

TRACEY

July 29, 2016
Project No. 16-061

New Bedford Conservation Commission
133 Williams Street – Room 304
New Bedford, MA 02740
Attention: Ms. Sarah E. Porter, Conservation Agent

Re: NOI Document Review
Nemasket Street Lots for Proposed Nemasket Street Recreation Area
New Bedford, MA
RTN 4-15685

Dear Ms. Porter:

TRACEY Environmental (TRACEY) is pleased to present to you the results of our recent review of documents related to a Notice of Intent (NOI) for the Nemasket Street Lots for a Proposed Nemasket Street Recreation Area (the “Property”) in New Bedford, Massachusetts, prepared by TRC Environmental Corporation (TRC), dated May 23, 2016. In accordance with our proposal dated June 15, 2016, TRACEY’s objective was to evaluate whether historical and documented contamination present at the Property may be impacted by the proposed use as a Recreation Area, including the proposed storm water infiltration system. TRACEY did not review storm water design or calculations for the project as that was not part of our scope of work.

Included within the NOI was a TRC letter dated May 12, 2016 to Nitsch Engineering, regarding the “Influence of Storm Water Infiltration on Impacted Fill, Nemasket Street Lots – Parker Street Waste Site, New Bedford, Massachusetts; Release Tracking Number 4-15685,” dated May 12, 2016. Additional documents reviewed included TRC’s “Phase II Comprehensive Site Assessment, Acquired Residential Properties and Nemasket Street Lots Portion of Parker Street Waste Site, New Bedford, Massachusetts,” dated January 2012; and portions of several other documents electronically filed with Massachusetts Department of Environmental Protection (MassDEP) under the RTN 4-15685 in accordance with the Massachusetts Contingency Plan (MCP) between 2009 and 2016.

Additional documents (hard copies) submitted to MassDEP prior to 2009, which were scanned and listed at the MassDEP website were not available for review. However, portions of work completed by BETA Group, Incorporated in 2006, were summarized or otherwise included in TRC’s documents reviewed by TRACEY. Of specific note were data generated by BETA Group regarding the Nemasket Street Lots leaching characteristics of compounds of concern, which included Toxicity Characteristic Leaching Procedure (TCLP) analysis. Lastly, TRACEY reviewed reports available at the City of New Bedford, Environmental Stewardship website, which also included historical BETA Group information.

Historically, off-site materials were brought to the Property during the mid-1900s to fill existing wetlands; the fill likely originated from industrial properties as indicative of the compounds present at the Property: metals, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), dioxins, and a few isolated volatile organic compounds (VOCs). Although these compounds are present in soil above MCP Method 1 risk based standards, and present for more than four decades, groundwater analyses for these compounds (including dissolved metals), as well as VOCs, did not detect concentrations greater than MCP risk based standards.

The compounds of concern are not expected to readily leach from the soil into groundwater, which corroborates analyses data from groundwater samples collected from three monitoring wells (MW-37, MW-38, and MW-39) at the Property. Due to a nearby private residential well, groundwater at MW-39 is classified as GW-1; while groundwater at the other two wells on the Property are classified as GW-2. Groundwater across the Property is considered to be GW-3, in accordance with the MCP. GW-1 is the most conservative and restrictive, as it is considered a source for drinking water, and as stated previously, laboratory data did not exceed the allowable risk based standards for groundwater categories GW-1, GW-2 or GW-3, where applicable.

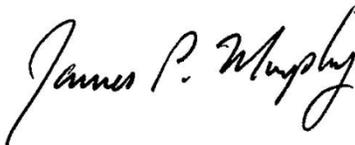
TRACEY understands the proposed redevelopment of the Property will result in removing contaminated soil from targeted locations, regrading the Property with off-site gravel, utilizing all appropriate soil management and health and safety plans, to create a soccer field, an asphalt basketball court, and concrete walkways. According to TRC's NOI document, the gravel fill beneath the field turf provides both a separation from the remaining soil contamination as well as "adequate storage and infiltration for the site improvements."

Based on review of the historic and recent laboratory data, the history of the Property and site conditions, the stable nature of the compounds of concern at the Property, it is TRACEY's opinion, and that of our Licensed Site Professional, that upon completion of the proposed development, the residual soil contamination at the Property is not expected to further adversely impact the groundwater at the Property. As stated previously, the adequacy of the storm water management design for the proposed Property redevelopment was not evaluated by TRACEY.

We are pleased to have this opportunity to assist you. If you have any questions, please contact TRACEY at jmurphy@lsp@gmail.com or (781) 726-2519.

Sincerely,

TRACEY Environmental Consulting LLC



James P. Murphy, LSP
Principal