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## Memorandum

**To:** Molly Cote, Massachusetts Department of Environmental Protection  
**From:** David M. Sullivan, LSP, CHMM, TRC Environmental Corporation  
**CC:** Scott Alfonse and Cheryl Henlin, City of New Bedford  
**Subject:** Clarification of Release Abatement Measure Plan for Soil Removal at Sample Location HF-31  
**Date:** December 21, 2010

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### Introduction

TRC Environmental Corporation (TRC) has prepared this memorandum on behalf of the City of New Bedford (City) in response to your request for clarification regarding certain aspects of the Release Abatement Measure Plan (RAM Plan) for Soil Removal at Sample Location HF-31. Specifically, clarification of the management and decontamination provisions, Appendix B - Remediation Figure and portions of Appendix C - Soil Management Plan of the RAM Plan submitted to the Massachusetts Department of Environmental Protection (MassDEP) on November 24, 2010 are provided below.

### Decontamination Provisions

Decontamination provisions associated with the soil removal activities were outlined in the Polychlorinated Biphenyl (PCB) Remediation Notification Letter (Notification Letter) sent to United States Environmental Protection Agency (EPA) by the City on July 14, 2010. The decontamination provisions were further described in the RAM Plan submitted on November 24, 2010. The following provides further clarification of those provisions.

Section 4.2.1.1 of the RAM Plan states the following describing the management and decontamination options:

- ***Equipment Decontamination*** - *Equipment that comes into direct contact with soils determined to be actual or potential PCB Remediation Waste will be decontaminated by one of the following methods referenced below:*
  - *Self-Implementing Decontamination Procedures, as set forth under 40 CFR Part 761.79(c); or*
  - *Aqueous cleaning followed by verification sampling as set forth under 40 CFR Part 761, Subpart P.*

Section 4.2.1.1 goes on to state that the City anticipates implementing the prescriptive decontamination approach per 40 CFR Part 761.79(c)(2)(ii) in an effort to avoid delays due to laboratory turnaround for verification wipe sampling. This section should reference an anticipated prescriptive approach per 40 CFR Part 761.79(c)(2)(i) which applies to the decontamination of movable equipment, tools and sampling equipment by swabbing non-porous surfaces with an appropriate solvent. An appropriate solvent (e.g., Zep Heavy Duty Citrus Degreaser) would meet the criteria listed in 40 CFR Part 761.79(d). The anticipated use of this decontamination procedure does not preclude the use of other approved methods during implementation of the RAM Plan, which accounts for the two provisions noted in the RAM Plan.

Section 5.0 of the RAM Plan (Remediation Waste Management), specifically Section 5.3, provides a further description of both potential decontamination provisions noted above since some waste fluids may be generated. Under the self-implementing approach, spent solvents (not anticipated in an effort to avoid delays due to the need to contain and collect any solvents applied directly to moveable equipment) and solvent soaked rags require appropriate management. Spent solvents and solvent soaked rags will be managed for disposal via incineration at a permitted facility per 40 CFR Part 761.79(g)(3), (4) or (5) which describe appropriate disposal of decontamination waste and residues at their existing PCB concentration unless otherwise specified. Non-liquid cleaning materials (e.g., rags, gloves, brushes, booties) and personal protective equipment (PPE) waste will be managed in accordance with 40 CFR Part 761.61(a)(5)(v), which allows for disposal as solid waste at an appropriately permitted facility. Under these provisions, moveable equipment, tools and sampling equipment used during implementation of the RAM Plan will be dry brushed (as needed) and non-porous surfaces will be swabbed with a solvent dampened rag.

As an alternative to the self-implementing approach for non-porous surfaces, an aqueous decontamination process could be employed. The use of this method is not anticipated but is presented in the RAM Plan for flexibility. Verification sampling would be conducted per the methods described in 40 CFR Part 761, Subpart P (see Appendix F of the RAM Plan) and meet the decontamination standards for non-porous surfaces per 40 CFR Part 761.79(b)(3). The spent aqueous decontamination fluids produced would be managed per the PCB decontamination standard described under 40 CFR 761.79(b)(ii) and (iii). The applicable standards are described in Section 5.3 of the RAM Plan.

