



PHASE IV REMEDY IMPLEMENTATION PLAN

**LEISURE SHORES AND HOWARD'S BEACH
PORTION OF SHORELINE SEGMENT W1F-02 (BRANDT ISLAND WEST)
MATTAPOISETT, MASSACHUSETTS**

**BARGE B120 SPILL, BUZZARDS BAY, MASSACHUSETTS
RTN 4-17786**

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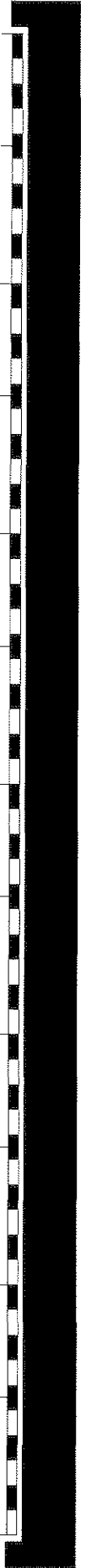




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FIGURES

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APPENDICES

APPENDIX A	Copy of BWSC108 Transmittal Form
APPENDIX B	Laboratory Analytical Report
APPENDIX C	Leisure Shores Test Pit Locations and Descriptions (September 20, 2006)
APPENDIX D	Leisure Shores Test Pit Locations and Descriptions (July 10, 2007)
APPENDIX E	Health and Safety Plan
APPENDIX F	Notice of Document Availability



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1.0 INTRODUCTION

GeoInsight, Inc. (GeoInsight) prepared this Phase IV Remedy Implementation Plan (RIP) at the request of Bouchard Transportation Company, Inc. (Bouchard) as part of response actions conducted under the Massachusetts Contingency Plan (MCP), 310 CMR 40.0000, associated with a release of No. 6 fuel oil from Bouchard Barge B120 that occurred on April 27, 2003 in Buzzards Bay, Massachusetts (the "Site"). This Phase IV RIP was prepared under the direction of Richard J. Wozmak, P.E., P.H. of EnviroLogic, LLC, the Licensed Site Professional (LSP)-of-record for this release and is specific to areas of shoreline segment W1F-02 (Brandt Island West) located in Mattapoisett, Massachusetts.

This Phase IV RIP is based upon MCP historical documents, including the May 2004 Phase I Initial Site Investigation Report, the August 2005 Phase II Comprehensive Site Assessment (CSA) Scope of Work and Conceptual Site Model, the August 3, 2006 Phase II CSA report, the August 3, 2006 Phase III Remedial Action Plan (RAP), and the April 3, 2007 Immediate Response Action (IRA) Status and Completion Report, as well as field data collected in 2007 after the Phase III RAP was completed. Assessment data collected during MCP field activities were used to evaluate potential risks to human health, public welfare, safety, and the environment as part of Method 1 and Method 3 Risk Characterizations conducted in the context of Phase I and Phase II activities, respectively. The Risk Characterizations supported the conclusion that a condition of No Significant Risk to human health, public welfare, safety, and the environment was achieved at the oiled shoreline segments and the subtidal



zone, with the exception of portions of the W1F-02-Brandt Island West (in Mattapoisett) and W2A-10-Long Island and Causeway South (in Fairhaven) segments. As a result, a Partial Class A-2 Response Action Outcome (RAO) Statement was submitted to the Massachusetts Department of Environmental Protection (MADEP) for these segments and the subtidal zone on August 3, 2006 and response actions were completed at these portions of the site in accordance with the MCP. The Phase III RAP identified potential response actions to be undertaken at the portions of the Brandt Island West and Long Island and Causeway South segments where limited amounts of residual oil are present and a condition of No Significant Risk to public welfare and/or the environment could not be concluded at the time the Risk Characterizations were prepared. A Phase IV RIP was prepared in November 2006 to address areas of residual oil at the Long Island and Causeway South segment (specifically the area of Hoppy's Landing).

This Phase IV RIP describes response actions to address residual oil detected in areas of the Leisure Shores and Howard's beach portions of the Brandt Island West segment. Refer to Figures 1 and 2 for the location of the Brandt Island West segment. A copy of Bureau of Waste Site (BWSC) Transmittal Form 108 associated with this Phase IV RIP is included in Appendix A.



