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TRC Project Number: 115058

October 7, 2008

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

RE: Immediate Response Action Plan (IRA Status Report) and Imminent Hazard Evaluation – PCB Contaminated Wetland Sediments
Wetland to Rear of Keith Middle School
225 Hathaway Boulevard, New Bedford, Massachusetts
Release Tracking Number (RTN) 4-21300

To Whom It May Concern:

Consistent with the requirements of the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000), specifically 310 CMR 40.0425, attached please find an Immediate Response Action Plan (IRA Status Report) for the above-referenced IRA condition in New Bedford, Massachusetts. This submittal also includes Massachusetts Department of Environmental Protection (MassDEP) transmittal form BWSC-105 as an attachment to the IRA Status Report.

If you have any questions concerning the IRA Status Report or transmittal forms, please do not hesitate to contact me at 978-656-3565 or via e-mail at dsullivan@trcsolutions.com.

Sincerely,

David M. Sullivan, LSP, CHMM
Senior Project Manager

Attachment

cc. D. Fredette, S. Alfonse; Department of Environmental Stewardship
M. Cote, G. Martin; MassDEP Southeast Regional Office



IMMEDIATE RESPONSE STATUS REPORT

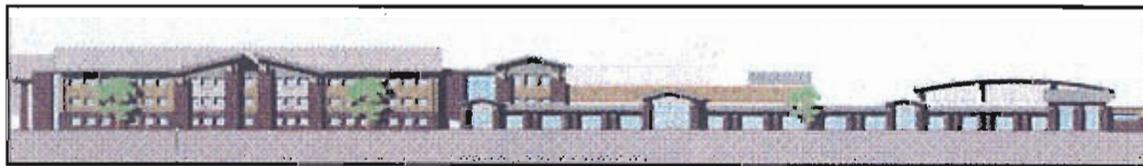
PCB Contaminated Wetland Sediments

Release Tracking Number (RTN) 4-21300

Wetland to Rear of Keith Middle School

225 Hathaway Boulevard

New Bedford, Massachusetts



Prepared for:

Department of Environmental Stewardship

City of New Bedford

133 William Street

New Bedford, Massachusetts 02740

Prepared by:

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October 2008

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Immediate Response Action Status Report

PCB Contaminated Wetland Sediments

Wetland to Rear of Keith Middle School
225 Hathaway Boulevard
New Bedford, Massachusetts

Release Tracking Number (RTN) 4-21300

TRC Project Number: 115058

October 7, 2008

TRC Environmental Corporation (TRC) is submitting this Immediate Response Action Status Report (IRA Status Report) to the Massachusetts Department of Environmental Protection (MassDEP) on behalf of the City of New Bedford. This IRA Status Report is for the detection of polychlorinated biphenyl (PCB) contamination in shallow wetland sediment in excess of a concentration indicating a condition that could pose an Imminent Hazard (IH) as defined in the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000) in accordance with 310 CMR 40.0321(2)(b). The potential IH condition is associated with the sample's concentration, depth below surface, proximity to a school or residential dwelling, and accessibility. The potential IH condition triggered a 2-hour regulatory reporting obligation to the MassDEP in accordance with 310 CMR 40.0321(2) and 310 CMR 40.0311(7), and was reported to MassDEP via telephone on June 9, 2008. MassDEP orally approved IRA assessment activities and assigned Release Tracking Number (RTN) 4-21300.

This IRA Status Report is organized as follows: Section I (Background) briefly summarizes information on TRC's involvement with the Site, the circumstances of the release, the initial response actions conducted at the Site under MassDEP oral approval, and the objectives of this IRA Status Report. Section II (IRA Status Report) provides the information required for an IRA Status Report under the MCP, specifically 310 CMR 40.0425. Section III (References) lists information sources relied upon in the preparation of this IRA Status Report. Attachment A contains relevant MassDEP transmittal forms.

I. BACKGROUND

Under the direction of a prior consultant (BETA Group, Incorporated [BETA]) and following the approval by the United States Environmental Protection Agency (EPA), the remedy for the PCB-contaminated wetland sediments at the McCoy Field/Keith Middle School Site (RTN 4-15685) 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. The 1 mg/kg concentration represents a self-implementing clean-up level for *Bulk Polychlorinated Biphenyl (PCB) Remediation Waste in High Occupancy Areas* under 40 CFR Part 761.61(a)(4)(i)(A) without further conditions, such as capping. EPA approval for the wetland and other site-related remedial activities was contingent, in part, upon the preparation and implementation of a Long-Term Monitoring and

Maintenance Implementation Plan (LTMMIP) describing the activities that will be conducted for the monitoring and maintenance of the remedy.

In accordance with provisions for wetland sediment monitoring at the KMS wetland site as set forth in the BETA-prepared LTMMIP (dated October 20, 2006), TRC performed sampling of sediment in the wetland to the rear of the KMS Site located at 225 Hathaway Boulevard in New Bedford, Massachusetts (see Figure 1).

A TRC field scientist conducted the sediment sampling on May 27, 2008 in accordance with the LTMMIP. For the annual sediment monitoring, the LTMMIP requires the collection of four randomly selected samples from locations abutting the slope consistent with the sediment sampling protocol in Appendix G of the LTMMIP. TRC used the 44 numbered wetland flag locations documented along the wetland/embankment edge on the 12/11/06 As-Built Plan of Land prepared on behalf of BETA by Land Planning, Incorporated (Land Planning) from the BETA-prepared December 2006 *Final Completion and Inspection Report* as approximate sampling station location identifiers.

TRC randomly selected three locations for sampling. 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 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 failure¹. All samples were collected using a hand auger and were collected from a depth of 0 to 6 inches below the top of the sediment surface. All samples were analyzed for PCB Aroclors via SW-846 Method 8082. The sampling locations are illustrated on Figure 2 and the samples were designated as follows (with approximate wetland flag or biased sample locations shown in parentheses):

- SD-01 (Biased sample from toe of slope below slope failure – collected in duplicate)
- SD-02 (Wetland Flag W-8)
- SD-03 (Wetland Flag W-19)
- SD-04 (Wetland Flag W-38)

TRC received the preliminary results of analysis on June 9, 2008. Three (3) out of four (4) samples were non-detect (see Table 1). 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 exceeds a 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 potential 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 immediately

¹ 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 has slumped to the bottom of the slope. The black separation fabric that demarcates 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). The City plans to implement a repair. The repair will consist of lining the damaged area with a 6-ounce non-woven geotextile fabric and covering the fabric with stone (rip-rap) up to local grade to restore the protective cap thickness and allow flow of storm water through the slope in this area without pressure buildup. The rip-rap is intended to allow free drainage of water and be more resistant to the erosive force of storm water overland run off.

consulted with the laboratory (Northeast Analytical [NEA] Laboratories of Schenectady, New York) to confirm the validity of the result. Robert Wagner, NEA's director, reviewed the work conducted by the laboratory and confirmed the result. TRC notified the City's Department of Environmental Stewardship and facilitated regulatory reporting of the potential IH condition 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 Release Tracking Number (RTN) 4-21300.

Further assessment initially implemented by TRC consisted of the following:

- Re-extraction and re-analysis of sample SD-03 by the laboratory to verify the original result.
- Collection of six (6) additional sediment samples on June 10, 2008 which were submitted to the laboratory for analysis on a rush turn-around basis to verify the original result and to help evaluate the extent of contamination.

The six (6) additional samples were collected as follows:

- SD-3R – A repeat sample from the approximate location of SD-03 (sediment).
- SD-3-1.5 – A sample collected at a depth of 1.5 feet at SD-3R/SD-03 (sediment).
- SD-3A – A sample collected 5 feet to the north of SD-03 (sediment).
- SD-3B – A sample collected 5 feet to the east of SD-03 (soil from the adjacent KMS cap).
- SD-3C – A sample collected 5 feet to the south of SD-03 (sediment).
- SD-3D – A sample collected 5 feet to the west of SD-03 (sediment).

