

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

Charles D. Baker Governor

Karyn E. Polito Lieutenant Governor Matthew A. Beaton Secretary

> Martin Suuberg Commissioner

January 11, 2019

Mayor of the City of New Bedford Office of Jonathan F. Mitchell, Mayor 133 William Street New Bedford, MA 02740 RE: DARTMOUTH - BWSC
Release Tracking Numbers 4-0027363, 4-0027576
McCabe Street and Kraseman Street Area Historical Dump Site
REQUEST FOR INFORMATION/
INTERIM DEADLINE
000006203

THIS IS AN IMPORTANT NOTICE FAILURE TO TAKE APPROPRIATE ACTION IN RESPONSE TO THIS NOTICE COULD RESULT IN SERIOUS LEGAL CONSEQUENCES

Dear Mr. Mitchell:

The Massachusetts Department of Environmental Protection (MassDEP or the Department), Bureau of Waste Site Cleanup is tasked with ensuring the cleanup of oil and hazardous material (OHM) releases pursuant to the Massachusetts Oil and Hazardous Material Release Prevention and Response Act (M.G.L. Chapter 21E). This law is implemented through regulations known as the Massachusetts Contingency Plan (310 CMR 40.0000 et seq. – the MCP). Both M.G.L. c. 21E and the MCP require the performance of response actions to provide for protection against harm to health, safety, public welfare and the environment which may result from release and/or threats of releases of OHM.

REASON FOR THIS REQUEST

MassDEP has become aware of historical dumping, filling, and/or burning of waste material that has resulted in soil contamination in the vicinity of McCabe Street and Kraseman Street and possibly extending to Sharp Street, Grant Street, and Wordell Street and beyond in Dartmouth. On August 10, 2018 MassDEP received the attached copies of articles from the May 29, 1939 and June 2, 1939 New Bedford Standard Times. These copies were provided by the Licensed Site Professional (LSP) for the 85 McCabe Street property where oil and/or hazardous material have been found with other waste material (RTN 4-0027363). In addition, waste material and polychlorinated biphenyls (PCBs) at concentrations that could pose an Imminent Hazard have been discovered at 20 Kraseman Street (RTN 4-0027576). Based on discussions with Town of Dartmouth officials, residents of the McCabe Street area, and contractors that work in the area, the extent of filling with waste material likely impacts numerous properties.

MassDEP is investigating the source(s) of the waste material and by way of this letter, is requesting additional information that the City of New Bedford may have relative to the dumping, filling, and/or burning of waste material in this area. The specific information requested is outlined in the attached REQUEST FOR INFORMATION (Attachment A).

Pursuant to the MassDEP's authority under M.G.L. c. 21E, sections 2, 4, and 8, and the MCP at 310 CMR 40.0165 and 310 CMR 40.1120(1), any employee(s), attorney(s), agent(s), assign(s), representative(s), and/or any other person or entity acting on behalf of you (as used in this letter, "you" and "your" refers to the City of New Bedford), however designated, are asked to provide MassDEP with the information requested in the enclosed and incorporated <u>REQUEST FOR INFORMATION</u>.

INTERIM DEADLINE

All requested information should be provided to MassDEP on or before the close of business on **Friday**, **February 22, 2019**. This date constitutes an enforceable Interim Deadline established by MassDEP pursuant to 310 CMR 40.0167. Failure to comply with an Interim Deadline may result in enforcement actions by the MassDEP, including, but not limited to, the issuances of a Notice of Noncompliance, an Administrative Penalty, and/or Enforcement Orders, or, referral to the Massachusetts Attorney General's Office.

Enclosed and incorporated with this Letter and <u>REQUEST FOR INFORMATION</u> is an <u>INSTRUCTION</u> <u>SUMMARY (Attachment B)</u> providing the information necessary to submit an accurate and complete response, and a <u>CERTIFICATION OF SUBMITTAL</u> (Attachment C).

