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TRC Project Number 54913-0010-00005

April 5, 2007

Massachusetts Department of Environmental Protection
Southeast Regional Office
20 Riverside Drive
Lakeville, Massachusetts 02347

Attention: Ms. Molly Cote

**RE: Request for Extension and Modification for Special Project Designation
Keith Middle School/McCoy Field Site
Release Tracking Numbers 4-0015685 and 4-0015824**

Dear Ms. Cote:

TRC Environmental Corporation (TRC) is submitting this letter and associated enclosures to extend and modify the Special Project Designation for the Keith Middle School Site pursuant to the requirements of 310 CMR 40.0065 and 310 CMR 40.0067 of the Massachusetts Contingency Plan (MCP). The original Special Project Designation request was submitted to the Massachusetts Department of Environmental Protection (MassDEP) on August 27, 2001 on behalf of the City of New Bedford by Vanasse Hangen Brustlin, Incorporated (VHB). Accordingly, this request includes the following:

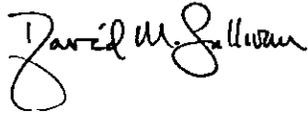
- A completed transmittal form established by MassDEP for such purposes;
- A statement as to the rationale for the extension and modification;
- Certifications set forth under 310 CMR 40.0009 (included with the transmittal form)
- A report describing the status of response actions and any known instances of non-compliance with 310 CMR 40.0000 associated with the Special Project Designation; and
- Certification concerning outstanding administrative or judicial environmental enforcement action under any federal, state or local law (included with the transmittal form).

A completed MassDEP Special Project Transmittal Form (Form) and associated certifications are enclosed. An attachment to the Form provides additional details and addresses the specific information requested in 310 CMR 40.0062(1) *Contents of Application*, 310 CMR 40.0065 *Modification of Special Project Designation Permit*, and 310 CMR 40.0067 *Extension of Special Project Designation Permit*.

Please call or write if you have any questions or if you need additional information. I can be reached by telephone at (978) 656-3565 or via electronic mail at dsullivan@trcsolutions.com.

Sincerely,

TRC Environmental Corporation



David M. Sullivan, LSP, CHMM
Sr. Project Manager

Enclosure (Form BWSC 50 Special Project Designation and related Attachments)

cc: G. Martin, MassDEP
S. Alfonse, City of New Bedford



BWSC 50 Special Project Designation

Application for Special Project Designation

Facility ID# (if known)

A. Special Project Information

Important:
When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



1. Special Project:

Keith Middle School Site

Special Project Name

Hathaway Boulevard

Designated Primary Street Address

New Bedford

MA

02740

Designated City or Town

State

Zip Code

2. Applicant:

City of New Bedford

Name of Governmental Entity

B. Description and Eligibility

1. Describe the project, its expected duration, and the requested duration of the Special Project Designation [310 CMR 40.0062(1)(e)]:

The project consists of the investigation and remediation of a former city burn dump located on the premises of

the current New Bedford High School that has impacted the High School property and neighboring properties

such as the former Andrea McCoy Field (Current Keith Middle School).

See Attachment 1 for additional details (Section 2.1.1).

2. Describe why Special Project Designation is necessary to successfully implement the project [310 CMR 40.0062(1)(e)]:

This is a very large site that has impacted multiple properties and an active school facility. Response actions

can be more effectively conducted under a schedule that provides for coordination with multiple property owners.

See Attachment 1 for additional details (Section 2.4).

3. Describe how the project meets each of the eligibility criteria described below [310 CMR 40.0061(3)]:

a. Proposed response actions will be managed in a coordinated fashion.

How?

Response actions will be managed by one Licensed Site Professional (LSP)
See Attachment 1 for additional details (Section 2.8.2).

b. Public financing for the project has been committed and/or secured.

What is the amount and type of public financing?

See Attachment 1 for additional details (Section 2.8.3)



BWSC 50 Special Project Designation
Application for Special Project Designation

B. Description and Eligibility (cont.)

- c. Compliance with response action deadlines would unreasonably decrease the cost-effectiveness of project implementation.

How?

