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TRC Reference No. 115058

September 10, 2010

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, 2009 – June 30, 2010)
Parker Street Waste Site
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) in accordance with the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000). The PSWS is tracked by the Massachusetts Department of Environmental Protection (MassDEP) under Release Tracking Number (RTN) 4-15685. Due to logistical complexities, the response actions at this disposal site are conducted under a Special Project Designation. Additional RTNs associated with the PSWS and included under the Special Project Designation include the following:

- RTN 4-15824 – Former Keith Junior High School (KJHS)/New Andrea McCoy Field (McCoy Field) historic underground storage tank (UST) release.
- RTN 4-21300 – Immediate Response Action (IRA) to address polychlorinated biphenyl (PCB) impacted sediments within Keith Middle School (KMS) wetland.
- RTN 4-21407 – IRA to address arsenic impacted surface soil at the Varsity and Junior Varsity Baseball Diamond portions of the Dr. Paul F. Walsh Memorial Field (Walsh Field).
- RTN 4-21823 – IRA to address lead impacted soil at the Soccer Field portion of Walsh Field.

- RTN 4-21847 – IRA to address PCB impacted soil at the New Bedford High School (NBHS) campus.
- RTN 4-21872 – IRA to address arsenic and chromium impacted surface soil at the NBHS campus.
- RTN 4-22409 – IRA to address a Condition of Substantial Release Migration (SRM) / Critical Exposure Pathway (CEP) at the NBHS campus.

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 five year Special Project Status Extension on June 2, 2007. The reporting period covered by this letter is July 1, 2009 through June 30, 2010.

BACKGROUND

Description - As noted above, the PSWS is tracked by MassDEP under RTN 4-15685, and currently includes the following locations:

- The KMS property including an adjacent wetland (referred to as the KMS wetland);
- The NBHS campus;
- The Walsh Field athletic complex;
- The Former KJHS/New McCoy Field property;
- Several other City-owned parcels (e.g., Department of Public Infrastructure [DPI] facilities and City Yard area, New Bedford School Department maintenance facility) as well as City right-of-ways (e.g., Hathaway Boulevard, Parker Street, Liberty Street, Hunter Street, etc.);
- Six City-owned residential properties, referred to as the Acquired Residential Properties, along Greenwood Street and Ruggles Street near the intersection with Hathaway Boulevard;
- Several additional residential properties along Greenwood, Ruggles and Durfee Streets, including vacant parcels along Ruggles Street and Hathaway Boulevard owned by the City and referred to as the Nemasket Street Lots (formerly the Bethel AME property);
- A church property located at the corner of Hathaway Boulevard and Parker Street (129 Hathaway Boulevard); and
- A commercial property located at the corner of Hathaway Boulevard and Durfee Street (319 Hathaway Boulevard).

The above-described properties are variously impacted by PCBs, polyaromatic hydrocarbons (PAHs), and/or heavy metals (including but not limited to arsenic, lead, and cadmium) in soil and/or fill. Localized subsurface impacts of petroleum-related compounds or volatile organic compounds (VOCs) have also been detected. The fill material is likely attributable to waste disposal associated with the PSWS, formerly

located in the vicinity of the NBHS campus. Groundwater impacts have also been detected at 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 within the wetland portion of the KMS property and on other parcels within the disposal site boundary to bring the site to closure.

Environmental investigations of the NBHS campus and Walsh field were initiated by BETA in 2006, but were not completed. TRC continues to conduct response actions within these portions of the PSWS. Investigations have been initiated at other portions of the PSWS, including 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.

Supplemental investigations of the PSWS disposal site boundary and/or other areas conducted by the United States Environmental Protection Agency (EPA) and the MassDEP during this reporting period are not described in this report.