All samples, with the exception of SD-3-1.5, were collected from a depth of 0 to 6 inches below the sediment surface (sediment sample SD-3-1.5 was collected from a depth of 1.5 feet below surface). All sediment sample locations were under approximately 4 to 6 inches of water with the exception of SD-3C, which was wet, but not under water. Sample SD-3B is a soil sample collected from the adjacent KMS cap. As noted above, SD-3R was collected in duplicate for quality control (QC) purposes. This follow-up sampling was conducted consistent with the LTMMIP except that 1) one additional sample (i.e., SD-3-1.5) was collected at the approximate location of sediment sample SD-03 at a depth of 1.5 feet below the sediment surface to evaluate the depth of contamination and 2) a duplicate sample was collected from SD-3R for QC purposes.

The results of the analysis of the follow-up sediment and soil samples collected on June 10, 2008 are also presented in Table 1 and the locations are illustrated in Figure 2. The results indicate that a sediment sample collected 5 feet to the south of SD-03 (i.e., SD-3C) contains total PCBs at a concentration below the LTMMIP documented 1.0 mg/kg action level for PCBs in sediment. In addition, no PCBs were detected in cap soil sample SD-3B. However, the samples collected 5 feet to the north and west of SD-03 (samples SD-3A and SD-3D, respectively) each contain total PCBs at concentrations greater than the 1.0 mg/kg action level set forth in the LTMMIP and at concentrations greater than the MassDEP 10 mg/kg potential IH reporting concentration under the MCP. Also, the analytical results from sediment sample SD-3-1.5 indicate that contamination is also present deeper than the 0 to 6 inch monitoring depth suggested by the LTMMIP and at a concentration greater than the LTMMIP 1.0 mg/kg action level.

Supplemental assessment sampling planned in coordination with the City's Department of Environmental Stewardship and performed by TRC on June 19, 2008 consisted of the collection of additional sediment samples at additional 5-foot to 10-foot increments to the north and west of previous samples SD-3A and SD-3D, respectively (see Figure 2), with the laboratory directed to analyze the first 5-foot increment and to keep remaining incremental sediment samples on hold pending the results of the first increment analyses. All sediment samples were collected at a depth of 0 to 6 inches below sediment surface. The following summarizes the June 19, 2008 sediment sampling:

- SD-3E – A sample collected 10 feet to the north of SD-03 (sediment)
- SD-3F – A sample collected 15 feet to the north of SD-03 (sediment)
- SD-3G – A sample collected 25 feet to the north of SD-03 (sediment)
- SD-3H – A sample collected 10 feet to the west of SD-03 (sediment)
- SD-3I – A sample collected 15 feet to the west of SD-03 (sediment)
- SD-3J – A sample collected 20 feet to the west of SD-03 (sediment)

The results of the analysis of the next increment of sediment delineation sampling collected on June 19, 2008 are also presented in Table 1 and the locations are illustrated in Figure 2. The results indicate that all sediment samples collected on June 19, 2008 contain total PCBs at concentrations above the LTMMIP documented 1.0 mg/kg action level for PCBs in sediment. Two samples (SD-3F to the north and SD-3H to the west) also contain total PCBs at concentrations greater than the MassDEP 10 mg/kg potential IH reporting concentration under the MCP (no further IRA-related reporting is required since the contamination appears to be consistent with that reported to MassDEP on June 9, 2008). The results indicated that further sampling was required to delineate the extent of the PCB sediment contamination.

On behalf of the City TRC submitted an IRA Plan to MassDEP on August 7, 2008. The IRA Plan included an IH Evaluation and outlined supplemental assessment sampling planned in coordination with the City's Department of Environmental Stewardship that consisted of the following:

- Evaluate the areal extent of shallow sediment (0 to 6 inches below the sediment surface) incrementally.
- Develop an efficient sampling plan to evaluate the depth of impacted sediment as the areal extent of PCB-impacted sediment is delineated.
- Adjust the incremental sampling plan as necessary based on sediment sampling results.

II. IMMEDIATE RESPONSE ACTION STATUS REPORT (310 CMR 40.0425)

This IRA Status Report is organized according to the minimum information needs set forth under 310 CMR 40.0425(3)(a) through (e) of the MCP.

(a) The Status of Assessment and/or Remedial Actions

The results of TRC's June 19, 2008 sediment sampling indicated that the extent of PCB-contaminated sediments proximate to SD-3 had not yet been found to the north and west of SD-3. On July 30, 2008 TRC collected 12 additional sediment samples from six locations (SD-3K, 3L, 3M, 3N, 3P, and 3Q). The sediment samples were submitted for laboratory analysis for PCB Aroclors via SW-846 Method 8082. The July 30, 2008 sediment samples included the following:

July 30, 2008 KMS Wetland Sediment Sampling		
Sample I. D.	Depth (feet)	Approximate Location
SD-3K-0-0.5	0-0.5	40 feet to the north of SD-3
SD-3K-1.5	1.5	40 feet to the north of SD-3
SD-3L-0-0.5	0-0.5	50 feet to the north of SD-3
SD-3LI-1.5	1.5	50 feet to the north of SD-3
SD-3M-0-0.5	0-0.5	80 feet to the north of SD-3
SD-3M-1.5	1.5	80 feet to the north of SD-2
SD-3N-0-0.5	0-0.5	25 feet to the west of SD-3
SD-3N-1.5	1.5	25 feet to the west of SD-3
SD-3P-0-0.5	0-0.5	30 feet to the west of SD-3
SD-3P-1.2	1.2	30 feet to the west of SD-3
SD-3Q-0-0.5	0-0.5	40 feet to the west of SD-3
SD-3Q-1.3	1.3	40 feet to the west of SD-3

TRC's July 30, 2008 sampling indicated that PCB-contaminated sediments (i.e., above the United States Environmental Protection Agency (EPA) unrestricted use standard of 1 mg/kg) were bounded to the north by SD-3M and to the west by SD-3Q. TRC collected 12 additional sediment sample from the wetland area to the northwest of SD-3 on August 19, 2008 in order to refine potential remedial volumes. Samples were collected from six locations, SD-3R through 3W, and included the following:

August 19, 2008 KMS Wetland Sediment Sampling		
Sample I. D.	Depth (feet)	Approximate Location
SD-3R-0.5	0.5	30 feet north of SD-03, 20 feet west
SD-3R-2	2	30 feet north of SD-03, 20 feet west
SD-3S-0.5	0.5	30 feet north of SD-03, 40 feet west
SD-3S-2	2	30 feet north of SD-03, 40 feet west

August 19, 2008 KMS Wetland Sediment Sampling		
Sample I. D.	Depth (feet)	Approximate Location
SD-3T-0.5	0.5	55 feet north of SD-03, 20 feet west
SD-3T-2	2	55 feet north of SD-03, 20 feet west
SD-3U-0.5	0.5	50 feet north of SD-03, 35 feet west
SD-3U-2	2	50 feet north of SD-03, 35 feet west
SD-3V-0.5	0.5	80 feet north of SD-03, 20 feet west
SD-3V-2	2	80 feet north of SD-03, 20 feet west
SD-3W-0.5	0.5	80 feet north of SD-03, 30 feet west
SD-3W-2	2	80 feet north of SD-03, 30 feet west

TRC's August 19, 2008 sampling results indicated that additional sampling was needed to assess lateral extent of PCB contamination in the wetlands and vertical extent in some locations (i.e., PCB contamination extended down to 1.5 or 2 feet in 3 locations). TRC collected 28 additional sediment samples on September 17 and 18, 2008. These samples included the following:

