

IT IS ANTICIPATED THAT THE INCINERATION ALTERNATIVE 7(C) AND SOLIDIFICATION/STABILIZATION ALTERNATIVE 6(B) MAY BE DIFFICULT TO IMPLEMENT BASED ON THE NEED TO CONSTRUCT A LANDFILL IN THE GOLF COURSE AND BECAUSE OF ISSUES RELATING TO PUBLIC ACCESSIBILITY, LAND ACQUISITION, SITING REQUIREMENTS AND COMMUNITY OPPOSITION.

7. COST

ALTERNATIVE 7(C), ON-SITE INCINERATION, WOULD BE THE MOST EXPENSIVE OF ALL THE ALTERNATIVES, WITH AN ESTIMATED TOTAL COST OF APPROXIMATELY \$10,000,000. SOLVENT EXTRACTION (ALTERNATIVE 5) WOULD BE EQUALLY EFFECTIVE AS ALTERNATIVE 7(C) IN REDUCING CONTAMINANT CONCENTRATIONS TO CLEANUP LEVELS, BUT AT A LOWER TOTAL COST OF APPROXIMATELY \$7,800,000. THE SOLIDIFICATION/STABILIZATION ALTERNATIVE 6(B), AT AN ESTIMATED TOTAL COST OF \$6,070,000, WOULD BE LESS EXPENSIVE THAN THE MORE PERMANENT TREATMENT ALTERNATIVES (ALTERNATIVES 5 AND 7(C)), BUT WOULD BE THE MOST EXPENSIVE ALTERNATIVE TO OPERATE AND MAINTAIN OVER THE LONG TERM, WITH AN ESTIMATED OPERATION AND MAINTENANCE TOTAL COST OF \$650,000. NO-ACTION ALTERNATIVE WOULD REQUIRE THE LEAST AMOUNT OF MONEY TO IMPLEMENT.

8. STATE ACCEPTANCE

BASED ON ITS REVIEW OF THE RI/FS AND PROPOSED PLAN, THE COMMONWEALTH OF MASSACHUSETTS CONCURS WITH ALTERNATIVE 5 AS THE CONTINGENCY REMEDY. A COPY OF THE DECLARATION OF CONCURRENCE IS ATTACHED AS APPENDIX C TO THIS ROD.

9. COMMUNITY ACCEPTANCE

COMMENTS RECEIVED FROM THE COMMUNITY INDICATED A PREFERENCE FOR THE NO ACTION ALTERNATIVE. IN PARTICULAR, A PETITION FROM GOLFERS AT THE NEW BEDFORD MUNICIPAL GOLF COURSE REQUESTED THAT THE PCBS BE LEFT ALONE SINCE THERE IS NO GUARANTEE THAT THE PCBS WILL BE REMOVED, AND BECAUSE THE COST OF REMEDIATION IS HIGH. THE CITY OF NEW BEDFORD OPPOSED THE CONTINGENCY ALTERNATIVE, STATING THAT IT WAS NOT PROTECTIVE OF THE ENVIRONMENT BECAUSE THE CLEANUP WOULD HAVE A MORE DAMAGING IMPACT ON SPECIES AT THE SITE THAN WOULD THE LONG-TERM EFFECTS OF PCB CONTAMINATION, AND WOULD CAUSE REDISTRIBUTION OF CONTAMINANTS ALL OVER THE SITE. THE CITY STATED THAT A LIMITED ACTION CONSISTING OF INSTITUTIONAL CONTROLS SHOULD BE IMPLEMENTED.

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X. THE SELECTED REMEDY

THE SELECTED AND CONTINGENCY REMEDIES CONTAIN SOURCE CONTROL COMPONENTS WHICH ADDRESS THE THREAT TO BIOTA POSED BY EXPOSURE TO CONTAMINATED SEDIMENT/SOILS IN MIDDLE MARSH AND THE ADJACENT WETLAND.

A. CLEANUP LEVELS

CLEANUP LEVELS HAVE BEEN ESTABLISHED FOR TOTAL PCBS WHICH WERE IDENTIFIED IN THE BASELINE RISK ASSESSMENT AND WERE FOUND TO POSE AN UNACCEPTABLE RISK TO THE ENVIRONMENT. PERIODIC ASSESSMENTS OF THE PROTECTION AFFORDED BY REMEDIAL ACTIONS WILL BE MADE AS THE REMEDY IS BEING IMPLEMENTED AND AT THE COMPLETION OF THE REMEDIAL ACTION. IF THE REMEDIAL ACTION IS NOT FOUND TO BE PROTECTIVE, FURTHER ACTION SHALL BE REQUIRED.

AS DESCRIBED IN SECTION VI. ABOVE, PROTECTIVE LEVELS WERE DEVELOPED TO ASSESS EXPOSURE OF MIDDLE MARSH SPECIES THROUGH BOTH AQUATIC AND WETLAND/TERRESTRIAL EXPOSURE PATHWAYS. BASED ON THE ECOLOGICAL RISK ASSESSMENT, SEDIMENT/SOIL CLEANUP LEVELS WERE ESTABLISHED FOR THE AQUATIC AREA DELINEATED IN MIDDLE MARSH AND FOR NON-AQUATIC AREAS IN MIDDLE MARSH AND THE ADJACENT WETLAND AS DESCRIBED BELOW:

1. SEDIMENT/SOIL CLEANUP LEVEL FOR AQUATIC AREAS IN MIDDLE MARSH

THE SEDIMENT/SOIL CLEANUP LEVEL FOR THE AQUATIC AREA IN MIDDLE MARSH, AS DESIGNATED IN FIGURE 7, IS THE INTERIM MEAN SEDIMENT QUALITY CRITERION (SQC) OF 20 MICROGRAMS OF TOTAL PCBS PER GRAM OF CARBON (UG/GC). AS DESCRIBED IN SECTION VI.B.3.A., THIS VALUE HAS BEEN DERIVED BY EPA'S CRITERIA AND STANDARDS DIVISION TO BE PROTECTIVE OF THE PRESENCE AND ECOLOGICAL FUNCTIONS OF BENTHIC INVERTEBRATES. IN ADDITION, THE PCB SQC WAS DERIVED FROM THE CORRESPONDING AMBIENT WATER QUALITY CRITERION DEVELOPED TO SAFEGUARD AGAINST BIOACCUMULATION THAT COULD RESULT IN CHRONIC REPRODUCTIVE EFFECTS IN UPPER LEVEL CONSUMERS AS REPRESENTED BY A SPECIES FOUND TO BE PARTICULARLY SENSITIVE, THE MINK (MUSTELA VISON).(5)

THE MEAN SEDIMENT QUALITY CRITERION (20 UG/GC) WAS ESTABLISHED AS THE CLEANUP LEVEL FOR AQUATIC AREAS IN MIDDLE MARSH BECAUSE AFTER REMEDIATION, THE RESULTING PCB CONCENTRATIONS IN SEDIMENT/SOILS REPRESENT LEVELS WHICH, WITH APPROXIMATELY 50 PERCENT CERTAINTY, WILL RESULT IN INTERSTITIAL WATER CONCENTRATIONS EQUAL TO OR LOWER THAN THE PCB AMBIENT WATER QUALITY CRITERION OF 0.014 UG/L.

2. SEDIMENT/SOIL CLEANUP LEVELS FOR NON-AQUATIC AREAS IN MIDDLE MARSH AND FOR THE ADJACENT WETLAND

**EPA Superfund
Record of Decision:**

**SULLIVAN'S LEDGE
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NEW BEDFORD, MA
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