Necessity for the Special Project Designation - The investigation and remediation of the PSWS requires coordination and site-specific negotiation with private property owners, the involvement of the EPA Regional PCB Coordinator due to Toxic Substances Control Act (TSCA) PCB impact triggers, and MassDEP in their oversight role. The implementation of response actions require a significant amount of site work over a large area (the currently understood extent of the site is in excess of 100 acres), and coordination with ongoing activities at NBHS, KMS, Walsh Field, New McCoy Field, other City-owned properties and 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 providing technical support to the City 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 prepared by BETA and dated October 20, 2006 sets forth requirements for the long-term monitoring and maintenance of the exposure

management barrier (soil and pavement cap), groundwater, wetland sediment, vent gas and indoor air quality of the KMS campus and adjacent wetland. The LTMMIP also describes the maintenance activities to be performed at the KMS property 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. Prior to the April 22, 2010 annual KMS personnel training class, conducted by TRC, the City self-implemented the LTMMIP annual training requirement in 2008 and 2009. TRC performed the training in 2010.

TRC's use of the LTMMIP for monitoring and maintenance activities has helped identify 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, which has been reviewed by EPA.

The City is also preparing a fact sheet summarizing the results of the LTMMIP monitoring activities which it hopes to finalize by September 2010.

- **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 on 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. TRC continues to regularly inspect the repair as part of the LTMMIP monitoring.

Based on the results of the most recent LTMMIP cap inspection on April 14, 2010 and wetland inspection on May 17, 2010, options for repair of the small

rip-rap outfall slump along the northwestern portion of the cap slope and surficial erosion along the southern cap slope are currently being evaluated. The Department of Public Infrastructure installed a gate in the fence at the southwestern corner of the KMS property in late May 2010. Repair and reseeded of the previously inaccessible southern slope is expected to occur during the early fall of 2010.

- **KMS Wetland Imminent Hazard** - TRC continues to support the City regarding the discovery of Imminent Hazard (IH) concentrations of PCBs in wetland sediments. Under the direction of a prior consultant (BETA) and following approval by the EPA, a remedy for the PCB-contaminated wetland sediments at the KMS was implemented. The approved remedy included the removal of up to 6 inches of impacted sediments with residual PCB concentrations greater than 1 milligram per kilogram (mg/kg). 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 cap slope failure along the southern half of the wetland. The biased sample was collected to investigate the potential for an impact 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 mg/kg, which exceeded the 10 mg/kg total PCB concentration that could pose an IH under the MCP 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 IH 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" IRA and assigned RTN 4-21300.

As detailed in the most recent IRA Status Report dated March 10, 2010, between May 2008 and February 2010 TRC conducted several rounds of sampling to evaluate the extent of the impacts within the KMS wetland. This

included sediment sampling to delineate the extent of impacts, cap slope and toe-of-slope sampling to evaluate potential source areas, sediment and surface water sampling in support of a Stage I Environmental Screening (ES) and a Stage II Ecological Risk Characterization (ERC) and installation of soil borings and supplemental groundwater sampling.

The sediment sampling conducted to date to assess the extent of total PCB impacts in the KMS wetland indicated that additional measures were required to mitigate the IH condition in the near-term, and to arrive at a permanent solution for the wetland. During November and December 2009, the City installed a permanent chain-link fence around the entire northern perimeter of the wetland.

The City also prepared a fact sheet in June 2010 discussing the issues currently being studied at the KMS wetland, the investigation findings, and the next steps to address the findings.

- **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 LSP will conduct design development activities consisting of the following:
 - Remedial design scoping;
 - Design development; and
 - 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 Removal and Abatement Report (RAR) documenting remediation activities performed during the summer of 2009 and one Report of Findings documenting the outcome of on-going PCB building materials source/sink evaluations.

TRC prepared a Removal and Abatement Plan (RAP) detailing the remediation of PCB bulk wastes and other building materials containing PCBs regulated by the EPA from the NBHS interior. The RAP outlines the removal and abatement

actions necessary to achieve compliance with applicable regulations, prioritizes the removal of select PCB-containing materials, and outlines regular maintenance and inspection activities.

TRC is also supporting remedial planning and implementation for the NBHS interior. TRC worked with the City to develop performance-oriented specifications/bid packages 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 also supported the City with the development of a Request for Proposals (RFP) to obtain bids from qualified bidders to perform the interior remediation. TRC supported the City during the pre-bid walk-through during the bidding process and respond to questions from the bidders. The City awarded the remediation contract to the selected bidder in June 2010 with prioritized removal and abatement of PCB bulk wastes and building materials, including univent replacement, targeted for the summer of 2010. This work was initiated on June 25, 2010.