Section 1.3.7 of the Soil Management Plan (SMP; Appendix C of the RAM Plan) notes that equipment will be decontaminated in accordance with the methods described in the RAM Plan. This is in reference to the anticipated implementation of the prescriptive decontamination approach per 40 CFR Part 761.79(c)(2)(i) as described in Section 5.3 of the RAM Plan and clarified above. The prescriptive approach is reiterated in Section 3.4 of the Soil Management Plan (Appendix C of the RAM Plan). Once again, the aqueous cleaning followed by verification sampling would be the contingency decontamination approach.

The approaches described are consistent in terms of technical approach options, and met with EPA's approval.

### **Remediation Figure**

The remediation figure presented in Appendix B of the RAM Plan has been modified to indicate the extents of both the area of PCB Remediation Waste (pending the results of in-situ confirmation sampling) and the area to be excavated as a risk reduction measure under the Massachusetts Contingency Plan (MCP; see attachment).

As depicted in the remediation figure, the anticipated extent of the PCB Remediation Waste excavation is estimated to be 1.5-meters by 1.5-meters (approximately 5-feet by 5-feet), by 3-feet deep (i.e., approximately 3 cubic yards). These dimensions are dependent on the results of in-situ confirmatory sampling collected per 40 CFR Part 761, Subpart O. Additional pre-excavation confirmatory samples will be collected if any of the above referenced confirmatory samples indicate a total PCB concentration greater than or equal to 50 milligrams per kilogram (mg/kg). Following the confirmatory sample determination of the excavation limits, the PCB Remediation Waste excavation will be "over" excavated by 6 to 12-inches per the request of the EPA to ensure that all PCB Remediation Waste has been removed.

As shown in the remediation figure, the area to be excavated as a risk reduction measure under the MCP has been pre-determined to be 29-feet by 29-feet, by 3-feet deep (i.e., approximately 94 cubic yards). Following removal of the PCB Remediation Waste, which falls within the footprint of the larger risk reduction excavation, the remaining soil will be excavated, directly loaded and transported off-site for disposal as described in the RAM Plan.

### **Soil Management Plan**

The RAM Plan submitted to MassDEP on November 24, 2010 provides the release description, site conditions and surrounding receptors, and specifies the planned soil excavation, remediation waste management and environmental monitoring approaches in accordance with the provisions of the MCP at 310 CMR 40.0440. The RAM Plan represents the anticipated approach for soil removal and management as a risk reduction measure at the HF-31 sample location only. The SMP, provided in Appendix C of the RAM Plan, is provided as a contingency. The SMP does not supersede the activities described in the RAM Plan; however, it does provide guidance to the City and/or Contractor to appropriately manage soil excavation activities described in the RAM Plan and respond to potential different conditions not specifically described in the RAM Plan. Minor modifications to the RAM Plan will not be implemented without the concurrence of the Licensed Site Professional (LSP), City, MassDEP and EPA and a modified RAM Plan would be submitted to MassDEP per 310 CMR 40.043(4) of the MCP prior to implementing any major changes to the proposed activities.

As an example of the SMP providing contingency guidance, Section 2.0, Page 2-1 of the SMP describes a typical soil management option for a remediation project that allows for soil to be returned to the approximate location from which it came provided it is chemically and geotechnically suitable for reuse as backfill. As described in the RAM Plan, no reuse of material is anticipated during soil removal activities at the HF-31 sample location. However, should any portion of the excavated material be targeted for reuse, it must meet certain suitability requirements. The SMP outlines this guidance as a contingency. As noted above, such a modification is not anticipated and would require appropriate notification and approval.

If the MassDEP has any further questions or requires additional clarification, TRC will provide additional details prior to implementation of the RAM Plan.

We look forward to discussing this memorandum with you at your earliest convenience.



GRAPHIC SCALE



### New Bedford High School HF-31 Area

### Extent of Excavation



Wannancott Mills  
650 Suffolk Street  
Lowell, MA 01854  
(978) 970-5600

DRAWN BY: ACH  
CHECKED BY: DP  
DATE: 8/28/10

FIGURE  
A

