Sarah Porter

From:

Marilyn Wade < MWade@BrwnCald.com>

Sent:

Friday, May 17, 2019 11:48 PM

To:

Sarah Porter

Cc: Subject: Michele Paul; Bruce C. Hebbel; Adam Gutta FW: NOI submission - your input needed asap

Attachments:

Diamond Sock Product Sheet 1.pdf; Final_PRB_Letter_Report_110618.pdf

Importance:

High

Sarah – Please see responses below. I am at the site on Monday and Tuesday, so if you have any questions please call my cell. I can also break away to meet you in person if that would be helpful.

Marilyn M. Wade, P.E., LSP

Brown and Caldwell

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From: Sarah Porter < SARAHP@newbedford-ma.gov>

Sent: Thursday, May 16, 2019 12:18 PM **To:** Marilyn Wade < <u>MWade@BrwnCald.com</u>>

Cc: Michele Paul < michele.paul@newbedford-ma.gov >

Subject: NOI submission

Good Afternoon Marilyn,

I have a few questions/comments regarding the NOI submission:

1. In Section 2.4.3 Land Subject to Flooding, it is stated that during regular tide cycles the southeastern portion of the site is regularly inundated, and during intense rainfall and periods of high tide, flooding has been observed in the eastern portion of the site. It would appear these conditions would affect both of your work areas, however it is not stated in the work plan how you will manage the tidal waters and potential flooding. With the invert elevations of the existing scuppers being lower than the MHW, is it presumed that the sandbags in front of the scuppers will prevent the saltwater intrusion? In the case of intense rainfall and high tide conditions, how do you intend to prevent intrusion of water from the Acushnet River into the Pilot Study PRB work area? Water does overtop the sheeting along the Acushnet River during storm events.

It is not feasible to completely prevent water intrusion, but we can minimize it, and manage what does enter the site. Based on our prior work at the site (removing NAPL impacted shoreline soils under an IRA) we found the following to be the most effective measures to manage tidal flooding:

• Soil excavation is completed within shoring/sheeting installed to support the excavation. The sheeting can be installed with the top of the sheets elevated (for example above MHHW or at approximately elevation 6,

the 100 year floodplain elevation); extending well above the elevation of the current sheetpile wall, and providing additional freeboard above rising water levels.

- To the extent feasible, timing of excavation is adjusted to the tide cycles to minimize excavation during high tide and avoid excavation in extreme/moon high tide periods.
- Excavation proceeds in small manageable segments and areas are backfilled as soon as practicable, avoiding long periods with open excavations
- Storm/wet weather planning is built into operations. When heavy rainfall or coastal storm events are predicted, work at the site is suspended and the excavation area is secured with covers, sandbags, and if necessary by backfilling. Near and long term weather forecasts are reviewed at every morning safety tailgate meeting.

EPA has installed riprap on the river side of the sheetpile wall above the height of the scuppers. Sandbags will be placed in front of the scuppers (land side), but we could in addition coordinate with EPA to temporarily move the riprap and place them on the river side of the scuppers as well.

- 2. With regard to the scuppers, will the sandbags be placed on the outside of the sheeting (on the opposite side of the work area) to block the water from entering.
- res p. See response above. Our primary objective is to prevent anything from the Aerovox side discharging into the river, but we can look at installing sandbags on both sides of the scuppers.
 - 3. Please describe what the Permeable Reactive Barrier (PRB) is made of and how it functions as a barrier. The permeable reactive barrier is a barrier to the migration of contaminants in groundwater. The objective of the PRB is to capture and treat contaminants in the subsurface groundwater as it flows through the PRB media. A series of treatability column studies was completed to identify the best media for the site using site specific groundwater from the most heavily impacted wells, and then spiking it with additional contaminants. The selected PRB media will be a combination of zero valence iron, sand and liquid phase granular activated carbon. I have attached a letter report which provides additional detail regarding the treatability column study and media selection.
 - 4. Please use compost filter tubes and not straw wattles.

We concur with the use of compost filter tubes (attached Diamond Socks- product information is one example) for locations where the erosion controls will be installed and remain at the same location for the duration of the project. However these types of controls are very heavy, and cannot be relocated without the use of machinery. We anticipate that in addition to the compost filter socks there will be a need for erosion controls in some areas that will be moved and adjusted regularly (for example around the active face of a stockpile or for temporary localized short term activities such as drilling). In these instances, it is preferable to have on hand and use more portable and lighter watt<u>le</u>s.

5. The Order of Conditions will require you to have absorbent sock and pads on site to absorb any runoff which escapes the two work areas.

We concur with capturing contaminants in runoff. Spill kits with absorbent pads and booms will be maintained on site during construction and deployed as needed to prevent sediment laden water from leaving the work areas. Normal precipitation driven sheet flow would be managed through the onsite storm sewer system.

Cc: Conservation Commissioners



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