- **Exterior Remedial Investigation** – TRC completed efforts to delineate impacts on the NBHS campus in support of remedial design efforts. During the reporting period, TRC collected approximately 33 additional soil samples for various analyses from various locations across the NBHS campus.

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 in March 2010 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 impacted 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.

- **NBHS Imminent Hazard Reporting and Response Actions** - Soil sampling events at the Site have 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 was temporarily stored at the Shawmut Avenue Transfer Station in lined and covered roll-off containers prior to being transported off-site for disposal at the CWM Chemical Services, LLC chemical and industrial waste management facility in Model City, New York. TRC submitted an IRA Completion Report for this release on July 20, 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.

- **NBHS Substantial Release Migration / Critical Exposure Pathway IRA** – TRC collected groundwater and aqueous seep samples near where groundwater appears to seep into the Mechanical Room of the NBHS building. Analytical results for these samples suggested the potential for chlorinated VOCs to be present in indoor air in the building. TRC evaluated the influence of the building structure and drainage system relative to the fate and transport of groundwater beneath the building and conducted an IH evaluation based on modeled indoor air concentrations. The IH evaluation concluded that an IH condition was not present.

TRC advised the City that the seep and impacted water and the underdrain system represented two potential SRM conditions as defined by 310 CMR 40.0006. In addition, the detection of chlorinated VOCs in groundwater, seep water and indoor in the vicinity of the Mechanical Room at NBHS defines a type of CEP under the MCP. The SRM conditions were reported to the MassDEP by TRC in conjunction with the City on January 29, 2010. MassDEP orally approved the IRAs at the site and assigned RTN 4-22409.

Following the reporting of the release condition to MassDEP, TRC undertook investigations of indoor air, subslab soil vapors, groundwater, aqueous seeps, storm sewer infrastructure and sanitary sewer infrastructure to evaluate the SRM and the nature and extent of impacts at NBHS. TRC submitted an IRA Plan to MassDEP on March 22, 2010 describing initial IRA activities and outlining additional investigation activities and CEP mitigation measures to be implemented at NBHS. TRC's IRA Status Report dated May 24, 2010 describes the results of additional investigation and mitigation activities implemented to date including:

- Supplemental indoor air, subslab vapor, and groundwater sampling;
- Plugging of floor drains;
- Sealing of two floor cracks;
- Seepage mitigation and source evaluations.

The results of additional activities to be completed under this IRA will be included in future regulatory submittals.

The City has also prepared several fact sheets that identified the implications for NBHS occupants, issues currently being studied at NBHS, summarized the investigation findings to date, present the next steps planned for the ongoing investigations, and described where additional information could be obtained. Fact sheets were issued in January and March 2010, with the most recent fact sheet available to the public on June 3, 2010.

- **NBHS Dioxin Investigation** – TRC conducted an initial environmental investigation for polychlorinated dibenzo-p-dioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs), collectively referred to as dioxin compounds, in soil at the NBHS campus. The sampling was conducted consistent with TRC's *Proposed New Bedford High School Dioxin Investigation Technical Approach* memorandum dated March 3, 2010.

On April 15, 2010, TRC advanced soil borings using direct push GeoProbe® technology and collected soil samples from five previous locations (HB-26, HF-14, HF-31D, HF-40 and HG-2) at the NBHS campus. The sample locations

were selected based on an evaluation of historic site data. Samples were collected from the top 1-foot, 1 to 3-foot zone and from within the disposal site fill layer. Soil samples were submitted for laboratory chlorinated dioxin/dibenzofuran congeners (SW-846 Method 8290), full 209 list PCB congeners (SW-846 Method 1668A), PCB as Aroclors (SW-846 Method 8082), PAHs (SW-846 Method 8270C) and MCP metals including mercury (SW-846 Methods 6010B/7471A) analysis. In addition, one sample from the HG-2 soil boring was also submitted for VOCs (SW-846 Method 8260B), volatile petroleum hydrocarbons (VPH) and extractable petroleum hydrocarbons (EPH; MassDEP methodologies).

