



ENVIRONMENTAL STEWARDSHIP DEPARTMENT/

NEW BEDFORD CONSERVATION COMMISSION

CITY OF NEW BEDFORD
SCOTT W. LANG, MAYOR

TRC Reference Number: 115058

October 21, 2010

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code: OSRR07-2
Boston, Massachusetts 02109-3912

RE: Amendment
Polychlorinated Biphenyl (PCB) Remediation Notification Letter
New Bedford High School Release Abatement Measure Plan
230 Hathaway Boulevard, New Bedford, Massachusetts 02740

Dear Ms. Tisa:

This amendment letter provides clarification to the July 14, 2010 notification to the United States Environmental Protection Agency (EPA) from the City of New Bedford (City), and was prepared following teleconferences with you on July 21, October 6, and October 7, 2010. We trust that the clarification on site history, the discussed verification sampling approach, and the logistical constraints of this removal effort will be satisfactory.

The July 14, 2010 notification described the City's intention to conduct a performance-based disposal action to remove PCB Remediation Waste (soil) at the New Bedford High School (NBHS) property located at 230 Hathaway Boulevard, New Bedford, Massachusetts consistent with 40 CFR Subpart 761.61(b). As indicated in the July 14, 2010 notification, the removal will take place during the performance of a Massachusetts Contingency Plan (MCP; 310 CMR 40.0000) Release Abatement Measure (RAM) to address impacted soils at NBHS in the vicinity of sample point HF-31, which is presently under preparation.

EPA's concurrence on the July 14, 2010 notification and this amendment letter will allow the City to efficiently integrate the planning for this EPA-governed removal action with MCP regulated remedial actions currently in the planning stages and overseen by the City's Licensed Site Professional (LSP) and the Massachusetts Department of Environmental Protection (MassDEP).

Historical Information

NBHS opened for use in 1972, and initial site construction was completed in 1973. A thorough review of all available information indicates that soils located at NBHS were in place as of 1973. Available information indicates that the soils in the vicinity of HF-31 have remained in place, undisturbed since April 1978 (other than activities conducted with EPA and/or MassDEP acknowledgment and/or oversight such as Immediate Response Actions, soil exploration, and the New McCoy Field force main related Utility Related Abatement Measure, as well as standard grounds keeping activities), and unimpacted by unauthorized PCB uses. Therefore, these soils do not meet the definition of PCB Remediation Waste, as defined in 40 CFR §761.3. Sample location HF-31 was originally sampled as a composite sample (0.5-1 foot and 2.5-3 feet) by the City in December 2004; total PCBs were detected at 2.55 milligrams per kilogram (mg/kg). During recent (April 2009) remedial investigation activities conducted by the City to delineate PCB impacted soils at sample location HF-31 (greater than 1 mg/kg), samples were collected at locations HF-31A, HF-31B, HF-31C, HF-31D, HF-31G, and HF-31H to confirm PCB concentrations, all of which were below 50 mg/kg, except for location HF-31D, where total PCBs were detected at 71.6 mg/kg at 1-3 feet. The City's July 14, 2010 notification summarized soil delineation activities conducted to date in the vicinity of HF-31 with supporting data tables and figures.

Confirmation Sampling

To mitigate potential safety issues (e.g., open excavation) associated with a remedial action conducted at an active school facility, confirmation grab samples will be collected in advance of excavation in-situ at a collection density and sample size (e.g., 3-inch core) in accordance with 40 CFR §761 (Subpart O) to document the boundaries of the greater than 50 mg/kg soil removal. Per your request, to ensure that all soils impacted with PCBs greater than 50 mg/kg have been removed, the pre-determined excavation limits will be over-excavated 6 to 12 inches. If any individual confirmatory sample result is greater than or equal to 50 mg/kg, additional confirmatory samples will be collected to assure that the excavation achieves the desired objective.

If you have any questions concerning the clarification provided in this amendment letter, please do not hesitate to contact me at 508-991-6188.

Sincerely,



Scott Alfonse

Director-Department of Environmental Stewardship

- cc. Molly Cote, Massachusetts Department of Environmental Protection (by electronic PDF)
Cheryl Henlin, City of New Bedford (by electronic PDF)
David M. Sullivan, LSP, CHMM, TRC (by electronic PDF)