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## Memorandum

**To:** Kimberly Tisa, United States Environmental Protection Agency.

**From:** David M. Sullivan, LSP, CHMM, TRC Environmental Corporation

**CC** Cheryl Henlin and Scott Alfonse, City of New Bedford

**Subject:** Supplemental Data Collection in Support of Liberty Street Drainage Improvements

**Date:** March 10, 2010

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### Introduction

TRC Environmental Corporation (TRC) has prepared this memorandum to summarize the proposed Liberty Street Utility-Related Abatement Measure (URAM) associated with proposed drainage improvements that the City of New Bedford's (City) Department of Public Infrastructure (DPI) wishes to pursue at the New Bedford High School (NBHS) portion of the Parker Street Waste Site (PSWS).

On November 9, 2009, following review of the City's November 5, 2009 letter regarding the drainage improvement project, you indicated the data density for polychlorinated biphenyls (PCBs) analyses in soil was not sufficient to support an affirmative response concerning your regulatory jurisdiction. Consistent with subsequent e-mail correspondence, the City requests your input regarding an appropriate data collection density along this project corridor to support your regulatory determination.

### Summary of Previous Data

To facilitate your evaluation, TRC has prepared the attached map that illustrates the proposed route of the Liberty Street drainage improvement with all the available PCB soil data posted on it to help illustrate the available PCB analytical data coverage in the area. Note that none of the available PCB results are greater than 1 milligram per kilogram (mg/kg) and many of the results are non-detect, which is encouraging.

### Data Density Evaluation

TRC completed an internal comparison between the New Andrea McCoy Field (McCoy Field) force main route and the proposed Liberty drainage improvement routing. The comparison revealed that more data are available for the McCoy Field utility routing relative to the Liberty Street routing.

However, there is no “standard” sample density for work of this kind, although the present McCoy Field routing is an obvious “benchmark” for the site at this time.

Please consider the following:

