



Wannalancit Mills
650 Suffolk Street
Lowell, MA 01854

978.970.5600 PHONE
978.453.1995 FAX

www.TRCSolutions.com

TRC Reference No. 115058

June 25, 2009

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

**RE: Special Project Status Annual Report (July 1, 2008 – June 30, 2009)
Parker Street Waste Site (a.k.a., McCoy Field/Keith Middle School Site)
225 Hathaway Boulevard, New Bedford, Massachusetts**

Dear Ms. Cote:

TRC Environmental Corporation (TRC) prepared this Special Project Status Annual Report on behalf of the City of New Bedford (City) for the Parker Street Waste Site (PSWS) under the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000) that is tracked by the Massachusetts Department of Environmental Protection (MassDEP) under Release Tracking Number (RTN) 4-15685. Response actions at this Site are conducted under a Special Project designation due to logistical complexities. In addition, a historic underground storage tank (UST) release identified by others at the former Keith Junior High School (KJHS) at 70 Hathaway Boulevard and tracked under RTN 4-15824 is also included under the Special Project Designation. This Special Project Status Annual Report covers the reporting period of July 1, 2008 through June 30, 2009.

This Special Project Status Annual Report, required under 310 CMR 40.0064(2)(i) of the MCP, describes the status of response actions for the above-referenced project, which was granted a Special Project Status Extension on July 1, 2007. The reporting period covered by this letter is July 1, 2008 through June 30, 2009.

BACKGROUND

Description. As noted above, the PSWS is tracked by MassDEP under Release Tracking Number (RTN) 4-15685, and includes the following locations:

- The Keith Middle School (KMS) property including an adjacent wetland (referred to as the KMS wetland);
- The New Bedford High School (NBHS) Campus;
- The Paul F. Walsh Field (Walsh Field);
- The Former Keith Junior High School (KJHS) property;
- Several other City-owned parcels (e.g., Department of Public Infrastructure [DPI] facilities and yard area, New Bedford School Department maintenance facility) as well as City ROWs (e.g., Parker Street, Liberty Street, Hunter Street, etc.);
- Several residential properties along Greenwood, Ruggles, and Durfee Streets, including vacant parcels along Ruggles Street and Hathaway Boulevard presently owned by the Bethel AME Church;
- A church property located at the corner of Hathaway Boulevard and Parker Street; and
- A commercial property located at 319 Hathaway Boulevard.

The above-described properties are variously impacted by the presence of contaminated fill contaminated by polychlorinated biphenyls (PCBs), polyaromatic hydrocarbons (PAHs), and heavy metals (including but not limited to arsenic, lead, and cadmium), with localized detections of petroleum-related soil contamination. The fill material appears to be attributable to waste disposal associated with the PSWS, formerly located in the vicinity of the NBHS campus.

A Partial Response Action Outcome (RAO-P) has been filed with the MassDEP by the BETA Group, Incorporated (BETA) for the KMS portion of the PSWS. However, additional response action activities remain to be conducted on other parcels impacted by PSWS-related contamination to bring the site to closure.

Remedial investigations of the NBHS campus and Walsh field were initiated by BETA in 2006, but were not completed. In addition, aerial photography captured during the presumed operational period of the burn-dump suggested that other current parcels may also have been impacted by waste deposition that warrant investigation.

Investigations have been initiated at several privately-owned parcels, which require further evaluation. 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 related reporting.

Necessity for the Special Project Designation. The investigation and remedy of the site require extensive coordination and site-specific negotiation with impacted private property owners and the involvement of the United States Environmental Protection Agency (EPA) Regional PCB Coordinator due to localized Toxic Substances Control Action (TSCA) PCB spill cleanup triggers. Implementation of response actions will require a significant amount of site preparation and civil work over a large area (the currently understood extent of the site is in excess of 140 acres), and coordination with ongoing activities at NBHS, KMS, Walsh Field and City facilities and private residences. For example, closing NBHS for the duration of remedial activities will be complicated 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 costly.

STATUS OF RESPONSE ACTIONS

Technical Activities. TRC is currently authorized by the City to provide technical support on the project in the following task areas:

- **Keith Middle School.** TRC is currently supporting the City with the following
 - **Long-Term Monitoring and Maintenance Implementation Plan (LTMMIP).** The LTMMIP sets forth requirements for the long-term monitoring and maintenance of the exposure management barrier, groundwater, wetland sediment, vent gas and indoor air quality of the KMS site. The LTMMIP also provides a description of the maintenance activities to be performed at the KMS site and related precautions to prevent exposure to the impacted fill layer located beneath the exposure management barrier. TRC continues to perform all monitoring activities set forth under the LTMMIP. The City self-implements the training component set forth in the LTMMIP for KMS personnel.

