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December 1, 2004

GeoInsight Project 3871-000

Richard Packard  
Massachusetts Department of Environmental Protection  
Southeast Regional Office  
Bureau of Waste Site Cleanup  
20 Riverside Drive  
Lakeville, Massachusetts

Re: Proposed IRA Cleanup Activities  
W1E-03 Strawberry Point West  
DEP RTN 4-17786  
Barge B120 Spill  
Buzzards Bay, Massachusetts

Dear Mr. Packard:

GeoInsight, Inc. (GeoInsight) prepared this letter to present proposed additional cleanup activities at Strawberry Point in Mattapoisett, Massachusetts. Refer to Figure 1 for the approximate location of Strawberry Point. These additional cleanup activities were discussed with you in our meeting on October 27, 2004. These cleanup activities will be conducted as part of response actions proposed in the September 15, 2003 Immediate Response Action (IRA) Plan (as modified) to remove residual oil on the shoreline associated with the release from Bouchard Barge No. 120 (B120). GeoInsight, as the Licensed Site Professional (LSP) under the Massachusetts Contingency Plan (MCP), prepared this letter on behalf of Bouchard Transportation Company, Inc.

## **1.0 LOCATION OF PROPOSED CLEANUP**

The proposed cleanup area is located primarily on the west side of Strawberry Point, which is a portion of shoreline segment W1E-03. Some of the cleanup will also be conducted near the tip of Strawberry Point, which is the boundary between shoreline segments W1E-02 and W1E-03. Shoreline segment boundaries are shown on Figure 2. The shoreline in this area is comprised of marsh, narrow sandy beach, and cobble substrates. Strawberry Point is a relatively isolated area (i.e., no direct road access) located between Nye's Cove and Pine Island Pond in Mattapoisett. The proposed cleanup area is primarily located in the approximate 0.5-mile extension of rocky shoreline to the west of Strawberry Point and marsh area extending to the east.



## 2.0 BACKGROUND

Under the direction of Unified Command, which was comprised of representatives from the United States Coast Guard, the Massachusetts Department of Environmental Protection (MADEP), and the responsible party (Bouchard Transportation Company, Inc.), initial response actions were conducted between April 23 and September 3, 2003. Due to the limited access to this location, response actions consisted primarily of visual inspections and the removal of tarballs and tar patties found at this location (segments W1E-02 and W1E-03). Residual oil at this segment consists primarily of discontinuous patches of oil mixed with sediment, known as pavement. The segment was initially characterized as an area of relatively moderate oiling compared to the other oiled areas in Buzzards Bay. Due to its isolated location, infrequent use, and the immobility of the hardened residual oil (i.e., pavement), Unified Command chose to leave portions of the residual oil pavement for natural attenuation. Segment W1E-03 did not pass Immediate Response Action Completion (IRAC) criteria, and the IRAC inspection team identified that further treatment was feasible in this segment (W1E-03). W1E-02 also did not pass IRAC, but the IRAC team indicated that further treatment was not feasible.

Segments W1E-03 and W1E-02 were periodically inspected for the presence of surficial oil as part of the IRA response actions proposed in the September 15, 2003 IRA Plan. On November 5, 2004 GeoInsight and Entrix, Inc. (ENTRIX) conducted an inspection of segment W1E-03 to evaluate the segment relative to the IRA Plan criteria. Residual pavement and tarballs were encountered, and the inspection team removed the tarballs where feasible. The residual oil did not present an Imminent Hazard and was not mobile. Therefore, based upon the criteria established in the September 15, 2003 IRA Plan, immediate IRA remedial measures were not necessary.

On April 13, May 5, May 12, June 3, and June 18, 2004, additional inspections and cleanup activities were conducted by GeoInsight and ENTRIX under the IRA Plan to evaluate and remove residual oil after one winter season of wave and ice scouring. During these inspections, discrete patches of residual pavement were found, primarily along the rocky shoreline and around the point. Approximately 950 pounds of oiled rocks and oil mixed with sediment was removed during cleanup activities. Pavement was not removed from areas judged by the field team as having the potential to damage the salt marsh areas. Refer to IRA Status Reports dated February 10 and September 16, 2004 for additional information regarding these inspection and cleanup activities.

Inspections conducted on August 23, 2004 by GeoInsight and ENTRIX, and on October 27, 2004 by GeoInsight, ENTRIX, and MADEP, confirmed residual pavement remaining at Strawberry Point West. The pavement at this location is primarily along a discontinuous strip in the middle to upper intertidal zone of the rocky shoreline and within some portions of salt marsh areas near Strawberry Point. Although additional cleanup may potentially impact marsh vegetation, the presence and amount of residual pavement warrant additional cleanup (as described below) to reduce potential impact to recreational users.



### **3.0 SENSITIVE RECEPTORS**

The area of proposed work is located in the middle to upper intertidal zone adjacent to Buzzards Bay (Figure 2). The work will be conducted primarily in the sand/cobble shoreline on the west side of Strawberry Point and small portions of salt marshes located at the southern tip of Strawberry Point. To evaluate potential sensitive receptors in the Buzzards Bay area, GeoInsight obtained information from the MADEP Massachusetts Geographic Information System (MassGIS) website (Figure 3). Additionally, the Proposed Cleanup Area Map (Figure 2) includes information obtained from Natural Heritage & Endangered Species Program (NHESP).