If you anticipate, or have reason to know, that any of the conditions, requirements, or obligations attendant to submitting an appropriate response to this <u>REQUEST FOR INFORMATION</u> may not be complied with, or if there is any ambiguity, confusion, or questions, please contact Lori Williamson at the letterhead address, or by telephone at (508) 946-2803 within seven (7) days of your receipt of this letter. Thank you for your cooperation.

Sincerely,

Gerard M.R. Martin

Deputy Regional Director Bureau of Waste Site Cleanup

GM/LW/lg

Attachments: A. Request for Information

B. Instruction Summary
C. Certification of Submittal

D. May 29, 1939 *Standard Times* Article E. June 2, 1939 *Standard Times* Article

CERTIFIED MAIL # 7017 1450 0000 0281 8126 RETURN RECEIPT REQUESTED

ec:

DEP-SERO

Attn: Millie Garcia-Serrano, Regional Director

Attn: Daniel Crafton, Chief, Emergency Response Section

Attn: Andrew Fowler, Regional Counsel

Attn: Lisa Ramos, Regional Enforcement Office

cc:

New Bedford Health Department Attn: Damon Chaplin, Director 1213 Purchase Street

New Bedford, MA 02740

Office of Environmental Stewardship Attn: Michele Paul, Director

133 William Street – Rm 304 New Bedford, MA 02740

Dartmouth Board of Health Attn: Christopher Michaud, Director 400 Slocum Road

Dartmouth, MA 02747

New Bedford Dept. of Public Infrastructure

Attn: Jamie Ponte, Commissioner

1105 Shawmut Avenue New Bedford, MA 02746

Attachment A

REQUEST FOR INFORMATION PURSUANT TO M.G.L. c. 21E AND 310 CMR 40.0000 et seq.

Consistent with the instructions set forth in the incorporated INSTRUCTION SUMMARY (Attachment B), please respond to the following request:

- 1. Please identify and provide complete documentation regarding all parties involved and all circumstances and events pertaining to historical dumping, filling, and/or burning of waste material that may have occurred in the vicinity of McCabe Street, Kraseman Street, Sharp Street, Grant Street, Lincoln Street, and East Wordell Street in Dartmouth and Rockdale Avenue in New Bedford ("the area") including:
 - a. A copy of any and all records and documents, including archived or microfiche or news documents, concerning the City's transporting, disposing, dumping, filling, or burning waste or material in this area, or its arranging for the same;
 - b. Copies of all surveys, studies, reports, investigations, analyses, or analytical data that you have performed or arranged to perform, or that you have received, relating to the environmental condition or history of this area;
 - c. A copy of all photographs of this area that show or are suspected to show solid waste, or fill, or evidence of disturbance from dumping or burning the same, including aerial or satellite photographs taken before 1970;
 - d. A copy of all plans and maps of this area, including plans and maps submitted by third parties, that show or are suspected to show street layouts, street construction, or the presence of utilities or their construction;
 - e. A copy of all communications amongst City personnel, or between City personnel and anyone affiliated with or hired by the City (e.g., environmental professionals, insurance agent) concerning the dumping, filling, or waste-burning practices in this area;
 - f. A copy of all communications between City personnel and personnel from the Town of Dartmouth concerning the dumping, filling, or waste-burning practices in this area;
 - g. A copy of all complaints or correspondence, both official and unofficial, received by the City or any of its subdivisions from any other subdivision of the City or from any person regarding fill, solid waste, or contamination in the soil, or the general conditions of the soil in this area;
 - h. A copy of all documents and communications within the City pertaining to potential fill or dumping of solid waste in this area, including but not limited to internal and external communications, telephone notes, photographs, and field notes;
 - i. Person(s), including businesses, who may have knowledge of or participated in these activities in the area;