TRC's use of the LTMMIP for monitoring and maintenance activities thus far has revealed a number of inconsistencies and technical errors that should be corrected to facilitate implementation of an effective LTMMIP. In addition, TRC has identified some activities that could be modified, reduced, or eliminated to decrease operation and maintenance costs for the KMS site and streamline monitoring and maintenance procedures, while still providing useful data and effectively monitoring the protectiveness of the remedy.

On March 24, 2009, TRC prepared a letter to EPA summarizing recommended changes to the KMS LTMMIP based on input from a panel of in-house TRC technical specialists (e.g., chemists, air monitoring specialists, cap engineers, and risk assessors) who performed a comprehensive review of the LTMMIP. The letter is presently under review by EPA.

- **Slope Repair Consultation and Remedy.** TRC supported the City in the evaluation and repair of a slope failure on the southwestern slope of the KMS. In the spring of 2007, a slope failure occurred on the steep slope above the wetland near the southwestern corner of the Site. The area measures approximately 7 feet by 8 feet where the topsoil slumped to the bottom of the slope. The black separation fabric demarcating the underlying contaminated fill from the clean imported fill was not exposed; however, a small (approximately 3 to 4 inch) piece of the orange warning layer was visible in the top left quadrant of the damaged area (when viewed from the wetland). TRC designed, obtained regulatory approval from EPA, and oversaw final repair of the failed slope (October 30, 2008). The damaged area was repaired with an 8-ounce non-woven geotextile fabric lining covered by stone (rip-rap) up to local grade, restoring the protective cap thickness and allowing storm water flow through the slope in this area without pressure buildup. The rip-rap allows free drainage of water and is more resistant to the erosive force of storm water overland run off.
- **KMS Wetland Imminent Hazard.** TRC continues to support the City regarding the discovery of Imminent Hazard (IH) concentrations of PCBs in sediments of the KMS wetland. Under the direction of a prior consultant (BETA) following approval by the EPA, a remedy for the PCB-contaminated wetland sediments at the KMS that included the removal of up to 6 inches of impacted sediments with residual PCB concentrations greater than 1 mg/kg at locations within the Site wetlands was implemented. EPA approval for the wetland and other site-related remedial activities was contingent, in part, upon the preparation and implementation of a LTMMIP describing the monitoring and maintenance of the remedy.

In accordance with provisions for annual wetland sediment monitoring in the LTMMIP, TRC performed sampling of sediment in the KMS wetland. A TRC field scientist conducted the LTMMIP-required sediment sampling on May 27, 2008 consisting of four randomly selected samples from locations abutting the cap slope. TRC departed from the LTMMIP by collecting one of the four sediment samples from a biased sample location at the bottom of the slope beneath the previously discussed KMS Site cap slope failure along the southern half of the wetland. The biased sample was collected to check on the potential for a contaminant release associated with the 2007 slope failure.

All samples were analyzed for PCB Aroclors via SW-846 Method 8082. Three (3) out of four (4) samples were non-detect. Sediment sample SD-03 contained total PCBs at a concentration of 16.56 milligrams per kilogram (mg/kg). The 16.56 mg/kg total PCB concentration exceeded the 10 mg/kg total PCB concentration under the MCP that could pose an IH in accordance with 310 CMR 40.0321(2)(b) due to the sample's concentration, depth below ground surface, proximity to a school or residential dwelling, and accessibility. The contamination condition triggered a 2-hour regulatory reporting obligation to MassDEP in accordance with 310 CMR 40.0321(2) and 310 CMR 40.0311(7). TRC notified the City's

Department of Environmental Stewardship and facilitated regulatory reporting to MassDEP via telephone within the regulatory reporting timeframe at approximately 3:15 P.M. on Monday June 9, 2008. MassDEP orally approved an “assessment only” Immediate Response Action (IRA) and assigned RTN 4-21300.

TRC has conducted several rounds of sampling to evaluate the extent of the contamination. The sediment sampling conducted to date to assess the extent of total PCB contamination in the KMS wetland indicates that additional measures are required to mitigate the IH condition in the near-term, and to arrive at a permanent solution for the wetland. The City is presently evaluating the practicability of a perimeter fence to restrict access to the wetland.