The analytical results associated with the dioxin investigation at NBHS, as well as a memorandum providing a detailed explanation of dioxin toxic equivalents (TEQs) was submitted by TRC to the City on July 6, 2010. The City has posted the memorandum and analytical results for public review.

- **Liberty Street Drainage Improvements** – The City of New Bedford’s Department of Public Infrastructure (DPI) wishes to pursue proposed drainage improvements within the NBHS portion of the PSWS adjacent to Liberty Street. The proposed drainage improvements will be implemented by the DPI following the submittal of and in accordance with a Utility-Related Abatement Measure (URAM) pursuant to 310 CMR 40.0460 of the MCP.

On November 9, 2009, following review of the City’s November 5, 2009 letter regarding the drainage improvement project, the EPA indicated that the data density for PCBs in soil was not sufficient to support an affirmative response concerning the regulatory jurisdiction. TRC’s Supplemental Data Collection in Support of Liberty Street Drainage Improvements memorandum dated March 10, 2010 proposed a sampling approach along the project corridor to support a regulatory determination.

Following verbal approval of the sampling approach by EPA on May 5, 2010, TRC conducted soil sampling consistent with the approach described in the March 10, 2010 memorandum. Eight soil borings (SB-LSD-1 through SB-LSD-8), spaced approximately every 50-feet along the proposed project corridor depending on underground utilities and site access, were advanced using direct push GeoProbe® technology. Soil samples were collected from the top 1-foot, 1 to 3 foot zone and the approximate depth of the proposed drainage line. Soil samples were submitted for laboratory PCB as Aroclors (SW-846 Method 8082) analysis.

As described in TRC’s *Analytical Results from Supplemental Soil Data Collection Along Drainage Installation Route* memorandum to the EPA dated June 17, 2010, one soil sample [SB-LSD-5 (1-3)] exhibited a total concentration of PCB Aroclors greater than 1 mg/kg. Twenty-one of the

twenty-six soil samples (including the two field duplicates) exhibited detectable concentration of total PCB Aroclors less than 1 mg/kg. The analytical results are currently under review by the EPA to determine the regulatory jurisdiction. Following that determination the City will provide notification to the MassDEP of the intent to conduct the URAM.

- **Walsh Field.** At Walsh Field, TRC is currently supporting the City with the following
 - **Remedial Investigation -** TRC completed efforts to delineate impacts at Walsh Field in support of remedial design. During the reporting period, TRC collected approximately 58 additional soil samples for various analyses from locations across Walsh Field.

TRC's Lead Chemist scheduled, coordinated, tracked, and oversaw sample analyses and validation of data produced. 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. The results of subsequent data collection will be provided in future regulatory submittals that are currently in preparation.

- **Remedial Design and Implementation -** TRC supported the City in the development and implementation of a remedy for impacted soil at Walsh Field. 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 also prepared a Design Basis Memorandum and Conceptual Design for Walsh Field.

TRC submitted a RAM Plan addressing contaminated soil removal at the Walsh Field athletic complex to the MassDEP on October 7, 2009. The RAM Plan described remediation activities to be implemented at Walsh Field

consistent with the Interim Phase II Remedial Action Plan (RAP) prepared by TRC and submitted to MassDEP on July 29, 2009. The remedial actions identified in the RAP included the excavation of the WFB-4 hot spot, excavation of soils that contribute to Exposure Point Concentrations (EPCs) in excess of Method 1/Method 2 S-1 soil cleanup standards and placement of an Activity and Use Limitation (AUL) on the property.

The City began implementation of RAM-related activities on November 23, 2009 and work occurred discontinuously until March 17, 2010. RAM-related activities conducted during the reporting period included:

- Site preparation activities (pre-surveying and mark-out and stockpile containment area);
- Excavation and stockpiling of pre-surveyed areas;
- Stabilization treatment of stockpiled soil;
- Stockpile management;
- Removal of treated soil for offsite reuse at a permitted Massachusetts landfill facility; and
- Field rehabilitation activities.