2.0 BACKGROUND

On or about April 27, 2003, an unknown volume (estimated to range between 22,000 gallons and 98,000 gallons) of No. 6 fuel oil was released from Bouchard Barge B120 after entering the western approach of Buzzards Bay, Massachusetts. Oil from the release primarily floated on the water surface and was driven by waves, tides, and currents to strand in the intertidal zone. The heaviest oiling occurred on exposed, southwest facing shorelines, such as Barney's Joy in Dartmouth or West Island in Fairhaven.

The shoreline was initially divided into 149 shoreline segments. Of those 149 segments, 29 segments were found to be unoiled and not part of the Site. The Site was, therefore, considered to be comprised of the 120 shoreline segments that were oiled to varying degrees by the release. A Phase I Initial Site Investigation (ISI) and Conceptual Site Model (CSM) report, Tier Classification, and Conceptual Phase II Scope of Work (SOW) were filed for the Site on May 3, 2004. On May 21, 2004, a Partial Class A-2 Response Action Outcome (RAO) statement was filed for 57 out of the 120 shoreline segments. The maximum degree of initial oiling at these 57 shoreline segments was characterized as "light" or "very light," as well as three sandy beach segments where the maximum degree of initial oiling was characterized as "moderate."

A Tier IA Permit was issued by MADEP as part of a July 27, 2004 Decision to Grant Permit letter. A Phase II Comprehensive Site Assessment (CSA) SOW and Updated CSM were submitted to MADEP on August 24, 2005. MADEP approved portions of the proposed Phase II CSA SOW and requested additional information (primarily regarding the proposed ecological risk characterization) in a letter dated January 18, 2006. Additional information was provided to MADEP in a letter dated March 31, 2006, and MADEP issued final approval of the Phase II CSA SOW in a letter dated June 27, 2006.



A Phase II CSA was completed in August 2006 to characterize the remaining 63 shoreline segments and the subtidal zone in Buzzards Bay. The Phase II CSA included a Method 3 Risk Characterization (Method 3) that concluded that a condition of No Significant Risk to human health, public welfare, safety, and the environment was present at 61 of the remaining 63 shoreline segments and the subtidal zone in Buzzards Bay. A Partial Class A-2 RAO was submitted for these 61 segments and the subtidal zone in August 2006. At the remaining two shoreline segments (segment W2A-10-Long Island and Causeway North and segment W1F-02-Brandt Island West), the Method 3 concluded that a condition of No Significant Risk exists for human health and safety. However, localized residual oil is present at portions of these two segments and a condition of No Significant Risk to public welfare (at portions of both segments) and/or the environment (at a portion of segment W2A-10) could not be concluded at that time. The August 2006 Phase III RAP identified potential response actions to be conducted at these two shoreline segments where a condition of No Significant Risk could not be concluded.





3.0 ADDITIONAL FIELD ACTIVITIES

Field activities conducted at this segment as part of Immediate Response Actions were summarized in previously-submitted IRA Status reports. Assessment activities were also conducted as part of comprehensive response actions conducted for the Phase II CSA and Phase III RAP. Please refer to the August 3, 2006 Phase II CSA and Immediate Response Action (IRA) Status Reports for information regarding reconnaissance and responses to reports of oil at the Brandt Island West segment that occurred prior to March 28, 2007. Additional field activities conducted at this segment since the last IRA Status report are summarized below.

3.1 RECONNAISSANCES AND RESPONSES TO REPORTS OF OIL

Reconnaissances and responses to reports of oil from residents were conducted on several occasions between May and July 2007 by the LSP and a representative from GeoInsight.

On May 4, 2007, a visual inspection was conducted at a portion of the Leisure Shores area between the two rock groins at shoreline segment W1F-02. The field team found and removed several cobbles with varying amounts of dried, hardened splatter. The oiled cobbles were primarily located in a row of rocks at the approximate mid-tide mark, between the rock groin adjacent to the “torpedo” grill and the rock groin to the west (intersecting the stream channel). One cobble was found and removed that had a “halo” of pavement (i.e., sediment mixed with oil) approximately one inch thick extending approximately one inch around the cobble perimeter. The pavement was soft and flexible to the touch. The total volume of oil and oiled material (e.g., sediment and cobbles) removed during this field inspection was approximately one-half of a 5-gallon bucket.