Response actions and regulatory reporting can be better conducted and managed as a whole,

rather than in a piecemeal fashion. See Attachment 1 (Section 2.8.4).

- d. One or more identified or suspected disposal sites are located within the boundaries of the project.

See Questions 4 and 5.

4. List each release tracking number identified to date in the Special Project's boundaries, and briefly describe each release and the status of response actions (attach additional pages if needed) [310 CMR 40.0061(3)(a)] and [310 CMR 40.0062(1)(g)]:

RTN 4-15685 and 4-15824. See Attachment 1 for additional details (Section 2.9).

5. If no releases have been identified at properties subject to this permit application, describe why you believe one or more disposal sites are located within the boundaries of the project [310 CMR 40.0061(3)(a)]:

Available data suggests that RTN 4-15685 one large disposal site that has impacted many different properties.

Contaminated fill from the former city burn dump has potentially impacted 80 or more acres. RTN 4-15824 is a smaller site associated with a historic UST release at the former Keith Junior High School.

6. Attach a description of response actions planned in the Special Project (to the extent known), including a proposed schedule [310 CMR 40.0062(1)(h)].

See Attachment 1, Section 2.10



BWSC 50 Special Project Designation
Application for Special Project Designation

C. Applicant Information and Certifications

1. Applicant Information:
City of New Bedford

Name of Government Entity

Name of Office/Department

133 William Street

Street

New Bedford

MA

02740

City/Town

508-991-6188

State

Zip Code

scott.alfonse@ci.new-bedford.ma.us

Telephone

Scott Alfonse

E-mail (optional)

508-991-6188

Contact Name

Contact Telephone

2. Type of applicant (check one):

- Municipality
- State Authority
- State Agency
- Federal Agency
- Other, please specify: _____

Certification of Submittal [310 CMR 40.0062(1)(I)]

"I, Scott Alfonse attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this submittal, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the person or entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate or incomplete information."

By:

Signature

3-30-07

Date

Scott Alfonse

Print Name

Director, Department of Environmental Stewardship

Print Title

For:

City of New Bedford

Name of entity



BWSC 50 Special Project Designation
Application for Special Project Designation

C. Applicant Information and Certifications (cont.)

Certification of Compliance [310 CMR 40.0062(1)(j)]

"I, Scott Alfonse attest that, except as fully disclosed in Attachment A in this permit application, I am not subject to any outstanding administrative or judicial environmental enforcement action under any federal, state or local law."

By: *Scott Alfonse*
Signature
3-30-07
Date
Scott Alfonse
Print Name
Director, Department of Environmental
Print Title
For: City of New Bedford
Name of entity

D. Parcel Information

1. Attach a map of the land area covered by the Special Project designation application identifying all properties that would be included and delineating parcel boundaries. For example applicants may use a tax assessors map to identify properties or surveys or maps from project planning documents.
2. Property Information (Please provide the following information for each property for which Special Project designation is sought. Make additional copies of this form if necessary):

Current Owner:

City of New Bedford Municipality
Name
Same Title
Company or Organization
133 William Street
Street
New Bedford MA 02740
City/Town State Zip Code
508-979-1487 Telephone Scott.Alfonse@ci.new-bedford.ma.us E-mail (optional)
Scott Alfonse Contact Name (if different) Same Contact Telephone

Current Operator (if different from owner):

Same
Name
Title
Company or Organization
Street
City/Town State Zip Code
Telephone E-mail (optional)
Contact Name (if different) Contact Telephone



BWSC 50 Special Project Designation
Application for Special Project Designation

D. Parcel Information (cont.)

- Attach documentation showing that the Applicant has notified the person who owns or controls the property(ies) included in the Special Project Designation and a description of how access to the property(ies) will be obtained for the purpose of performing response actions (e.g., copies of correspondence/agreements with property owners/operators) [310 CMR 40.0062(1)(k)].
- List all RTN numbers, if known, associated with the property identified above:
RTN 4-15685 and 4-15824

E. Person Who Will Be Conducting Response Actions Under Special Project Designation (if different from Applicant) Information and Certifications [310 CMR 40.0062(1)(i)]

(Make additional copies of this section if necessary.)

