

Parker Street Waste Site Public Involvement Plan Meeting
Keith Middle School Community Room
September 21, 2011
6:00-9:00pm

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

Wetland (Phase II report)

- 1. I can't remember mention of an area containing 700 parts per million (ppm) total polychlorinated biphenyls (PCBs) in previous PIP presentations.**

Slide 50 from the April 14, 2010 PIP meeting directs people to the March 2010 Immediate Response Action (IRA) Status Report for the most current data at that time for the Keith Middle School wetland. Duplicate sediment samples were collected at location SED-11A-B for quality control purposes; total PCB concentrations of 705 ppm and 805 ppm were reported for this location on Table 5 of this Status Report. Since this sampling location is located within the fenced area and under standing water, it does not pose a direct contact risk to people who are using the campus.

- 2. Comment: When the City says "no risk," that is because there is a fence around the wetland. The contamination is still there and I feel that it is still a risk.**

The term "No Significant Risk" used by the City comes from the Massachusetts Contingency Plan (MCP). While impacted sediment remains within the wetland, it does not currently pose a risk to anyone using the school campus or living in the adjacent neighborhoods because the fence keeps people from coming into contact with the impacted areas.

- 3. Is sampling location SED-11A-B the source of wider contamination in the wetlands? If not, what is the source of the (re-)contamination?**

No, sampling location SED-11A-B does not appear to be the source of impacts detected in the wetland. The draft *Phase II Comprehensive Site Assessment (CSA) for the Wetland to the West of the Keith Middle School* states that the wetland initially became impacted due to the placement of fill material associated with the construction of New Bedford High School (NBHS) (see the Executive Summary and pages 1-1 and 10-1). As also described in the Phase II CSA, sediment sampling conducted subsequent to the 2005-2006 sediment remediation detected the presence of polychlorinated biphenyls (PCBs) in sediment above reporting thresholds and cleanup criteria. The City's root cause analysis has evaluated several potential mechanisms for the post-remedy PCB concentrations detected in sediment samples collected as part of the long-term monitoring program and further delineated during extensive follow-up sampling. The details of the root cause analysis were communicated to the City under attorney client privilege. However, the potential causes are not on-going or active conditions, and the delineation of the nature and

extent of contamination provided in the Phase II CSA is suitable for planning and implementing the next phase of response actions.

4. I can't remember information on groundwater in previous PIP presentations on the wetland.

Generally, discussions regarding groundwater were noted in numerous PIP presentations as part of the reviews of the routine groundwater monitoring performed under the *Long Term Monitoring and Maintenance Implementation Plan* (see the following PIP presentations for examples: April 2010 [slide 46], September 2010 [slide 39], and January 2011 [slide 33]). Groundwater data for the Keith Middle School (KMS) Wetland were included in the Immediate Response Action (IRA) Status Report dated March 2010, and IRA Completion Report dated October 2010. As Massachusetts Contingency Plan groundwater standards were not exceeded for polychlorinated biphenyls (PCBs) or dissolved metals in groundwater, and the primary concern are soil and sediment impacts at the KMS Wetland, the PIP presentations focused on impacts to soil and sediment.

Acquired Residential Properties and the Nemasket Street Lots (Phase II and III reports)

5. What are the levels of dioxins found in the Nemasket Street lots?

Dioxins, expressed in the Phase II report as total toxicity equivalents (TEQs), were measured in soil at 10 locations on the Nemasket Street properties. Total TEQ concentrations ranged from 6.4×10^{-5} milligrams per kilogram (mg/kg) at location SB-NM-20 (0-1 foot depth) to 1.1×10^{-3} mg/kg at location SB-NM-19 (0-1 foot depth). All measured concentrations for dioxin TEQs in soil were above the Massachusetts Contingency Plan Method 1 S-1 soil standards. Further details on the dioxin sampling conducted for the Nemasket Street properties can be found in Section 4.1.5 of the Phase II report.

6. Comment: Data presented in the PIP meeting appears to be incomplete compared to what the City knows and has planned. This seems particularly true for elevated levels of contaminants.

There is not sufficient time at PIP meetings to cover each report or document that the City has issued since the previous meeting in the level of detail provided in the reports themselves. The City seeks to make PIP meetings accessible to all community members by providing an overview of technical details. All final data from the City's sampling will continue to be posted on the City's website as it becomes available; in most cases these data are incorporated into reports which are submitted to the Massachusetts Department of Environmental Protection (MassDEP), and are thus also available through MassDEP's website. Planning documents, such as Release Abatement Measure (RAM) Plans, and milestone documents, such as Phase II Comprehensive Site Assessments (CSA) and Response Action Outcome (RAO) reports, are also made available for public review before submittal to MassDEP. Specific questions regarding the City's data or

reports can be directed to Cheryl Henlin at (508) 961-4576 or via e-mail at Cheryl.Henlin@newbedford-ma.gov.

