UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 18, 2011

Neal J. Carey, Program Manager
APEX Companies, LLC
184 High Street, Suite 502
Boston, Massachusetts 02110

Re: PCB Cleanup and Disposal Notification under 40 CFR § 761.61(a)(3)
Sunoco, Westfield, Massachusetts
MADEP RTN: 1-15718

Dear Mr. Carey:

The US Environmental Protection Agency – Region 1 (EPA) has received a Notification dated May 9, 2011 to address PCB contamination at the property located at 88-90 South Maple Street, Westfield, Massachusetts (the Site). Specifically, the Notification indicates that PCB-contaminated soils (*PCB remediation waste*) are present at the Site, which require cleanup under the federal PCB regulations at 40 CFR Part 761. The Notification was submitted by you on behalf of Sunoco.

EPA has reviewed your Notification and **has determined that it is incomplete and does not meet the notification requirements at 40 CFR § 761.61(a)(3).** Specific comments follow:

General Comments:

1. The lab analysis reports and chain of custody forms were not included in the SIP. Region 1 does require that the chains of custody and lab reports, including applicable QA/QC samples, be provided. These documents may be provided on a CD.

2. The Notification indicates that the Site was undeveloped until 1955. Later the Notification indicates that the building was constructed in 1988 and the carwash in 1985. Please clarify the use of the Site between 1955 and 1985 and also between 1985 and 1988.

3. The sampling protocols for characterization sampling were not consistent with the requirements under § 761.61(a). Please see specific comments below.

4. Not all sampling locations are shown on Figure 2. Please see specific comments below.

Specific Comments:

1. Page 1. Section 2. There is reference to a previous soil stockpile which was located at the Site.

    a. Where was this stockpile located and where was it disposed of?

    b. Please provide a figure showing the origin of the stockpile soils, that is, which area(s) on the Site the soils were generated from.

2. Pages 2, 4, and 5: "Low frequency area" is not a term defined in 40 CFR 761.3. This term should be changed to "*Low occupancy area*" in order to avoid confusion and for consistency.

3. Page 2, Sampling Data and Table 1.

    a. Numerous samples were collected over multiple feet intervals (e.g. 0-3'; 6-10', etc). There are no provisions under 40 CFR Part 761, Subpart N or Subpart O which provide for sampling over such large intervals.

    b. The Notification indicates that cleanup of the Site is being proposed under § 761.61(a). Accordingly, the sampling requirements specified under Subparts N and/or O would apply. With respect to the overall 56,628 square foot (ft^2) site, the sampling requirements were not met for either subpart.

    c. The Notification indicates that the source of the PCB contamination is believed to be due to historical flooding. If this be the case, sampling over large depth intervals could potentially dilute PCBs concentrations that may be in shallower soils rather than in deeper soils (see previous comment 7.a.).

4. Page 4. Section 3.1.

    a. Sample SB-501, located outside of the planned excavation, has a concentration of 27.4 mg/kg in the top 1 foot of soil. This is above the *low occupancy area* cleanup standard of greater than or equal to ($\geqslant$ 25 mg/kg, which is proposed for this area.

        i. Thus, this sampling location should be included in the proposed excavation area.

        ii. Given the above, the horizontal extent of contamination towards the south from SB-501 has not been adequately characterized to define the extent of this proposed excavation area.

b. Regarding the 45 ppm PCB concentration at SB-311, please see previous comment regarding vertical intervals. As this sample was collected over a large interval, there is the potential that the PCB concentration is greater than (>) 100 mg/Kg, which would exceed the low occupancy area limit with a cap under § 761.61(a)(4).

c. The last sentence states "Additional sampling from 0 to 1-feet and 1 to 2-feet (and deeper if necessary), and along the base of the excavation, will be performed during the excavation and soil removal work (Section 4.0)."

This sentence comes directly after the discussion about the SB-311 area. However, based on Section 4.0, it is not indicated that SB-311 will be removed. Thus, EPA assumes that this statement was intended to apply to the SB-313 and SB-315 excavation areas. Please confirm.

5. Page 4. Section 3.2.

a. Are the staked areas mentioned in the first paragraph, the same as the planned removal areas shown on Figure 2?

b. § 761.50(a)(2) prohibits the processing of liquid PCBs into non-liquid materials for purposes of disposal. Rinse water from decontamination of PCB-contaminated equipment thus could not be added to the roll-offs containing PCB-contaminated soils unless the water has been sampled and found to have a PCB concentration of less than (<) 0.50 µg/L.

6. Page 5, Section 4.0. This section appears to imply that only the SB-311 area will require a deed restriction. Please be aware that under § 761.61(a), a deed restriction would be required in any area where PCB concentrations are greater than (>) 1 ppm. Please amend paragraph for regulatory compliance.

7. Page 6, Section 4.2. The Notification indicates that compositing of verification samples may be conducted. Please be aware that compositing is not authorized if the PCB contamination has not been adequately delineated.

a. See previous comment 8.a.

b. EPA notes that SB-508 has a PCB concentration at 8.6 ppm at 0-1' and a PCB concentration of 10.8 in the 1-2'. There is some appearance that the PCB concentration may be increasing. Accordingly, EPA would recommend additional sampling to verify that the PCB concentrations have been adequately delineated in the SB-315 area.

8. Page 6. Section 4.3. The Notification indicates that all soils will be assumed to contain PCB concentrations > 100 mg/Kg. Please be aware that under § 761.61(a)(5)(i)(B)(*2*)(*i*), all soils should be assumed to be greater than or equal to (≥) 50 ppm for purposes of disposal.

9. Page 6. Section 4.4. See previous comment 9.b.

10. Page 7. EPA notes that the records for this work are proposed to be maintained at the Site building as certified by William R. Morse.

    a. EPA also requires confirmation that Sunoco, Inc. located at 10 Industrial Highway, Lester, Pennsylvania will be the entity responsible for the PCB cleanup work.

    b. Please clarify if Mr. Morse is the Sunoco representative who will be responsible for the work to be conducted under this Notification. If so, please provide Mr. Morse's title and contact information. If Mr. Morse is not the correct person, please provide.

    c. If Mr. Morse is not located at the Pennsylvania office or if there is another person who should be copied on future correspondence at the Pennsylvania office, please provide name, title and contact information.

11. Table 1. Summary of Soil Analytical Results for PCBs.

    a. This table should include all PCB analytical results. According to Figure 2, the 500 series of data is missing from the Table. Please insure all PCB results are shown on the Table.

    b. Not all PCB analytical results contained in Table 1 are shown on Figure 2. For example, T1, T2, T5, T1-A, T1-B, T1-C are not shown. Please review data and insure that all sampling locations in Table 1 are depicted on Figure 2.

    c. MW-204 has a PCB concentration at 9.6 ppm in the 10-12' sampling interval.

        i. Were any other intervals collected during installation of this well? If not, is there a possibility that higher PCB concentrations exist at shallower intervals based on the conceptual site model?

        ii. EPA also notes that the water table is approximately 9 to 12 feet below ground surface. Was this sample located within/below the groundwater table? If so, and if this location was developed into a monitoring well, has a sample of the water been collected for PCB analysis? If so, please provide this data.

Should you have any questions, please feel free to contact me at (617) 918-1527 or Katherine Woodward at (617) 918-1353.

Sincerely,

Kimberly N. Tisa, TSCA PCB Coordinator
Remediation & Restoration II Branch/RCRA Corrective Action

cc: MADEP – Western Regional Office
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