July 30, 2008 KMS wetland Sediment Sampling		
Sample I. D.	Depth (feet)	Approximate Location
SD-4-0.5	0.5	40 feet north of SD-03, 55 feet west
SD-4-2	2	40 feet north of SD-03, 55 feet west
SD-4-2.5	2.5	40 feet north of SD-03, 55 feet west
SD-5-0.5	0.5	60 feet north of SD-03, 55 feet west
SD-5-2	2 feet	60 feet north of SD-03, 55 feet west
SD-5-2.5	2.5 feet	60 feet north of SD-03, 55 feet west
SD-6-0.5	0.5 foot	105 feet north of SD-03 (toe of slope)
SD-6-1.5	1.5 feet	105 feet north of SD-03 (toe of slope)
SD-6-3	3 feet	105 feet north of SD-03 (toe of slope)
SD-7-0.5	0.5 foot	100 feet north of SD-03, 30 feet west
SD-7-2	2 feet	100 feet north of SD-03, 30 feet west
SD-7-3	3 feet	100 feet north of SD-03, 30 feet west
SD-8-0.5	0.5 foot	90 feet north of SD-03, 65 feet west
SD-8-2	2 feet	90 feet north of SD-03, 65 feet west
SD-9-0.5	0.5 foot	130 feet north of SD-03 (toe of slope)
SD-9-2	2 feet	130 feet north of SD-03 (toe of slope)
SD-9-3	3 feet	130 feet north of SD-03 (toe of slope)
SD-10-0.5	0.5 foot	125 feet north of SD-03, 30 feet west
SD-10-2	2 feet	125 feet north of SD-03, 30 feet west
SD-10-3	3 feet	125 feet north of SD-03, 30 feet west
SD-11-0.5	0.5 foot	125 feet north of SD-03, 75 feet west
SD-11-2	2 feet	125 feet north of SD-03, 75 feet west
SD-11-3	3 feet	125 feet north of SD-03, 75 feet west
SD-12-0.5	0.5 foot	55 feet west of SD-03

July 30, 2008 KMS wetland Sediment Sampling		
Sample I. D.	Depth (feet)	Approximate Location
SD-12-2	2 feet	55 feet west of SD-03
SD-3-2	2 feet	At SD-03
SD-3K-3	3 feet	40 feet north of SD-03 (toe of slope)
SD-3V-3	3 feet	80 feet north of SD-03, 20 feet west

The above described sampling program improved the delineation of contamination to the west (all westernmost sample results were below 1 mg/kg, with a maximum of 9.984 mg/kg from SD-08-0.5, as shown on Figure 2). However, results to the north require further delineation, with two of the three northernmost sample points containing total PCBs greater than 1 mg/kg, as summarized below:

SD-09-3	2.09 mg/kg total PCBs
SD-10-0.5	1.23 mg/kg total PCBs

TRC mobilized to the Site on October 3, 2008 to collect additional samples to the west to confirm the delineation boundary and to the north to attempt to locate the northern boundary of PCB contamination. The results of this work will be reported in future IRA-related reports and/or plans.

All TRC sampling locations were marked with a pin flag in the field and later surveyed in by Land Planning of Hanson, Massachusetts. Sampling Locations and associated total PCB data are summarized in Figure 2.

(b) New Site Information and Data

Table 1 summarizes analytical sampling results. Total PCB concentrations are also summarized on Figure 2. As described in II.a. sample data to date indicate that PCB sediment contamination has been bounded along the western portion of the wetland (see sample locations SD-4, 5, 8, 11, and 12). Additional sediment sampling is on-going in order to verify the western boundary, refine the area estimated to require remediation and/or management, and establish the northern extent of sediment impacts.

(c) Plans for the Management of Remediation Waste, Remedial Wastewater, and/or Remedial Additives.

To date IRA activities have included assessment only activities. Therefore, no remediation waste or remedial wastewater have been generated, and no remedial additives have been employed.

(d) Mass DEP-Required Information

An IH evaluation was performed and submitted with the IRA plan. No additional information has been requested by MassDEP.

(e) LSP Opinion

The objective of this IRA is to assess, delineate and control access to sediment contamination as a follow-up to MassDEP orally approved IRA activities initiated June 9, 2008. Once the areal extent of contaminated sediment is delineated, temporary barriers and access limitations (snow fencing and signage) will be emplaced to control the IH condition, with pending diagnosis, remedy, and closure of the release condition to be incorporated into the comprehensive KMS Site Special Project remedial actions. Activities conducted to date have been in keeping with this objective, and further assessment is on-going.

Following control of the IH condition that gave rise to the IRA, TRC will submit an IRA Completion Report. The pending diagnosis, remedy, and closure release condition will then be addressed as part of the comprehensive response actions for the KMS Site under Special Project status and linked under RTN 4-15685.

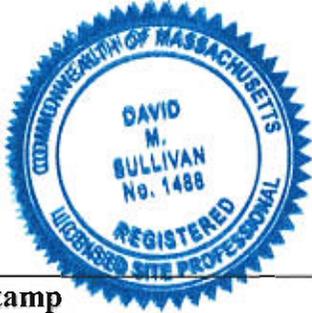
This IRA Status Report has been prepared in accordance with 310 CMR 40.0425 as set forth in the MCP.



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

10/6/2008

Date



Stamp

III. REFERENCES USED TO PREPARE THIS IRA STATUS REPORT

- MassGIS 2008 Massachusetts Geographic Information System (MassGIS), On-line MassDEP Priority Resource Map. Accessed July 28, 2008.
<http://maps.massgis.state.ma.us/21e/viewer.htm>
- TRC 2008 Letter to David Fredette, PE, City of New Bedford Department of Environmental Stewardship from David M. Sullivan, LSP, CHMM, TRC Environmental Corporation, Lowell, Massachusetts. Re: Groundwater Monitoring Results, Keith Middle School, New Bedford, Massachusetts. June 11, 2008.

TABLE

Table 1
Summary of Analytical Results for Wetland Sediment and Soil Samples - 2008
Keith Middle School
New Bedford, Massachusetts

Analysis	Analyte	Sample ID:							SD-03						SD-3A	SD-3B	SD-3C	SD-3D	SD-3E	SD-3F
		Sample Depth ft.:		Sample Date:		Sample Date:		0-0.5	0-0.5	0-0.5	0-0.5	1.5	2	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	0-0.5	
		S-1/GW-2	S-1/GW-3	S-2/GW-2	S-2/GW-3	RC S-1	TSCA	5/27/2008	5/27/2008*	6/10/2008	6/10/2008	6/10/2008	9/18/2008	6/10/2008	6/10/2008	6/10/2008	6/10/2008	6/19/2008	6/19/2008	
PCBs (mg/kg)	Aroclor 1016	2	2	3	3	2	1	0.485 U	0.302 U	0.424 UJ	0.355 UJ	0.483 UJ	0.0551 U	0.264 U	0.0576 U	0.0588 U	0.761 U	0.0736 U	0.605 UJ	
	Aroclor 1221	2	2	3	3	2	1	0.485 U	0.302 U	0.424 UJ	0.355 UJ	0.483 UJ	0.0551 U	0.264 U	0.0576 U	0.0588 U	0.761 U	0.0736 U	0.605 UJ	
	Aroclor 1232	2	2	3	3	2	1	0.485 U	0.302 U	0.424 UJ	0.355 UJ	0.483 UJ	0.0551 U	0.264 U	0.0576 U	0.0588 U	0.761 U	0.0736 U	0.605 UJ	
	Aroclor 1242	2	2	3	3	2	1	0.485 U	0.302 U	0.424 UJ	0.355 UJ	0.483 UJ	0.0551 U	0.264 U	0.0576 U	0.0588 U	0.761 U	0.0736 U	0.605 UJ	
	Aroclor 1248	2	2	3	3	2	1	0.485 U	0.302 U	0.424 UJ	0.355 UJ	0.483 UJ	0.0551 U	0.264 U	0.0576 U	0.0588 U	0.761 U	0.0736 U	0.605 UJ	
	Aroclor 1254	2	2	3	3	2	1	15.0 J	10.6 J	11.8 J	13.9 J	18.0 J	0.933 **	12.9 J	0.0576 U	0.143 J	29.9 J	3.64 J	20.2 J	
	Aroclor 1260	2	2	3	3	2	1	1.56 J	1.28 J	1.48 J	1.76 J	2.37 J	0.0551 U	1.68 J	0.0576 U	0.0588 U	3.57 J	0.0736 U	2.57 J	
	Total PCBs	2	2	3	3	2	1	16.56 J	11.88 J	13.28 J	15.66 J	20.37 J	0.933	14.58 J	0.0576 U	0.143 J	33.47 J	3.64 J	22.77 J	

Notes:

All units in mg/kg unless otherwise specified.

mg/kg - milligrams per kilogram (dry weight) or parts per million (ppm).

J - Estimated value.

U - Compound was not detected at specified quantitation limit.

UJ - Estimated non-detect.

Values in **Bold** indicate the compound was detected.