TRC provided professional field oversight and conducted dust monitoring and VOC field screening with a photoionization detector (PID) during the site set-up, excavation, treatment, removal/hauling and field rehabilitation activities.

TRC submitted a RAM Status Report to the MassDEP on February 2, 2010 describing remedial activities implemented to date. Additional RAM Plan activities, including soil excavation associated with the Varsity Field portion of Walsh Field (anticipated for late summer 2010), will be documented in future RAM related reporting.

The City also prepared a fact sheet in June 2010 describing what is being done to determine that it is safe for people to use Walsh Field, current conditions, and work planned for the summer of 2010.

- **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** – Removal actions associated with surface soil samples (0-0.5 foot below grade) collected from the Varsity and Junior Varsity (JV) Baseball Diamond portions of Walsh Field containing arsenic at concentrations above a threshold that could pose an

IH under 310 CMR 40.0321(2)(b) were described in the July 1, 2008 through June 30, 2009 reporting period. An IRA Completion Report associated with RTN 4-21407 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 on March 11, 2009. The soil was moved to the Shawmut Avenue Transfer Station in lined and covered roll-off containers for temporary storage.

TRC submitted an IRA Plan for this release on May 4, 2009 and IRA Status Report on July 10, 2009. Following analytical characterization of the WFE-5 area soils, TRC also oversaw unloading and temporary stockpiling of the soils on July 10, 2009. The soils were temporarily stockpiled to facilitate lead stabilization treatment. Following treatment and additional analytical testing, TRC oversaw the loading and transportation of the material to the Crapo Hill Landfill facility. TRC provided professional field oversight and conducted dust monitoring during the soil excavation, treatment and loading processes. An IRA Completion Report was submitted to the MassDEP on August 18, 2009.

- **Walsh Field Varsity Improvements** – TRC submitted a RAM Plan in accordance with 310 CMR 40.0440 of the MCP on behalf of the City on April 3, 2009 describing anticipated construction activities (field refurbishment and upgrades) at the Varsity Field. Work to be performed under the RAM included excavation of soil during installation of fence posts and paving, removal of existing asphalt, grading of warning tracks, bullpens and coaches boxes, pre-characterization sampling, temporary stockpiling of soil, off-site reuse, recycling or disposal of select materials and as needed replacement of soil.

The majority of the response actions were completed prior to the submittal of the RAM Status Report on July 24, 2009. Remaining activities included the removal of existing substandard pavement, removal of soil and paving of select areas around the Varsity Field, disposal characterization analysis of soil and asphalt excavated during refurbishment activities and subsequent offsite disposal.

As of the most recent RAM Status Report dated January 11, 2010, all of the stockpiled soil and asphalt material had been removed from the site. A small stockpile of displaced soil (less than 5 cubic yards) was consolidated and transported off-site during the initial phase of the RAM implemented for contaminated soil removal at Walsh Field. Additional soil displaced during the response operations was placed directly in a roll-off container, characterized for disposal and subsequently transported off-site for reuse.

Removal of substandard asphalt and removal of soil to facilitate additional paving operations have not been completed as of the date of this report. When these items are completed or cancelled a RAM Completion Report will be submitted to the MassDEP.

On June 10, 2010, the City connected a water line from the Varsity Field concession stand to the existing City infrastructure. TRC provided professional oversight, including dust monitoring and VOC field screening with a PID, and no soil was permanently displaced during operation. Details of the water line installation will be included in a future regulatory submittal.

The City also prepared a fact sheet in February 2010 that identified the implications for Varsity Field occupants and spectators and summarized the investigation findings to date at the Varsity Field.

- ***Acquired Residential Properties*** – TRC submitted a RAM Plan in accordance with 310 CMR 40.0440 of the MCP on behalf of the City on September 9, 2009 describing anticipated construction activities (demolition of dwellings at six properties) to be undertaken by the City at 101, 102, and 111 Greenwood Street and 98, 108, and 118 Ruggles Street (the “Acquired Residential Properties”) portion of the PSWS. On September 17, 2009, a Modified RAM Plan was submitted to the MassDEP to address changes to the proposed demolition activities and serve as a stand-alone replacement to the original RAM Plan. The Modified RAM Plan underwent a public comment period and initial site preparation activities (perimeter fence installation, initial erosion control measures and later installation of gates) were completed in September 2009 and February 2010. The City also performed abatement work to remove hazardous materials from the dwellings which is not covered under the RAM Plan.

