



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION I  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

***CERTIFIED MAIL – RETURN RECEIPT REQUESTED***

**AUG 27 2012**

City of New Bedford  
Office of Environmental Stewardship  
Attn: Cheryl Henlin  
133 William Street  
New Bedford, Massachusetts 02740

Re: August 2012 Revised Long-Term Monitoring and Maintenance Implementation Plan  
Keith Middle School Property  
New Bedford, Massachusetts

Dear Ms. Henlin:

This is written in response to your March 24, 2009 letter concerning a revision to the *October 20, 2006 Long-Term Monitoring and Maintenance Implementation Plan (2006 LTMMIP)* for the Keith Middle School property located at 225 Hathaway Boulevard in New Bedford, Massachusetts, and submitted on behalf of the City of New Bedford by TRC Environmental Corporation (TRC). The March 24, 2009 letter summarized changes that were proposed to the *2006 LTMMIP*. EPA provided verbal comments on the proposed changes to TRC on December 8, 2009.

On May 14, 2012, the New Bedford School Committee voted to accept transfer of the Keith Middle School, McCoy Athletic Complex, and the Joaquim “Jack” Nobrega Athletic Building from the City of New Bedford. On June 12, 2012, the New Bedford Public Schools authorized the Office of Environmental Stewardship (OES) to coordinate and oversee the environmental monitoring and maintenance requirements related to the *LTMMIP* and to continue to serve as the point of contact for EPA on such matters, until further notice is provided.

*A Revised Long-Term Monitoring and Maintenance Implementation Plan, August 2012, Revision 5.5 (2012 LTMMIP)*, was submitted that includes the following proposed major changes to the *2006 LTMMIP*:

- ⇒ Eliminate sampling of volatile organic compounds (VOCs) for indoor air, the foundation vent stacks, and groundwater;

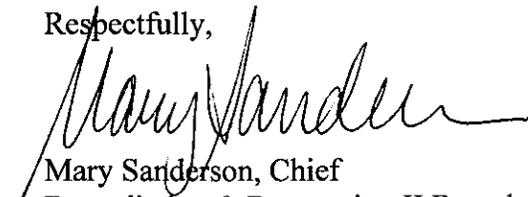
- ⇒ Reduce PCB indoor air and foundation vent stack sampling frequency to two (2) events per year;
- ⇒ Change the PCB analytical method for indoor air and foundation vent stacks to PCB homologues using EPA Method 680;
- ⇒ Eliminate the separate extraction and analysis of PCB sample media (quartz pre-filter and adsorbent PUF);
- ⇒ Use indoor air background sample as background sample for both indoor air and the foundation vent stacks;
- ⇒ Reduce cap inspections to two events per year; and,
- ⇒ Reduce frequency of annual employee requirements.

These proposed changes were discussed with the community at a Public Involvement Plan Meeting on May 2, 2012 and the City received no comments on the proposed changes. The Massachusetts Department of Environmental Protection (MassDEP) concurred on elimination of the VOC sampling requirements via emails dated July 19 and August 8, 2012.

Based on the information provided and EPA's review of the long-term monitoring results to-date, the proposed changes are reasonable and EPA approves the 2012 LTMMIP as written.

Should you have any questions, please call Kimberly Tisa at 617-918-1527.

Respectfully,



Mary Sanderson, Chief  
Remediation & Restoration II Branch  
Office of Site Remediation & Restoration

cc: M. Cote, MassDEP  
D. Sullivan, TRC  
M. Medeiros, Acting Facilities Manager  
M. Shea, Acting Superintendent of New Bedford Public Schools  
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