

HARC writes letter of complaint to EPA Inspector General

Hands Across the River Coalition, Inc. (HARC) is a non-profit organization based in New Bedford, Massachusetts. We have sought environmental justice and safety, while representing a broad-based collection of citizens in Southeast Massachusetts.

The EPA designated New Bedford Harbor as a Superfund Site due to the extensive contamination of PCBs. They decided to create unlined burial holes in the riverbed called "CAD cells" (Confined Aquatic Disposal) in the lower harbor, (Lower Harbor CAD Cell = LHCC in EPA records), between Interstate 195 and Rte 6. They will dispose of 300,000 cubic yards of PCB sediments ranging from 50 to 190 ppm into these CAD cells.

Their method is using a mechanical dredge bringing the PCB sediments up and out of the water, placing it on an open top barge or scow, towing it to the CAD cell, then dumping the deadly sediments into the CAD cell in the riverbed. The CAD cell is about 200 yards west of the residential area of Fairhaven, MA. Fairhaven High School is approximately a quarter mile to the south and a middle school is less than a mile to the east.

This method does not remove PCB sediments offsite as originally planned, but simply relocates the toxic material to another area of the harbor away from where it originated. This is not a cleanup.

Here, according to the EPA's evaluation, entitled, FINAL EVALUATION OF THE IMPACT OF DREDGING AND CAD CELL DISPOSAL ON AIR QUALITY NEW BEDFORD HARBOR SUPERFUND SITE, NEW BEDFORD, MA by JACOBS ENGINEERING GROUP, June 2010 would be a number of opportunities for some of the PCBs to become

airborne contaminating our air. (Comments made by highly respected and credentialed experts on this report are also attached. Please see reports made by Dr. Wilma Subra, Dr. Stephen Lester from CHEJ, Dr. Peter Montague with the Environmental Research Foundation, and Dr. Noelle Eckley Selin, from MIT.)

Governor Chris Christie in the state of New Jersey refused to allow the EPA to bury PCBs and DIOXIN in their HARC Board 2016-Feb-25 1 HARC_2016-0114_EPA_Complaint_PBS Passaic river using CAD cells. (His letter attached) The project here just began and will take at least a year to complete according to their plans. This will cause a tremendous threat to our community due to PCB air contamination from the project.

The cumulative effects of ingesting such air over time could create serious harm to humans especially small children and pregnant women.

We have attempted over the last five years to bring to the attention of relevant authorities and institutions the travesty that is being imposed on our community in Fairhaven, and to stop the construction of toxic waste-PCB dump that the EPA is constructing adjacent to Oxford Village, one of the oldest residential communities in the entire area. This community was begun in 1652 as a direct spin-off of the Plymouth Colony, while its high school is a historic monument that was donated to the town of Fairhaven at the turn of the 19Th -20Th centuries. There is more than sufficient evidence to indict the EPA Officials for (i) Failure to assess the impacts of putting a CAD cell in a residential area, (ii) Failure to assess the impact on the Cultural and Historic Heritage of the area, (iii) Collusion with officials of the Town of Fairhaven to obscure vital information from the public and (iv) Intentional Misrepresentation to the public.

The EPA Project Manager during the period when the CAD Cell was being conceived and promoted has demonstrated a complete

lack of concern for the health and welfare of Fairhaven's citizens and for the real estate value of the private homes next to which they are building this massive, toxic waste dump. His actions and those of his associates in EPA's Northeast Region 1, border on deliberate fraud and should be completely unacceptable in a democratic society.

Read the entire letter [here](#).