

TRC
Wannalancit Mills
650 Suffolk Street
Lowell, Massachusetts 01854

Main 978.970.5600
Fax 978.453.1995

Memorandum

To: Kimberly Tisa, PCB Coordinator

From: David M. Sullivan, LSP

CC: Michele Paul, LSP, Cheryl Henlin

Subject: **Request for Additional Information concerning *Request for Regulatory Opinion, Remediation of Polychlorinated Biphenyl (PCB) Impacted Soils***
Subset of Acquired Residential Properties 101 and 102 Greenwood Street and 118 Ruggles Street New Bedford, Massachusetts

Date: November 2, 2012

TRC Environmental Corporation (TRC) has prepared this memorandum to provide the supplemental information requested by the United States Environmental Protection Agency (EPA) concerning the TRC letter, *Request for Concurrence on Regulatory Opinion Remediation of Polychlorinated Biphenyl (PCB) Impacted Soils*, dated August 15, 2012.

- 1. The proposed vertical delineation sampling at sample location SB-101-6B may be inadequate given the depth of PCBs >50 ppm at adjacent locations** – In addition to the vertical pre-delineation sample proposed at 4 feet, we will add vertical delineation samples to be taken at 5–7 feet, and 7-9 feet to ensure that PCB concentrations >50 ppm will be addressed during remediation.
- 2. It is unclear what is happening with test pit TP-101G** – Our plan calls for test pit TP-101G to be addressed during the excavation at TP-101C, and TP-101F. It was inadvertently not included in our text, but is illustrated in Figure 2.
- 3. At sample locations SB-101-4D and SB-101-6A, additional sampling should be performed to ensure sampling did not result in PCB dilution** – As discussed in the TRC letter at page 6, samples will be taken at sample locations SB-101-4D and SB-101-6A in light of previous sample results approaching 50 mg/kg total PCBs (49.2 mg/kg and 42.4 mg/kg, respectively). At each of the locations three borings will be placed surrounding the locations indicated on Figure 2. Samples will be taken at 3-5 feet, 5-7 feet, and 7-9 feet and analyzed for total PCBs. If any of these samples indicate a concentration greater than or equal to 50 mg/kg total PCBs, the locations will be excavated. If this scenario occurs, confirmatory grab samples will be taken from the sidewalls at a frequency of one sample per 1.5 meters of sidewall. Additional pre-

excavation confirmatory samples would be collected if any confirmatory sample results indicate a concentration greater than or equal to 50 mg/kg total PCBs. Lateral limits will be determined to be where sidewall confirmatory sampling results are less than 50 mg/kg. Where field conditions allow, sidewalls will be over-excavated 6 inches beyond the aforementioned limits as a conservative measure.

4. **Please provide a table showing the proposed number of pre-excavation samples –**
The proposed number of pre-excavation samples are as follows:

Excavation Location	Number of pre-excavation samples ⁽¹⁾
101 Greenwood Street	
H2, TP101A	12
TP101-H, TP101-I, TP-101B, TP-101D, TP-101E	36
TP101-C, TP101-F, TP101-G	19
SB-101-6B	6 ⁽²⁾
SB-101-6A ⁽³⁾	9
SB-101-4D ⁽³⁾	9
102 Greenwood Street	
SB-102-6	5
SB-185, SB-102-8A, SB-102-8B, SB-102-8C, SB-102-8D, TP102-C	24

Notes:

1. Number of pre-excavation samples based on sample results <50 ppm PCBs in first sampling event.
2. Number of samples includes sidewall samples, and vertical delineation samples at 4', 5-7', and 7-9'.
3. Samples at SB-101-6A (49.2 ppm PCBs) and SB-101-4D (42.4 ppm PCBs) include three locations surrounding the original sample location taken at three depths (3-5', 5-7', and 7-9').

5. **Please add the location of house foundations to the figures –** The location of the house foundations have been added to Figures 1, 2, and 3.
6. **With respect to 118 Ruggles Street, did you obtain the information from the EPA Removal Group, who performed the soil excavation at 128 Ruggles Street, to support that this location has been excavated? –** The information was supplied by Marcus Holmes, EPA On-Scene Coordinator, which indicates that the removal action performed by EPA at 128 Ruggles Street included sample location A15 on the 118 Ruggles Street property. Please see attached the two figures provided by EPA (128 Ruggles Street (P-020) Removal Grid Location Map, and Satellite View of Excavation), and the TRC Excavation Plan showing the 118 Ruggles Street area.
7. **On the August 15, 2012 submittal, Figure 1 does not include data for sample location SB-196 –** The PCB data for sample location SB-196 has been added to Figure 1.

