

Parker Street Waste Site Public Involvement Plan Meeting
Keith Middle School Community Room
August 23, 2012
6:00-8:30pm

Questions and Comments received during the meeting related to the City's work which were not answered that evening

Draft Release Abatement Measure (RAM) Plan: Acquired Residential Properties and Nemasket Street Lot update

- 1. Request a minimum of three weeks to review data/reports/other material before meetings. It is unrealistic and unacceptable to expect the community to have read through such a large report that was released the same week as the public meeting and to be able to comment on it at the meeting. A 20-day comment period is not long enough.**

The City has previously sought to make reports and other materials (such as memoranda) that will be discussed at public meetings available at a minimum of several business days prior to the meetings, and it will continue to do so.

The City will consider any request to extend the public comment period per 310 CMR 40.1405(6)(e)(1). The City strives to balance the requirements of the Massachusetts Contingency Plan regarding the procedures for having a plan approved to start work with community input regarding scheduling of work.

- 2. The executive summary that was included with the RAM Plan is still too technical.**

The City appreciates this comment, and will work on making future executive summaries more understandable. However, since an executive summary of a technical report is still likely to have a fair amount of technical information included, the City will also compile a separate, non-technical summary of each document released for public comment in an effort to better communicate the key points of each document. Such summaries have been prepared for the draft RAM Plan for the Acquired Residential Properties and the draft Phase III report for the wetland to the west of Keith Middle School, and are available on the City's website as well as at the Lawler Branch library.

- 3. Why haven't photos of the test pit activities conducted at the Nemasket Street Lots been included in reports, especially photos of the corroded drums that were found?**

Photographs are not necessary to support the technical data that forms the basis of reports that are required by the Massachusetts Department of Environmental Protection. Also, the subject document is the RAM Plan for the six acquired residential properties, which did not include the Nemasket Street Lots – these will be the subject of an upcoming report.

- 4. When the Department of Public Facilities (DPF) cuts the grass at the Acquired Residential Properties, could the dust contain polychlorinated biphenyls (PCBs)? Can dust monitors (and water sprays, if necessary) be used at property boundaries with houses where people live whenever the grass is cut? Also, I think grass clippings should be removed from the properties whenever DPF mows.**

PCBs are present in the surface layer of soil at the Acquired Residential Properties, so dust that is generated during mowing activities may contain low levels of PCBs. However, at most surface soil locations (greater than 75% of locations tested), PCBs concentrations are less than 2 mg/kg, the Massachusetts Department of Environmental Protection (MassDEP) soil standard for residential use.

A human health risk characterization was performed for the Acquired Residential Properties that evaluated the risk posed to groundskeepers performing maintenance activities at the properties. The risk characterization determined that a condition of No Significant Risk, as defined by MassDEP, exists for these workers. Workers were assumed to be exposed to PCBs and other chemicals in surface soil through ingestion, dermal contact and inhalation of dust for 150 days per year, 4 hours per day, for 27 years. The dust inhalation pathway was associated with less than 1% of the estimated risk, meaning that ingestion of soil and dermal (skin) contact with soil accounted for greater than 99% of the estimated risk for the groundskeeper. Because adjacent residents are less exposed to the dust than the workers performing the mowing activities, a condition of no significant risk would exist for adjacent residents. Therefore, it is not necessary to monitor or control dust that is produced during periodic mowing activities.

Grass clippings present no health risk and DPF is not required to remove grass clippings from properties that they maintain.

- 5. Comment: I am frustrated by the City's discussion of certain options (such as end-uses for a parcel) or schedules for work that later change when the written plan is issued.**

As discussed at the meeting, the City has not decided on an end-use for the Acquired Residential Properties. The City continues to discuss options that it is considering with the community to receive community input; these options should not be considered final until they have been included in a written plan.

When scheduling is first discussed for any project, the City is not always aware of all factors (including weather, staff availability, and timelines for procuring necessary materials) that ultimately affect the schedule that is later proposed in the written plan or as work progresses. The City does its best to present accurate information to the community based on its understanding at the time.

Draft Phase III report: Wetland to the west of Keith Middle School

- 6. Is there a timeline for remediating the wetland? If so, can the remediation of the high school be prioritized over the wetland?**

No timeline has been established for remediating the wetland.

- 7. I would like to see groundwater data for this property presented in a visual form such as a graph or contour map.**

Figure 3-2 of the *Phase II Comprehensive Site Assessment, Wetland to the west of Keith Middle School* provides a groundwater contour map.

New Bedford High School updates

- 8. What was the highest concentration of polychlorinated biphenyls (PCBs) that was identified in window caulking at the high school?**

The highest concentration of PCBs in window caulking was 25.1 parts per million (ppm), which is well below the threshold of 50 ppm requiring removal of the building product established by the U.S. Environmental Protection Agency.

- 9. Will the City conduct air quality tests in every room of every portion of the high school when remediation has been completed?**

Since remediation has not been completed yet, the City cannot comment on what activities a monitoring program may require.

- 10. What is the status of balancing the unit ventilators (univents) throughout the high school? When air samples are collected from a particular room, would it be useful to sample inside the univents and HVAC ductwork?**

The School Department contracts to have univents at the high school balanced as-needed. Air samples are collected within the breathing zone in a room to evaluate PCB exposure to room occupants. Because the room occupants are not exposed to the air within the univents and HVAC ductwork, air sampling in these locations would not provide suitable information to evaluate exposure.

Site General

- 11. How much money has been paid to the City's environmental consultants to date?**

As previously explained in the Public Involvement Plan (PIP) Meeting response summaries for the April 2010 and March 2011 PIP meetings, the City paid BETA and VHB approximately \$3,710,000.00. For services through July 2012, the City has paid TRC approximately \$10,153,000.00.