- **KMS Wetland Remedial Planning.** TRC continues to support the City in the development of a remedy for PCB impacted sediments in the KMS wetland. TRC’s remedial engineer and Licensed Site Professional (LSP) will conduct design development activities consisting of the following:
 - Remedial design scoping
 - Design development (e.g., volume calculations, design drawings, design submittals, supporting calculations [drainage], specifications package and bid package development support).
 - MCP-related document preparation.

TRC is presently completing an ecological risk assessment to support the above-outlined remedial planning effort.

- **New Bedford High School.** TRC is currently supporting the City with the following
 - **Interior PCB Source Mapping and Remedy Implementation.** TRC continues to support the City in the investigation and remediation of PCB-containing building materials and the targeting of PCB-containing building material sources for abatement consistent with EPA regulations. During the reporting period, TRC has prepared one Report of Findings and an Addendum to the Report of Findings documenting the outcome of on-going PCB building materials source/sink evaluations.

TRC is also supporting remedial planning for the NBHS interior and has prepared associated specification/bid packages. TRC worked with the City to develop performance-oriented specifications for remediation of PCB building materials from NBHS, based on the outcome of the interior source/sink evaluations and the logistical constraints of conducting remediation in an actively used facility. The specifications were prepared in consultation with a TRC Certified Industrial Hygienist (CIH) and a PCB remediation specialist. TRC submitted the specifications to the City for review and comment, and then amended them to include comments from the City.

TRC also supported the City with the development of an RFP to obtain bids from qualified bidders to perform the interior remediation. TRC will support the City during the pre-bid walk-through during the bidding process and respond to questions from the bidders. TRC will provide recommendations for award to the City.

- **Exterior Remedial Investigation.** TRC continues to support the City in the delineation of soil and fill related contamination on the NBHS Campus to support remedial design. During the reporting period, TRC has collected over 600 soil samples for various analyses from various locations across the NBHS Campus. TRC installed seven groundwater monitoring wells on the NBHS Campus. Three were installed in the interior of the NBHS building and four others in exterior locations. All of the wells were sampled between July 2008 and June 2009.

TRC's Lead Chemist scheduled, coordinated, tracked, and oversaw sample analyses and validation of data produced. TRC validated PCB samples consistent with relevant EPA guidance to Tier I, with a subset of PCB soil samples (approximately 10-percent) validated to Tier II. TRC also evaluated PCB surrogate recoveries for all PCB soil samples slated for Tier I validation. Metals and PAH soil analyses were evaluated for usability consistent with the Massachusetts Department of Environmental Protection (MassDEP) Compendium of Analytical Methods (CAM). TRC's data management team also determined the usability of laboratory and field data (e.g., field screening, logs, and field measurements). All laboratory and field data were reviewed to check for unexpected conditions. TRC's Lead Chemist prepared data usability evaluations with assistance from qualified members of the project team.

TRC prepared one concise data summary report as an interim deliverable with tabulated data compared with relevant comparison criteria (e.g., Massachusetts Contingency Plan Method 1 cleanup standards, etc.), with a brief narrative describing relevant findings and recommendations. The results of subsequent data collection will be provided in future regulatory submittals that are currently in preparation.

- **Exterior Remedial Design.** TRC continues to support the City in the development of a remedy for contaminated soil at the NBHS campus. TRC's remedial engineer and LSP are conducting design development activities consisting of the following:
 - Remedial design scoping
 - Design development (e.g., volume calculations, design drawings, design submittals, supporting calculations [drainage], specifications package and bid package development support).
 - MCP-related documentation preparation.

This work also includes supplemental topographic mapping by a Massachusetts-licensed surveying subcontractor to facilitate remedial planning and volume calculations.