Review of the MassGIS Map indicated that the proposed work area is not in a protected open space or an Area of Critical Environmental Concern. The proposed area of cleanup includes some portions of wetland areas on the east side of Strawberry Point. The segment is not located within a Zone II, an interim wellhead protection area, a potentially-productive aquifer or a sole-source aquifer. Schools and residences are not located within 500 feet of the proposed work area.

Typically, the intertidal zone of the shoreline provides habitat for various species, such as shorebirds and marine invertebrates that are common in the Buzzards Bay area. Information obtained from the NHESP indicates that the proposed work area is located within threatened or endangered species habitat. GeoInsight requested information from the Massachusetts Division of Fisheries and Wildlife (MADFW) on whether the proposed activities will adversely impact the endangered or threatened species in this area. Information provided by MADFW in letters dated November 23 and December 1, 2004 indicates that the proposed cleanup activities will not adversely impact the threatened or endangered species present in this area, as long as the work activities are not conducted between April 15 and August 31. Copies of these letters are attached.

### **4.0 PROPOSED CLEANUP ACTIVITIES**

GeoInsight proposes to remove pavement near and in some portions of the salt marsh areas using hand tools and absorbent material. The pavement is generally present as discrete patches that typically measure approximately 1 to 20 square feet in area and 2 to 4 inches deep, with a few areas that are slightly larger in size. The approximate total (non-continuous) area requiring additional remediation is approximately 50,000 square feet. The pavement in some of these areas is discontinuous, and the overall area listed above may be larger than the estimated area covered by pavement. During the operations, care will be taken to minimize impacts, if any, to the nearby marsh vegetation.

The field crew will be transported to and from the cleanup area via boat due to restricted landward access. GeoInsight anticipates that the proposed cleanup will be conducted by approximately 10 to 12 workers using hand tools (e.g., buckets, hand shovels, large shovels, wire brushes); mechanized equipment will not be used to remove the residual oil. Removed pavement will be placed by the field crew into polyethylene bags for transport out of the work area via boat. The polyethylene bags will be brought to an onshore staging area, where the waste will be



loaded onto trucks for off-site disposal in accordance with applicable requirements. Waste material will be transported under Bill of Lading to the SEMASS facility in Rochester/West Wareham, Massachusetts for disposal. During the cleanup activities, absorbent pads and/or “sweep” (rolls of oil absorbent material) will be placed within the work areas to contain sheen that may be released by pavement removal. Additionally, at the end of each work day, snare (also known as “pom pom”) or sweep will be staked in the work areas to contain potential sheen. If warranted at the completion of the cleanup activities, solid (containment) boom and/or snare will be staked around the perimeter of the work areas during tidal events to contain sheen and collect small amounts of oil that may migrate off-site. The boom and/or snare will be monitored and replaced or removed when warranted.

To be conservative with respect to the maximum tonnage of pavement removal, GeoInsight estimates that less than approximately 10 tons of pavement, oiled rocks, and oiled absorbent materials will be generated by this operation. The Proposed Cleanup Area Plan is included as Figure 2. The proposed activities are expected to pose little (if any) disruption to recreational activities due to a small number of people that use this relatively secluded area.

## **5.0 SCHEDULE**

Because the oil observed is present primarily in the intertidal zone, cleanup and post-cleanup inspection activities must be conducted within the low tide work window, approximately 3 to 4 hours before and after low tide. GeoInsight anticipates that the proposed cleanup will require approximately 5 days of work, which is scheduled to begin on Monday, December 6, 2004 and be completed on Friday, December 10, 2004. The beginning of the week of December 13, 2004 will be utilized if additional cleanup is required. A pre-cleanup inspection, consisting of flagging the affected areas, will be conducted prior to December 6, 2004. A post-cleanup inspection will be conducted shortly after cleanup activities have been completed to evaluate the effectiveness of cleanup operations. GeoInsight will evaluate alternative or further cleanup strategies, in consultation with the MADEP, if the post cleanup inspection indicates that additional cleanup activities are necessary under this IRA.

Adverse impacts, if any, to marsh vegetation caused by the proposed remedial activities will be assessed during the post-cleanup inspection and in the spring of 2005. The need for restoration (i.e., planting marsh vegetation) will be determined during the spring 2005 inspection. The post-cleanup marsh assessment will be performed by field biologists from ENTRIX, the environmental consulting company involved with the Natural Resource Damage Assessment (NRDA) that is being conducted under the Oil Pollution Act of 1990. The assessment will consist of visually inspecting the marsh for evidence of plant re-growth in areas where cleanup was conducted. It is anticipated that the affected areas will recover naturally and the surrounding healthy marsh vegetation will recolonize the work area by rhizomonous spread. Marsh restoration, if warranted, will be conducted in the 2005 growing season.



Please feel free to call Kevin Trainer at (978) 692-1114 if you have any questions or if you would like to discuss this project.

Sincerely,  
GEOINSIGHT, INC.

Kevin D. Trainer, P.G., C.P.G., L.S.P.  
Senior Project Geologist

Richard J. Wozmak, P.E., P.H., L.S.P.  
Principal

Attachments: Figure 1 – Site Locus  
Figure 2 – Site Plan  
Figure 3 – MassGIS Map  
Division of Fisheries and Wildlife Letters

cc: Victor Corso, Bouchard Transportation Company, Inc.  
Andrew Davis, LeBoeuf, Lamb, Greene & MacRae LLP