- j. Generator(s) of fill, solid waste, or other material to this area;
- k. Source(s) of fill, solid waste, or other material to this area;
- 1. Any person or company who by contract, agreement, or otherwise, directly or indirectly, arranged for the transport, disposal, or storage of fill, solid waste, or other material to this area; and
- m. Any person or company who directly or indirectly transported fill, solid waste, or other material to this area.
- 2. Please identify, provide a detailed description of, and provide all documentation concerning:
 - a. The subject matter of the *Standard Times* article from May 29, 1939 (attached as Attachment D), including its quote "The Department of Public Works uses the McCabe Street lots for a dumping ground", regarding dumping, filling, or burning in the area of McCabe Street or the streets listed above.
 - b. The subject matter of the *Standard Times* article from June 2, 1939 (attached as Attachment E) regarding dumping, filling, or burning in the area of McCabe Street or the streets listed above.

MassDEP hereby requests your responses to this <u>REQUEST FOR INFORMATION</u> by Friday, February 22, 2019. This date constitutes an enforceable Interim Deadline, pursuant to 310 CMR 40.0167. Failure to comply with an Interim Deadline may result in enforcement actions by the MassDEP, including, but not limited to, the issuances of a Notice of Noncompliance, an Administrative Penalty, and/or Enforcement Orders, or, referral to the Massachusetts Attorney General's Office.

MassDEP strongly encourages you to give this matter your immediate attention. Your response must be sent to Lori Williamson, Bureau of Waste Site Cleanup, Department of Environmental Protection, 20 Riverside Drive, Lakeville, Massachusetts 02347. If you have any questions regarding the information requested herein, please contact Ms. Williamson at the letterhead address, or by telephone at (508) 946-2803.

Thank you for your cooperation.

Attachment B

INSTRUCTION SUMMARY FOR SUBMITTING RESPONSE TO REQUEST FOR INFORMATION PURSUANT TO M.G.L. c.21E, SECTIONS 2, 4 & 8

I. General Instructions

Pursuant to M.G.L. c.21E and the Massachusetts Contingency Plan (MCP), 310 CMR 40.0000, you are required to complete and submit the enclosed <u>REQUEST FOR INFORMATION</u> ("<u>REQUEST</u>") in the manner and form described below. Failure to submit an accurate and complete response may result in the commencement of legal action against you by MassDEP. You have a continuing obligation to supplement and/or update responses provided upon obtaining new information material to any <u>REQUEST</u>, or to correct any errors or omissions in any response thereto.

The fact that an investigation is or may be ongoing shall not excuse failure to respond to each <u>REQUEST</u> as fully as possible.

II. Form of Responses

Submit your responses with a dated cover letter by the required deadline. Each response should be set out in a separate, numbered paragraph that corresponds to the <u>REQUEST</u> being answered.

You have an obligation to provide the best information available. Accordingly, you should seek out responsive information from all relevant sources. If specific information has not been memorialized but is responsive to the <u>REQUEST</u>, your response must include that information. <u>Submission of cursory responses</u> when other responsive information is available will be considered noncompliance with this Request.

For each <u>REQUEST</u> and subpart, if the information responsive to the <u>REQUEST</u> is not in your possession, custody, or control, please: (1) undertake reasonable efforts to obtain the information; (2) state what measures you took to obtain that information, if unsuccessful; and (3) identify the person(s) and/or entity(ies) who have or maintain such custody or control over the information, if known.

Unless otherwise specified, attach a legible photocopy of each and every document identified in your response, numbered according to the specific <u>REQUEST</u> to which it responds, unless the information is maintained or stored in such a manner that makes it impossible to submit a photocopy. For any information that does not exist in such a reproducible format, please identify the information and the manner and format in which it is stored or maintained.

III. Confidentiality

For each and every document or part thereof which you claim is protected from disclosure by 310 CMR 40.0011, you must separate the portions of the document(s) for which such protection is <u>not</u> claimed, and, pursuant to 310 CMR 3.00, state the nature of the protected information and the basis for your claim of protection from disclosure.