David M. Sullivan		Senior Project Manager	
Name	TRC Environmental Corporation	Title	
Company or Organization			
650 Suffolk Street			
Street			
Lowell		MA	01854
City/Town		State	Zip Code
978-970-5600		dsullivan@trcsolutions.com	
Telephone		E-mail (optional)	
Same		Same	
Contact Name (if different)		Contact Telephone	

Certification of Submittal [310 CMR 40.0062(1)(i)]

"I, David M. Sullivan attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this submittal, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the person or entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate or incomplete information."

By:

Signature

Date 4/5/07

Date

David M. Sullivan

Print Name

Senior Project Manager

Print Title

For: TRC Environmental Corporation

Name of person or entity



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC 50 Special Project Designation
Application for Special Project Designation

Transmittal Number _____

Facility ID# (if known) _____

E. Person Who Will Be Conducting Response Actions Under Special Project Designation (if different from Applicant) Information and Certifications [310 CMR 40.0062(1)(i)] (cont.)

Certification of Compliance [310 CMR 40.0062(1)(j)]

"I David M. Sullivan attest that, except as fully disclosed in Attachment A in this permit application, I am not subject to any outstanding administrative or judicial environmental enforcement action under any federal, state or local law."

By: _____

Signature

Date

David M. Sullivan

Print Name

Senior Project Manager

Print Title

For: TRC Environmental Corporation

Name of person or entity

ATTACHMENT 1



SPECIAL PROJECT EXTENSION AND
MODIFICATION

Keith Middle School Site
New Bedford, Massachusetts

Release Tracking Numbers 4-15685 and 4-15824

Prepared for:

City of New Bedford
133 William Street
New Bedford, Massachusetts

Prepared by:

TRC
Wenhamcott Mills
650 Suffolk Street
Lowell, MA 01854

April 2007

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1.0 INTRODUCTION

The following information is provided to fulfill the information requirements for the extension and modification of the Special Project Designation for the Keith Middle School Site in New Bedford, Massachusetts on behalf of the City of New Bedford (City). The following sections provides information relevant to the Massachusetts Department of Environmental Protection (MassDEP) Bureau of Waste Site Cleanup (BWSC) form *BWSC 50 Special Project Designation* and relevant sections of 310 CMR 40.0062 *Procedures for Applying for a Special Project Designation Permit* referenced therein and in the Massachusetts Contingency Plan (MCP). This information presented below is also provided in fulfillment of the information requirements of 310 CMR 40.0065 *Modification of Special Project Designation Permit* and 310 CMR 40.0067 *Extension of Special Project Designation Permit*.

2.0 CONTENTS OF APPLICATION

This Special Project Designation Modification and Extension request seeks to extend the schedule for completing comprehensive response actions for five years, and include publicly-owned properties not previously addressed by the Special Project Designation. Additional details are provided herein regarding this large and complex site.

2.1 Project Description, Expected Project Duration, and Requested Duration of Special Project (310 CMR 40.0062(1)(e)&(f)(1) and BWSC-50 Part B.1)

2.1.1 Project Description

The project consists of the following publicly-owned parcels, as illustrated on Figure 1:

- The Keith Middle School site;
- An adjacent wetland;
- The neighboring New Bedford High School (NBHS) campus;
- Walsh Field;
- Former Keith Junior High School; and
- Several other City-owned parcels (e.g., Department of Public Infrastructure [DPI] facilities, school department maintenance facility, etc.).

These parcels are impacted by the presence of polychlorinated biphenyls (PCBs), polyaromatic hydrocarbons (PAHs), and metal-contaminated fill material suspected of originating from a City burn-dump formerly located on the NBHS campus.

Other sources of PCB contamination may also be present, locally originating from deteriorating PCB-containing building materials, particularly PCB-containing caulking and sealants at NBHS.

While a partial Response Action Outcome (RAO) has been filed with the MassDEP by the BETA Group, Incorporated (BETA) for the Keith Middle School site and adjacent

wetland, additional comprehensive response action activities remain to be conducted on other parcels impacted by the burn-dump formerly located on the NBHS campus. In addition, wetland restoration remains to be conducted at the wetland remediation site, which was delayed, in part, due to the onset of winter weather in 2006/2007. This work is anticipated to occur in April 2007.