On May 16, 2007, a visual inspection was conducted at a portion of the Leisure Shores area between the two rock groins at shoreline segment W1F-02. Several cobbles with dried,



hardened oil splatter were observed in the same area of Leisure Shores as the material encountered on May 4, 2007. The field team cleaned approximately 30 to 40 of the oiled cobbles by manually scraping the splatter from the surface with hand tools. The clean cobbles were then returned to their original location. Cobbles that could not be sufficiently cleaned were removed by the field team. The total volume of rocks and oil removed during this field inspection was approximately one-half of a 5-gallon bucket.

A response to a report of oil by Frank Haggerty was conducted on May 21, 2007. The field team observed two small tarballs at the Leisure Shores portion of W1F-02 (each approximately 1 inch diameter) in the same general area as the previous findings. The tarballs were soft and flexible to the touch and were removed by the field team. Several cobbles with dried, hardened oil splatter (up to approximately 1 inch diameter) were also observed on the shoreline and removed. The total volume of rocks and oiled material removed was approximately one and one-half 5-gallon buckets. The field team excavated six test pits in the same localized area that the oiled cobbles were observed. Evidence of oil (i.e., sheen or particles of oil) was not observed in the test pits.

On June 12, 2007, the LSP and representatives from GeoInsight and MADEP conducted a shoreline and buried oil inspection at portions of Leisure Shores Beach. Several cobbles with small areas (up to 1 inch in diameter) of hardened, dried splatter were observed and removed for disposal. The total volume of rocks and oiled material removed during this inspection was approximately one-quarter of a 5-gallon bucket. Eleven test pits were excavated in the intertidal zone, in the approximate area where residual oil (in the form of small particles and/or sheens) was observed during previous subsurface inspections. Particles and/or sheens were observed in three of the eleven test pits. In general, the sheens were small, generally 1 inch or less in diameter. The particles were also small, measuring less than 1 millimeter in diameter ("pinhead" sized). Only one larger particle (approximately 2 millimeters in diameter) was observed.



Material generated from cleanup activities during this monitoring period were combined with material generated during the Phase IV cleanup at Hoppy's Landing in Fairhaven. The cleanup material was sent to Covanta Waste Services for proper disposal in accordance with applicable environmental laws and regulations. Additional Information regarding the disposal of this material will be included in the next Phase IV Status Report for Hoppy's Landing.

3.2 SAMPLE ANALYSIS

As described in the April 3, 2007 IRA Status and Completion Report, an oiled cobble was collected as a sample for laboratory fingerprint analysis on March 27, 2007. The sample was collected during a response to a report of oil in the Leisure Shores portion of shoreline segment W1F-02. The cobble was located in the same approximate area as the oiled cobbles encountered during the May 2007 visits described above. The residual oil on the cobble that was submitted for fingerprint analysis was soft and tacky to the touch, and the visual characteristics were consistent with B120 oil. On April 11, 2007, the oiled cobble sample was submitted to B&B Laboratories, Inc. of College Station, Texas for fingerprint analysis. The laboratory report of the fingerprint analysis is included in Appendix B. The fingerprint results indicate that the sample has a signature that is consistent with weathered B120 oil. The data analysis indicate that an unknown quantity of another (unknown) fossil fuel is present in the sample, as indicated by the presence of a biomarker that was not present in the original B120 oil.

3.3 TEST PIT EVALUATION

On July 10, 2007, the LSP and representatives from GeoInsight conducted a buried oil inspection by excavating test pits at a portion of Leisure Shores to evaluate residual oil in intertidal sediment. This inspection was also conducted such that the results could be compared to conditions observed during a similar inspection previously performed on





September 20, 2006 so that an evaluation could be made regarding the attenuation of residual oil in the Leisure Shores beach sediment. The September 20, 2006 test pit results were described in the April 3, 2007 IRA Status and Completion Report. The field observations are graphically presented on Figure 3 and a summary of the observations at individual test pits is included in Appendix C.