IV. Personal Privacy Information

Personnel, medical, and similar files, the disclosure of which to the general public may constitute an invasion of privacy, should be segregated from your responses, included on separate sheets, and marked as "Personal Privacy Information." However, unless prohibited by law, the Department may disclose this information to the general public without further notice to you.

V. Deadline

If you know or anticipate that you cannot comply with the deadline set by this <u>REQUEST FOR INFORMATION</u>, submit to the letterhead address and MassDEP employee named in this letter a written request for extension pursuant to 310 CMR 40.0167(2) as soon as possible.

VI. Certification

Your response to this <u>REQUEST FOR INFORMATION</u> is subject to the provisions of 310 CMR 40.0009 and must be certified consistent with its requirements. **Please use Attachment C - Certification of Submittal for this purpose.**

In relevant part, 310 CMR 40.0009: Certification of Submittal, states as follows:

(1)	Any pers declaratio	on undertaking a n:	response a	action	shall	include	the	following	written
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	For:								
	Name of person or entity								

(2) Th[is] written declaration...shall be made by the highest ranking individual having day-to-day responsibility for the performance of the response action which is the subject of the submittal. The written declaration shall not be made by the Licensed Site Professional engaged or employed by the RP, PRP, or Other Person to render Professional Services with respect to the site, unless the Licensed Site Professional's

client or employer has authorized him or her in writing to act as his or her agent for the purpose of making the written declaration.

(3) Th[is] written declaration...shall include the signature of each person making the certification, the date of each person's written declaration and the position or office of each such person.

VII. Definitions

Unless otherwise specified, words and phrases used in this <u>REQUEST FOR INFORMATION</u> shall have the meaning ascribed to them by M.G.L. c.21E, § 2 and/or 310 CMR 40.0006, unless the context therein clearly indicates otherwise. In all instances, (1) the use of a singular form includes the use of the plural form as well, and (2) a capital letter designation includes a small type-face designation, if appropriate to the context.

The words "and" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring all responses within the scope of the request.

The following definitions shall apply to the following words and phrases as they appear in this <u>REQUEST FOR</u> INFORMATION:

<u>Communication</u> means any manner or form of information or message transmission, howsoever produced or reproduced, whether by document, orally, electronically, or otherwise, that is made, distributed, and/or circulated between or among persons or data storage or processing units.

Document, documents, documentation, and records and information means any and all memorializations or recordings of any nature whatsoever within your possession, custody, or control (including without limitation, attorneys, advisors, accountants, analysts, consultants or any other person(s) acting or purporting to act for you or on your behalf). This includes, but is not limited to, contracts, agreements, communications, correspondence, telegrams, memoranda, records, reports, books, logs, summaries or records of telephone communications, summaries or records of personal conversation(s) or interviews, diaries, forecasts, statistical statements, work papers, drafts, copies, graphs, charts, accounts, analytical records, minutes or records of meetings or conferences, consultant's reports, appraisals, records, reports, or summaries of negotiations, press releases, drafts, notes, marginalia, bills, invoices, checks, inventory reconciliation records, bills of lading, manifests, photographs, microfilm, microfiche, videotape, journals, and all other written, printed, recorded or photographic matter or sound production or electronically or magnetically stored matter, however produced or reproduced.

For any tape, disc, CD-ROM disc, or other type of memory generally associated with computers and data processing, the attendant information must also be produced: (1) the programming instructions and other written material necessary to use such punch card, disc, disc pack, tape, or other type of memory; and (2) printouts of such punch card, disc, disc pack, tape, or other type of memory.

For purposes of this definition, "draft(s)" means any earlier, preliminary, preparatory, or tentative version of all or part of a document, whether or not such draft was superseded by another draft and whether or not the terms of the final draft are the same as or different from the terms of the final document.

The term "copies" shall mean each and every copy of any document that is not identical in every respect to the document being produced.