Remedial investigation of the NBHS campus and Walsh field were initiated by BETA in 2006, but were not completed. In addition, a review of available aerial photography during the presumed operational period of the burn-dump (1950s and 1960s), suggests that other current municipally-owned parcels may also have been impacted by burn-dump waste deposition and warrants further investigation.

Investigations have also been initiated at several privately-owned parcels, which require further investigation. However, due to privacy concerns expressed by some homeowners, the City requests that specific information on privately-owned parcels not be documented in the Special Project Designation application, although coverage under the Special Project is nonetheless requested.

In addition, one state-owned parcel (Hetland Skating Rink) is suspected of having been impacted by the former burn-dump and also warrants investigation. A property access agreement is presently under negotiation with the Commonwealth of Massachusetts Department of Capital Asset Management (DCAM), but is not yet secured. This parcel will be added to the Special Project Designation via modification when property access agreements are secured.

2.2 Anticipated Project Duration

The project will be a multi-year effort. Available data indicates that properties other than the City-owned parcels are impacted by former burn-dump contamination and warrants investigation and potentially remediation. In addition, because of the concentrations of PCBs detected in site soil, some parcels will require the involvement of the United States Environmental Protection Agency (EPA) Regional PCB Coordinator due to Toxic Substances Control Act (TSCA; 40 CFR Part 761) PCB-spill cleanup triggers.

Completing a remedy for the entire site is expected to take more than five years due to the coordination of multiple parties, overlapping regulatory requirements, and negotiation for rights of property access.

2.3 Deadline Extension Requested

An extension of five years is requested for completing environmental investigation and response actions.

2.4 Why is the Special Project Designation Necessary? (310 CMR 40.0062(1)(f)(2) and BWSC-50 Part B.2)

Investigation and remedy of the site will require extensive coordination and site-specific negotiation with impacted private property owners and the involvement of the EPA Regional PCB Coordinator due to TSCA PCB spill cleanup triggers.

Implementation of the remaining response actions will require a significant amount of site preparation and civil work over a large area (in excess of 80 acres), and coordination with ongoing activities at the active high school and other City facilities. Closing the school for the duration of remedial activities will be extremely difficult and expensive due to the size of the student body and the lack of readily available similarly-sized and suitably prepared buildings to house the students. The City of New Bedford School Department seeks to avoid disruption to the educational activities at NBHS. Closing other City facilities and operations will also be disruptive and unnecessarily costly.

The bulk of the necessary environmental investigation work can take place without extraordinary precautions since the buried contaminants will be minimally disturbed during investigation activities. Remedial actions have not be finalized/selected at this time, but any necessary precautions to accommodate remedial activities will be designed and implemented as needed, including potential closure of the school if health and safety concerns warrant such action.

2.5 Map of Parcels Within the Boundaries of the Areas for which the Special Project Designation is Sought (310 CMR 40.0062(1)(f)(3))

A map of parcels within the currently anticipated boundaries of the area for which the Special Project Designation is sought is provided in Figure 1.

As noted herein, the City has initiated investigations at several privately-owned parcels and further investigation of these properties is warranted. However, due to privacy concerns expressed by some homeowners, the City requests that specific information on privately-owned parcels not be documented in Special Project Designation application (a publicly available document), although coverage under the Special Project is nonetheless requested.

TRC and the City recommends meeting with MassDEP representatives to discuss and identify the parcels in question, either through a site visit and/or through a discussion utilizing a map clearly identifying parcels targeted for investigative, and potential remedial, activity. TRC and the City anticipate that the public record will include information on the private properties in question upon project closure when a Response Action Outcome (RAO) is achieved.

2.6 Description of Planned Redevelopment of the Parcels within the Boundaries of the Special Project Designation (310 CMR 40.0062(1)(f)(4))

The City is not aware of any planned redevelopment of the parcels within the boundaries of the Special Project Designation. However, the City anticipates the response actions on the NBHS campus may require the reconstruction and re-landscaping of exterior facilities (e.g., basketball courts, parking lots, etc). However, there are no specific plans for this activity at this time since the need for this work will be dependent on the remedial actions selected for implementation.