Values shown in **Bold and shaded type** exceed one or more of the listed Method 1 standards.

Values boxed and shown in **Bold type** exceed TSCA but are less than the listed Method 1 standards.

PCBs - Polychlorinated Biphenyls.

RC - Reportable Concentration.

TSCA - Toxic Substances Control Act criteria.

RC S-1 is listed for reference purposes only.

* - The sample was reextracted and reanalyzed to confirm the results

** - The sample exhibits altered PCB pattern; best possible Aroclor match reported.

Table 1
Summary of Analytical Results for Wetland Sediment and Soil Samples - 2008
Keith Middle School
New Bedford, Massachusetts

Analysis	Analyte	Sample ID: Sample Depth ft.: Sample Date:						SD-3G	SD-3H	SD-3I	SD-3J	SD-3K			SD-3L			SD-3M		SD-3N	
		0-0.5		0-0.5		0-0.5		0-0.5	0-0.5	0-0.5	0-0.5	1.5	3	0-0.5	1.5	1.5	0-0.5	1.5	0-0.5	1.5	
		S-1/GW-2	S-1/GW-3	S-2/GW-2	S-2/GW-3	RC S-1	TSCA	6/19/2008	6/19/2008	6/19/2008	6/19/2008	7/30/2008	7/30/2008	9/18/2008	7/30/2008	7/30/2008	7/30/2008 Field Dup	7/30/2008	7/30/2008	7/30/2008	7/30/2008
PCBs (mg/kg)	Aroclor 1016	2	2	3	3	2	1	0.311 UJ	0.288 U	0.221 U	0.231 U	0.552 U	0.272 U	0.0652 U	0.172 U	0.161 U	0.165 U	0.158 U	0.259 U	0.779 U	0.055 U
	Aroclor 1221	2	2	3	3	2	1	0.311 UJ	0.288 U	0.221 U	0.231 U	0.552 U	0.272 U	0.0652 U	0.172 U	0.161 U	0.165 U	0.158 U	0.259 U	0.779 U	0.055 U
	Aroclor 1232	2	2	3	3	2	1	0.311 UJ	0.288 U	0.221 U	0.231 U	0.552 U	0.272 U	0.0652 U	0.172 U	0.161 U	0.165 U	0.158 U	0.259 U	0.779 U	0.055 U
	Aroclor 1242	2	2	3	3	2	1	0.311 UJ	0.288 U	0.221 U	0.231 U	0.552 U	0.272 U	0.0652 U	0.172 U	0.161 U	0.165 U	0.158 U	0.259 U	0.779 U	0.055 U
	Aroclor 1248	2	2	3	3	2	1	0.311 UJ	0.288 U	0.221 U	0.231 U	0.552 U	0.272 U	0.0652 U	0.172 U	0.161 U	0.165 U	0.158 U	0.259 U	0.779 U	0.055 U
	Aroclor 1254	2	2	3	3	2	1	7.41 J	11.7 J	6.12 J	5.05 J	18.3 **	5.84 **	0.0652 U	5.00 **	0.219 **	0.165 U	0.812 **	0.765 **	21.5 **	0.430 **
	Aroclor 1260	2	2	3	3	2	1	0.951 J	0.288 U	0.673 J	0.735 J	0.552 U	0.272 U	0.0652 U	0.172 U	0.161 U	0.165 U	0.158 U	0.259 U	0.779 U	0.055 U
	Total PCBs	2	2	3	3	2	1	8.361 J	11.7 J	6.793 J	5.785 J	18.3	5.84	0.0652 U	5.00	0.219	0.165 U	0.812	0.765	21.5	0.430

Notes:

All units in mg/kg unless otherwise specified.

mg/kg - milligrams per kilogram (dry weight) or parts per million (ppm).

J - Estimated value.

U - Compound was not detected at specified quantitative limit.

UJ - Estimated non-detect.

Values in **Bold** indicate the compound was detected.

Values shown in **Bold and shaded type** exceed one or more of the listed Method 1 standards.

Values boxed and shown in **Bold type** exceed TSCA but are less than the listed Method 1 standards.

PCBs - Polychlorinated Biphenyls.

RC - Reportable Concentration.

TSCA - Toxic Substances Control Act criteria.

RC S-1 is listed for reference purposes only.

* - The sample was reextracted and reanalyzed to confirm the results

** - The sample exhibits altered PCB pattern; best possible Aroclor match reported.

Table 1
Summary of Analytical Results for Wetland Sediment and Soil Samples - 2008
Keith Middle School
New Bedford, Massachusetts

Analysis	Analyte	Sample ID:						SD-3P		SD-3Q		SD-3R		SD-3S		SD-3T		SD-3U		
		Sample Depth ft.:						0-0.5	1.2	0-0.5	1.3	0.5	2	0.5	2	0.5	2	0.5	0.5	2
		Sample Date:						7/30/2008	7/30/2008	7/30/2008	7/30/2008	8/19/2008	8/19/2008	8/19/2008	8/19/2008	8/19/2008	8/19/2008	8/19/2008	8/19/2008	8/19/2008
		S-1/GW-2	S-1/GW-3	S-2/GW-2	S-2/GW-3	RC S-1	TSCA													
PCBs (mg/kg)	Aroclor 1016	2	2	3	3	2	1	0.132 U	0.0627 U	0.0593 U	0.102 U	0.175 U	0.192 U	0.104 U	0.053 U	0.079 U	0.291 U	0.216 U	0.245 U	0.239 U
	Aroclor 1221	2	2	3	3	2	1	0.132 U	0.0627 U	0.0593 U	0.102 U	0.175 U	0.192 U	0.104 U	0.053 U	0.079 U	0.291 U	0.216 U	0.245 U	0.239 U
	Aroclor 1232	2	2	3	3	2	1	0.132 U	0.0627 U	0.0593 U	0.102 U	0.175 U	0.192 U	0.104 U	0.053 U	0.079 U	0.291 U	0.216 U	0.245 U	0.239 U
	Aroclor 1242	2	2	3	3	2	1	0.132 U	0.0627 U	0.0593 U	0.102 U	0.175 U	0.192 U	0.104 U	0.053 U	0.079 U	0.291 U	0.216 U	0.245 U	0.239 U
	Aroclor 1248	2	2	3	3	2	1	0.132 U	0.0627 U	0.0593 U	0.102 U	0.175 U	0.192 U	0.104 U	0.053 U	0.079 U	0.291 U	0.216 U	0.245 U	0.239 U
	Aroclor 1254	2	2	3	3	2	1	3.17 ^{99%}	0.329 **	1.61 **	0.195 *	0.470 **	0.267 **	0.805 **	0.053 U	0.872 **	0.291 U	1.70 **	1.85 **	0.353 **
	Aroclor 1260	2	2	3	3	2	1	0.132 U	0.0627 U	0.0593 U	0.102 U	0.175 U	0.192 U	0.104 U	0.053 U	0.079 U	0.291 U	0.216 U	0.245 U	0.239 U
	Total PCBs	2	2	3	3	2	1	3.17	0.329	1.61	0.195	0.470	0.267	0.805	0.053 U	0.872	0.291 U	1.70	1.85	0.353

Notes:

All units in mg/kg unless otherwise specified.

mg/kg - milligrams per kilogram (dry weight) or parts per million (ppm).

J - Estimated value.

U - Compound was not detected at specified quantitation limit.

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Values in **Bold** indicate the compound was detected.

Values shown in **Bold and shaded type** exceed one or more of the listed Method 1 standards.

Values boxed and shown in **Bold type** exceed TSCA but are less than the listed Method 1 standards.

PCBs - Polychlorinated Biphenyls.

RC - Reportable Concentration.

TSCA - Toxic Substances Control Act criteria.

RC S-1 is listed for reference purposes only.

