



ENVIRONMENTAL STEWARDSHIP DEPARTMENT/

NEW BEDFORD CONSERVATION COMMISSION

CITY OF NEW BEDFORD
SCOTT W. LANG, MAYOR

July 14, 2010

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code: OSRR07-2
Boston, Massachusetts 02109-3912

RE: Polychlorinated Biphenyl (PCB) Remediation Notification Letter
New Bedford High School Release Abatement Measure Plan
230 Hathaway Boulevard, New Bedford, Massachusetts 02740

Dear Ms. Tisa:

This letter serves as notification that the City of New Bedford (City) will conduct a performance-based disposal action to remove PCB Remediation Waste (soil) at the New Bedford High School (NBHS) property located at 230 Hathaway Boulevard, New Bedford, Massachusetts consistent with 40 CFR Subpart 761.61(b). The removal will take place during the performance of a Massachusetts Contingency Plan (MCP; 310 CMR 40.0000) Release Abatement Measure (RAM) to address impacted soils at NBHS. This disposal activity will achieve compliance with both 40 CFR Part 761 and the MCP. The activity will center on soil removal in the vicinity of soil boring HF-31 on the west side of the NBHS campus (see Figure 1).

PCBs were detected at a concentration greater than 50 milligrams per kilogram (mg/kg) during the delineation of PCB impacted soils at sample location HF-31. At sample location HF-31, samples were collected at six sample locations in a grid pattern having a 10-foot lateral separation around the original sampling point (sample locations identified as HF-31A, HF-31B, HF-31C, HF-31D, HF-31G, and HF-31H) at 0-1 foot and 1-3 foot intervals and analyzed for PCBs, cadmium, and lead for delineation purposes. Samples were collected at locations HF-31E and HF-31F, but not analyzed, as sample locations HF-31A and HF-31B exhibited acceptable results. Total PCBs were detected at sample location HF-31D at 71.6 mg/kg in the 1 -3 foot sampling interval. Using MCP risk assessment procedures, the excavation area was determined to be bound by samples HF-31A, HF-31B, HF-31G, and HF-31H. The removal of the pre-defined area of soil will meet MCP risk reduction goals and will result in the removal of all soils shown to exhibit a total PCB concentration greater than or equal to 50 mg/kg. The sample results are presented in Table 1. Sample locations are identified in Figure 2.

TRC estimates that approximately 140-145 tons of impacted soil will be excavated, loaded directly into lined storage containers, and then all the excavated soils will be transported for disposal to either Model City in New York or the EQ/Wayne Disposal Landfill in Michigan. The dimensions of area to be excavated are approximately 29 feet by 29 feet by 3 feet deep.

Following completion of this excavation, confirmation samples will be taken to confirm that all PCB Remediation Wastes have been removed. Confirmatory samples will be taken as follows:

- One sample per fifteen feet of sidewall (two samples per sidewall for a total of eight samples), and ;
- One sample in the center of each of four fifteen foot grids at the bottom of the excavation, to be composited into one composite sample (individual samples from each grid to be collected and held).

Additional excavation of soils will be performed if any confirmatory sample result is greater than or equal to 50 mg/kg, or if additional excavation is required to achieve MCP risk reduction goals. Additional confirmatory samples will be taken following the additional excavation consistent with the above.

All records of the excavation, confirmatory sampling, manifests, and certificates of disposal for this performance based disposal activity will be maintained and included in either a MCP RAM Status Report, or a MCP RAM Completion Report, as appropriate. The RAM-related MCP documents will be available for inspection at any time by a representative of the United States Environmental Protection Agency (EPA) at the Massachusetts Department of Environmental Protection Office located in Lakeville, Massachusetts or on the City of New Bedford's website.

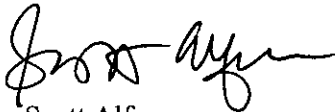
Representative quality control samples will also be collected during implementation of this excavation. This will include field duplicate, matrix spike and matrix spike duplicate samples collected at a frequency of one per twenty samples.

All sampling equipment will be decontaminated prior to use and between each discreet sample in accordance with the self-implementing decontamination procedures as set forth under 40 CFR Part 761.79(c)(2)(i) consisting principally of a solvent swab of tools, moveable equipment, and sampling implements that come into direct contact with potentially contaminated soil. Under the self-implementing decontamination approach, spent solvents and solvent soaked rags from decontamination activities will be managed for disposal via incineration at an appropriately permitted facility per 40 CFR Part 761.79(g)(3), (4) or (5).