2.7 Release Tracking Numbers for Any Known Release of OHM, Description of Sources, Nature and Extent of Releases, and Known/Probable Exposure Pathways (310 CMR 40.0062(1)(f)(5))

2.7.1 Release Tracking Numbers

The Release Tracking Number (RTN) for the Keith Middle School site is 4-15685. In addition, a historic underground storage tank (UST) release identified by others at the former Keith Junior High School on Hathaway Boulevard is included under RTN 4-15824.

There are no other RTNs associated with this site.

2.7.2 Description of Sources

The source of contamination for RTN 4-15585 is the former City burn-dump located on the campus of the present-day NBHS. The source of contamination for RTN 4-15824 is a historic UST release on a limited portion of the former Keith Junior High School property.

2.7.3 Nature and Extent of Releases

Much of the material underlying NBHS, Keith Middle School, Walsh Field, and other nearby impacted properties is relocated fill material from the present day high school site and past operations of the burn-dump. Historic dumping and burning activities were reportedly performed prior to the construction of the high school in the early 1970s. The waste and ash was covered with sand, gravel, and/or topsoil depending on location prior to, or associated with, the development of neighboring properties.

In general, the contaminated ash-containing fill ranges in depth from less than two feet to more than 17 feet below grade, depending upon location. The lateral extent of contaminated ash-containing fill placement has not been fully delineated. Additional characterization of the horizontal and vertical extent of contamination is warranted.

Available groundwater data indicate that the PCB, PAH, and metal contamination detected in contaminated fill and soil, is not present or migrating in groundwater.

Nonetheless, future investigative work at the site will include groundwater monitoring to verify these findings in other areas of the site.

Vapor phase contamination originating from the former burn-dump fill material does not appear to be a source of air phase contamination. Monitoring of the passive vent system in the Keith Middle School has not detected PCBs. VOCs detected thus far are attributable to building materials (paints, adhesives, etc.). Vapor phase PCB contamination has been detected in background samples and in the indoor air of NBHS. However, the background detections are attributable to the ubiquitous low-level presence of PCBs in ambient air, especially in urban industrial areas like New Bedford. The indoor air PCBs detected in the high school are largely attributable to PCB-containing building materials such as caulking, mastics, paints, and hydraulic fluids, that over time, has partitioned to other indoor media, particularly accumulated dust.

The contamination associated with RTN 4-15824 (a historic UST release) is petroleum related and impacts a limited portion of the former Keith Junior High School property.

2.7.4 Known or Probable Exposure Pathways

Potential human receptors at NBHS and surrounding area include students, school employees, visitors, municipal employees (e.g., public works, water department, etc.) and residents.

Exposure pathways associated with contaminated fill under current conditions are largely incomplete since the contaminated fill from the former burn-dump is buried under a layer of uncontaminated fill of variable thickness. Available soil boring data indicate a minimum thickness of overlying clean soil of one to two feet.

Exposure pathways associated with contaminated fill under future conditions could occur if a person were to penetrate a building foundation (where a building is present overlying and area of contaminated fill deposition), or dig through the clean fill layer or pavement. Potential exposure routes include incidental ingestion, dermal contact, and inhalation of fugitive dusts.

Groundwater exposure pathways are not expected since the contamination does not appear to leach from the soil/fill. The contaminants of concern (i.e., PCBs, PAHs, and metals) have either not been detected in site groundwater to date (PCBs, PAHs) or have been detected at concentrations below Massachusetts Contingency Plan (MCP; 310 CMR 40.0000) Method 1 groundwater cleanup criteria.

Pathways associated with surface water and/or sediments are no longer a concern with the completion of the wetland remediation to the west of the new Keith Middle School.

2.8 How does the Project Meet the Special Project Eligibility Criteria? (310 CMR 40.0062(1)(f)(6), 310 CMR 40.0061(3), and BWSC-50 Part B.3)

This project is eligible for the Special Project Designation and satisfies each of the following criteria set forth in 310 CMR 40.0061(3) of the MCP.

