

**COMMITMENT & INTEGRITY  
DRIVE RESULTS**

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October 14, 2010

Massachusetts Department of Environmental Protection  
BWSC/WERO  
436 Dwight Street  
Springfield, MA 01103

Re: 120-Day Release Abatement Measure Status Report  
University of Massachusetts  
Southwest Residential Area Concourse Project  
Amherst, Massachusetts  
MassDEP Release Tracking Number 1-17872

To Whom It May Concern:

On behalf of the University of Massachusetts (UMass), Woodard & Curran, Inc. (W&C) has prepared this 120-Day Release Abatement Measure (RAM) Status Report relating to the RAM being performed at the above-mentioned site.

On June 18, 2010, the Massachusetts Department of Environmental Protection (MassDEP) received a written RAM Plan. The RAM Plan concerned the Site referred to as the Southwest Residential Area on the UMass campus in Amherst, Massachusetts, identified by MassDEP Release Tracking Number (RTN) 1-17872 (the "Site"). The subject of this RAM Plan is the excavation and management of polychlorinated biphenyl (PCB)-impacted soils at the Site. The source of the PCBs in soils is PCB containing caulking on adjacent structures within the work area. This work is also being conducted under an Approval issued by the United States Environmental Protection Agency (EPA) under 40 CFR 761.61.

This RAM is being conducted as part of a larger concourse revitalization project within the Southwest Residential Area, referred to as the Southwest Concourse replacement project (see attached Figure). Beginning in May 2010, the southwest concourse is undergoing renovations to paved and unpaved ground surfaces within the Southwest Residential Area. The work within this approximately 5-acre site includes, but is not limited to: removal and disposal of existing ground surface coverings (pavement, concrete, etc.); regrading and excavating soils to support new ground surface coverings, landscaping areas, and utilities; removal and replacement of granite staircases; removal and disposal of select retaining walls; and restoring select ground surfaces with concrete, pavement, pavers, etc.

The objective of this RAM is to properly manage PCB-impacted soils in areas planned for soil excavation in support of new infrastructure and subgrade components as part of the Southwest Concourse replacement project. Following removal, post-excavation samples were collected to determine the concentration of PCBs remaining in the sub-soils. Given that this project is regulated both under 40 CFR 761 and the Massachusetts Contingency Plan (MCP), the EPA's high occupancy area cleanup level of  $\leq 1$  parts per million (ppm) total PCBs was used as the remedial objective for no further restrictions. If this level is met, then the soils represented by the characterization data will have unrestricted use and a condition of No Significant Risk can be achieved under the MCP.



In areas not subject to excavation or for residual concentrations of PCBs following excavation completion, EPA's high occupancy area cleanup level of  $\leq 10$  ppm total PCBs will be used as the remedial objective with further restrictions, as applicable. In these areas, the remaining soils will be covered by a cap meeting the requirements of 40 CFR 761.61(a)(7), which would include asphalt, concrete, or other similar material at the required thickness. The objective of the cap will be to prevent or minimize human exposure, infiltration of water, and erosion. Under these conditions, a condition of No Significant Risk can also be achieved under the MCP through the use of restrictions, as applicable.

This RAM Status Report has been prepared in a format established at 310 CMR 40.0445 and summarizes the results of RAM activities conducted at the site during the reporting period from June 18 through the beginning of October 2010.

### **Status of Response Operations [310 CMR 40.0445(2)(a)]**

As discussed in the RAM Plan, the work associated with the RAM involves the excavation and off-site disposal of PCB-impacted soils that are being disturbed during the concourse replacement project. PCBs were detected in soils located throughout the concourse project area.

Between June 18 and August 12, 2010, Triumvirate Environmental Inc. (TEI) performed excavation activities of PCB-impacted soils across the project site as part of the concourse replacement project. All PCB impacted soils were placed into lined and covered roll-off containers and segregated based on concentrations (e.g.,  $\geq 50$  ppm PCBs; and  $> 1$ ,  $< 50$  ppm PCBs).

Approximately 1,000 tons of  $\geq 50$  ppm PCB impacted soils (and concrete) and approximately 1,400 tons of  $> 1$  and  $< 50$  ppm PCB impacted soils were collected in their respective roll-off containers. As of the date of this Status Report, the majority of the roll-off containers have been transported off-site for disposal; however, this process is still on-going. The  $\geq 50$  ppm PCB impacted materials are being transported to EQ Wayne Disposal chemical waste landfill in Belleville, MI, as hazardous waste under uniform hazardous waste manifests. The  $> 1$  and  $< 50$  ppm soils are being transported to the Waste Management of New Hampshire – Turnkey Landfill in Rochester, NH under a Massachusetts Bill of Lading.