On July 10, 2007 a total of 142 test pits were excavated by hand in the lower intertidal zone (i.e., the relatively “flat” portion of Leisure Shores) in a grid pattern. The weather on this day was overcast and hazy with an air temperature of approximately 85 degrees Fahrenheit. Surface water temperature at Leisure Shores was approximately 85 degrees Fahrenheit close to the shoreline and approximately 78 degrees Fahrenheit approximately 20 feet seaward from the shoreline, as measured on-site using a thermometer. The grid consisted of eight transects (identified as transects A through H) that were orientated approximately parallel to the shoreline between the two rock groins. Refer to Figure 4 for the transect locations. The test pit locations (i.e., grid pattern) and the methodology used to evaluate the sediment during this evaluation were repeated from the previous buried oil evaluation conducted on September 20, 2006. The transects were spaced approximately 15 feet apart and test pits were excavated at 10-foot intervals along each transect.

The test pits were of uniform size and depth, approximately 12 inches in diameter and 9 inches deep. Sediment excavated from each of the test pits was placed in a 5-gallon bucket, lined with a disposable polyethylene bag. Seawater was added to each bucket until the level of the water was slightly above the level of the sediment. The test pits were allowed to equilibrate and naturally fill with water. Approximately 10 to 20 minutes after excavation, the presence of oil sheen and/or oil particles (if present) on the water surface in both the bucket and the test pit was then recorded. If oil particles were present, the number of oil particles were counted or estimated, and the approximate size range of the oil particles was noted. After the data were recorded, the test pit was backfilled with the excavated sediment in the bucket. One additional transect was added to the grid during this evaluation because





the height of the tide was lower than experienced in September 2006 and therefore a larger portion of the intertidal zone was exposed for delineation. Test pits could not be excavated at a few of the planned locations on each transect because of unfavorable conditions (e.g., a stream channel or advancing tide).

The results of the buried oil inspection were compared to data collected on September 20, 2006 to evaluate the effects of natural weathering processes (e.g., scouring associated with winter storms and tides) on the extent and magnitude of residual oil in the sediment. The test pit and bucket observations are summarized in the table below. The quantity of particles represents the sum of the particles observed in the test pit and the corresponding bucket.

Field Observation	September 20, 2006		July 10, 2007	
	Number of Test Pits or Buckets	Percent of Total	Number of Test Pits or Buckets	Percent of Total
No sheen or particles	97	80%	118	83%
Oil sheen only	5	4%	9	6%
Fewer than six particles	12	10%	12	8%
Six or more particles	7	6%	3	2%

In general, the oil particles were small, generally one millimeter or less in diameter (“pinhead” size) and were soft to the touch. Additional information regarding the July 10, 2007 field observations in each test pit and bucket is presented in the data tables attached in Appendix D and the data are shown on Figure 4.

It is important to note that naturally-occurring inorganic sheens (commonly associated with iron oxides that are not related to the B120 release were observed in some test pits. Inorganic sheens typically break into fragments when disturbed, in contrast to oil sheens that are liquid and do not break apart when disturbed. Inorganic sheens are not included in the summary presented above.



The test pits where oil sheen or particles were observed were primarily located in the eastern portion of the study area. Of the 20 buckets where oil sheen or particles were observed, 16 of them were located within 80 feet of the easternmost groin, indicating that the residual oil is mostly present in this location. The test pits in the western side of the grid area were observed to have oil sheen only, with the exception of one test pit where fewer than six oil particles were observed.

An evaluation of the vertical distribution of residual oil in the sediment column was also conducted at three locations adjacent to grid locations where particles of oil were observed in the initial test pit. At each location, an additional test pit was excavated at 2-inch depth intervals (to a total depth of 6 inches below grade surface) and the test pit was allowed to equilibrate at each depth interval before advancing to the next depth interval. In two of the three vertical test pits (test pits D-60 and E-60), residual oil was observed at the 6-inch depth interval; however, it was not observed at the 2-inch and 4-inch depth intervals. At the A-70 test pit location, the vertical distribution of oil appeared to be more uniform with depth, although the field team noted that the quantity of oil particles appeared to be slightly less at the 6-inch depth interval. Additional information regarding field observations recorded during the vertical distribution inspection is presented in a data table attached in Appendix D, and locations of the vertical distribution test pits are shown on Figure 4.