2.8.1 Disposal Site(s) – 310 CMR 40.0061(3)(a)

A large disposal site is located within the boundaries of the project as described herein.

2.8.2 Coordinated Management of Response Actions – 310 CMR 40.0061(3)(b)

Proposed response actions will be under the direction of a single Licensed Site Professional (LSP).

Investigation and remediation on City-owned parcels, especially the NBHS campus, will be coordinated within the academic calendar year, with highly disruptive activities taking place during off-hours and during vacation periods.

Investigation and remediation of state and privately-owned parcels will be negotiated on a case-by-case basis through the City's Legal Department and outside legal counsel (Shepard S. Johnson, Esq.)

2.8.3 Adequacy of Financing – 310 CMR 40.0061(3)(c)

On May 11, 2000 the City of New Bedford City Council appropriated \$42,000,000 for acquiring land, constructing, equipping and furnishing a new middle school. On July 19, 2001, the City Council authorized an additional appropriation for \$11,784,000 for acquisition of land for constructing, equipping and furnishing a new middle school.

In addition, the City has secured 90-percent reimbursement from the Massachusetts School Building Authority (SBA) up to \$103 million to address remaining contamination at the Site.

2.8.4 Cost Effectiveness – 310 CMR 40.0061(3)(d)

The cost effectiveness of response actions will be enhanced through the Special Project status. Response action planning and reporting can better coordinated and managed as a whole, rather than in a piecemeal fashion working from property to property, or with multiple LSPs representing multiple property interests.

2.8.5 Tier Classification Submittal – 310 CMR 40.0061(3)(d)

A Tier Classification Submittal has not been prepared for this site, for which a Special Project Designation was sought and obtained following the City's application to MassDEP on August 27, 2001. A Tier Classification was not required at that time. Since

a Special Project Designation already exists, we have assumed that a Tier Classification Submittal is not required for this extension and modification. If MassDEP requires a Tier Classification, the City will work expeditiously to prepare the necessary documentation.

2.8.6 Eligible Person/Eligible Tennant Criteria – 310 CMR 40.0061(3)(e)

Not applicable. The City is applying as a public body politic consistent with 310 CMR 40.0061(2)(a).

2.9 List of In Progress Status Reports, Phase Reports, Completion Statements or Response Actions (310 CMR 40.0062(1)(g))

The following is a summary of recently submitted or in-progress reports and response actions.

2.9.1 Reports

- Final Completion and Inspection Report, McCoy Field/Keith Middle School, 225 Hathaway Boulevard, New Bedford, Massachusetts. December 2006
- Partial Response Action Outcome Statement, McCoy Field/Keith Middle School, 225 Hathaway Boulevard, New Bedford, Massachusetts. December 11, 2006, and included an Activity and Use Limitation (AUL) for the school property.

2.9.2 Response Actions

- Final wetland plantings for the Keith Middle School wetland remediation will take place during the week of April 16 through 20, 2007. The work is expected to be completed that week.
- Planning/scoping activities for the investigation of the NBHS site are ongoing.
- The availability of public bidding documents for the remediation of the contaminated NBHS ventilation system was advertised on March 28, 2007.

2.10 Description of Anticipated Response Actions and Schedule (310 CMR 40.0062(1)(h))

Three aspects of the project are currently underway including completion of wetland restoration following the wetland remediation activities conducted in the Fall/Winter 2006, remediation of contaminated ventilation systems at NBHS, and planning/scoping of the NBHS and surrounding area investigation and response action.

2.10.1 Wetland Remediation/Restoration

As noted above, final wetland plantings for the Keith Middle School wetland remediation is expected to be completed during the week of April 16 through 20, 2007.

2.10.2 NBHS Ventilation System Remediation

The currently proposed remedy, to be finalized in consultation with a qualified specialty contractor retained by the City, consist of cleaning all supply, return, and exhaust ducts in the school; cleaning an estimated 20 central Heating, Ventilation, and Air Conditioning (HVAC) components, fans coils and intakes; cleaning and filter replacement for all univents and corridor heaters (an estimated 250 units); and cleaning an estimated 120 return air exhaust vents and fans. In addition, the specialty contractor will be required to clean exposed horizontal surfaces with visible dust accumulation that are not routinely cleaned. This is an initial step toward a PCB remedy for the interior of NBHS. The objective is to remove deposited material and reduce the interior PCB burden, improve the indoor air quality of the school, and reduce airborne PCB concentrations. Phased remediation of other interior PCB sources will be designed and implemented upon completion of this initial phase of work.