Post-excavation soil samples were collected following the initial excavations and following subsequent excavations until the cleanup levels were met. Upon meeting the cleanup objectives (stated above), the excavation areas were subsequently backfilled with the appropriate material specified as part of the replacement project Contract Documents.

Currently, all soil removal activities have been completed and site data is being reduced, validated, and evaluated as part of the project and MCP reporting requirements. It is expected that this information will be provided in the next RAM submittal.

### **Significant New Site Information or Data [310 CMR 40.0445(2)(b)]**

No significant new site information has been obtained since the submittal of the RAM Plan. Volumes of soil requiring removal were consistent with the anticipated volumes presented in the RAM Plan. As part of the work, 11 separate areas are present with PCB concentrations  $> 1$  ppm and will be managed with restrictions (e.g., concrete cap or other use restriction).



**Details of and/or Plans for the Management of Remediation Waste, Remedial Wastewater, and/or Remedial Additives [310 CMR 40.0445(2)(c)]**

Remediation waste subject to the RAM and generated to date includes the impacted soils that were excavated. These soils have been or are being transported for disposal via a uniform hazardous waste manifest (for  $\geq 50$  ppm PCB materials) to EQ Wayne Disposal chemical waste landfill in Belleville, MI or via a Bill of Lading (for  $> 1$ ,  $< 50$  ppm PCB soils) to the Waste Management of New Hampshire – Turnkey Landfill in Rochester, NH. It is expected that the waste disposal documentation will be provided in the next RAM submittal.

**Any Other Information Required by the Department in its Review and Evaluation of a Status Report [310 CMR 40.0445(2)(d)]**

This section is not applicable to this report.

**LSP Opinion [310 CMR 40.0445(2)(e)]**

The RAM is being conducted in conformance with the written RAM Plan. There were no site-specific MassDEP approvals issued as part of this RAM. The electronic seal and signature of the Licensed Site Professional is provided in Section E of the RAM Transmittal Form BWSC106, provided via electronic transmission with this report.

If you have any questions or require additional information, please feel free to contact me at [jhamel@woodardcurran.com](mailto:jhamel@woodardcurran.com) or (978) 557-8150.

Sincerely,

WOODARD & CURRAN INC.

A handwritten signature in cursive script, reading "Jeffrey A. Hamel".

Jeffrey A. Hamel, LSP, LEP  
Senior Vice President

223505

Enclosure(s): Figure

cc: T. Shaw  
T. Behta



**FIGURE**





Massachusetts Department of Environmental Protection  
Bureau of Waste Site Cleanup

BWSC106

RELEASE ABATEMENT MEASURE (RAM)  
TRANSMITTAL FORM

Release Tracking Number

1 - 17872

Pursuant to 310 CMR 40.0444 - 0446 (Subpart D)

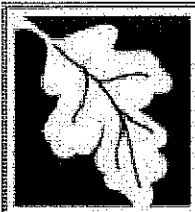
**A. SITE LOCATION:**

1. Site Name/Location Aid: **UMASS SOUTHWEST RESIDENTIAL AREA**
2. Street Address: **MASS AVE. AND UNIVERSITY DR.**
3. City/Town: **AMHERST** 4. ZIP Code:
5. UTM Coordinates: a. UTM N: **4698316** b. UTM E: **209445**
- ☐ 6. Check here if a Tier Classification Submittal has been provided to DEP for this disposal site.  
☐ a. Tier IA ☐ b. Tier IB ☐ c. Tier IC ☐ d. Tier II
7. If a Tier I Permit has been issued, provide Permit Number: \_\_\_\_\_