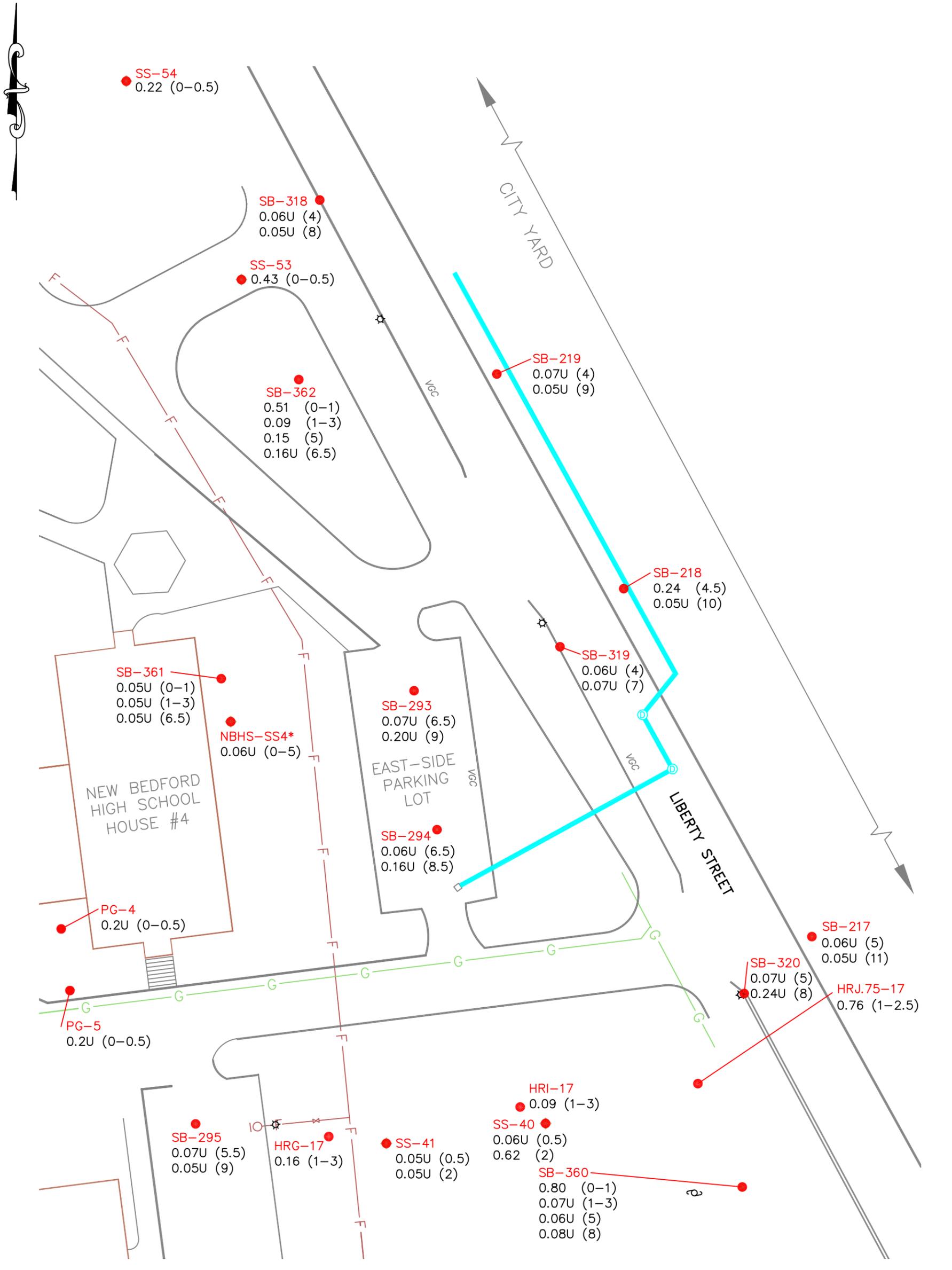
- **McCoy Field Route Sample Density** – There are approximately 27 individual soil boring sample points (including both TRC and BETA points) within approximately 30-feet of the McCoy Field force main route. This includes approximately 49 individual PCB Aroclor soil samples ranging in depth from 0 to 9.5-feet below grade. The majority of those (39 out of 49) were collected from less than or equal to 4-feet below grade.
- **Liberty Street Route Sample Density** – Based on the attached figure, four locations are located within approximately 50-feet of the proposed Liberty Street drainage improvement route. This includes eight samples from depths ranging from 4 to 10-feet below grade.
- **McCoy/Liberty Route Lengths** – The McCoy force main is approximately 800 feet long, which is approximately twice the length of the Liberty Street drain (based on the information provided by DPI).
- **McCoy/Liberty Comparison** – The Liberty route has comparatively fewer samples and also has fewer samples in/near the surface soil. The relative lack of surface soil samples is due to the fact that the areas in question are under pavement or within the City Yard where surface soil sampling was not conducted.

## **Recommendations**

TRC estimates that an additional eight borings (approximately every 50-feet along the proposed drain line) with two shallow samples per boring (at 0-1 and 1-3 foot intervals) and one sample from the approximate depth of drainage line installation should be sufficient. This proposed characterization program would generate a total of 16 additional shallow samples and eight additional deeper samples, which would produce the same linear density of coverage as the McCoy Field utility route and an approximately equal shallow to deep sample coverage ratio.

For this effort, we are only recommending the collection of PCB data along the route to facilitate EPA’s regulatory determination. TRC estimates that the field effort would be less than one day.

Thanks for your attention on this matter. We look forward to discussing this memorandum with you at your earliest convenience.



LEGEND:

- APPROXIMATE LOCATION OF PROPOSED DRAINAGE
- F APPROXIMATE LOCATION OF FIRE LINE
- G APPROXIMATE LOCATION OF GAS LINE

TOTAL PCB CONCENTRATION  
mg/Kg DEPTH IN FEET

0.80	(0-1)
0.07U	(1-3)
0.06U	(5)
0.08U	(8)

U = NOT DETECTED



NEW BEDFORD HIGH SCHOOL LIBERTY STREET DRAINAGE CONSTRUCTION AREA NEW BEDFORD, MASSACHUSETTS	
PCB SAMPLE LOCATION DATA MAP	
Wannalancit Mills 650 Suffolk Street Lowell, MA 01854 (978) 970-5600	FIGURE 1
DRAWN BY: HWB CHECKED BY: DNP	DATE: NOV 2009