During the July 10, 2007 site visit, several residents indicated that residual oil was present in three localized areas outside the area of the test pit investigation. One area was located in the cobble beach portion of the intertidal zone to the east of the Leisure Shores test pit area, a second area was located along the west-facing side of the eastern rock groin that establishes the eastern boundary of Leisure Shores beach, and a third area was located near the fringing marsh west of the stream channel. The LSP and representatives from GeoInsight recorded their concerns and conducted visual inspections of the areas.





At the cobble beach area, small patches of pavement (up to approximately three inches in diameter) and a few isolated small tarballs (up to approximately two inches in diameter) were observed in the middle intertidal zone. One larger area of pavement (approximately five inches wide and ten inches long) was observed on the sediment surface adjacent to a large rock. In general, the residual oil was soft and tacky to the touch. The field team excavated four test pits (one foot wide and six feet long) approximately perpendicular to the shoreline. Silver sheen was observed on the surface of the water in three of the four test pits.

The field team then conducted a visual inspection of the fringing marsh area west of the stream channel and residual oil was not observed on the marsh or shoreline surface. The field team excavated two test pits (approximately one foot wide and seven feet long) oriented approximately parallel to the shoreline. Oiled sediment was observed approximately three to five inches below grade. One tarball (approximately one inch in diameter) was found and removed. Silver and rainbow sheen was observed covering approximately 50 percent of the water surface. In general, the oil was soft and tacky to the touch.

Pavement, tarballs, oiled cobbles, and oiled sediment were removed from these two areas by the field team on July 10, 2007. The total volume of oil and oiled material removed was approximately one-half of a 5-gallon bucket.

The area near the eastern rock groin was also inspected by the field team. Approximately 10 to 12 rocks with hardened splatter were observed. However, the splatter was either solid or crumbly and did not come off on material or skin when rubbed.

The field team collected four samples from the two areas where soft and tacky oil was observed to submit for fingerprint analysis to compare to B120 oil. Two samples were collected from the area west of the stream channel; one consisted of oiled sediment excavated from the test pit and one consisted of oiled sediment scrapped from the test pit sidewall. The remaining two samples were collected from the area of concern to the east; one consisted of a





small patch of pavement and the surrounding oiled sediment and the other consisted of the large patch of pavement located adjacent to a large cobble. Results of the fingerprint analysis will be presented in a subsequent report.

Additional characterization and cleanup activities will be conducted at these areas of concern as part of Phase IV Comprehensive Response Actions. Additional information regarding the proposed Phase IV field activities is summarized in the sections that follow. Please refer to Figure 5 for the approximate locations of the proposed Phase IV field activities.





4.0 REMEDY IMPLEMENTATION PLAN

The response actions proposed in this Phase IV RIP are modified from the original activities described in the August 3, 2006 Phase III RAP based upon field data collected between March and July 2007. Current field data indicates that some residual oil is present in two areas of Leisure Shores and Howard's Beach (i.e., the cobble beach area and the area near the stream channel and fringing marsh) that are separate from the lower intertidal zone area between the two rock groins that was the focus of the Phase III RAP for this segment. The Phase IV response actions were therefore modified based upon the different shoreline substrate conditions and residual oil characteristics at these two locations.

4.1 BACKGROUND

Residual oil is primarily present at shoreline segment W1F-02 in two general locations (shown on Figure 5), and these two locations will be the focus of Phase IV response actions. The shoreline substrate in these two general locations consists primarily of sandy gravel and cobble beach with some fringing marshes located near the western portion of the shoreline segment. Field observations collected to date indicate that the residual oil in the two general locations consists primarily of weathered pavement and splatter on cobbles (in the eastern area) and weathered tarballs and splatter on cobbles at or below the shoreline surface (in the western area).