GREENWOOD STREET

CLF

LEGEND:

- ● SOIL SAMPLE LOCATION
- ⊕ EXISTING MONITORING WELL
- X— EXISTING FENCE
- - - - - PROPERTY LINE
- TSCA SAMPLING GRID
- TEST PIT LOCATION
- SITE OF DEMOLISHED HOUSE

SAMPLE LOCATION SAMPLE DATE	H1		SAMPLE DEPTN INTERVAL IN FEET
	12/19/05	1.00 - 3.00	
	Constituent	0.207 U	

NOTE:
 J - ESTIMATED VALUE.
 U - COMPOUND WAS NOT DETECTED AT SPECIFIED QUANTITATION LIMIT.
 UJ - ESTIMATED NON-DETECT.



ACQUIRED RESIDENTIAL PROPERTIES
 NEW BEDFORD, MASSACHUSETTS

SOIL SAMPLE TOTAL PCBs RESULTS
 102 GREENWOOD STREET

	Wannalancit Mills 650 Suffolk Street Lowell, MA 01854 (978) 970-5600	FIGURE 1
	DRAWN BY: PZ CHECKED BY: DMS	

SB-102-9 12/16/10	0.00 - 1.00	Field Dup 0.00 - 1.00	1.00 - 3.00
Total PCBs	0.058 U	0.178 J	0.246 J

SB-102-9

SB-196 06/10/08	1.00 - 1.00	3.50 - 3.50	8.00 - 8.00
Total PCBs	0.284 J	0.191 J	0.204 J

SB-196

SB-102-8A 12/16/10	0.00 - 1.00	1.00 - 3.00	5.00 - 6.00	7.00 - 9.00
Total PCBs	0.3622 J	3.14 J	529 J	0.0869 J

TP102-C

SB-102-8A

SB-185

SB-102-8D/
MW-36

SB-102-8B

SB-102-8D 12/16/10	0.00 - 1.00	1.00 - 3.00	5.00 - 7.00	8.00 - 10.00
Total PCBs	0.0931 J	3.562 J	8280 J	0.52 U

SB-187

SB-102-8C

SB-102-7

SB-187 06/09/08	4.00 - 4.00	6.00 - 6.00
Total PCBs	0.2699 J	5.88 J

SB-102-12

SB-186

SB-102-6

SB-185 06/09/08	2.00 - 2.00	4.00 - 4.00	6.00 - 6.00
Total PCBs	68.3 J	45.7 J	10.7 J

SB-102-8B 12/16/10	0.00 - 1.00	1.00 - 3.00	5.00 - 6.00	7.00 - 9.00
Total PCBs	6.22 J	83.3 J	37.4 J	0.0561 U

SITE OF DEMOLISHED HOUSE

SB-102-12 12/15/10	0.50 - 1.50	3.00 - 5.00	7.00 - 9.00
Total PCBs	0.657 J	0.984 J	0.0571 U

SB-102-8C 12/16/10	0.00 - 1.00	1.00 - 3.00	5.00 - 7.00	8.00 - 10.00
Total PCBs	0.578 J	32.8 J	80.3 J	0.32 J

