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Memorandum

To: Molly Cote, Massachusetts Department of Environmental Protection
From: David M. Sullivan, LSP, CHMM, TRC Environmental Corporation
Subject: Residential Demolition Concrete Foundation Removal
101 and 111 Greenwood Street and 98 and 108 Ruggles Street
New Bedford, Massachusetts
Date: July 26, 2010
CC: Kimberly Tisa, United States Department of Environmental Protection
Ronald Labelle, Commissioner of Department of Public Infrastructure, City of New Bedford
Scott Alfonse, Director of Environmental Stewardship, City of New Bedford
Cheryl Henlin, Department of Environmental Stewardship, City of New Bedford

Introduction

Per the direction of Molly Cote of the Massachusetts Department of Environmental Protection (MassDEP), TRC Environmental Corporation (TRC) has prepared this memorandum to summarize a change to the approach to the demolition of residential structures described in the Revised Modified Release Abatement Measure (RAM) Plan submitted to MassDEP on July 6, 2010 for Release Tracking Number (RTN) 4-15685, regarding building demolition within a portion of the Parker Street Waste Site (PSWS).

Rather than on-site reuse of the crushed concrete from foundation walls from the 101 and 111 Greenwood Street and 98 and 108 Ruggles Street properties, this material will be removed from the site for offsite landfill disposal. The remaining concrete basement slab material will be demolished and managed onsite as described in Section 4.2.3.1 of the Revised Modified RAM Plan.

The following presents a summary of a teleconference between TRC, MassDEP, the United States Environmental Protection Agency (EPA), and the City of New Bedford (City) regarding the modification of the plan for offsite disposal of select concrete material.

Concrete Foundation Management

As described in the MassDEP approved RAM Plan for demolition of the six Acquired Residential Properties, with the exception of the 102 Greenwood Street and 118 Ruggles Street properties (concrete foundation and foam insulation material was managed as PCB Remediation Waste in accordance with EPA approval), the City planned to demolish the concrete foundation walls and basement slab to a location at or below grade pursuant to the MassDEP Site Assignment Regulations

for Solid Waste Facilities (310 CMR 16.00), specifically the asphalt pavement, brick and concrete recycling operations detailed in 310 CMR 16.05(3)(e). However, during implementation of RAM-related activities by the City of New Bedford's Department of Public Infrastructure (DPI), it was determined that the on-site reuse of the crushed concrete foundation walls at the 101 and 111 Greenwood Street and 98 and 108 Ruggles Street properties would result in mounding throughout the Site following grading of the properties with documented uncontaminated imported backfill and/or loam. Removal of the concrete would eliminate the mounding issue and provided a more attractive and more easily maintained result for the properties before the implementation of reuse and remediation activities.

As a result, Ronald Labelle (Commissioner of the City of New Bedford's DPI), requested approval to dispose of the concrete foundation walls from the 101 and 111 Greenwood Street and 98 and 108 Ruggles Street properties at a permitted offsite facility. MassDEP (Molly Cote) verbally approved demolition and offsite disposal of the concrete foundation walls on July 26, 2010. The concrete foundation walls have previously undergone laboratory testing for polychlorinated biphenyls (PCBs) and this material does not require management as PCB Remediation Waste in accordance with the July 13, 2010 approval letter from the EPA to the City (i.e., total PCB concentrations in concrete did not exceed 1 milligram per kilogram). The concrete basement slabs at each of the four above-referenced properties will be managed onsite as described in the approved RAM Plan (i.e., demolished onsite to a size no greater than 6-inches in diameter in accordance with 310 CMR 16.00).

The City of New Bedford's DPI is planning to load the material into trucks for offsite disposal at the Crapo Hill Landfill in Dartmouth, Massachusetts. The facility has given preliminary acceptance to receive the material. TRC will work with the City to provide any needed documentation to facilitate disposal of the material consistent with the facilities specifications, and state and Federal regulations and policies. Shipping of the material will begin as early as July 26, 2010.

Please call or write if you have any questions or comments.