

RELEASE ABATEMENT MEASURE STATUS REPORT

SOIL EXCAVATION AND REMOVAL

**NEW BEDFORD HIGH SCHOOL
NEW BEDFORD, MASSACHUSETTS**

Release Tracking Number 4-15685

Prepared for:

City of New Bedford
133 William Street
New Bedford, Massachusetts 02740

Prepared by:

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February 2013

Acronyms

BOL	Bill of Lading
CGP	Construction General Permit
DPI	Department of Public Infrastructure
EP	Exposure Point
EPA	United States Environmental Protection Agency
MassDEP	Massachusetts Department of Environmental Protection
MCP	Massachusetts Contingency Plan
NBHS	New Bedford High School
NPDES	National Pollutant Discharge Elimination System
NOI	Notice of Intent
RAM	Release Abatement Measure
RTN	Release Tracking Number
SWPPP	Stormwater Pollution Prevention Plan
TRC	TRC Environmental Corporation

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FIGURE

Figure 1 Site Location Map

1.0 INTRODUCTION

TRC Environmental Corporation (TRC) is submitting this Release Abatement Measure Status Report (RAM Status Report) to the Massachusetts Department of Environmental Protection (MassDEP) on behalf of the City of New Bedford (City) per 310 CMR 40.0445 of the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000). This RAM Status Report addresses impacted soil removal and site restoration activities conducted at the New Bedford High School (NBHS) Campus (“the Site”), under a RAM Plan submitted to MassDEP on April 6, 2011 (TRC, 2011a) and conditionally approved by MassDEP on April 15, 2011. Additional activities were proposed in the RAM Plan Modification (TRC, 2011b) submitted to MassDEP on July 22, 2011 and conditionally approved on August 1, 2011.

The NBHS Campus is a portion of the disposal site managed under the MCP and tracked by MassDEP under Release Tracking Number (RTN) 4-15685. Response actions at the Site are conducted under a MCP Special Project Designation Permit (310 CMR 40.0060) that has been established for RTN 4-15685 and other related RTNs. A Site location map is provided as Figure 1. Additional information about this site contained in MCP filings prepared by TRC is available in several references noted herein.

This RAM Status Report is organized as follows: Section 1.0 (Introduction) briefly summarizes information pertaining to RAM-related activities. Section 2.0 (RAM Status Report) provides the information required for a RAM Status Report per the MCP (310 CMR 40.0445). Section 3.0 (References) lists information sources relied upon in the preparation of this RAM Status Report.

2.0 RELEASE ABATEMENT MEASURE STATUS REPORT (310 CMR 40.0445)

This RAM Status Report is organized according to the information needs set forth under 310 CMR 40.0445(2)(a) through (e) of the MCP.

2.1 The Status of Response Operations

As of the prior RAM Status Report submitted on August 6, 2012, the following items remain to be completed in accordance with the RAM Plan:

- **Excavation** – Excavation of impacted soil within EP HS-8 in the top three feet in landscaped areas and the top 1-foot in areas excavated in preparation for capping.
- **Disposal** – Off-site transportation (as needed) and disposal of laboratory characterized segregated soil and debris (e.g., cobbles, boulders and tree stump material) for reuse, recycling or disposal.

Prior RAM-related activities were described in the following reports submitted to MassDEP by the City:

- *Release Abatement Measure Status Report – Soil Excavation and Removal, New Bedford High School, New Bedford, Massachusetts.* August 2011. (TRC, 2011c)
- *Release Abatement Measure Status Report – Soil Excavation and Removal, New Bedford High School, New Bedford, Massachusetts.* February 2012. (TRC, 2012a)
- *Release Abatement Measure Status Report – Soil Excavation and Removal, New Bedford High School, New Bedford, Massachusetts.* August 2012. (TRC, 2012b)

No remedial activities were conducted during this reporting period. Spot excavation and temporary soil stockpiling activities were completed in July 2011 and are described in the RAM Status Report submitted to MassDEP on August 5, 2011 (TRC, 2011c). Excavation and temporary stockpiling in support of capping activities, in association with consideration of existing trees, and spot excavation HB-22 were completed in December 2011 and are described in the RAM Status Report submitted to MassDEP on February 3, 2012 (TRC, 2012). Remedial activities to facilitate offsite transportation and disposal of remaining soil, debris and tree stump material staged at the Transfer Station were completed in February 2012 as documented in the August 6, 2012 RAM Status Report.

Risk Reduction Measures in Exposure Point HS-8

A future Solar Park is proposed for the area between the two northern student parking lots (EP HS-8). Based on the risk characterization, this area was proposed for RAM activities to prevent direct contact exposure to impacted soil by risk reduction measures. Risk reduction measures proposed for EP HS-8 are included in the RAM Plan Modification (TRC, 2011b). However, the Solar Park configuration is subject to change. Depending on the final footprint of the solar park, additional excavation and disposal of soil from perimeter buffer zone areas may be performed.

An area in the northeast corner of EP HS-8, north of the existing parking lot will likely remain undisturbed as data in this area indicates a condition of No Significant Risk currently exists in the top three feet of soil.

The City and operation and maintenance lessee are currently evaluating design options and constraints associated with the construction of the Solar Park. Per the conditional approval, the City will notify MassDEP if construction consistent with the currently approved RAM Plan Modification is scheduled. Additional modifications to the proposed remedial activities in EP HS-8 will be the subject of future regulatory notification(s) and/or submittal(s).

