered beneath the NBHS Mechanical Room. This IRA Plan Modification added the following activities to the existing IRA Plan:

- **Hydraulic Control** - Installation, operation, and maintenance of a hydraulic control system in the vicinity of MW-27R within the NBHS Mechanical Room; and
- **Supplemental Investigation** - Investigation of soil, groundwater, and NAPL contamination in that area using a Membrane Interface Probe System (MIPS).

During the most recent reporting period, IRA Status Reports and the associated Remedial Monitoring Reports (RMR) were submitted to MassDEP on November 28, 2012 and May 28, 2013. The IRA Status Reports generally described:

- Installation, operation and maintenance of the hydraulic control system;

- System aqueous effluent and air emission monitoring conducted to date;
- Monitoring and recovery well installation;
- Supplemental soil, groundwater and aqueous seep investigation activities and analytical results;
- Quarterly discharge monitoring in accordance with the Industrial Discharge Permit; and
- Management of investigation-derived waste (IDW).

The City is currently evaluating remedial approaches, including further investigation of the lateral and vertical extents of impacts in the vicinity of the Mechanical Room and remedies that meet both MassDEP and EPA remedial goals under the MCP and TSCA. Additional investigatory activities and a determination of the remedial approach will be discussed in future submittals, including additional IRA Status Reports and/or IRA Plan Modifications.

The City prepared an updated fact sheet in August 2012 that identified issues being studied at NBHS and summarized the investigation findings to date, including those associated with the Mechanical Room.

➤ ***Acquired Residential Properties & Nemasket Street Lots***

- **Acquired Residential Properties RAM Plan** - A draft Phase III RAP including both the Acquired Residential Properties and the Nemasket Street Lots was made available for public comment on April 13, 2012; however this comment period was subsequently temporarily suspended on May 3, 2012 pending further discussion between the City and the EPA.

A RAM Plan describing remedial activities at the Acquired Residential Properties was made available by the City for public comment on August 20, 2012.<sup>2</sup> The RAM Plan described soil pre-characterization, soil excavation, soil management and on-site reuse, offsite disposal, backfilling and exposure barrier construction activities.

On August 15, 2012, the City issued a *Request for Concurrence on Regulatory Opinion* letter to the EPA regarding the regulatory classification of PCB impacted soil at three of the Acquired Residential Properties (i.e., 101 and 102 Greenwood Street and 118 Ruggles Street). At the request of the EPA, a memorandum was issued on November 2, 2012 to provide supplemental information concerning the August 15, 2012 letter.

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<sup>2</sup> A summary of the RAM Plan activities was also made available by the City on September 7, 2012.

As described in the December 10, 2012 response letter, EPA determined that the proposed pre-characterization and removal procedures were sufficient and reasonable. A final RAM Plan was subsequently submitted to the MassDEP on December 18, 2012.

Preliminary RAM-related site investigation activities were initiated in March 2013). These activities, including DigSafe notification, surveying and initial soil boring installation and sample collection, are described in the RAM Status Report dated April 25, 2013. Soil pre-characterization activities continued during May and June 2013 and are on-going as of the preparation of this report. Additional investigatory activities and/or modifications to the remedial approach will be discussed in future submittals, including additional correspondences with the EPA, RAM Status Reports and/or RAM Plan Modifications.

The City also prepared a fact sheet in August 2012 that identified issues being studied at Acquired Residential Properties and Nemasket Street Lots and summarized the investigation findings to date.

- ***Walsh Field*** – A Partial RAO Statement was submitted to MassDEP on May 26, 2011 documenting the assessment activities, the determination that Condition of No Significant Risk exists at the site and that the requirements of a Class A-3 RAO had been met.
- ***New Andrea McCoy Field (former Keith Junior High School) Partial Response Action Outcome (P-RAO) Statement*** - A Partial RAO Statement was submitted to MassDEP on June 5, 2012 documenting the assessment activities, the determination that Condition of No Significant Risk exists at the site and that the requirements of a Class B-1 RAO had been met.
- ***Liberty Street / “Slim” Parcel*** – CDM Smith prepared a Partial RAO for public comment on June 24, 2013. The RAO-P documented that, like Walsh Field and the New McCoy Field, the area east of Liberty Street contains widely distributed historic urban fill that is a background condition. Comments were received, addressed and a final RAO-P for the parcel was submitted on August 6, 2013.
- ***Public Involvement Planning*** - The City developed a Public Involvement Plan (PIP) for the PSWS in response to a request by a citizens group, Citizens Leading Environmental Action Network (CLEAN). On December 22, 2011, the City received public comments on its Application for Extension and Modification of the Special Project Designation Permit from CLEAN. As part of these comments, CLEAN requested that a formal PIP be developed and complied with in accordance with the MCP. On February 7, 2012, the City issued a response to CLEAN’s public comments that included a commitment to the development of a formal PIP.

