

need for changes to a remedial action is significant but does not fundamentally alter the overall remedy.

Because EPA has determined that the changes to the remedial action at OU-I outlined below create significant but not fundamental differences from the remedy prescribed by the OU-I ROD, EPA is issuing this ESD.

#### **D. Summary of Circumstances Necessitating this ESD**

There are two circumstances requiring an ESD for Operable Unit 1.

1. The Record of Decision called for the concrete lining of the unnamed stream adjacent to the cap over the disposal area. The ESD calls for the culverting of a section of the unnamed stream adjacent to the disposal area and the replication of wetlands in the golf course across the street. This is necessary because it is not feasible restoring vegetation and habitat in the concrete lined channel as described in the ROD.
2. The substitution of a slurry wall for the shallow collection trench described in the Record of Decision along a section of the Site boundary; and the addition of two recovery wells to augment the slurry walls effectiveness in meeting the objectives of the remedy. The slurry wall was instituted because of depressions found in the bedrock surface during the design process. The recovery wells were installed due to difficulties in installing the slurry wall because of debris in this area.

EPA Interim Final Guidance on Preparing Superfund Decision Documents (OSWER Directive 9355.3-02) states that changes to a component of a remedy generally are incremental changes to the hazardous waste approach selected for the Site (i.e., a change in timing, cost, or implementability). EPA has determined that the revisions to the remedy described in this ESD do not fundamentally alter the overall approach of the remedy but, rather, are incremental changes to a component of the remedy. Thus, consistent with the guidance, it is appropriate to make these changes to the OU-I ROD through this ESD.

#### **E. Location and Times at Which the Administrative Record File is Available for Public Review**

**EPA Superfund  
Explanation of Significant Differences:**

**SULLIVAN'S LEDGE  
EPA ID: MAD980731343  
OU 01  
NEW BEDFORD, MA  
09/27/2000**

## EXECUTIVE SUMMARY

The Sullivan's Ledge Site, located in New Bedford, Massachusetts, consists of two operable units, Operable Unit 1 (OU1) and Operable Unit 2 (OU2). OU1 consists of a 12-acre historic disposal area and the adjacent unnamed stream. OU2 includes a 13-acre wooded wetland called Middle Marsh, and a 1.5 acre wetland area bordering the unnamed stream (400 feet upstream of the Middle Marsh) referred to as the "Adjacent Wetlands."

The selected remedy for Sullivan's Ledge OU1 included site preparation, soil excavation/treatment, sediment treatment, construction of an impermeable cap, diversion and lining of the unnamed stream, collection and treatment of on-site groundwater, wetlands restoration/enhancement, long-term environmental monitoring, institutional controls, and five-year reviews.

Three Explanations of Significant Difference (ESDs) have been issued for OU1. The first ESD revised the remedy so that soils in the disposal area would remain in place, untreated, and covered by the cap. Also, excavated soils and sediments from other areas of OU1 that exceeded cleanup standards would remain untreated and would be disposed of beneath the cap within the disposal area. The second ESD revised the remedy so that the stream channel would be permanently placed in an underground 72-inch pre-stressed concrete cylinder pipe (PCCP) and a new stream channel was created on the golf course and vegetation planted to recreate the habitat lost. Also, the ESD called for a slurry wall along a portion of the southern boundary and two recovery wells adjacent to the slurry wall. A third ESD incorporates ARARs related to landfill gas migration and describes the actions taken to comply with the ARARs.

The selected remedy for OU2 included site preparation, excavation of contaminated sediments and soils from portions of Middle Marsh and the Adjacent Wetland, dewatering of the excavated sediment/soils, disposal of the treated sediment/soils beneath the cap, wetlands restoration, institutional controls to prevent future residential use and non-recreational commercial use and to restrict access to Middle Marsh and the Adjacent Wetland, and long-term environmental monitoring.

This is the second five-year review for the site. The trigger for this statutory review is the signature date of the previous five-year review report on September 29, 2003. This review is required by statute as the selected remedies for OU1 and OU2 result in site contaminants being left on the site above levels that allow for unlimited use and unrestricted exposure.

This five-year review concludes that the remedies for both OU1 and OU2 currently protect human health and the environment because the construction of the remedy is complete, and operation and maintenance and monitoring of the remedy is being performed. However, in order for the remedy to be protective in the long-term, the following actions need to be taken.

### OU1

- Implement Institutional Controls;
- Continue to monitor the groundwater pump and treat operation effectiveness on controlling contaminant migration in order to comply with OU1 remedial action objectives (RAOs);



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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**Memorandum**

**Date:** September 23, 2008

Site: Sullivan's Ledge Superfund Site  
Date: 8.3  
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**Subject:** Transmittal of Second 5 Year Review,  
Sullivan's Ledge Superfund Site,  
New Bedford, MA

**From:** David O. Lederer  
Remedial Project Manager

**To:** James T. Owens, III  
Director, Office of Site Remediation and Restoration

**Thru:** Bob Cianciarulo,  
Chief, Massachusetts Superfund Section

Larry Brill  
Chief, Remediation and Restoration Branch

Richard A. Cavagnero  
Deputy Director, Office of Site Remediation and Restoration

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