**B. THIS FORM IS BEING USED TO:** (check all that apply)

1. List Submittal Date of Initial RAM Plan (if previously submitted): **6/18/2010**  
(mm/dd/yyyy)
- ☐ 2. Submit an **Initial Release Abatement Measure (RAM) Plan**.  
a. Check here if the RAM is being conducted as part of the construction of a permanent structure. If checked, you must specify what type of permanent structure is to be erected in or in the immediate vicinity of the area where the RAM is to be conducted.  
b. Specify type of permanent structure: (check all that apply) ☐ i. School ☐ ii. Residential ☐ iii. Commercial  
☐ iv. Industrial ☐ v. Other Specify: \_\_\_\_\_
- ☐ 3. Submit a **Modified RAM Plan** of a previously submitted RAM Plan.
- ☒ 4. Submit a **RAM Status Report**.
- ☐ 5. Submit a **Remedial Monitoring Report**. (This report can only be submitted through eDEP, concurrent with a RAM Status Report.)  
a. Type of Report: (check one) ☐ i. Initial Report ☐ ii. Interim Report ☐ iii. Final Report  
b. Number of Remedial Systems and/or Monitoring Programs: \_\_\_\_\_  
A separate BWSC106A, RAM Remedial Monitoring Report, must be filled out for each Remedial System and/or Monitoring Program addressed by this transmittal form.
- ☐ 6. Submit a **RAM Completion Statement**.
- ☐ 7. Submit a **Revised RAM Completion Statement**.
8. Provide Additional RTNs:  
☐ a. Check here if this RAM Submittal covers additional Release Tracking Numbers (RTNs). RTNs that have been previously linked to a Primary Tier Classified RTN do not need to be listed here. This section is intended to allow a RAM to cover more than one unclassified RTN and not show permanent linkage to a Primary Tier Classified RTN.  
b. Provide the additional Release Tracking Number(s) covered by this RAM Submittal. ☐ -  ☐ -

(All sections of this transmittal form must be filled out unless otherwise noted above)



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C. RELEASE OR THREAT OF RELEASE CONDITIONS THAT WARRANT RAM:

1. Identify Media Impacted and Receptors Affected: (check all that apply)

- ☐ a. Air ☐ b. Basement ☐ c. Critical Exposure Pathway ☐ d. Groundwater ☐ e. Residence  
☐ f. Paved Surface ☐ g. Private Well ☐ h. Public Water Supply ☐ i. School ☐ j. Sediments  
☒ k. Soil ☐ l. Storm Drain ☐ m. Surface Water ☐ n. Unknown ☐ o. Wetland ☐ p. Zone 2  
☐ q. Others Specify: \_\_\_\_\_

2. Identify all sources of the Release or Threat of Release, if known: (check all that apply)

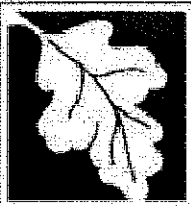
- ☐ a. Above-ground Storage Tank (AST) ☐ b. Boat/Vessel ☐ c. Drums ☐ d. Fuel Tank  
☐ e. Pipe/Hose/Line ☐ f. Tanker Truck ☐ g. Transformer ☐ h. Under-ground Storage Tank (UST)  
☐ i. Vehicle ☒ j. Others Specify: **PCB CAULKING**

3. Identify Oils and Hazardous Materials Released: (check all that apply)

- ☐ a. Oils ☐ b. Chlorinated Solvents ☐ c. Heavy Metals  
☒ d. Others Specify: **POLYCHLORINATED BIPHENYLS (PCBS)**

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply, for volumes list cumulative amounts)

- |  |   |
|--|---|
| <input type="checkbox"/> 1. Assessment and/or Monitoring Only                | <input type="checkbox"/> 2. Temporary Covers or Caps                        |
| <input type="checkbox"/> 3. Deployment of Absorbent or Containment Materials | <input type="checkbox"/> 4. Temporary Water Supplies                        |
| <input type="checkbox"/> 5. Structure Venting System                         | <input type="checkbox"/> 6. Temporary Evacuation or Relocation of Residents |
| <input type="checkbox"/> 7. Product or NAPL Recovery                         | <input checked="" type="checkbox"/> 8. Fencing and Sign Posting             |
| <input type="checkbox"/> 9. Groundwater Treatment Systems                    | <input type="checkbox"/> 10. Soil Vapor Extraction                          |
| <input type="checkbox"/> 11. Bioremediation                                  | <input type="checkbox"/> 12. Air Sparging                                   |



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Pursuant to 310 CMR 40.0444 - 0446 (Subpart D)