- **NBHS Imminent Hazard Reporting and Response Actions.** Soil sampling events at the Site have indicated identified IH-related reporting conditions that have led to two IRAs under the MCP. The following conditions were identified on the NBHS campus:
 - **Location HB-23.** RTN 4-21847 was triggered on March 19, 2009 by the detection of total PCBs at a concentration that could pose an IH under 310 CMR 40.0321(2)(b) in surface soil (0 to 1 foot in depth) at the HB-23 area of the NBHS campus. TRC conducted additional soil sampling, prepared an IH evaluation, and approximately 63 cubic yards of contaminated soil were removed. The soil is temporarily stored at the Shawmut Avenue Transfer Station in lined and covered roll-off containers. The City is currently identifying disposal options for the material. TRC submitted an IRA Plan for this release on May 18, 2009.
 - **Location HH-13.** RTN 4-21872 was triggered on April 2, 2009 by the detections of arsenic and chromium at a concentration that could pose an IH under 310 CMR 40.0321(2)(b) in surface soil (0 to 1 foot in depth) at the HH-13 area of the NBHS campus. Additional soil sampling and an IH evaluation indicated that an IH does not exist. TRC submitted an IRA Completion Report for this reportable condition on June 1, 2009.
- **Walsh Field.** At Walsh Field, TRC is currently supporting the City with the following
 - **Remedial Investigation.** TRC continues to support the City in the delineation of soil and fill related contamination at Walsh Field to support remedial design. During the reporting period, TRC has collected over 850 soil samples for various analyses from locations across Walsh Field. TRC installed three groundwater monitoring wells at Walsh Field, which were sampled in March 2009.

TRC's Lead Chemist scheduled, coordinated, tracked, and oversaw sample analyses and validation of data produced. TRC validated PCB samples consistent with relevant EPA guidance to Tier I, with a subset of PCB soil samples (approximately 10-percent) validated to Tier II. TRC also evaluated PCB surrogate recoveries for all PCB soil samples slated for Tier I validation. Metals and PAH soil analyses were evaluated for usability consistent with the Massachusetts Department of Environmental Protection (MassDEP) Compendium of Analytical Methods (CAM). TRC's data management team also determined the usability of laboratory and field data (e.g., field screening, logs, and field measurements). All laboratory and field data were reviewed to check for unexpected conditions. TRC's Lead Chemist prepared data usability evaluations with assistance from qualified members of the project team.

TRC prepared one concise data summary report as an interim deliverable with tabulated data compared with relevant comparison criteria (e.g., Massachusetts Contingency Plan Method 1 cleanup standards, etc.), with a brief narrative describing relevant findings and recommendations. The results of subsequent data collection will be provided in future regulatory submittals that are currently in preparation.

- **Remedial Design.** TRC continues to support the City in the development of a remedy for contaminated soil at the NBHS campus. TRC's remedial engineer and LSP conducted design development activities consisting of the following:
 - Remedial design scoping
 - Design development (e.g., volume calculations, design drawings, design submittals, supporting calculations [drainage], specifications package and bid package development support).
 - MCP-related documentation preparation.

This work also included supplemental topographic mapping by a Massachusetts-licensed surveying subcontractor to facilitate remedial planning and volume calculations. TRC's Design Basis Memorandum and Conceptual Design for Walsh Field will be provided to MassDEP in a future regulatory submittal that is currently in preparation.

- **Walsh Field Imminent Hazard Reporting and Response Actions.** Soil sampling events at the Site have indicated identified IH-related reporting conditions that have led to two IRAs under the MCP. The following conditions were identified at Walsh Field:
 - **Varsity and JV Baseball Diamonds.** Surface soil samples (0-0.5 foot below grade) collected from the Varsity and Junior Varsity (JV) Baseball Diamond portions of Walsh Field contained arsenic at concentrations above a threshold that could pose an IH under 310 CMR 40.0321(2)(b). Release notification was provided to MassDEP on July 30, 2008, who orally approved IRA assessment activities and assigned RTN 4-21407. The IRA included additional soil sampling, preparation of an IH evaluation, and implementation of controls limiting access to the Site, including locking the perimeter fence around the area and posting "No Trespassing" signs. TRC's evaluation concluded that an IH condition was present at the Varsity Baseball Diamond, but not at the JV Baseball Diamond. In September 2008, TRC submitted an IRA Completion Report to MassDEP, the objective of which was to document the assessment and delineation of the potential IH condition and the mitigation of the condition through fencing. TRC subsequently submitted a Release Abatement Measure (RAM) Plan on October 27, 2008 that set forth a soil removal action intended to reduce risk. MassDEP later advised that response actions proposed

for the Site would be preferably conducted as an IRA. TRC withdrew the RAM Plan and filed an IRA Plan in November 2008, with the following objectives:

- Remove the top 6 inches of base path, pitcher's mound, and infield soil within the Varsity Baseball Diamond that contain elevated concentrations of arsenic;
- Remove additional soil around the outer perimeter of the infield extending into the outfield and foul territory to a depth of 6-inches; and
- Replace the removed surface soil with appropriately documented, contaminant-free soil.

