RESPONSES TO D. DICKERSON'S (EPA) COMMENTS ON THE 100% TRANSPORATION AND DISPOSAL COST ESTIMATE AT $15 MILLION/YEAR NEW BEDFORD HARBOR SUPERFUND SITE DATED JANUARY 2010

GENERAL COMMENTS:

1. **Comment:** Dredge volume totals 692,864 cy, lets discuss to double check basis.

   Response: Per discussion on 1/21/10 between EPA and Jacobs, the volume estimate will remain as is given the variables in volume predication at this time.

PAGE-SPECIFIC COMMENTS:

1. **Comment: Page 1** Recommend using "Other Costs" instead of "Capital Costs" for the 8th column header, as most of these cost items are not true capital costs.

   Response: Header has been changed.

2. **Comment: Page 1, Project Year 37 and 39 Wetland Costs** To be consistent with page 25 these two costs should be switched (i.e., year 37 = $12.18m and year 39 = $12.84m).

   Response: Cost links corrected.

3. **Comment: Page 2** Recommend using 2008 actual costs, not 2005 actual costs, as the basis for the Planning and Reporting fixed costs at this $15m/yr funding level, as this is the most recent year in which we were at a similar funding level.

   Response: The attached Current Approach $15M cost estimate uses the 2008 actuals.

4. **Comment: Page 4, Project Management Fixed Costs** See comment #3 above (should use 2008 actuals, not 2005 actuals).

   Response: The attached Current Approach $15M cost estimate uses the 2008 actuals.

5. **Comment: Page 7, Mobilization/Demobilization** Was there a difference between the 2008 proposal cost and the 2008 actual cost? If so, recommend using the actual cost. Also suggest clarifying in the comment that these costs are added for every dredge year.

   Response: The attached Current Approach $15M cost estimate uses the 2008 actuals. Comment edited to read, "Same for all hydraulic dredge seasons".

6. **Comment: Page 9, Seasons 37 – 42** Air monitoring will be required for both wetland remediation and cell 1 removal, so some sampling and analysis costs should be added here (lets discuss further the actual amount).

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Response: Per discussion on 1/21/10 between EPA and Jacobs, a cost was added to the Fixed Operational Sampling & Analysis cost item for Project Years 36-41 for 4 ambient air samples collected monthly for the full year. The actual 2008 ambient air sampling costs were used as a basis. The cost is included but is insignificant.

7. **Comment: Page 9, Site O&M** See comment #5, if there was a difference between the 2008 proposal amount and the 2008 actual amount for O&M than the actual value should be used.

   Response: The attached Current Approach $15M cost estimate uses the 2008 actuals.

8. **Comment: Page 12, NAE Expenditures** Recommend we revisit NAE's actual oversight costs for 2008. Those listed here seem high. Also edit the comment here to reflect use of 2008 actuals, and that these costs are added every year.

   Response: Actuals provided to Jacobs by EPA are used in the attached Current Approach $15M cost estimate. Comment has been edited as suggested.

9. **Comment: Page 17, Hydraulic Dredging** Recommend using 2008 actual costs instead of those from the 2008 cost estimate.

   Also, 490 cy/day times 40 days = 19,600 cy/yr…is there a reason the 19,500 cy figure is used?

   Response: The attached Current Approach $15M cost estimate uses the 2008 actuals.

   The cy figure has been adjusted in all dredge years, and yearly estimates adjusted, accordingly.

10. **Comment: Page 21-24, Assumptions** The "0 cy cake to CDFs" holdover comment needs to be removed.

    Response: Comment removed.

11. **Comment: Page 26, Confirmational Sampling** Suggest we revisit this cost item…if we'll be using 2008 actual fixed costs, and we obtained sufficient post-dredge samples in 2008, then it should be a safe assumption that these conformational sampling costs would be included in the fixed costs and that there would be no need to carry this as an additional line item.

    Response: Per discussion on 1/21/10 between EPA and Jacobs, this cost item has been omitted and is included in the operational sampling estimate.