D. DESCRIPTION OF RESPONSE ACTIONS (cont.): (check all that apply, for volumes list cumulative amounts)

☒ 13. Excavation of Contaminated Soils

☐ a. Re-use, Recycling or Treatment

☐ i. On Site Estimated volume in cubic yards \_\_\_\_\_

☐ ii. Off Site Estimated volume in cubic yards \_\_\_\_\_

ii.a. Receiving Facility: \_\_\_\_\_ Town: \_\_\_\_\_ State: \_\_\_\_\_

ii.b. Receiving Facility: \_\_\_\_\_ Town: \_\_\_\_\_ State: \_\_\_\_\_

iii. Describe: \_\_\_\_\_

☐ b. Store

☐ i. On Site Estimated volume in cubic yards \_\_\_\_\_

☐ ii. Off Site Estimated volume in cubic yards \_\_\_\_\_

ii.a. Receiving Facility: \_\_\_\_\_ Town: \_\_\_\_\_ State: \_\_\_\_\_

ii.b. Receiving Facility: \_\_\_\_\_ Town: \_\_\_\_\_ State: \_\_\_\_\_

☒ c. Landfill

☐ i. Cover Estimated volume in cubic yards \_\_\_\_\_

Receiving Facility: \_\_\_\_\_ Town: \_\_\_\_\_ State: \_\_\_\_\_

☒ ii. Disposal Estimated volume in cubic yards **1600**

Receiving Facility: **TURNKEY/EQ-WAYNE DISPOS** Town: **ROCHESTER NH/BELLEVILL** State: **MI**

☐ 14. Removal of Drums, Tanks or Containers:

a. Describe Quantity and Amount: \_\_\_\_\_

b. Receiving Facility: \_\_\_\_\_ Town: \_\_\_\_\_ State: \_\_\_\_\_

c. Receiving Facility: \_\_\_\_\_ Town: \_\_\_\_\_ State: \_\_\_\_\_

☐ 15. Removal of Other Contaminated Media:

a. Specify Type and Volume: \_\_\_\_\_

b. Receiving Facility: \_\_\_\_\_ Town: \_\_\_\_\_ State: \_\_\_\_\_

c. Receiving Facility: \_\_\_\_\_ Town: \_\_\_\_\_ State: \_\_\_\_\_

☐ 16. Other Response Actions:

Describe: \_\_\_\_\_

☐ 17. Use of Innovative Technologies:

Describe: \_\_\_\_\_





Massachusetts Department of Environmental Protection  
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Pursuant to 310 CMR 40.0444 - 0446 (Subpart D)

E. LSP SIGNATURE AND STAMP :

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and 309 CMR 4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

> if Section B of this form indicates that a **Release Abatement Measure Plan** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that a **Release Abatement Measure Status Report** and/or **Remedial Monitoring Report** is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that a **Release Abatement Measure Completion Statement** is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal:

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

1. LSP #: 1278

2. First Name: JEFFREY A

3. Last Name: HAMEL

4. Telephone: 9785578150

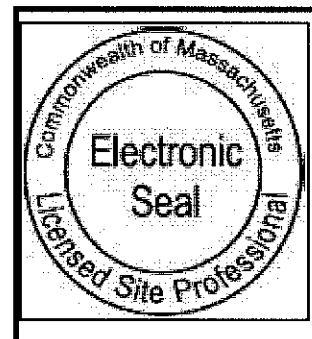
5. Ext.:

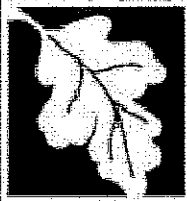
6. FAX:

7. Signature: Jeffrey A Hamel

8. Date: 10/15/2010  
(mm/dd/yyyy)

9. LSP Stamp:





**Massachusetts Department of Environmental Protection**  
*Bureau of Waste Site Cleanup*

**BWSC106**

**RELEASE ABATEMENT MEASURE (RAM)  
TRANSMITTAL FORM**

Release Tracking Number

**1 - 17872**

Pursuant to 310 CMR 40.0444 - 0446 (Subpart D)

**F. PERSON UNDERTAKING RAM:**

1. Check all that apply: ☐ a. change in contact name ☐ b. change of address ☐ c. change in the person undertaking response actions
2. Name of Organization: **UNIVERSITY OF MASSACHUSETTS**
3. Contact First Name: **THERESA** 4. Last Name: **BECHTA**
5. Street: **117 DRAPER HALL** 6. Title: **ASST DIRECTOR OF ENVIRONMENTAL SE**
7. City/Town: **AMHERST** 8. State: **MA** 9. ZIP Code:
10. Telephone:  11. Ext.:  12. FAX:

**G. RELATIONSHIP TO RELEASE OR THREAT OF RELEASE OF PERSON UNDERTAKING RAM:**

- ☒ 1. RP or PRP ☒ a. Owner ☐ b. Operator ☐ c. Generator ☐ d. Transporter  
☐ e. Other RP or PRP Specify:
- ☐ 2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
- ☐ 3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
- ☐ 4. Any Other Person Undertaking RAM Specify Relationship:

**H. REQUIRED ATTACHMENT AND SUBMITTALS:**

- ☐ 1. Check here if any Remediation Waste, generated as a result of this RAM, will be stored, treated, managed, recycled or reused at the site following submission of the RAM Completion Statement. You must submit a Phase IV Remedy Implementation Plan along with the appropriate transmittal form (BWSC108).
- ☒ 2. Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.
- ☐ 3. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the implementation of a Release Abatement Measure.
- ☐ 4. Check here if any non-updatable information provided on this form is incorrect, e.g. Release Address/Location Aid. Send corrections to the DEP Regional Office.
- ☐ 5. If a RAM Compliance Fee is required for this RAM, check here to certify that a RAM Compliance Fee was submitted to DEP, P. O. Box 4062, Boston, MA 02211.
- ☒ 6. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.



Massachusetts Department of Environmental Protection  
Bureau of Waste Site Cleanup

BWSC106

RELEASE ABATEMENT MEASURE (RAM)  
TRANSMITTAL FORM

Release Tracking Number

1 - 17872

Pursuant to 310 CMR 40.0444 - 0446 (Subpart D)

I. CERTIFICATION OF PERSON UNDERTAKING RAM:

1. I, **Theresa W. Bechta**, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

2. By: **Theresa W. Bechta**

Signature

3. Title: **ASST DIRECTOR OF ENV. SER**

4. For: **UNIVERSITY OF MASSACHUSETTS**

(Name of person or entity recorded in Section F)

5. Date: **10/14/2010**

(mm/dd/yyyy)

☐ 6. Check here if the address of the person providing certification is different from address recorded in Section F.

7. Street: \_\_\_\_\_

8. City/Town: \_\_\_\_\_ 9. State: \_\_\_\_\_ 10. ZIP Code: \_\_\_\_\_

11. Telephone: \_\_\_\_\_ 12. Ext.: \_\_\_\_\_ 13. FAX: \_\_\_\_\_

YOU ARE SUBJECT TO AN ANNUAL COMPLIANCE ASSURANCE FEE OF UP TO \$10,000 PER BILLABLE YEAR FOR THIS DISPOSAL SITE. YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.

Date Stamp (DEP USE ONLY:)

Received by DEP on

10/15/2010 8:56:31 AM

## MEMORANDUM



**TO:** MassDEP - Western Regional Office  
**FROM:** Woodard & Curran  
**DATE:** October 14, 2010  
**RE:** Statement of Provisions – Section H.2.  
RTN 1-17872 BWSC-106

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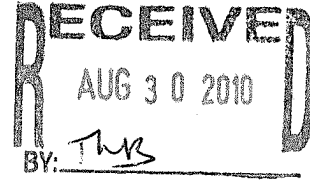
To Whom It May Concern:

The work subject to the RAM is also being conducted under an Approval dated August 30, 2010 issued by the United States Environmental Protection Agency (EPA) under 40 CFR 761.61. Applicable provisions are attached to this memorandum.



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

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**



Donald A. Robinson, Ph.D.  
Director of Environmental Health & Safety  
Draper Hall Room 117  
University of Massachusetts  
40 Campus Center Way  
Amherst, Massachusetts 01003-9244

Re: University of Massachusetts - Amherst  
Southwest Residential Area Concourse PCB Cleanup and Disposal Approval under  
40 CFR §§ 761.61(a) and (c) and § 761.79(h)

Dear Mr. Robinson:

This is in response to University of Massachusetts (UMASS) Notification<sup>1</sup> for approval of a proposed PCB cleanup for the Southwest Residential Area Concourse located on the University of Massachusetts – Amherst campus (the Site). The Site contains PCB-contaminated materials that exceed the allowable PCB levels under the federal PCB regulations at 40 CFR §§ 761.20, 761.61(a), and 761.62. Specifically, PCBs have been identified in caulk; in surrounding concrete, brick, and asphalt substrates; on *non-porous surfaces* (i.e. granite stairs); and in soils.