In November 2008 TRC oversaw the excavation of approximately 1,118 tons of arsenic-contaminated soil from the Varsity and JV Baseball Diamonds. The soil was temporarily stockpiled at the Shawmut Avenue Transfer Station, which is owned and operated by the City. Following a Special Waste Determination Approval, the soil was accepted for disposal by the Crapo Hill Landfill in New Bedford/Dartmouth. The soil was shipped for disposal on March 12 and 13, 2009.

A post-excavation evaluation demonstrated that an IH condition does not exist at either the Varsity or JV Baseball Diamond and that the fields can continue to be safely used until a permanent remedy that addresses the remaining soil contamination can be implemented. The IRA Completion Report was filed with MassDEP on April 13, 2009.

- **Location WFE-5.** RTN 4-21823 was triggered on March 4, 2009 by the detection of lead at a concentration presenting an IH in surface soil (0 to 1 foot in depth) at the Soccer Field area of Walsh Field. TRC conducted additional soil sampling, prepared an IH evaluation, and approximately 41 cubic yards of contaminated soil were removed. The soil was moved to the Shawmut Avenue Transfer Station in lined and covered roll-off containers for temporary storage. The City is currently identifying reuse, recycling, and/or disposal options for the material. TRC submitted an IRA Plan for this release on May 4, 2009.
- **Residential/Commercial Locations.** During the reporting period, TRC conducted environmental investigations at residential, commercial, and church properties to the west of the NBHS Campus. All TRC investigative activities were documented in Data Summary Reports provided to the City and MassDEP. The owners of each location where investigative activities were undertaken were also provided the analytical data, consistent with the requirements of the MCP under 310 CMR 40.1403(10), and a copy of the same Data Summary Report provided to the City and MassDEP. Due to privacy concerns, the City requests that specific information on privately owned parcels not be documented in the Special Project related reports, although the Special Project status covers work at these locations.

- ***Keith Junior High School.*** During the reporting period, TRC prepared a RAM Plan in accordance with 310 CMR 40.0440 of the MCP outlining risk reduction measures to be undertaken by the City at the New Andrea McCoy Field property (former Keith Junior High School [KJHS]) located at 70 Hathaway Boulevard to support construction in a contaminated area and to address soil contamination hot spots. The applicable MassDEP RTNs were 4-15685 and 4-15824, but the RAM Plan was filed under RTN 4-15685 since the risk reduction and soil contamination hot spot activities are primarily associated with contamination associated with the PSWS. Activities addressed under the RAM included:
 - Excavation of soil during site construction activities;
 - Excavation of approximately 1,340 tons of soil to reduce risk posed by contaminated soil/fill;
 - Temporary soil stockpiling and stockpile management;
 - Offsite reuse, recycling or disposal of contaminated soils excavated to reduce risk and uncontaminated soil displaced by Site construction and grading activity;
 - Onsite reuse of soil suitable for such application;
 - Replacing the removed soil where necessary with appropriately documented contaminant-free fill material screened in advance for the presence of regulated contaminants; and
 - On-site groundwater management where dewatering is required for construction and/or risk-reduction related excavation activity.

TRC estimated approximately 1,340 tons of soil would be excavated to remove hot spots as part of this RAM, and transported offsite for reuse, recycling or disposal. RAM activities commenced in May 2009 and will be documented in future RAM related reporting.

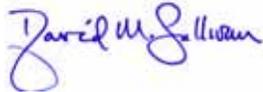
- ***Phase II Comprehensive Site Assessment and Phase III Identification, Evaluation and Section of Comprehensive Remedial Action Alternatives.*** During the reporting period, TRC supported the City by initiating the preparation of a focused Interim Phase II Comprehensive Site Assessment (CSA) report for the NBHS Campus and Walsh Field. The Interim Phase II CSA is being prepared to support Phase III Identification, Evaluation and Section of Comprehensive Remedial Action Alternatives (Phase III) for these parcels. Issuance of the Interim Phase II CSA to MassDEP is imminent and will be followed shortly by the Phase III. The Interim Phase II CSA focuses on the NBHS campus and Walsh Field portions of the disposal site in order to support remedial planning activities targeting these locations. The other properties associated with the PSWS will be addressed in future Interim Phase II and Phase III reports, as needed.

Ms. Molly Cote
June 25, 2009
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Please do not hesitate to contact me at TRC at 978-656-3565 or via e-mail at dsullivan@trcsolutions.com if you have any questions or comments.

Sincerely,

TRC Environmental Corporation



David M. Sullivan, LSP, CHMM
Senior Project Manager

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