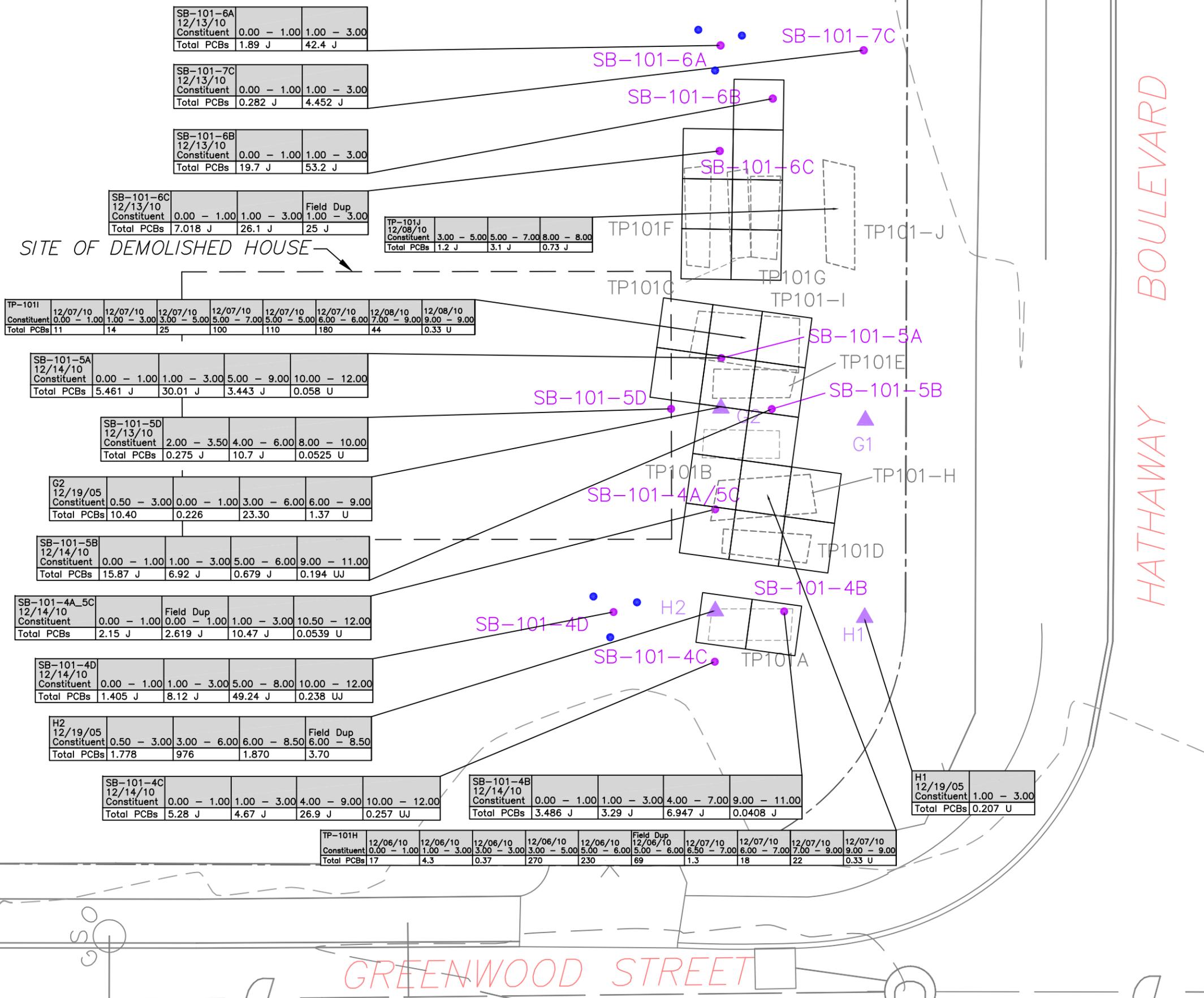
SB-186 06/09/08	2.00 - 2.00	3.40 - 3.40
Total PCBs	1.2 J	1.011 J

SB-102-6 12/16/10	0.00 - 1.00	1.00 - 3.00
Total PCBs	1.583 J	243 J

SB-102-7 12/16/10	0.00 - 1.00	1.00 - 3.00	Field Dup 1.00 - 3.00
Total PCBs	34 J	1.77 J	5.63 J

SB-195 06/10/08	1.00 - 1.00	7.50 - 7.50	9.00 - 9.00	11.00 - 11.00
Total PCBs	2.45 J	4.34 J	0.141 J	0.0515 U

BOULEVARD
 HATHAWAY



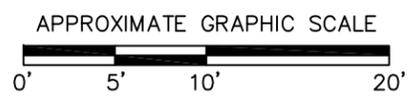
LEGEND:

- ▲ SOIL SAMPLE LOCATION
- PROPOSED INVESTIGATIVE SAMPLE LOCATION
- X— EXISTING FENCE
- - - - - PROPERTY LINE
- TSCA SAMPLING GRID
- ▭ TEST PIT LOCATION
- ▭ SITE OF DEMOLISHED HOUSE

SAMPLE LOCATION

H1	12/19/05	1.00 - 3.00	SAMPLE DEPTH INTERVAL IN FEET
Constituent			
Total PCBs		0.207 U	

NOTE:
 J - ESTIMATED VALUE.
 U - COMPOUND WAS NOT DETECTED AT SPECIFIED QUANTITATION LIMIT.
 UJ - ESTIMATED NON-DETECT.



**ACQUIRED RESIDENTIAL PROPERTIES
 NEW BEDFORD, MASSACHUSETTS**

**SOIL SAMPLE TOTAL PCBs RESULTS
 101 GREENWOOD STREET**

TRC Wanalancit Mills
 650 Suffolk Street
 Lowell, MA 01854
 (978) 970-5600

FIGURE 2

DRAWN BY: PZ DATE:
 CHECKED BY: DMS JULY 2012

RUGGLES STREET



SB-118-1A

SB-118-1A 12/08/10	Constituent	0.00 - 1.00	1.00 - 3.00	4.00 - 5.00
Total PCBs		3.132 J	17.46 J	0.0567 U

A15

SB-118-1B/
MW-34

SB-118-1B 12/08/10	Constituent	0.00 - 1.00	1.00 - 3.00	3.00 - 4.00	6.00 - 7.00
Total PCBs		1.487 J	9.17 J	13.64 J	0.055 U