In the Notification, UMASS has requested cleanup of the PCB contamination under the self implementing cleanup and disposal option (SIP) at § 761.61(a); the risk-based disposal option at § 761.61(c); and, the alternative decontamination option at § 761.79(h). UMASS is proposing the following PCB cleanup standards and activities under this project:

- For substrates that will be removed and/or encountered as part of the revitalization within the concourse project area, the caulk will be removed under § 761.62, and PCB-contaminated concrete and pavers, bedding sand beneath granite stairs, and, the PCB-contaminated asphalt and soils will be decontaminated under §§ 761.61(a) and 761.79(h) to achieve a *high occupancy area* cleanup standard of less than or equal to ( $\leq$ ) 1 ppm;

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<sup>1</sup> Information was submitted on behalf of UMASS by Woodward and Curran to satisfy the notification requirements under 40 CFR §§ 761.61(a)(3) and (c), and 761.79(h). Information was provided dated June 2010 (PCB Remediation Plan); July 7, 2010 (update of PCB sampling results); July 27, 2010 (Addendum 1 to Remediation Plan); August 18, 2010 (granite stairs data); and August 24, 2010 (Addendum 2 to Remediation Plan). These submissions will be referred to as the "Notification."

- Soils not planned for removal as part of the revitalization project will meet the  $\leq 1$  ppm PCB standard without further restriction or the  $\leq 10$  ppm beneath a compliant cap under § 761.61(a)(7);
- The soil area located north face wall of the John Quincy Adams at approximately 5 feet below ground surface (bgs) will be cleaned to a PCB cleanup standard of less than ( $<$ ) 25 ppm;
- Certain PCB-contaminated substrates, including certain concrete retaining walls, building walls, and a pedestrian tunnel ceiling will be encapsulated under the risk-based option at § 761.61(c) with long term maintenance and monitoring of the encapsulated surfaces;
- *Non-porous surfaces* (e.g. granite stairs) will be removed or decontaminated to a  $\leq 10 \mu\text{g}/100 \text{ cm}^2$ ;
- Disposal of approximately 45 rollofs of PCB wastes in a TSCA-approved disposal facility or RCRA hazardous waste landfill in accordance with § 761.61(a)(5)(i)(B)(2)(iii);
- Disposal of approximately 77 rollofs in a RCRA non-hazardous waste landfill as a less than ( $<$ ) 50 ppm PCB waste in accordance with § 761.61(a)(5)(i)(B)(2)(ii); and,
- Implementation of long term maintenance and monitoring of the *encapsulated porous surfaces*; and,
- Recording of a deed notice to document the PCB concentrations at the Site and to document the long-term maintenance and monitoring requirements.

Based on the EPA's review, the information provided in the Notification meets the notification requirements under 40 CFR §§ 761.61(a)(3), 761.79(h), and § 761.61(c) for *PCB remediation waste* and the disposal requirements under § 761.62 for *PCB bulk product waste*. Based on the information provided, EPA has determined that the abatement plan proposed by UMASS will not result in an unreasonable risk to public health or the environment when implemented in accordance with the Notification and the conditions specified in this Approval.

UMASS may proceed with its cleanup in accordance with 40 CFR §§ 761.61(a); 761.61(c); 761.62; 761.79(h); its Notification; and this Approval, subject to the conditions of Attachment 1.

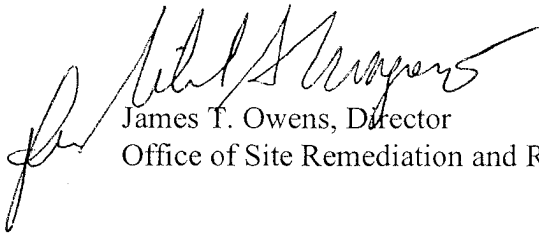
Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator  
United States Environmental Protection Agency  
5 Post Office Square, Suite 100 (OSRR07-2)  
Boston, Massachusetts 02109-3912  
Telephone: (617) 918-1527  
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This Approval does not release UMASS from any applicable requirements of federal, state or local law, including the requirements related to cleanup and disposal of PCBs or other contaminants under the Massachusetts Department of Environmental Protection (MassDEP) regulations.

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,

A handwritten signature in black ink, appearing to read "James T. Owens", is written over the typed name and title.

James T. Owens, Director  
Office of Site Remediation and Restoration

Attachment 1

cc: J. Hamel, Woodward & Curran  
MassDEP RTN: 1-17872  
File