Between March 8, 2010 and April 1, 2010, TRC conducted sampling of concrete from the sub-grade foundations of the six Acquired Residential Properties (and exterior forma insulation at one residence) consistent with the City’s September 16, 2009 notification letter to the EPA and the City’s formal addendum to the notification letter submitted to the EPA on February 17, 2010. Due to concentrations of PCBs in excess of 50 mg/kg in foundation concrete at the 102 Greenwood Street property and in excess of 1 mg/kg in foam insulation at the 118 Ruggles Street property, certain aspects of the demolition are subject to EPA jurisdiction and require material management as PCB Remediation Waste following EPA approval.

TRC drafted a Revised Modified RAM Plan on behalf of the City which underwent a public comment period. The Revised Modified RAM Plan serves as a stand-alone replacement to the September 17, 2009 Modified RAM Plan

and will be submitted to the MassDEP following the public comment period. Activities to be completed under the Revised Modified RAM Plan include:

- Installation of perimeter fence (completed in September 2009);
- Excavation and immediate replacement of soil during disconnection of utilities;
- Demolition of dwelling structures;
- Removal, segregation and off-site disposal of foam insulation (118 Ruggles Street property);
- Demolition and off-site disposal of concrete foundation (102 Greenwood Street property);
- Demolition and onsite management of concrete foundations and basement slabs at the six Acquired Residential Properties (except 102 Greenwood Street);
- Backfilling of basement space;
- Removal of other miscellaneous structures (e.g., above-ground swimming pool); and
- Minimal temporary soil stockpiling and stockpile management.

No demolition or soil excavation activities have been implemented during the reporting period.

- ***Residential Properties*** – TRC is currently supporting the City with the following:
 - **110 Greenwood Street** - During the reporting period, TRC conducted an environmental investigation at one residential property located at 110 Greenwood Street. On July 9, 2009, TRC implemented an investigative approach intended to evaluate the presence or absence of fill and the potential presence of impacts in the 0 to 3 foot below ground surface horizon of the a sinkhole. The 0 to 3 foot horizon was considered to be representative of sinkhole contamination exposures at the time of sample collection. Soil samples were submitted for laboratory PCB Aroclor (SW-846 Method 8082), PAHs (SW-846 Method 8270C) and MCP metals including mercury (SW-846 Methods 6010B/7471A) analysis.

TRC's investigative activities were documented in a Data Summary Report provided to the City and MassDEP on September 24, 2009. The owners of 110 Greenwood Street were also provided the analytical data, consistent with the requirements of the MCP under 310 CMR 40.1403(10). 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.

- **Summit Street Parcel** - On September 11, 2009, TRC submitted a letter on behalf the City to the property owner of parcels #75-165 and #75-166 in New Bedford, Massachusetts. The letter summarized the results of analytical testing on the property and included a MassDEP Notification of Sampling form (BWSC-123). 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.
- ***New Andrea McCoy Field (former Keith Junior High School)*** – At the New Andrea McCoy Field, TRC is currently supporting the City with the following
 - **RAM Implementation** - 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) 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 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 to excavation activity.

As of the submittal of TRC's August 10, 2009 RAM Status Report completed activities included:

- Temporary stockpiling and stockpile management pending on-site reuse or off-site reuse, recycling and/or disposal (“Hot Spot” material);
- Excavation and disposal of approximately 2,283 tons of impacted soil and fill material;
- Excavation and disposal of approximately 163 tons of soil and roofing debris; and
- As needed on-site soil stabilization treatment.