TP118B

A14

A14 12/20/05	Constituent	2.00 - 3.00	3.00 - 4.50
Total PCBs		2.40	0.964

SB-118-1C

SB-118-1C 12/08/10	Constituent	0.00 - 1.00	1.00 - 3.00	3.00 - 4.50	5.00 - 6.00
Total PCBs		0.955 J	1.987 J	3.576 J	0.0546 U

A15 12/20/05	Constituent	2.75 - 4.00
Total PCBs		59.1

TP118A

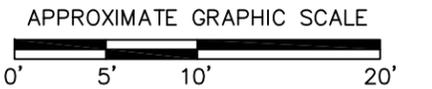
SITE OF DEMOLISHED HOUSE

LEGEND:

- SOIL SAMPLE LOCATION
- EXISTING MONITORING WELL
- EXISTING FENCE
- PROPERTY LINE
- TSCA SAMPLING GRID
- TEST PIT LOCATION
- SITE OF DEMOLISHED HOUSE

SAMPLE LOCATION SAMPLE DATE	H1 12/19/05	SAMPLE DEPTH INTERVAL IN FEET	
	Constituent		1.00 - 3.00
	Total PCBs		0.207 U

NOTE:
 J - ESTIMATED VALUE.
 U - COMPOUND WAS NOT DETECTED AT SPECIFIED QUANTITATION LIMIT.
 UJ - ESTIMATED NON-DETECT.



ACQUIRED RESIDENTIAL PROPERTIES NEW BEDFORD, MASSACHUSETTS	
SOIL SAMPLE TOTAL PCBs RESULTS 118 RUGGLES STREET	
Wannalancit Mills 650 Suffolk Street Lowell, MA 01854 (978) 970-5600	FIGURE 3
DRAWN BY: PZ CHECKED BY: DMS	DATE: JULY 2012



Ruggles Street

P-020-NW01A
Cd: 8 ppm
 Pb: 251 ppm
 PCB: 1.33 ppm
P-020-NW01B
 Pb: 206 ppm
 PCB: 8 ppm

P-020-EW01A
Cr: 31 ppm
 Pb: 265 ppm
 PCB: 0.74 ppm
P-020-EW01B
As: 29 ppm
Cr: 68 ppm
Pb: 647 ppm
PCB: 10 ppm
Benzo(a)anthracene: 44 ppm
Benzo(a)pyrene: 36 ppm
Benzo(b)fluoranthene: 29 ppm
Dibenzo(a,h)anthracene: 1.4 ppm
Indeno(1,2,3-cd)pyrene: 11 ppm

P-020-WW01A
 Pb: 25 ppm
 PCB: ND
P-020-WW01B
Cd: 9 ppm
 Pb: 97 ppm
 PCB: 0.5 ppm

P-020-Q1
 Pb: 5.1 ppm
 PCB: ND

**128 Ruggles Street
 (Property P-020)**

P-020-SW01A
 Pb: 93 ppm
 PCB: 0.2 ppm
P-020-SW01B
 Pb: 33 ppm
 PCB: 0.08 ppm

Figure 3
128 Ruggles Street (P-020)
Removal Grid Location Map
Parker Street Waste Site
New Bedford, Massachusetts

EPA Region I
Superfund Technical Assessment and
Response Team (START) III
Contract No. EP-W-05-042
TDD Number: 10-10-0001
Created by: T. Benton
Created on: 8 June 2010
Modified by: R. Sharp
Modified on: 13 August 2012

LEGEND

- Parcel Boundary
- Composite floor sample location
- Area excavated to a depth of 3-feet
- Composite side-wall sample location bordering City Right of Way
- Location of composite side-wall sample collected from interior wall

Bolded values depicted are greater than the Massachusetts Contingency Plan S-1 & GW-2 standards.
 ppm: parts per million
 As: Arsenic
 Cd: Cadmium
 Cr: Chromium
 Pb: Lead
 PCB: Polychlorinated Biphenyls

0 12.5 25
 Feet

Data Sources:
 Imagery: MassGIS (2008 Aerial - 24628210)
 All other data: START



118 Ruggles St, New Bedford, MA

© 2012 Google

Google

Imagery Date: 4/2/2012

41°38'36.20" N 70°56'57.97" W elev 98 ft

Eye alt 406 ft

RUGGLES STREET

I=85.1

CLF



SB-118-IB/
MW-34

WALK

APPROXIMATE EXTENT OF AREA
UNDERSTOOD TO HAVE BEEN
PREVIOUSLY EXCAVATED

A15

118 RUGGLES STREET

4"

8"

86

97

96

90

96

91

91

S

M

M

M

M

M

M

M

M

M

M

M

M

M

M

M

M

OHW

OHW