* - The sample was reextracted and reanalyzed to confirm the results

** - The sample exhibits altered PCB pattern; best possible Aroclor match reported.

Table 1
Summary of Analytical Results for Wetland Sediment and Soil Samples - 2008
Keith Middle School
New Bedford, Massachusetts

Analysis	Analyte	Sample ID:		SD-3V			SD-3W		SD-04			SD-05			SD-06							
		Sample Depth ft.:		0.5	2	3	0.5	2	0.5	0.5	2	2.5	0.5	2	2.5	0.5	1.5	3				
		Sample Date:		8/19/2008	8/19/2008	9/17/2008	8/19/2008	8/19/2008	9/17/2008	9/17/2008	9/17/2008	9/17/2008	9/17/2008	9/17/2008	9/17/2008	9/18/2008	9/18/2008	9/18/2008				
		S-1/GW-2	S-1/GW-3	S-2/GW-2	S-2/GW-3	RC S-1	TSCA															
PCBs (mg/kg)	Aroclor 1016	2	2	3	3	2	1	0.116 U	0.148 U	0.06 U	0.147 U	0.240 U	0.179 U	0.188 U	0.0576 U	0.0567 U	0.18 U	0.0562 U	0.0581 U	0.152 U	0.271 U	0.0529 U
	Aroclor 1221	2	2	3	3	2	1	0.116 U	0.148 U	0.06 U	0.147 U	0.240 U	0.179 U	0.188 U	0.0576 U	0.0567 U	0.18 U	0.0562 U	0.0581 U	0.152 U	0.271 U	0.0529 U
	Aroclor 1232	2	2	3	3	2	1	0.116 U	0.148 U	0.06 U	0.147 U	0.240 U	0.179 U	0.188 U	0.0576 U	0.0567 U	0.18 U	0.0562 U	0.0581 U	0.152 U	0.271 U	0.0529 U
	Aroclor 1242	2	2	3	3	2	1	0.116 U	0.148 U	0.06 U	0.147 U	0.240 U	0.179 U	0.188 U	0.0576 U	0.0567 U	0.18 U	0.0562 U	0.0581 U	0.152 U	0.271 U	0.0529 U
	Aroclor 1248	2	2	3	3	2	1	0.116 U	0.148 U	0.06 U	0.147 U	0.240 U	0.179 U	0.188 U	0.0576 U	0.0567 U	0.18 U	0.0562 U	0.0581 U	0.152 U	0.271 U	0.0529 U
	Aroclor 1254	2	2	3	3	2	1	5.64 **	3.49 **	0.06 U	1.86 **	0.240 U	0.552 **	0.73 **	0.0576 U	0.0567 U	0.263 **	0.0562 U	0.0581 U	2.49 **	0.32 **	0.0529 U
	Aroclor 1260	2	2	3	3	2	1	0.116 U	0.148 U	0.06 U	0.147 U	0.240 U	0.179 U	0.188 U	0.0576 U	0.0567 U	0.18 U	0.0562 U	0.0581 U	0.152 U	0.271 U	0.0529 U
	Total PCBs	2	2	3	3	2	1	5.64	3.49	0.06 U	1.86	0.240 U	0.552	0.73	0.0576 U	0.0567 U	0.263	0.0562 U	0.0581 U	2.49	0.32	0.0529 U

Notes:

All units in mg/kg unless otherwise specified.
mg/kg - milligrams per kilogram (dry weight) or parts per million (ppm).

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Values in **Bold** indicate the compound was detected.

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Values boxed and shown in **Bold type** exceed TSCA but are less than the listed Method 1 standards.

PCBs - Polychlorinated Biphenyls.

RC - Reportable Concentration.

TSCA - Toxic Substances Control Act criteria.

RC S-1 is listed for reference purposes only.

* - The sample was reextracted and reanalyzed to confirm the results

** - The sample exhibits altered PCB pattern; best possible Aroclor match reported.

Table 1
Summary of Analytical Results for Wetland Sediment and Soil Samples - 2008
Keith Middle School
New Bedford, Massachusetts

Analysis	Analyte	Sample ID:						SD-07			SD-08		SD-09			SD-10			SD-11			SD-12	
		Sample Depth ft.:		Sample Date:		RC S-1		TSCA		0.5	2	3	0.5	2	0.5	2	3	0.5	2	3	0.5	2	
		S-1/GW-2	S-1/GW-3	S-2/GW-2	S-2/GW-3	9/17/2008	9/17/2008	9/17/2008	9/17/2008	9/17/2008	9/18/2008	9/18/2008	9/18/2008	9/17/2008	9/17/2008	9/17/2008	9/17/2008	9/17/2008	9/17/2008	9/17/2008	9/17/2008	9/17/2008	
PCBs (mg/kg)	Aroclor 1016	2	2	3	3	2	1	0.237 U	0.0702 U	0.0611 U	0.158 U	0.183 U	0.134 U	0.0575 U	0.138 U	0.188 U	0.0765 U	0.063 U	0.238 U	0.0598 U	0.0567 U	0.0612 U	0.0924 U
	Aroclor 1221	2	2	3	3	2	1	0.237 U	0.0702 U	0.0611 U	0.158 U	0.183 U	0.134 U	0.0575 U	0.138 U	0.188 U	0.0765 U	0.063 U	0.238 U	0.0598 U	0.0567 U	0.0612 U	0.0924 U
	Aroclor 1232	2	2	3	3	2	1	0.237 U	0.0702 U	0.0611 U	0.158 U	0.183 U	0.134 U	0.0575 U	0.138 U	0.188 U	0.0765 U	0.063 U	0.238 U	0.0598 U	0.0567 U	0.0612 U	0.0924 U
	Aroclor 1242	2	2	3	3	2	1	0.237 U	0.0702 U	0.0611 U	0.158 U	0.183 U	0.134 U	0.0575 U	0.138 U	0.188 U	0.0765 U	0.063 U	0.238 U	0.0598 U	0.0567 U	0.0612 U	0.0924 U
	Aroclor 1248	2	2	3	3	2	1	0.237 U	0.0702 U	0.0611 U	0.158 U	0.183 U	0.134 U	0.0575 U	0.138 U	0.188 U	0.0765 U	0.063 U	0.238 U	0.0598 U	0.0567 U	0.0612 U	0.0924 U
	Aroclor 1254	2	2	3	3	2	1	1.84 **	0.0702 U	0.0611 U	0.984 **	0.183 U	0.236 **	0.0575 U	2.09 **	1.23 **	0.0765 U	0.063 U	0.909 **	0.0598 U	0.0567 U	0.0612 U	0.0924 U
	Aroclor 1260	2	2	3	3	2	1	0.237 U	0.0702 U	0.0611 U	0.158 U	0.183 U	0.134 U	0.0575 U	0.138 U	0.188 U	0.0765 U	0.063 U	0.238 U	0.0598 U	0.0567 U	0.0612 U	0.0924 U
	Total PCBs	2	2	3	3	2	1	1.84	0.0702 U	0.0611 U	0.984	0.183 U	0.236	0.0575 U	2.09	1.23	0.0765 U	0.063 U	0.909	0.0598 U	0.0567 U	0.0612 U	0.0924 U

Notes:

All units in mg/kg unless otherwise specified.

mg/kg - milligrams per kilogram (dry weight) or parts per million (ppm).

J - Estimated value.

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Values boxed and shown in **Bold type** exceed TSCA but are less than the listed Method 1 standards.

PCBs - Polychlorinated Biphenyls.

RC - Reportable Concentration.