TRC’s submitted another RAM Status Report on behalf of the City on February 11, 2010. The RAM Status Report described the following activities that occurred within the footprint of the PSWS:

- Installation of athletic field lighting and associated soil management;
- Utility-related activities to be managed consistent with a URAM;
- Sidewalk and curbing demolition;
- Fence footing installation and associated soil management;
- Parking lot lighting pier installation and associated soil management;
- Soil excavation, management and supplemental investigation of soil associated with the installation of a transformer vault;
- Imported backfill characterization; and
- “Like-Site” soil management approach.

TRC provided professional oversight, including dust monitoring and VOC screening, throughout impacted soil excavation, stockpiling, management, treatment and loading/hauling activities. TRC continues to support the City with as needed oversight during New Andrea McCoy Field construction operations. The results of subsequent RAM-related activities will be provided in future regulatory submittals.

- **URAM Implementation** - TRC submitted a URAM in accordance with 310 CMR 40.0460 of the MCP on behalf of the City on September 22, 2009 to facilitate installation of a horizontally directionally drilled force main sewer which would traverse known soil impacts within the PSWS footprint. The City submitted a notification letter to the EPA regarding the directional drilling activities on October 26, 2009 to facilitate a jurisdictional determination. EPA approved the installation of the force main, as designed, in a letter to the City dated November 12, 2009.

At the request of the MassDEP, TRC submitted Revised URAM Submittal for the New Andrea McCoy Field memorandum on behalf of the City on December 15, 2009. The memorandum served to amend and update the URAM plan submitted on September 22, 2009.

TRC submitted a URAM Status Report on behalf of the City on January 15, 2010. The URAM Status Report described the activities completed between September 29, 2009 and January 14, 2010 and included:

- Installation of a fire line and domestic water line;
- Installation of sewer and drainage lines within the parking lot; and
- Installation of the horizontally directionally drilled force main.

TRC provided professional oversight, including dust monitoring and VOC screening, throughout the URAM-related activities. TRC continues to support the City with as needed oversight during New Andrea McCoy Field utility-related construction operations. The results of subsequent URAM-related activities will be provided in future regulatory submittals.

- **UST Release** - TRC supported the City in preparing a Response Action Outcome (RAO) pursuant to 310 CMR 40.1000 of the MCP for the historic UST release at the New Andrea McCoy Field tracked under RTN 4-15824. The City submitted the RAO to the MassDEP in June 2010.
- **Nemasket Street Lots** - During the reporting period, TRC supported the City in efforts to implement an initial investigation of the Nemasket Street Lots (former Bethel AME property) portion of the PSWS located south of the KMS campus at the intersection of Hathaway Boulevard and Ruggles Street. TRC submitted a *Proposed Nemasket Street Lots Investigation Approach* memorandum on March 3, 2010 describing an iterative approach consistent with previous investigations throughout the PSWS. The proposed approach included:
 - Property clearing activities to facilitate the environmental investigation;
 - Geophysical investigation of the property;
 - Test pit exploration activities; and
 - As needed soil sampling activities.

The City submitted a notification letter to the EPA on March 16, 2010 regarding preparations to conduct the clearing and subsequent environmental investigation at the Nemasket Street Lots. The EPA responded with comments on the proposed approach on March 24, 2010. TRC submitted a response to comments memorandum on behalf of the City on June 18, 2010 and is awaiting a response from the EPA.

TRC also supported the City in submittal of a Request for Determination of Applicability (RDA) to the City of New Bedford Conservation Commission (ConCom) regarding the proposed clearing and environmental investigation activities on February 2, 2010. Given the presence of an Isolated Vegetated Wetland (IVW) within a portion of the Nemasket Street Lots property, the City

sought and received a negative determination of applicability from ConCom following a hearing on February 16, 2010.

TRC also supported the City in the submittal of notifications in April 2010 to the Army Corp under the Massachusetts Programmatic General Permit as a Category I (non-reporting) activity, the Massachusetts Historical Commission, the Wampanoag Tribal Historic Preservation Officer and the Mashpee Wampanoag Tribe of the proposed investigation activities.