The sampling will be performed in accordance with TRC's site-specific health and safety plan (HASP) which outlines the anticipated hazards associated with above referenced properties.

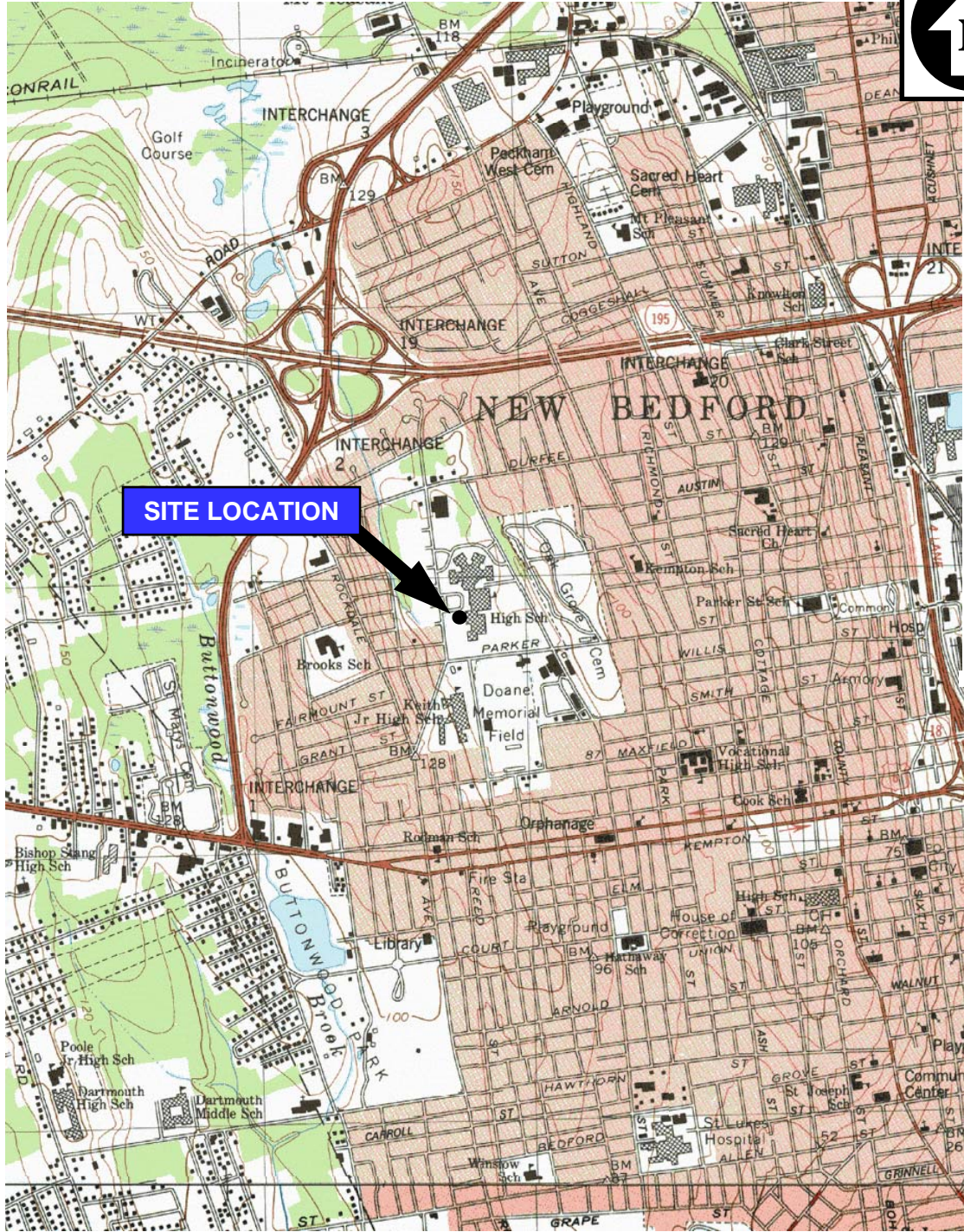
If you have any questions concerning this letter, please do not hesitate to contact me at 508-991-6188.