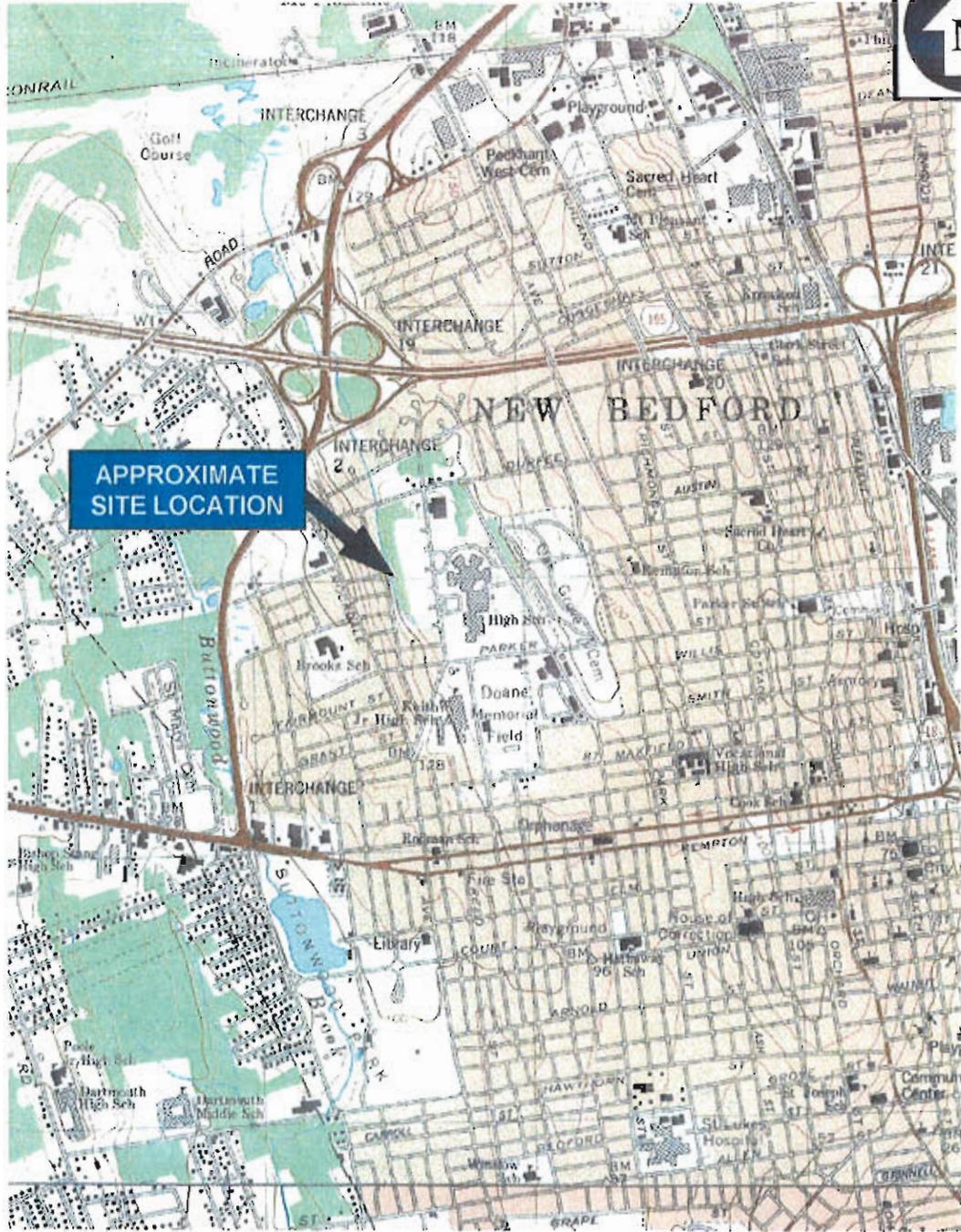
TSCA - Toxic Substances Control Act criteria.

RC S-1 is listed for reference purposes only.

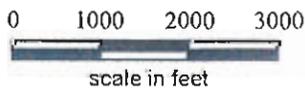
* - The sample was reextracted and reanalyzed to confirm the results.

** - The sample exhibits altered PCB pattern; best possible Aroclor match reported.

FIGURES



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



QUADRANGLE
 LOCATION

KEITH MIDDLE SCHOOL WETLAND
 PCB CONTAMINATED SEDIMENTS
 NEW BEDFORD, MASSACHUSETTS

SITE LOCATION MAP

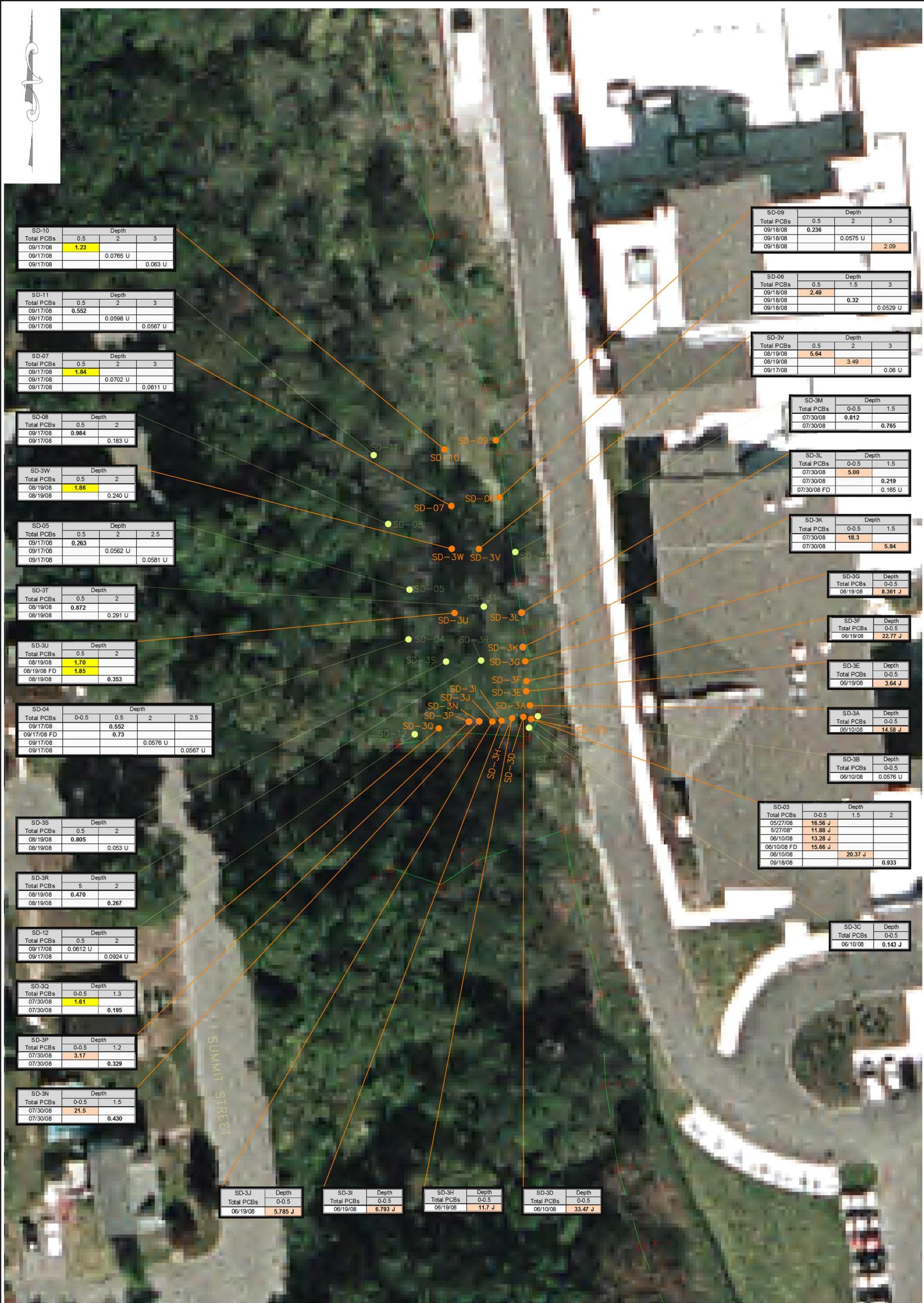


Wannalancit Mills
 650 Suffolk Street
 Lowell, MA 01854
 978-970-5800

FIGURE
 1

Drawn: HWB
 Checked: DS

SCALE: AS SHOWN
 Date: JULY 2008



SD-10		Depth	
Total PCBs	0.5	2	3
09/17/08	1.23		
09/17/08		0.0765 U	
09/17/08			0.063 U

SD-11		Depth	
Total PCBs	0.5	2	3
09/17/08	0.552		
09/17/08		0.0598 U	
09/17/08			0.0567 U

SD-07		Depth	
Total PCBs	0.5	2	3
09/17/08	1.84		
09/17/08		0.0702 U	
09/17/08			0.0611 U

SD-08		Depth	
Total PCBs	0.5	2	
09/17/08	0.984		
09/17/08		0.183 U	

SD-3W		Depth	
Total PCBs	0.5	2	
08/19/08	1.86		
08/19/08		0.240 U	

SD-05		Depth	
Total PCBs	0.5	2	2.5
09/17/08	0.263		
09/17/08		0.0562 U	
09/17/08			0.0581 U