TRC toured the facility with City personnel in October 2006 to support preparation of public bidding specifications for vent system cleaning services. Draft bid specifications were prepared by and submitted to the City for review by TRC in October 2006. Following extensive technical, legal, and purchasing department review, the bid specifications were finalized in March 2007. Public notification/advertisement of the work was published on March 28, 2007 in the Massachusetts Central Register and New Bedford Standard Times.

The current estimated schedule for the Ventilation System Remediation provided below:

- Bid Walk – April 17, 2007
- Bids Due – May 1, 2007
- Project Award – May 8, 2007
- Project Start – June 2007

2.10.3 NBHS and Surrounding Area Investigation/Remediation

The design of the NBHS and area environmental investigation is currently ongoing. Currently contemplated environmental investigation components consist of the following:

- Over 250 soil borings (NBHS/Area), including eight subslab borings in NBHS.
- Eleven monitoring wells, including two to three subslab wells in NBHS

- Ten surface soil samples near the school building to investigate potential surface soil impacts from deteriorated PCB-containing caulking and sealants.

The anticipated remedial elements for NBHS and the surrounding area include the following, with specific designs pending the collection of sufficient soil and groundwater data:

- Material removal
- Clean soil cover
- Excavation and consolidation with clean cover
- Activity and use limitations (AULs)

The currently anticipated schedule for the NBHS and surrounding area investigation and remediation is outlined below:

- Drilling/sampling – April/May 2007
- Lab analysis – May/June 2007
- Remedial analysis/design – Initiate Summer 2007
- Public Bidding – To Be Determined.
- Initiate Remedy – To Be Determined.

2.11 Contact Information for Person Performing the Response Action (310 CMR 40.0062(1)(i))

The following person/firm will be conducting response actions under the Special Project Designation:

David M. Sullivan, LSP, CHMM
TRC
Wannalancit Mills
650 Suffolk Street
Lowell, Massachusetts 01854

Telephone: 978-656-3565
Facsimile: 978-453-1995
E-mail: dsullivan@trcsolutions.com

2.12 Justification for Extension of Deadline Relative to Risk (310 CMR 40.0062(1)(k))

Contaminated materials are located below ground surface and are not subject to erosion and do not serve as a source of contaminated fugitive dust. No Imminent Hazards or other conditions warranting Immediate Response Actions (IRAs) are evident. A Condition of Substantial Release Migration (SRM) does not exist. Extension of response action deadlines through the Special Project Designation is unlikely to compromise health, safety, public welfare, or the environment.

2.13 Public Notification (310 CMR 40.0062(1)(n))

Documentation of public notification activity (advertisement tear sheet, etc.) is provided in Attachment A.

3.0 SPECIAL PROJECT MODIFICATION (310 CMR 40.0065)

A modification is sought for the Special Project Designation to include additional publicly owned parcels where it is suspected contaminated fill from the former operation of the former City burn-dump has come to be located. These additional publicly owned parcels will be the subject of a soil boring program to evaluate the potential presence of contaminated fill on the parcels.

4.0 SPECIAL PROJECT EXTENSION (310 CMR 40.0067)

Investigation and remediation of the Keith Middle School Site has been initiated and a partial RAO has been submitted for a portion of the cleanup. However, extensive investigation and remediation work remains to be completed. This project will require extensive coordination and site-specific negotiation with impacted property owners and the involvement of the EPA Regional PCB Coordinator due to TSCA PCB spill cleanup triggers.

Implementation of the remaining response actions will require a significant amount of site preparation and civil work over a large area (in excess of 80 acres), and coordination with ongoing activities at the active high school and other City facilities. The additional time afforded by the extension of the Special Project Designation will facilitate the City's ability to coordinate and complete this challenging project.