Identify means to state:

- (1) with respect to a natural person,
 - (a) the person's full name, present or last-known business and home address, business and home telephone number; and
 - (b) present or last-known job title, position or business and responsibilities in that position, his/her supervisor's title or position, and his/her supervisor's responsibilities and supervisor.
- (2) with respect to persons other than natural persons,
 - (a) the proper name or designation, the address of the principal office, legal form (i.e. corporation, partnership, etc.), and a brief description of its business.
- (3) with respect to a document,
 - (a) whether the document is currently in existence, the date the document bears (or bore) or if undated, the date it was written;
 - (b) the name and address of each person who wrote it or participated in the writing of it;
 - (c) the name and address of each person to whom it was addressed and each person to whom a copy was identified as being directed;
 - (d) the name and address of each person who received or may have received a copy of the document (including recipients designated as blind copies or "bcc");
 - (e) a description of the type of document, a summary of the contents of the document, its present location or custodian, or if unknown, its last known location or custodian; and
 - (f) if the copy is no longer in your possession, custody, or control, the disposition made of it, the reason(s) for such disposition, and the date of disposition thereof.

<u>Person</u> means any agency or political subdivision of the federal, state or local government; any state, public or private corporation or authority; any individual, trust, firm, joint stock company, factor, partnership, association, or entity; any officer, employee, or agent of such person, and/or group of persons.

ATTACHMENT C

CERTIFICATION OF SUBMITTAL (310 CMR 40.0009)

This ce	rtification must be included with	your response to the Request for I	ntormation.
all doc immed submit author submit signific	cally examined and am familiar with cuments accompanying this sublicately responsible for obtaining tall is, to the best of my knowledgized to make this attestation outlies.	est under the pains and penalticith the information contained in the bmittal, (ii) that, based on my the information, the material is and belief, true, accurate and con behalf of the person or entityhose behalf this submittal is mad ot limited to, possible fines and ete information.	is submittal, including any and inquiry of those individual nformation contained in thi mplete, and (iii) that I am fully legally responsible for this am/is aware that there are
Ву:	Signature	Date	
	Title		
For:			
	Name of person or entity		

RTN 4-0027363, 4-0027576

DEBRIS FILLS

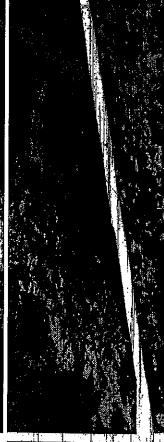
MANY VACANT LOTS OF CITY

Unsightly Dumps Spring Up In Several Sections Of New Bedford

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dition to the 12 dumps used by the Department of Public Works, there are at least 50 vacant lots through-

Liminated After Protest by Neigh One Dumping Ground



the .. Charles .. Street

of Parker Street between Oak Grove Cemetery and Bockdale Ave-nie and extending north from Partance. This dump covers several acres and is on property owned by

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tor 100 yands along the north

doned cars, old auto seats, mal-tresses and every conceivable kind of rubbish is-thrown. side of Perker Street parts of aban-

Tires Start

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these with cultibing they say It effi-izing yound rottow their example and dump their rubbish a reason-able distance north of the street and not by

Parker Street dump, the dump, on both sides of McCabe Street, west of Rockside Avenue, is an example of just what a dump inside the city limits should never be allowed

rid of nahes, paper and every celvable kind of junk and rub-

using this dumping and object to REPUBLICANS SEE THOMAS RAPS SAVING IN STATES

Say Saltonstall Working 'Under Handicaps'

MERINGTON, May 39 TAF

Socialist Says Russia Has. Become Totalitarian

SOVIET UNION Opposes Bill for Federal WALSH ASSAILS

Allotments

WASHIMITON

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TO GET SALARY **FOWN OFFICIAL**

To Pay Moderator For Fairhaven Meeting

PELES

SAVING IN STATES THOMAS RAPS both rides of the street of tilked a strike street of the nearly an eighth of a mile on either Say junk and rubside of the greet. The south side seems to he the favorite dumping ground, but every verset in

west or the Oesting He residents of the far Hellities." The city also uses this loca-tion to get rid of the rubbish it col-terts from homes in the neighbor-hood. This dump seems to be a fa-Vacant lots at the head of Lexigton Street, west of Jenny Lind Favorite of Goale and east

Works are the suggestment or runne money that had already been spening the yards of mills which have been abundaned and are the property of the city. These dumpa are HOLY GHOST REAST are not close in the location, and it is at the end of a street, not at the Location and traveled highway.