SD-3T		Depth	
Total PCBs	0.5	2	
08/19/08	0.872		
08/19/08		0.291 U	

SD-3U		Depth	
Total PCBs	0.5	2	
08/19/08	1.70		
08/19/08 FD	1.85		
08/19/08		0.353	

SD-04		Depth	
Total PCBs	0-0.5	0.5	2
09/17/08		0.552	
09/17/08 FD		0.73	
09/17/08			0.0576 U
09/17/08			0.0567 U

SD-3S		Depth	
Total PCBs	0.5	2	
08/19/08	0.805		
08/19/08		0.053 U	

SD-3R		Depth	
Total PCBs	5	2	
08/19/08	0.470		
08/19/08		0.267	

SD-12		Depth	
Total PCBs	0.5	2	
09/17/08	0.0612 U		
09/17/08		0.0924 U	

SD-3Q		Depth	
Total PCBs	0-0.5	1.3	
07/30/08	1.61		
07/30/08		0.195	

SD-3P		Depth	
Total PCBs	0-0.5	1.2	
07/30/08	3.17		
07/30/08		0.329	

SD-3N		Depth	
Total PCBs	0-0.5	1.5	
07/30/08	21.5		
07/30/08		0.430	

SD-09		Depth	
Total PCBs	0.5	2	3
09/18/08	0.236		
09/18/08		0.0575 U	
09/18/08			2.09

SD-06		Depth	
Total PCBs	0.5	1.5	3
09/18/08	2.49		
09/18/08		0.32	
09/18/08			0.0529 U

SD-3V		Depth	
Total PCBs	0.5	2	3
08/19/08	5.64		
08/19/08		3.49	
09/17/08			0.06 U

SD-3M		Depth	
Total PCBs	0-0.5	1.5	
07/30/08	0.812		
07/30/08		0.765	

SD-3L		Depth	
Total PCBs	0-0.5	1.5	
07/30/08	5.00		
07/30/08		0.219	
07/30/08 FD		0.165 U	

SD-3K		Depth	
Total PCBs	0-0.5	1.5	
07/30/08	18.3		
07/30/08		5.84	

SD-3G		Depth	
Total PCBs	0-0.5	0-0.5	
08/19/08		8.361 J	

SD-3F		Depth	
Total PCBs	0-0.5	0-0.5	
06/19/08		22.77 J	

SD-3E		Depth	
Total PCBs	0-0.5	0-0.5	
06/19/08		3.64 J	

SD-3A		Depth	
Total PCBs	0-0.5	0-0.5	
08/10/08		14.58 J	

SD-3B		Depth	
Total PCBs	0-0.5	0-0.5	
08/10/08		0.0576 U	

SD-03		Depth	
Total PCBs	0-0.5	1.5	2
05/27/08	16.56 J		
5/27/08*	11.88 J		
06/10/08	13.28 J		
06/10/08 FD	15.66 J		
06/10/08		20.37 J	
09/18/08			0.933

SD-3C		Depth	
Total PCBs	0-0.5	0-0.5	
06/10/08		0.143 J	

SD-3J		Depth	
Total PCBs	0-0.5	0-0.5	
06/19/08	5.785 J		

SD-3I		Depth	
Total PCBs	0-0.5	0-0.5	
06/19/08	6.793 J		

SD-3H		Depth	
Total PCBs	0-0.5	0-0.5	
06/19/08	11.7 J		

SD-3D		Depth	
Total PCBs	0-0.5	0-0.5	
06/10/08	33.47 J		

NOTES:
 ALL UNITS IN MG/KG UNLESS OTHERWISE SPECIFIED
 MG/KG - MILLIGRAMS PER KILOGRAM (DRY WEIGHT)
 J- ESTIMATED VALUE
 PCBs - POLYCHLORINATED BIPHENYLS
 U - COMPOUND WAS NOT DETECTED AT SPECIFIED QUANTITATION LIMIT
 FD - FIELD DUPLICATE
 MASS DEP - MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION
 TSCA - TOXIC SUBSTANCES CONTROL ACT

VALUES SHOWN IN PEACH BACKGROUND EXCEED ONE OR MORE OF THE LISTED MASSDEP METHOD 1 STANDARDS
 VALUES SHOWN IN YELLOW BACKGROUND EXCEED TSCA BUT ARE LESS THAN THE LISTED MASSDEP METHOD 1 STANDARDS

SAMPLE LOCATION
 CONTAMINANT ABBREVIATION
 SAMPLE DATE

SD-12		Depth	
Total PCBs	0.5	2	
09/17/08	0.0612 U		
09/17/08		0.0924 U	

SAMPLE DEPTH/
 (DEPTH RANGE) FEET

● SOIL BORING ● SOIL BORING THAT HAS CONCENTRATIONS WITH EXCEEDANCES



KEITH MIDDLE SCHOOL
 NEW BEDFORD, MASSACHUSETTS

ANALYTICAL RESULTS SUMMARY MAP
 TRC DATA

TRC
 Wannafanc1 Mills
 850 Suffolk Street
 Lowell, MA 01854
 (978) 970-5600

FIGURE
 2

DRAWN BY: HWB
 CHECKED BY: DMS
 DATE: OCT 2008

FILE: \\E:\CAD\15058\15058_KMS_NEW BEDFORD_2008-2.XLS & _2008-3.XLS THIS DRAWING REFERENCES BUT IS NOT LINKED TO FILE: \\E:\CAD\15058\15058_KMS_NEW BEDFORD_2008-2.XLS & _2008-3.XLS

ATTACHMENT A

**MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION
TRANSMITTAL FORMS**

BWSC-105 Immediate Response Action (IRA) Transmittal Form



Massachusetts Department of Environmental Protection
 Bureau of Waste Site Cleanup

BWSC105

IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL FORM Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

4 - 21300

A. RELEASE OR THREAT OF RELEASE LOCATION:

1. Release Name/Location Aid: Keith Middle School
2. Street Address: 225 Hathaway Boulevard
3. City/Town: New Bedford 4. ZIP Code: 02740
5. UTM Coordinates: a. UTM N: 337,584 b. UTM E: 4,612,274
6. Check here if a Tier Classification Submittal has been provided to DEP for this disposal site.
 a. Tier IA b. Tier IB c. Tier IC d. Tier II
7. Check here if this location is Adequately Regulated, pursuant to 310 CMR 40.0110-0114. Specify Program (check one):
 a. CERCLA b. HSWA Corrective Action c. Solid Waste Management
 d. RCRA State Program (21C Facilities)

B. THIS FORM IS BEING USED TO: (check all that apply)

1. List Submittal Date of Initial IRA Written Plan (if previously submitted): 08/07/2008
 (mm/dd/yyyy)
2. Submit an **Initial IRA Plan**.
3. Submit a **Modified IRA Plan** of a previously submitted written IRA Plan.
4. Submit an **Imminent Hazard Evaluation**. (check one)
 a. An Imminent Hazard exists in connection with this Release or Threat of Release.
 b. An Imminent Hazard does not exist in connection with this Release or Threat of Release.
 c. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release, and further assessment activities will be undertaken.
 d. It is unknown whether an Imminent Hazard exists in connection with this Release or Threat of Release. However, response actions will address those conditions that could pose an Imminent Hazard.
5. Submit a request to **Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard**.
6. Submit an **IRA Status Report**.
7. Submit a **Remedial Monitoring Report**. (This report can only be submitted through eDEP.)
 a. Type of Report: (check one) i. Initial Report ii. Interim Report iii. Final Report
 b. Frequency of Submittal: (check all that apply)
 i. A Remedial Monitoring Report(s) submitted monthly to address an Imminent Hazard.
 ii. A Remedial Monitoring Report(s) submitted monthly to address a Condition of Substantial Release Migration.
 iii. A Remedial Monitoring Report(s) submitted concurrent with a IRA Status Report.
 c. Number of Remedial Systems and/or Monitoring Programs: _____

A separate BWSC105A, IRA Remedial Monitoring Report, must be filled out for each Remedial System and/or Monitoring Program addressed by this transmittal form.



