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Memorandum

To: Kimberly N. Tisa, United States Environmental Protection Agency
From: David M. Sullivan, LSP, CHMM, TRC Environmental Corporation
Subject: EPA Comments - March 3, 2010 Proposed Nemasket Lots Investigation Approach
Date: June 18, 2010
CC: Scott Alfonse, City of New Bedford, Department of Environmental Stewardship
Cheryl Henlin, City of New Bedford, Department of Environmental Stewardship
Molly Cote, Massachusetts Department of Environmental Protection
John Mulhall, Malcolm Beeler, TRC Environmental Corporation

The purpose of this memorandum is to respond to the comments you transmitted in your electronic mail message of March 24, 2010 to the City of New Bedford (City) regarding the Nemasket Sampling Work Plan prepared by TRC Environmental Corporation (TRC). Your comments are repeated below in the order posed in the electronic mail message.

- 1. In your plan you indicate the number of test pits will be driven by the ground penetrating radar (GPR) results. Given that the number of test pits will be somewhat driven by the data, I would suggest that the work plan include a provision for review of a revised work plan by the Agencies once the GPR data is received. That is the revised work plan would include more details on the number of test pits proposed based on the GPR findings.**

All test pit activity will be planned following the collection of the geophysical data described in TRC's March 3, 2010 memorandum. TRC will prepare a scope of work for the test pit program for regulatory review at that time.

- 2. As a follow-up to the above, the work plan references potential soil samples based on field observations. In the work plan you may want to include some minimum number of soil samples regardless of field findings.**

All test pit activity and related sampling activity will be planned following the collection of the geophysical data described in TRC's March 3, 2010 memorandum. TRC will prepare a scope of work for the test pit program for regulatory review at that time.

3. I do believe that the air monitoring number proposed ($150 \mu\text{g}/\text{m}^3$) needs to be supported.

TRC's Certified Industrial Hygienist (CIH) performed a mathematical industrial hygiene dust model calculation to verify that the 150 microgram per cubic meter ($\mu\text{g}/\text{m}^3$) dust monitoring level, which is the ambient Action Level and is based on the EPA 24 hour National Ambient Air Quality Standard (NAAQS) for PM10 particulate, would be protective. TRC's CIH performed the modeling using the available soil concentration data obtained previously by the BETA Group, Incorporated (BETA) in August 2005 for polychlorinated biphenyls (PCBs) and metals. The modeling assumed that the airborne dust is representative of the constituents identified in Site soil (i.e., all constituent concentration becomes airborne as particulate), and maximum soil concentrations from the BETA data set were assumed. Exposure guideline assumptions were as follows. For PCBs, TRC assumed the $0.3 \mu\text{g}/\text{m}^3$ Acceptable Long-Term Average Exposure Concentration used for air monitoring at Keith Middle School and New Bedford High School. For lead, TRC assumed EPA's $0.15 \mu\text{g}/\text{m}^3$ National Ambient Air Quality Standard for lead. For other constituents, TRC assumed Occupational Safety and Health Administration (OSHA) Permissible Exposure Limits (PELs).

4. You may need to reference a different waste management provision than proposed under § 761.61(a). I would refer to 761.79(g) as a possible alternative since you aren't proposing a § 761.61(a) cleanup at this time.

The waste management provision you reference is found in the City's letter dated March 16, 2010, not in the March 3, 2010 Proposed Nemasket Lots Investigation Approach. TRC has reviewed the possible alternatives noted by EPA, specifically 761.79(g) for Decontamination Waste and Residues, and concurs with EPA's suggestion.

Please contact the City or TRC if you have any additional questions.