4.2 RESPONSE ACTION GOALS

The objective of the proposed Phase IV response actions at portions of shoreline segment W1F-02 is to assess the magnitude and extent of residual oil at the two locations discussed above and, as necessary, remove residual oil to reach a condition of No Significant Risk



4.3 DESCRIPTION OF THE SELECTED REMEDIAL ACTION ALTERNATIVE

Additional assessment activities will be conducted in the two general locations where residual oil was observed to evaluate the horizontal and vertical extent as well as magnitude and physical characteristics (viscosity, thickness, etc.) of residual oil. Additional assessment will be conducted in the area of the test pit investigation and the area to the west of the stream channel. The assessment activities will consist of visual inspections of the shoreline surface in these areas and excavating test pits (primarily using hand shovels) at selected locations. Test pits in the cobble beach area will be excavated using a mini-excavator or small backhoe. After assessment activities are conducted, the proposed remedial action alternative will consist of the removal of residual oil and associated sheen using hand tools (e.g., shovels) absorbent materials, or small equipment (e.g., bobcat or mini-excavator) in the non-marsh areas. Remedial actions are not expected to be necessary to remove residual oil in the marsh areas; however, if field investigations indicate that oil should be removed from the marsh, then this residual oil will be removed using hand tools, to the extent feasible.

4.4 RELEVANT DESIGN AND OPERATIONAL PARAMETERS

4.4.1 Waste Management

Remediation waste will consist of residual oil pavement, oiled sediment, oiled cobbles, oiled absorbent material, and personal protective equipment. Recovered remediation waste will be temporarily stored on-site in polyethylene bags during cleanup operations. At the completion of response actions, the remediation waste will be transported off-site under a Bill of Lading for proper disposal. Less than one ton of remediation waste is expected to be generated during Phase IV cleanup operations.



4.4.2 Identification of Site-Specific Characteristics Affecting Design

The residual oil is located in the upper intertidal zone, and the field work will be conducted during low tide to maximize the area of exposed intertidal shoreline. Although removal of residual oil in the marsh areas is not expected to be necessary, assessment and cleanup activities in the vicinity of the marsh will be conducted using hand tools to minimize potential damage to the marsh.

4.4.3 Environmental Impact Mitigation Measures

Field work will be conducted using hand tools and or small equipment to minimize disruption to the shoreline. The field work is not expected to cause noticeable damage to the shoreline after the investigation, and, if necessary, cleanup operations are complete.

4.4.4 Remedial Action Monitoring

The LSP and field personnel from GeoInsight will be present to oversee and supervise the Phase IV field activities. Visual monitoring of the cleanup areas will be used to evaluate the removal effectiveness during the cleanup operations. A post-cleanup inspection will also be conducted approximately one week after the Phase IV field activities are completed.

4.4.5 Remedial Action Schedule

Assessment and, if necessary, cleanup activities are scheduled to be conducted in September 2007. It is anticipated that the proposed field activities will require between five and ten days to allow the LSP to conclude No Significant Risk. On each day, field activities will begin approximately three hours before low tide and will continue to approximately three hours after low tide, weather and daylight permitting.





4.4.6 Health and Safety Plan

A Health and Safety Plan (HASP) is attached as Appendix E, and this HASP will be used during the implementation of the Phase IV RIP.

4.4.7 Federal, State, and Local Permits and Approvals Required

Because of the small scale of the remedial project, the use of hand tools and/or small equipment, and the minimal disruption to the shoreline, federal, state, and local permits are not anticipated to be required. GeoInsight and EnviroLogic will notify the Mattapoisett Conservation Commission regarding the proposed cleanup activities and anticipated schedule and address any issues. Other permits or approvals are not expected to be required for the proposed Phase IV assessment and cleanup activities.





5.0 PUBLIC INVOLVEMENT

To fulfill the requirements of 310 CMR 40.1403 (3)(f) of the MCP, notice will be provided to the Chief Municipal Officer and the Board of Health concurrently with the submittal of this report to the MADEP. Copies of the notification letters are provided as Appendix F.

