

Present worth is the amount required to fund a project assuming that amount can be invested at the start of the project for a given rate of return as the project progresses. Present worth estimates help evaluate various options on an equal basis, but they do not represent the actual funding levels that will be required for a project of this type. The fully funded estimate, on the other hand, includes inflation and reflects the total of the actual annual funding levels required to implement the harbor cleanup. In addition, since the ROD cost estimate is based strictly on a conceptual (rather than a more detailed) project design, EPA guidance acknowledges that actual project costs could be up to 50% higher than the cost estimate developed for the ROD (USEPA, 1999).

The following table shows the comparative process used by EPA and the Corps of Engineers to evaluate whether the current, fully funded estimate of \$317 million is within the initial, present worth estimate of \$129 million included in the ROD.

Type of Cost Estimate	\$ - in millions
EPA ROD 2 cost at 1995 price level, <b>present worth</b>	129
EPA ROD 2 cost at 1995 price level, <b>present worth basis removed</b>	188
EPA ROD 2 cost <b>at 2001 price level, present worth basis removed</b> (increases due to inflation)	223
EPA ROD 2 cost at 2001 price level, acceptable upper limit ( <b>\$223 million times 1.5</b> per EPA guidance)	335
<b>Current fully funded cleanup estimate (2001 price level including inflation)</b>	<b>317</b>

Since the current, fully funded estimate for offsite disposal of \$317 million as explained in this ESD is \$18 million less than this last \$335 million threshold, EPA believes that the remedy has been maintained within the acceptable range of the original ROD cost estimate.

#### **IV. Offsite Disposal “ARARs” (Applicable or Relevant and Appropriate Requirements)**

Consistent with ROD 2, PCB-contaminated sediment above EPA’s clean up levels must be handled and disposed of in accordance with 40 CFR 761.61(c) of TSCA, which requires that the methods used will not pose an unreasonable risk of injury to health or the environment. See Table 8 of the ROD, Action Specific ARARs. This section describes the cleanup methods to be used that will be compliant with TSCA’s standards.

Except for a limited amount of sediment removal discussed below, all dredged sediment over 50 ppm PCBs *in situ* (i.e., as measured in place) will be subject to a coarse material separation process and a dewatering process before being disposed in a CDF or, as modified in this ESD for CDF D, transported offsite for disposal at a licensed TSCA facility. After

**Explanation of Significant Differences**  
**for the**  
**Upper and Lower Harbor Operable Unit**  
**New Bedford Harbor Superfund Site**  
**New Bedford, Massachusetts**

**August 2002**



**U.S. Environmental Protection Agency**  
**Region I - New England**  
**Boston, MA**

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