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not within view of pedestrians and auto drivers, and in most instances the, mills are not near dwelling

of the Fairbaven Mills and the Whitman Mills in the North End, and the Butler Mill in the South dumping. ment of Rubile Works, which has established official dumps in yards grounds exclusively by the Depart.

Next: Beason secribed for use of vacant lots here as neighbor-hood dumping grounds.

officiers.

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Saltonstall Working

.. Socialist Says Russia Has save the states more than \$100,000.000 in the next two years, the Republican National Committee esti-'Under Handicaps'

Become Totalitarian

State

of the Socialist Party, spoke at La-American policies in retation to bor Temple last night at them were discussed. In Massachusetts, the committee said, Governor Saltonstall is work, ing under "handicape." The state-Jovernor Saltonstall reports that ment added:

for debt service incurred because of the hutricane and there was a \$5,000,000 therease in weffare disturnements to cities and towns for \$10,000,000 of the increase in the 1839 budget is traceable to, 1838 atone. The preceding Gayernor left just \$15,000 in the cash drawer, Lest "There was an additional \$1,500,000 the purpose, as houses year he had \$4,300,000 in free cash,

Stalin, however, Lenin's plans are not'being realized, he added. A nev concentration camps and mis treated brutally, than in any other totalitarian state, Mr. Thomas de bureaucracy is being built up, mor paople have been alain, more throw great things OBSERVANCE CLOSES do Solemn High Maas, offered year terday by the Monsignor Antonio Previera, pastor of Mr. Carnet Church, marked the close of a weekend observance of the Feast events in the Portuguess religious eslendar. The Rev John V. Resenof the Holy Chost, one of the major

bill probably would lead to heve lossing the nations which have not repaid their borrowings of the lass war, Mr. Thomas said. The Pittman

re ceremonites. The Holy Ghost Club heid an an-

colebration of the occasion

des, dencon, and the Rev. Joseph Valerio, sub-descon assisted, in

was visiting Sacred Hear here today to ican Civic League and the State of Band of New Bedford carried the clown of the Egly Ghost. The percount has been archibited through. Pesterday at its clubrooms in Bridge Street, Fairhaven. An im-pressive procession, including the Drill Team of the Portuguese-Amer-lean Civic League and the State

SOVIET UNION Opposes Bill for Federal WALSH ASSAILS

Allotments

a meet. siding our public schools from the Treasury, Walsh said, WASHTHREEDING THE TATE Norman Thomas, national leader Federal Government, Schator of the Socialist Party, spoke & La. "We cannot undertake to sub-"The most potent waspon of dica Panding legislation to sive state frame of the state of the section of the sectio the public school system by the ing presided over by Toby Mendes. Federal Treasury," International war dangers and the taint of Federal

country to lead a "United States

of Europe," Mr.

Thomas declared.

heard in Russia, and from my careful reading of the last two or three

Jears. I am convinced now Russia morrow for James Boward Bridge, is nothing more or less than anoth. 89, author and editor who was sec. er totallarian state" the speaker retary to Herbert Spencer, the asserted.

British philosopher, and Andrew NEW YORK, May 19 (INS). Funeral services will be held to

hem were discussed.

The Sowiet Union is not a fit trol of schools and the education of outry to lead a "United States," youth. The present bill is the open-

In answer to a question. He said he ity report on the bill approved by once had high hopes for Russia; the Senate Education Committee.

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Protested as DumpsHere In Progress Handicap

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Some switch of hour portrained in the section dumps do not any desire to clear them. I then how and police destroy have no authority to note that they have the statistic.

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