7. Why didn't TRC collect samples in the road areas in the Acquired Residential / Nemasket areas (i.e., in Ruggles and Greenwood Streets, and in Hathaway Boulevard)?

Soil sampling has taken place in the City's rights-of-way along portions of Hathaway Boulevard and Ruggles Street. The City is presently evaluating approaches to managing the roadways within the site in an inclusive manner.

8. When will the City tell us what it plans to do to remediate contaminated land in the Acquired Residential/Nemasket areas? What will the extent of remediation be (depth of soil to be excavated)? Neighbors have an interest in what the City's future plans are because this is a residential neighborhood and they live here.

By the current project schedule, which has been submitted to the Massachusetts Department of Environmental Protection for the Special Project Designation annual report, the City would have issued a Phase IV report, which will discuss the specifics of a remedial design, by February 2012. However, the City received a request to extend the comment periods on the Phase II and III reports by a minimum of one month, which will at this time delay the submission of the Phase IV report until March 2012.

New Bedford High School

9. Where are the PCBs coming from in the closed classrooms of the high school?

The City is currently evaluating this situation and will provide information as it becomes available.

10. What is the total tonnage of soil removed from New Bedford High School (NBHS) to date? What is the projected additional tonnage of soil that will be removed from NBHS?

Approximately 11,258 tons of soil have been removed from NBHS to date. The tonnage of soil remaining to be excavated cannot be determined until a final design for the proposed solar park at the northern end of campus has been agreed upon.

11. Is the plan to place solar panels at NBHS open to public review? Soil under proposed solar panels on the NBHS campus may be capped in place (i.e., paving or a soil cap) and would therefore be considered as "remediated" but the soil underneath will still be contaminated.

No, the plan to place solar panels at NBHS is not open for public review.

12. What is the estimated cost of replacing all the windows at NBHS? Would that window replacement also include the windows in the fire doors and windows between offices/hallways inside the building?

The City has not developed a scope of work for this activity yet, so an estimated cost of replacing the windows at NBHS has not been developed.

13. Comment: I feel that more soil samples need to be taken in the areas where high concentrations of dioxins have been found on NBHS grounds, to determine the extent of the contamination. Especially at sample location HB-22.

The City plans on delineating and removing dioxin impacted soils at sample location HB-22. The City feels that dioxin impacts at the NBHS campus have been adequately characterized and has no plans for additional dioxin sampling.

Site General

14. What is the cost of all consultants paid 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 August 2011, the City has paid TRC approximately \$8,598,103.00.

15. What was the initial amount of money that was appropriated for the Parker Street Waste Site (PSWS) cleanup? To date, how much money has been spent? How much money is left in the budget?

The initial appropriation for the Parker Street Waste Site project, which included expenses associated with the construction of the Keith Middle School, was \$103,687,860.00. To date, \$90,025,349.35 has been spent; of that amount, the City estimates that \$32,642,062.00 can be attributed to remediation costs. A total of \$13,662,510.65 remains in the bond.

16. When is the City Yard going to be tested?

The City does not currently have a timeframe for testing the City Yard. The City is aware of its responsibility to delineate the nature and extent of contamination at the Parker Street Waste Site and to show whether it is or is not appropriate to include the City Yard within the site boundaries.

17. Comment: It would be really helpful if the City and TRC would share their master schedule of their plans for the Parker Street Waste Site (PSWS) with the public. For upcoming PIP

meetings, there should be a clear schedule for all upcoming work within PSWS, including all submittals for the various parcels.

In August 2011, the City submitted a schedule of upcoming work to the Massachusetts Department of Environmental Protection as part of the Special Project Designation annual report; this schedule is available on the City of New Bedford's Parker Street Waste Site website, and was discussed during the PIP meeting. Site activities notices are published weekly in the Sunday edition of the *Standard-Times* and are also available on the City's website.

18. Comment: I feel as though the Department of Public Health and the Department of Education are ignoring the contamination at NBHS.

The Massachusetts Department of Public Health (MDPH) released two Health Consultations on September 27, 2011, with respect to New Bedford High School and the Parker Street Waste Site neighborhood. MDPH held public meetings the same day to go over the reports and to answer questions, and they are holding a public comment period on these documents through November 9, 2011. Also, MDPH staff has participated in previous PIP meetings.

The City maintains regular communication with the Massachusetts School Building Authority, which replaced the former school building assistance program administered by the Department of Education (now the Department of Elementary and Secondary Education) in 2004, with respect to funding for this project. The City's Department of Environmental Stewardship also has regular conference calls with the Superintendent, the School Department business manager, and NBHS' headmaster, to ensure that the School Department's administration is aware of any contamination identified on school property and is involved with the planning on how to address it.