5.0 PUBLIC NOTICE (310 CMR 40.0062(5)(a))

A public notice was placed in the New Bedford Standard Times for publication on Friday, April 6, 2007. A copy of the notice submitted to the New Bedford Standard Times is provided as an attachment.



LOT	STREET NUMBER	STREET NAME	OWNER
1	SS	PARKER ST	CITY OF NEW BEDFORD
1	WS	LIBERTY ST	CITY OF NEW BEDFORD
2	134	HUNTER ST	CITY OF NEW BEDFORD
12	ES	HATHAWAY BLVD	CITY OF NEW BEDFORD
48	543	MAXFIELD ST	CITY OF NEW BEDFORD
85	70	HATHAWAY BLVD	CITY OF NEW BEDFORD
92	ES	HUNTER ST	CITY OF NEW BEDFORD
167	WS	HATHAWAY BLVD	CITY OF NEW BEDFORD
227	ES	LIBERTY ST	CITY OF NEW BEDFORD
256	ES	LIBERTY ST	CITY OF NEW BEDFORD
345	230	HATHAWAY BLVD	CITY OF NEW BEDFORD



650 Suffolk St.
Worcester, MA 01854
Lowell, MA 01854

FIGURE 1
KEITH MIDDLE SCHOOL SITE
SPECIAL PROJECT DESIGNATION
PARCELS AND BOUNDARIES
APRIL 2007

Attachment A
PUBLIC NOTICE

**NOTICE OF APPLICATION
FOR
EXTENSION/MODIFICATION
OF
SPECIAL PROJECT DESIGNATION**

**KEITH MIDDLE SCHOOL SITE
HATHAWAY BOULEVARD
NEW BEDFORD, MASSACHUSETTS
RELEASE TRACKING NUMBERS 4-15685 AND 4-15824**

A release of oil and/or hazardous materials has occurred at this location, which is a disposal site as defined by M.G.L. c. 21E, § 2 and the Massachusetts Contingency Plan, 310 CMR 40.0000. On or about April 9, 2007, the City of New Bedford intends to file an Application for an Extension and Modification to an existing Special Project Designation granted by the Massachusetts Department of Environmental Protection (MassDEP) on October 10, 2001 pursuant to 310 CMR 40.0060. The following extension and modifications to the existing Special Project Designation are sought:

- An extension is requested for completing comprehensive response actions of five years.
- Modification is sought to include additional parcels of land that will be investigated, and if necessary, remedied as part of site-wide response actions.

Anyone interested in reviewing the Application for a Major Permit Modification should contact Scott Alfonse, Director of the Environmental Stewardship Department with the City of New Bedford at 508-979-1487 to request a copy of the Application for Special Project Designation and associated attachments. Written comments related to this Application must be submitted within 20 days of the publication of this notice to: (1) Massachusetts Department of Environmental Protection, Southeast Regional Office, 20 Riverside Drive, Lakeville, Massachusetts 02347 (Attention: Molly Cote) by mail or by hand delivery during normal business hours; and (2) City of New Bedford, Department of Environmental Stewardship, 133 William Street, New Bedford, Massachusetts 02740 (Attention: Scott Alfonse).

The Application and the disposal site file can be reviewed at Massachusetts Department of Environmental Protection, Southeast Regional Office, 20 Riverside Drive, Lakeville, Massachusetts 02347 Call 508-946-2700, 8:45 a.m. - 5:00 p.m. Monday through Friday, to set an appointment.

TRC

TRC Environmental Corporation

21 Griffin Road North
Windsor, Connecticut 06095-1512

CHECK NO. 005408

Date April 3, 2007

62-22
311

D Sullivan ESP #1488
TRC Lowell

PAY TO THE

ORDER OF

Commonwealth of Massachusetts

\$

750.00

VOID AFTER NINETY DAYS

Seven hundred fifty and 00/100***** DOLLARS

Wachovia Bank, N.A.
Philadelphia, PA 19106

Kern Middle School Site RTN 45685
New Bedford, MA RTN 415824

By John A. Cippitelli
AUTHORIZED SIGNATURE

⑈005408⑈ ⑆03110022502079950064538⑈