- ***Phase II Comprehensive Site Assessment and Phase III Identification, Evaluation and Selection of Comprehensive Remedial Action Alternatives.*** TRC submitted the focused Interim Phase II Comprehensive Site Assessment (CSA) report for the NBHS campus and Walsh Field to MassDEP on behalf of the City on July 20, 2009. In addition, TRC submitted an Interim Phase III Remedial Action Plan for the Walsh Field portion of the PSWS on behalf of the City on July 29, 2009.

During the reporting period, TRC supported the City by initiating the preparation of an amended focused Phase II CSA report for the NBHS campus and Walsh Field. The amended focused Phase II CSA is being prepared to present data and activities conducted at the NBHS and Walsh Field portions of the PSWS through January 2010. The amended focused Phase II CSA will also support remedial design and implementation efforts at the NBHS campus. The City hopes to issue the amended focused Interim Phase II CSA to MassDEP in the near future. The other properties associated with the PSWS will be addressed in future Interim Phase II and Phase III reports, as needed.

PROPOSED SCHEDULE

The following table presents a proposed schedule for major response actions currently underway throughout the Site, associated deliverable(s) and estimated timeframe for submittal of those deliverables for public comment (where required) or to the MassDEP.

Special Project Schedule			
Project Area/Location	Deliverable/Activity	Proposed Due Date*	Notes/Comments
<i>New Bedford High School</i>	Final Phase II Report	January 14, 2011	MassDEP to provide ORS comments on Interim Phase II. City will apprise MassDEP if findings from remaining investigations (e.g., VOCs) require additional time for report preparation.
	Phase III evaluation for high school campus.	RAM Plan – February 11, 2011	Will not be submitted if RAM plan and Modified IRA

Special Project Schedule			
Project Area/Location	Deliverable/Activity	Proposed Due Date*	Notes/Comments
			Plan submitted in advance.
	Phase IV/RAM – campus soil	RAM Plan – February 11, 2011	Phase IV not required if RAM Plan submitted.
	HF-31 RAM Plan	October 22, 2010	Focused soil removal targeting TSCA regulated soil.
	VOC SRM/CEP modified IRA Plan	January 21, 2011	Phase III/IV not required for VOC issue if managed under a Modified IRA Plan. An IRA plan is appropriate vehicle for expedited actions.
<i>Walsh Field</i>	RAO/AUL	March 25, 2011	Assumes complete implementation of Varsity soil removal. Schedule subject to change based on timing of City Council/Mayor approval/acceptance of the AUL.
<i>Acquired Residential Properties</i>	Phase II Report	May 20, 2011	City will apprise MassDEP if findings from supplemental investigation activities require additional time for report preparation.
	Phase III Report	Summer 2011	Will not be submitted if RAM plan submitted instead.
	Performance based disposal notification.	Summer 2011	City to apprise MassDEP if risk-based approach selected instead. Will require schedule modification if selected.
<i>Nemasket Street Lots</i>	Phase II Report	See Notes/Comments.	<p>Deliverable schedule to proposed pending the gaining securing of site access and the conduct of the first phase of investigation.</p> <p>If sufficient data can be collected in the Fall of 2010, the City will endeavor to integrate with Phase II/Phase III schedule for the Acquired Residential Properties.</p> <p>Access anticipated in October 2010.</p> <p>City will apprise MassDEP if findings from supplemental investigation activities</p>

Special Project Schedule			
Project Area/Location	Deliverable/Activity	Proposed Due Date*	Notes/Comments
			require additional time for report preparation and/or separate timeline for Nemasket Street Phase II/III.
<i>New McCoy Field</i>	RAO/AUL	March 25, 2011	Assumes receipt of all outstanding paperwork. Schedule subject to change based on timing of City Council/Mayor approval/acceptance of the AUL.
<i>KMS Wetland</i>	Ecological Risk Assessment	November 5, 2010	
	Phase II Report	Summer 2011	Focused on wetland to west of KMS (wetland to the north and south of the land bridge, north of Nemasket and south of Durfee).

Notes:

MassDEP – Massachusetts Department of Environmental Protection

ORS – Office of Research and Standards

*- Where submittals require a 20-day public review, the date proposed indicates the initiation of the public review period.

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: S. Alfonse, City of New Bedford
 C. Henlin, City of New Bedford