Stormwater Management

During the RAM-related remedial activities, various areas on the property were disturbed to remove impacted soil and to complete Site grading. Given that the cumulative area of disturbed soil was greater than one acre, a SWPPP was prepared, submitted to the United States Environmental Protection Agency (EPA) and the New Bedford Conservation Commission and included in the RAM Plan Modification (TRC, 2011b).

Effective February 16, 2012, the EPA issued a five-year renewal of its General Permit for construction site stormwater. On behalf of the City, TRC prepared an amended SWPPP to comply with the provisions of the new National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) for storm water discharges from construction sites. Superseding the 2008 permit, projects proceeding under the previous permit were required to file a Notice of Intent (NOI) with the EPA by May 16, 2012 to comply with Clean Water Act (33 U.S.C. §1251 et. seq.) requirements under the new CGP. Pursuant to the new CGP (Section 7.1.1), the SWPPP needed to be reviewed and updated (as needed) with necessary and appropriate modifications to meet the specifications of the 2012 CGP. Although the scope of the RAM Plan remains fundamentally unchanged the amended SWPPP was developed, prior to submittal of the NOI, in accordance with the minimum requirements as set forth in Parts 7.2 and 7.4 of the CGP, respectively.

The amended SWPPP describes the preparation and implementation of measurements to be taken to minimize the release of pollutants in storm water runoff from the construction site to waters of the State. Following implementation of the majority of the remedial activities, construction activities are currently in an extended period of temporary cessation while Solar Park design options and constraints are further evaluated. The SWPPP will be included with a future regulatory submittal in association with implementation of additional remedial activities. RAM-related activities within EP HS-8 will adhere to the erosion and sedimentation controls included in the RAM Plan, the amended SWPPP and the Massachusetts Stormwater Management Guidelines to the maximum extent practicable.

2.2 Significant New Site Information or Data

No new site information or data were collected during the reporting period covered by this RAM Status Report.

2.3 Details of and/or Plans for the Management of Remediation Waste, Remedial Wastewater, and/or Remedial Additives

Please refer to the previous RAM Status Reports (TRC, 2011c, TRC, 2012a and TRC, 2012b) for descriptions of previous stockpile management and offsite transportation activities, as well as previous shipping documentation.

No additional remediation waste, remedial wastewater or remedial additives have been managed under this RAM Plan and RAM Plan Modification.

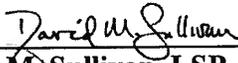
2.4 Other Necessary Information

No additional information under this RAM Plan and RAM Plan Modification is required in association with this RAM Status Report.

2.5 LSP Opinion

The objective of this RAM Status report is to apprise MassDEP of the City's activities at the New Bedford High School.

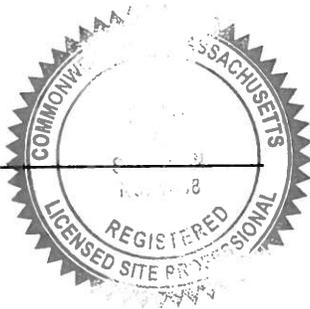
This RAM Status Report has been prepared in accordance with 310 CMR 40.0445 as set forth in the MCP.



David M. Sullivan, LSP
TRC Environmental Corporation
Licensed Site Professional No. 1488

2/13/2013
Date

Stamp



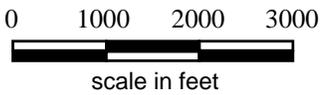
3.0 REFERENCES

- TRC, 2011a *Release Abatement Measure Plan, Soil Excavation and Removal at New Bedford High School, Parker Street Waste Site, New Bedford, Massachusetts.* Prepared for the City of New Bedford. Prepared by TRC, Lowell, Massachusetts. April 2011
- TRC, 2011b *Release Abatement Measure Plan Modification, Soil Excavation and Removal at New Bedford High School, Parker Street Waste Site, New Bedford, Massachusetts.* Prepared for the City of New Bedford. Prepared by TRC, Lowell, Massachusetts. July 2011
- TRC, 2011c *Release Abatement Measure Status Report, Soil Excavation and Removal at New Bedford High School, Parker Street Waste Site, New Bedford, Massachusetts.* Prepared for the City of New Bedford. Prepared by TRC, Lowell, Massachusetts. August 2011.
- TRC, 2012a *Release Abatement Measure Status Report, Soil Excavation and Removal at New Bedford High School, Parker Street Waste Site, New Bedford, Massachusetts.* Prepared for the City of New Bedford. Prepared by TRC, Lowell, Massachusetts. February 2012.
- TRC, 2012b *Release Abatement Measure Status Report, Soil Excavation and Removal at New Bedford High School, Parker Street Waste Site, New Bedford, Massachusetts.* Prepared for the City of New Bedford. Prepared by TRC, Lowell, Massachusetts. August 2012.

FIGURE



BASE MAP IS A PORTION OF THE FOLLOWING 7.5' X 15' USGS TOPOGRAPHIC QUADRANGLES: NEW BEDFORD NORTH, MA, 1979; NEW BEDFORD SOUTH, MA 1977



**NEW BEDFORD HIGH SCHOOL
NEW BEDFORD, MASSACHUSETTS**

SITE LOCATION MAP



Wannalancit Mills
650 Suffolk Street
Lowell, MA 01854
978-970-5600

**FIGURE
1**

Drawn: HWB
Checked: DS

SCALE: AS SHOWN
Date: OCT 2008