This PIP outlines the steps that the City plans to take to keep the public informed of the assessment and response action activities performed by the City at the PSWS. A draft PIP was presented at a public meeting on May 2, 2012. Following a public comment period, the final PIP was submitted to MassDEP on June 28, 2012.

During the current reporting period, the City held PIP meetings on August 23, 2012, January 16, 2013 and May 8, 2013. In each case, the City responded in writing to comments received from the public at the PIP meetings. The next PIP meeting is anticipated to be held in September 2013.

## SCHEDULE

The following table presents an updated schedule for major response actions currently underway throughout the Site, associated deliverable(s) and estimated timeframe for submittal of those deliverables for public comment (where required) or to the MassDEP.

<b>Special Project Designation Schedule</b>			
<b>Project Area/Location</b>	<b>Deliverable/Activity</b>	<b>Proposed Due Date</b>	<b>Notes/Comments</b>
<b><i>New Bedford High School</i></b>	RAM Status, RAM Completion and/or RAO/AUL (partial)	February 4, 2014 <sup>(1)</sup>	<ul style="list-style-type: none"> <li>▪ Exterior soil remedy.</li> <li>▪ Mechanical room groundwater on separate track.</li> <li>▪ Assumes completion of field work by mid Fall (soil shipment).</li> <li>▪ Assumes no further characterization for dioxins required or if potential risk posed by dioxin in soil, schedule may change.</li> </ul>
	VOC SRM/CEP IRA Status Report	November 29, 2013 <sup>(2)</sup> May 29, 2014 <sup>(2)</sup>	
	VOC SRM/CEP modified IRA Plan	TBD	<ul style="list-style-type: none"> <li>▪ Dependent on selected remedial strategy.</li> <li>▪ Phase III/IV not required if managed under a Modified IRA Plan.</li> </ul>
<b><i>Private Properties (110 Greenwood, Corner Sports)</i></b>	RAOs	TBD	Pending completion of RAM at 110 Greenwood Street and settlement of negotiations between City and the Corner Sports Store.
<b><i>Acquired Residential Properties</i></b> <sup>(3)</sup>	RAM Status Report	October 17, 2013 <sup>(2)</sup>	
		April 17, 2014 <sup>(2)</sup>	
<b><i>Nemasket Street Lots</i></b>	Phase III in support of Class C RAO	TBD	<ul style="list-style-type: none"> <li>▪ TBD</li> </ul>
<b><i>KMS Wetland</i></b>	Phase IV Remedy Implementation Plan	TBD	<ul style="list-style-type: none"> <li>▪ TBD</li> </ul>

**Notes:**

MassDEP – Massachusetts Department of Environmental Protection

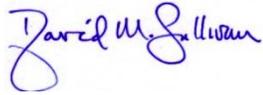
- 1- Due date assumes start of public comment period where City-owned parcels are concerned, unless indicated otherwise by the City.
- 2- Massachusetts Contingency Plan (MCP; 310 CMR 40.0000) required deadline for submittal to MassDEP unless Completion Report filed on or prior to indicated date(s) unless a Completion Report and/or RAO Statement is filed first.

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3- Assumes work performed by Department of Public Infrastructure (soil excavation, paving, laying out of fabric, soil cap, etc.).

Please do not hesitate to contact me at TRC at 978-656-3565 or via e-mail at [dsullivan@trcsolutions.com](mailto:dsullivan@trcsolutions.com) if you have any questions or comments.

Sincerely,  
**TRC Environmental Corporation**



David M. Sullivan, LSP  
Senior Project Manager

cc: M.S.W. Paul, City of New Bedford