Sincerely,

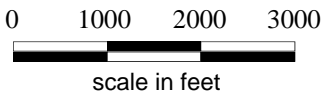


Scott Alfonse
Director

cc. Molly Cote, Massachusetts Department of Environmental Protection (by electronic PDF)
Cheryl Henlin, City of New Bedford (by electronic PDF)
David M. Sullivan, LSP, CHMM, TRC (by electronic PDF)



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



**NEW BEDFORD HIGH SCHOOL
 NEW BEDFORD, MASSACHUSETTS**

PCB REMEDIATION SITE LOCATION MAP

 Wannalancit Mills
 650 Suffolk Street
 Lowell, MA 01854
 978-970-5600

**FIGURE
 1**

Drawn: HWB SCALE: AS SHOWN
 Checked: DP Date: JUNE 2010



NEW BEDFORD HIGH SCHOOL
NEW BEDFORD, MASSACHUSETTS

PCB REMEDIATION
SAMPLE LOCATIONS



Wannalancit Mills
650 Suffolk Street
Lowell, MA 01854
(978) 970-5600

FIGURE

2

DRAWN BY: HWB
CHECKED BY: DNP

DATE:
JUNE 2010

LEGEND:

- BETA BORINGS
- TRC BORINGS

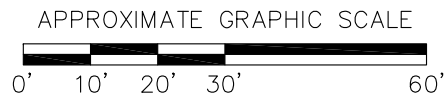


Table 1
Summary of Analytical Results for Soil Samples
New Bedford High School - HF-31 Area
New Bedford, Massachusetts

Analysis	Analyte	Sample Location:							HF31-0.5-1+2.5-3	HF-31A		HF-31B		HF-31C			HF-31D		HF-31G	HF-31H
		Sample Depth (ft.):							0.5-3	0-1	1-3	0-1	1-3	0-1	1-3	1-3	0-1	1-3	1-3	1-3
		Sample Date:							12/30/2004	4/2/2009	4/2/2009	4/2/2009	4/2/2009	4/2/2009	4/2/2009	4/2/2009	4/2/2009	4/2/2009	4/2/2009	4/2/2009
		S-1/GW-2	S-1/GW-3	S-2/GW-2	S-2/GW-3	RC S-1**	TSCA													
PCBs (mg/kg)	Aroclor 1254	2	2	3	3	2	1	2.26	1.35 J	2.49 J	0.310 J	2.66 J	2.88 J	5.32 J	7.31 J	0.597 J	71.6 J	0.334 J	0.565 J	
	Aroclor 1260	2	2	3	3	2	1	0.056 U	0.291 J	0.217 U	0.0554 U	0.219 U	0.571 U	0.376 U	0.550 U	0.0532 U	3.36 U	0.0535 U	0.355 J	
	Aroclor 1262	2	2	3	3	2	1	0.293	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
	Total PCBs	2	2	3	3	2	1	2.553	1.641 J	2.49 J	0.310 J	2.66 J	2.88 J	5.32 J	7.31 J	0.597 J	71.6 J	0.334 J	0.920 J	
Metals (mg/kg)	Mercury	20	20	30	30	20	N/A	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	Arsenic	20	20	20	20	20	N/A	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	Barium	1,000	1,000	3,000	3,000	1,000	N/A	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	Beryllium	100	100	200	200	100	N/A	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	Cadmium	2	2	30	30	2	N/A	NA	0.51	0.47	0.41	0.49	0.29	0.34	NA	0.62	1.24	NA	NA	NA
	Chromium	30	30	200	200	30	N/A	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	Lead	300	300	300	300	300	N/A	NA	194	168	79.7	164	31.5	82.9	NA	192	441	NA	NA	NA
	Nickel	20	20	700	700	20	N/A	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	Silver	100	100	200	200	100	N/A	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	Vanadium	600	600	1,000	1,000	600	N/A	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	Zinc	2,500	2,500	3,000	3,000	2,500	N/A	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Notes:

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

J - Estimated value; below quantitation limit.

NA - Sample not analyzed for the listed analyte.

N/A - Not applicable.

U - Compound was not detected at specified quantitation limit.

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

Values shown in **bold and shaded type** exceed one or more of the listed MassDEP Method 1 standards or TCLP criteria.

Values shown in **bold and outlined** exceed TSCA but are less than the listed MassDEP Method 1 standards.

PCBs - Polychlorinated Biphenyls.

RC - Reportable Concentration.

TSCA - Toxic Substances Control Act criteria.

(1) - SW-846 Chapter 7, Table 7-1, *Maximum Concentration of Contaminants for Toxicity Characteristic*.

** - for Reference purposes only.