**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

4 - 21300

B. THIS FORM IS BEING USED TO (cont.): (check all that apply)

8. Submit an **IRA Completion Statement**.

a. Check here if future response actions addressing this Release or Threat of Release notification condition will be conducted as part of the Response Actions planned or ongoing at a Site that has already been Tier Classified under a different Release Tracking Number (RTN). When linking RTNs, rescoring via the NRS is required if there is a reasonable likelihood that the addition of the new RTN(s) would change the classification of the site.

b. Provide Release Tracking Number of Tier Classified Site (Primary RTN): -

These additional response actions must occur according to the deadlines applicable to the Primary RTN. Use the Primary RTN when making all future submittals for the site unless specifically relating to this Immediate Response Action.

9. Submit a **Revised IRA Completion Statement**.

(All sections of this transmittal form must be filled out unless otherwise noted above)

C. RELEASE OR THREAT OF RELEASE CONDITIONS THAT WARRANT IRA:

1. Identify Media Impacted and Receptors Affected: (check all that apply)

- a. Air b. Basement c. Critical Exposure Pathway d. Groundwater e. Residence
 f. Paved Surface g. Private Well h. Public Water Supply i. School j. Sediments
 k. Soil l. Storm Drain m. Surface Water n. Unknown o. Wetland p. Zone 2
 q. Others Specify: _____

2. Identify Oils and Hazardous Materials Released: (check all that apply)

- a. Oils b. Chlorinated Solvents c. Heavy Metals
 d. Others Specify: polychlorinated biphenyls

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply, for volumes list cumulative amounts)

- | | |
|--|---|
| <input checked="" type="checkbox"/> 1. Assessment and/or Monitoring Only | <input type="checkbox"/> 2. Temporary Covers or Caps |
| <input type="checkbox"/> 3. Deployment of Absorbent or Containment Materials | <input type="checkbox"/> 4. Temporary Water Supplies |
| <input type="checkbox"/> 5. Structure Venting System | <input type="checkbox"/> 6. Temporary Evacuation or Relocation of Residents |
| <input type="checkbox"/> 7. Product or NAPL Recovery | <input type="checkbox"/> 8. Fencing and Sign Posting |
| <input type="checkbox"/> 9. Groundwater Treatment Systems | <input type="checkbox"/> 10. Soil Vapor Extraction |
| <input type="checkbox"/> 11. Bioremediation | <input type="checkbox"/> 12. Air Sparging |



**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

4 - 21300

D. DESCRIPTION OF RESPONSE ACTIONS (cont.): (check all that apply, for volumes list cumulative amounts)

13. Excavation of Contaminated Soils

a. Re-use, Recycling or Treatment

i. On Site Estimated volume in cubic yards _____

ii. Off Site Estimated volume in cubic yards _____

 iia. Receiving Facility: _____ Town: _____ State: _____

 iib. Receiving Facility: _____ Town: _____ State: _____

 iii. Describe: _____

b. Store

i. On Site Estimated volume in cubic yards _____

ii. Off Site Estimated volume in cubic yards _____

 iia. Receiving Facility: _____ Town: _____ State: _____

 iib. Receiving Facility: _____ Town: _____ State: _____

c. Landfill

i. Cover Estimated volume in cubic yards _____

Receiving Facility: _____ Town: _____ State: _____

ii. Disposal Estimated volume in cubic yards _____

Receiving Facility: _____ Town: _____ State: _____

14. Removal of Drums, Tanks or Containers:

a. Describe Quantity and Amount: _____

b. Receiving Facility: _____ Town: _____ State: _____

c. Receiving Facility: _____ Town: _____ State: _____

15. Removal of Other Contaminated Media:

a. Specify Type and Volume: _____

b. Receiving Facility: _____ Town: _____ State: _____

c. Receiving Facility: _____ Town: _____ State: _____

16. Other Response Actions:

Describe: _____

17. Use of Innovative Technologies:

Describe: _____



**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

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4 - 21300

E. LSP SIGNATURE AND STAMP:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and 309 CMR 4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

> if Section B of this form indicates that an **Immediate Response Action Plan** is being submitted, the response action(s) that is(are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is(are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an **Imminent Hazard Evaluation** is being submitted, this Imminent Hazard Evaluation was developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and the assessment activity(ies) undertaken to support this Imminent Hazard Evaluation comply(ies) with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;

> if Section B of this form indicates that an **Immediate Response Action Status Report** and/or a **Remedial Monitoring Report** is(are) being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that an **Immediate Response Action Completion Statement** or a **request to Terminate an Active Remedial System or Response Action(s) Taken to Address an Imminent Hazard** is being submitted, the response action(s) that is(are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is(are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

1. LSP #: 1488

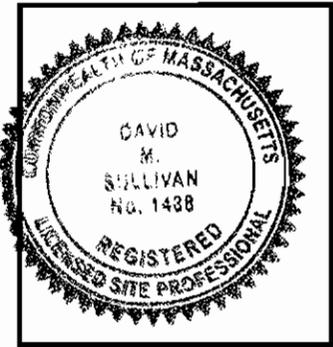
2. First Name: David 3. Last Name: Sullivan

4. Telephone: 978-656-3565 5. Ext.: _____ 6. FAX: 978-453-1995

7. Signature: 

8. Date: 10/6/2008
(mm/dd/yyyy)

9. LSP Stamp:





**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

4 - 21300

F. PERSON UNDERTAKING IRA:

1. Check all that apply: a. change in contact name b. change of address c. change in the person undertaking response actions
2. Name of Organization: City of New Bedford
3. Contact First Name: Scott 4. Last Name: Alfonse
5. Street: 133 William Street 6. Title: Director, Dept. Env. Stew.
7. City/Town: New Bedford 8. State: MA 9. ZIP Code: 02740
10. Telephone: 978-979-1487 11. Ext.: _____ 12. FAX: 978-961-3045

G. RELATIONSHIP TO RELEASE OR THREAT OF RELEASE OF PERSON UNDERTAKING IRA:

1. RP or PRP a. Owner b. Operator c. Generator d. Transporter
- e. Other RP or PRP Specify: Municipality
2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
4. Any Other Person Undertaking IRA Specify Relationship: _____

H. REQUIRED ATTACHMENT AND SUBMITTALS:

1. Check here if any Remediation Waste, generated as a result of this IRA, will be stored, treated, managed, recycled or reused at the site following submission of the IRA Completion Statement. If this box is checked, you must submit one of the following plans, along with the appropriate transmittal form.
- a. A Release Abatement Measure (RAM) Plan (BWSC106) b. Phase IV Remedy Implementation Plan (BWSC108)
2. Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.
3. Check here to certify that the Chief Municipal Officer and the Local Board of Health were notified of the implementation of an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
4. Check here to certify that the Chief Municipal Officer and the Local Board of Health were notified of the submittal of a Completion Statement for an Immediate Response Action taken to control, prevent, abate or eliminate an Imminent Hazard.
5. Check here if any non-updatable information provided on this form is incorrect, e.g. Release Address/Location Aid. Send corrections to the DEP Regional Office.
6. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC105

**IMMEDIATE RESPONSE ACTION (IRA) TRANSMITTAL
FORM** Pursuant to 310 CMR 40.0424 - 40.0427 (Subpart D)

Release Tracking Number

4 - 21300

I. CERTIFICATION OF PERSON UNDERTAKING IRA:

1. 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 transmittal form, (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 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.

2. By: [Signature] Signature 3. Title: DIRECTOR

4. For: CITY OF NEW BEDFORD 5. Date: 10/2/2008
(Name of person or entity recorded in Section F) (mm/dd/yyyy)

6. Check here if the address of the person providing certification is different from address recorded in Section F.

7. Street: _____

8. City/Town: _____ 9. State: _____ 10. ZIP Code: _____

11. Telephone: _____ 12. Ext.: _____ 13. FAX: _____

YOU ARE SUBJECT TO AN ANNUAL COMPLIANCE ASSURANCE FEE OF UP TO \$10,000 PER BILLABLE YEAR FOR THIS DISPOSAL SITE. YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.

Date Stamp (DEP USE ONLY:)

This IRA Status Report has been prepared in accordance with 310 CMR 40.0425 as set forth in the MCP.



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

10/6/2008

Date



Stamp