To: Lederer, Dave[Lederer.Dave@epa.gov]
From: Stanley, Elaine
Sent: Fri 10/14/2016 6:51:40 PM
Subject: FW: Former Aerovox Site IRA Work Implementation
Aerovox IRA MIP-23 Photos 10-05-16.pdf
Aerovox IRA MIP-23 Photos 10-04-16 .pdf

fyi

From: Stanley, Elaine
Sent: Friday, October 14, 2016 2:43 PM
To: 'Gallagher, Angela (DEP)' <Angela.Gallagher@MAssMail.State.MA.US>
Cc: Martin, Gerard (DEP) (Gerard.Martin@MassMail.State.MA.US) <Gerard.Martin@MassMail.State.MA.US>; Lombardo, Ginny <Lombardo.Ginny@epa.gov>; Tisa, Kimberly <Tisa.Kimberly@epa.gov>; 'Coyne, Joseph (DEP)' <joseph.coyne@state.ma.us>
Subject: Former Aerovox Site IRA Work Implementation

Angela,

We want to share with you some photographs (attached) taken Oct 4th and 5th and a short video Josh Cummings of Jacobs took on Oct 4th of the MIP-23 excavation area, when most of the material was out of the pit (the link to the video is found below). EPA believes this is indicative of the continued presence of DNAPL in the pit and of continued leaking of DNAPL into the pit from the unexcavated side walls.

In addition, the stained soil lens can be seen running in a southerly direction beyond the excavation boundary where the sheet piles were not installed due to presumed boulder presence. Josh stated that this lens had a bluish purple color to it in places and observed sheens emanating from it. Interpreting the stained soil as containing NAPL is qualitative, but zooming in on the photos it does appear to be separate phase. Formation of a sheen under the conditions observed is an indicator of separate phase. It is much more apparent in the video where you can see droplets of separate phase floating around in the pooled water at the bottom of the excavation and in water coming through the sheet pile wall from the northern side. Sheen cannot be formed from contaminants dissolved in groundwater or adsorbed to the soil matrix. EPA is very interested in MassDEP's interpretation of the attached photos and video and looks forward to discussing this with MassDEP and/or its contractor.

Also concerning is that after all of the excavated material was taken out the following day, the contractors continued to apply absorbents to the bottom of the pit to address the sheens (photos of Oct 5th).

EPA understands that this IRA action to remove NAPL was based on previously obtained data and that MassDEP concurred with AVX's approach to confirm NAPL removal using visual, olfactory and PID readings. However, visually it can be seen that NAPL is still present in the area and appears to extend laterally from more than one side of the excavation area. EPA had recommended that confirmatory sampling be conducted before backfilling the area, but that was not required. We understand the area is now backfilled. The work will now move on to the UV-17 area where the NAPL conditions are more severe and the peat layer is 4 feet thick in some of the area as can be seen on the construction drawing C-002, submitted in the August 4th IRA status update. PCB concentrations at the UV-17 area are in the thousands of parts per million close to if not below the elevation of bottom of the existing sheet pile wall (approximately 9 feet bgs). To document adequate removal of DNAPL impacted soils, we again recommend that MassDEP require AVX to conduct confirmatory sampling at UV-17 prior to backfilling or possibly MassDEP could perform the sampling.

As noted in EPA's comments on the AVX Phase III, General Comment 8, the Phase III Remedial Action Plan must address DNAPL conditions that exist at the Site. Where DNAPL conditions will remain following implementation of the ongoing IRA actions and any potential follow-on IRA actions, the Phase III must consider the impact of remaining DNAPL on remedial approaches and the adequacy of remedial approaches to address remaining DNAPL, particularly along the eastern shoreline where DNAPL could impact the river.

Please contact me once you have had the opportunity to consider the attached information. As we discussed with you, Dawn and Debbie a couple weeks ago when we were expressing our concerns with the sheens observed in the river, we agree with DEP that the ongoing IRA work is important and we want to see the work performed. We believe however that confirmatory sampling to support decisions on the extent of DNAPL contamination at the excavation limits would provide valuable information to either require additional removal or demonstrate that DNAPL conditions were effectively remediated within the excavation footprint.

We also remain concerned about AVX's position regarding operation of the DNAPL

recovery system. MassDEP's July 15, 2016 letter stated: "If it is determined that the active/passive free-product recovery system is not adequately removing the DNAPL, and therefore not achieving the objectives of the IRA to prevent the potential migration of DNAPL into the Acushnet River in response to the scheduled EPA dredging of the New Bedford Harbor, MassDEP may require that AVX implement a containment system to prevent migration of the DNAPL in response to EPA dredging." We are interested in understanding MassDEP's position on what they would require as a next step if AVX determines that active recovery system will not be operated.

Finally, according to Josh Cummings, B&C/CHESI have begun installing the sheet pile walls in the UV-17 excavation area and will soon begin constructing the slurry wall next week along the northern boundary of the UV-17 area. I understand from the weekly calls that the UV-17 sheeting and dewatering plans and the slurry wall construction plan will be forwarded when finalized. If you have received them, we would appreciate you forwarding these plans to us.

Always lots to discuss on this Site! Look forward to talking with you.

Thanks Angela,

Elaine

From: Josh.Cummings@jacobs.com [mailto:Josh.Cummings@jacobs.com]
Sent: Wednesday, October 12, 2016 4:34 PM
To: Stanley, Elaine <stanley.elainet@epa.gov>
Subject: Aerovox MIP23 10/4/16

Jacobs File Transfer System

Josh.Cummings@jacobs.com has sent you a file archive.

If you trust Josh.Cummings@jacobs.com, use the URL below to pick up the file archive (you may need to copy and paste it into your browser):

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Elaine Stanley

Remedial Project Manager

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