



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF AIR AND HAZARDOUS MATERIALS
291 Promenade Street
Providence, R.I. 02908-5767

6 July 1993

James Brown
U.S. Environmental Protection Agency
Waste Management Division
J.F.K. Federal Building, HSV-CAN5
Boston, MA 02203-2211

Dear Jim:

This Division has reviewed the draft Operable Unit 2 Remedial Investigation Work Plan for the Central Landfill and has generated the following comments.

Page 3, Paragraph 3:

RIDEM has not taken enforcement actions at all of these 29 sites. The list referred to is a list of potential sources of contamination within a one mile radius of Central. Except for the State Action sites, the list was generated from the EPA Facility Index System.

Page 4, Paragraph 4:

It should be noted that flow nets may be too simple a model for the groundwater flow in this area. Empirical information gathered during OU2 studies and or additional modeling may validate your point.

Page 9 and Figure 2:

Detention Pond 2 and the Quarry Stream are not depicted on Figure 2.

Page 11, Paragraph 2:

Does RISWMC own all residential wells which have shown contamination due to the landfill?

Page 12, Test Pits:

The excavation of test pits in this area could pose serious health and safety hazards to on-site workers. Please make sure that the site Health and Safety Plan covers this activity and if not please update the plan. Additionally the excavated refuse and septage may be too contaminated for the landfill to accept if this is the case

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costs for this activity will be substantially impacted.

Page 12, Ecological Studies:

Lower Simmons Reservoir is potentially affected by conditions at the landfill and should be included in this study. Please see the final paragraph of this letter for additional rationale for inclusion of the Lower Simmons.

In addition to these comments, the Division notes that as a condition of the RISWMC's operating permit, the Corporation was required to submit a plan for the sampling of fish tissue for metals in the Simmons Upper and Lower Reservoirs. The plan was to be submitted within 6 months from the date of issuance of the license. The Corporation met this condition and in January 1992 submitted a document entitled Central Landfill Fish Sampling and Tissue Analysis Program to the Solid Waste Section of the Division of Air and Hazardous Materials. The document was prepared by GZA's Connecticut office and reviewed by the Department. At that time it was decided and understood by all parties that in order to avoid duplication of effort the implementation of that program would coincide with Ecological Risk studies planned for the Central Landfill under Superfund. The Department therefore requires that the fish tissue sampling work plan be incorporated into the OU 2 RI Work Plan.

If you have any questions or comments concerning this document, please feel free to contact me.

Sincerely,



Judith Graham
Division of Site Remediation

cc: Terrence Gray
Warren Angell