



CITY OF NEW BEDFORD  
JONATHAN F. MITCHELL, MAYOR

**Response to Public Comment**  
**Phase II Comprehensive Site Assessment/Partial Response Action Outcome (RAO-P)**  
**Report**  
**Liberty Street Parcel, New Bedford, Massachusetts**

General Comments: One set of comments was received by the City regarding the Draft RAO-P, stating that appendices were not included in the draft document. The City intends to finalize and submit the report to MassDEP as the information contained in Appendices A through F substantially support the narrative provided. This final document with appendices is available on the City's Parker Street Waste Site web page at [http://www.newbedford-ma.gov/McCoy/sitemap/special\\_project.html](http://www.newbedford-ma.gov/McCoy/sitemap/special_project.html). If upon review of the supporting appendices there are substantial comments, these comments will be reviewed and the City may issue an addendum to the RAO-P.

Another general comment stated that the document "does not support an argument that the lead concentrations are attributable to background or that the Liberty Street Parcel is separate and distinct from the Parker Street Waste Site. We recommend that the report be modified to state that the lead concentrations are from an unknown source."

Response: CDM Smith stands by the conclusion that the source of lead is from historic urban fill not an unknown source. Concentrations in historic urban fill vary widely and the concentrations found at the Liberty Street Parcel are consistent with other historic urban fill throughout much of the Commonwealth.

The remaining comments were specifically numbered and each is presented below. Responses appear following each comment.

1. Comment: "The use of the term "site" is inconsistent. Sometimes it refers to the Liberty Street Parcel and sometimes it refers to the entire Site for RTN 4-15685. This needs to be corrected particularly in light of discussions regarding contaminants of concern as well as impacted media (surface water, sediment, indoor air, and groundwater at the larger Site)."

Response: The City will revise to use "parcel" to refer to the Liberty Street Parcel which the RAO-P covers and "site" to refer to the overall site 4-15685.

2. Comment: "The closest surface water bodies are less than 1,000 feet away."

Response: Areas of forested wetlands are located north and northwest of the parcel with the closest being located about 400' northwest of the parcel. There is also an area

subject to flooding located immediately north of the parcel. This will be added to Section 4.3 of the document.

3. Comment: “The site history arguments with regards to filling should not be made in the REDUA portion of the report. The REDUA is intended to demonstrate that the data are of adequate quality and representativeness to support the opinions rendered. The Conceptual Site Model is intended to be a concise summary about a site. The other sections of a report are where data and conclusions are presented.”

Response: The Conceptual Site Model is intended to document how contamination entered the environment, the site history regarding the filling and the surrounding area directly relate to this issue. No change will be made in response to this comment.

4. Comment: “The REDUA states no data were rejected as a result of the REDUA. However, the lead concentrations from SB-212 are not included in Tables 4-8 or 4-9. Furthermore, the basis for suggesting that data are biased high is not substantiated. Finally, I do not believe these data were used in the risk characterization contrary to the statement in Section 3.1.8.”

Response: Data from SB-212 was used in the risk assessment as stated below from Section 4.4:

“A parent and duplicate sample were collected from soil boring SB-212 for metals analysis. The lead results were 2,420 mg/kg and 5,580 mg/kg, respectively. To further evaluate the lead concentration, CDM Smith installed test pits TP-A through TP-F in May 2012 to collect samples for lead analysis. For the comparison of standards, an average lead concentration was calculated between the parent and duplicate. As part of the “hot spot” evaluation, the resultant concentration from SB-212 was then averaged with the test pit sample results with concentrations greater than 300 ppm to determine an average lead concentration for the hot spot. Table 4-5 shows these average lead results. A site-wide lead exposure concentration was then calculated.”

The resultant representative average lead concentration from this area was used in the site-wide exposure concentration (as stated above). The purpose of Tables 4-8 and 4-9 are to select chemicals of concern. That the specific concentration from SB-212 was not listed did not change the fact that lead was selected and treated in the report as a chemical of concern. No change will be made in response to this comment.

5. Comment: “The presence of lead in the soil does not appear to correlate with the presence of coal and coal ash. The lead concentration reported for TP-02 where coal ash was identified was 43 ppm. This concentration is less than all of the other samples tested by CDM except three. The PAH concentrations also do not appear to correlate with the presence of coal ash in TP-02.”

Response: The following sentence from the draft document:

“A review of data collected to date indicates the historic fill compounds at the Liberty Street Parcel are mainly related to coal/coal ash and clinkers.”

will be replaced with:

“A review of the data collected to date indicates that the compounds of concern found at the Liberty Street Parcel are likely related to historic fill material, which has been found to contain coal/coal ash and clinkers.”

6. Comment: “Coal Ash in two samples collected from one location along a 1,700 foot parcel are inadequate to support an argument that the source of impacted soil at the site is historic fill material that contains coal ash.”

Response: In addition to the two samples collected by CDM Smith, fill material containing ash, and trace coal was observed in 10 out of 11 soil boring installed by TRC during the 2008 sampling round. No change will be made in response to this comment.

7. Comment: “CDM states that the lead concentrations reported in SB-212 are inconsistent with the other data. However, they are silent on the concentration of 1,500 ppm in SB-219 approximately 950 feet to the north. The data show that lead is present at a wide range of concentrations throughout the Liberty Street Parcel similar to the entire Parker Street Waste Site. I suspect that the focus on the concentrations at SB-212 was the exceedances of the UCL.”

Response: The lead concentrations vary across the parcel which is typical of historic fill site. The discussion of the inconsistency of the data collected from SB-212 was related to the UCL exceedance of 5580 ppm. Samples collected by CDM Smith in the vicinity of SB-212 ranged from 67 ppm to 550 ppm. No change will be made in response to this comment.

8. Comment: “The near ubiquitous presence of PCBs in the soil on the Liberty Street Parcel (94% of the surface soils according to Table 4-8) appears to contradict the “historical record” with regards to filling. The data (both chemical testing and historical records) show contradictory information with regard to the sources of contamination and do not support the conclusion that the Liberty Street Parcel is separate and distinct from the rest of the Parker Street Waste Site.”

Response: PCB concentrations within the Liberty Street Parcel are less than 1 ppm with the exception of one concentration of 3.9 ppm. Low levels of PCBs are consistent with historic fill material. No change will be made in response to this comment.