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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

October 16, 1996

Mr. Dennis aRusso
Interdivisional Operations Manager
R.I. Resource Recovery Corporation
65 Shun Pike
Johnston, RI 02919

Dennis

Dear Mr. ~~aRusso~~:

The purpose of this letter is to address several issues that RIRRC/GZA originally brought up during the September 4 and September 10, 1996 meetings. GZA followed up on these issues in a subsequent letter (September 23, 1996) and Progress Report (No. 19). The issues concerned: 1) the Upper Simmons Reservoir sediments/dredging program; 2) the scope of the proposed OU2 Feasibility Study; and 3) the deletion of Task 5C from the study. EPA's response to each issue is outlined below.

1. <u>EPA's comments regarding the Upper Simmons Reservoir sediments/dredging status and its potential impact on future risk assessments.</u>

At this time, EPA agrees that RIRRC does not need to conduct additional sediment sampling at the Upper Simmons Reservoir (USR). However, as part of the Central Landfill OU2 ecological risk assessment (ERA), RIRRC should prepare a full ERA for this water body based on all the corresponding analytical data previously generated. The ERA should include appropriate food chain/web modeling. The ERA should give special attention to contaminants with potential to undergo bioaccumulation and biomagnification (e.g., pesticides, PCBs, cadmium, and selenium). In addition, the ERA should take into consideration the new sediment background analytical data generated for OU2.

EPA may require future "confirmatory" sediment sampling at the USR in the Record of Decision (ROD). If appropriate, the ROD would recommend that the RIRRC conduct this confirmatory sampling after the current dredging program has been completed and sufficient time has elapsed for stable conditions to return to the USR. Analytical parameters would include those from previous determinations, including TOC, SEM/AVS and grain size.

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If the analytical results from the confirmatory sampling indicate that concentrations of contaminants of concern (COCs) are lower than those previously detected during pre-dredging conditions, the RIRRC may only have to conduct a qualitative evaluation. This evaluation of relative risk would be based on the findings and recommendations of the full OU2 ERA for the Upper Simmons Reservoir.

However, if the analytical results from the confirmatory sampling (post-dredging) indicate that COC concentrations are higher than those previously detected, then RIRRC may need to address the remaining concerns associated with the sediment contamination in the USR. A decision on whether the confirmatory sampling will involve only one sampling event or more will depend on the analytical results, and some potentially unresolved issues. These issues include: the possible discharge of contamination into the USR via groundwater; possible contribution of sediments and contaminants into the USR from non-Central Landfill sources; and successful implementation of measures to control surface runoff from the landfill.

2. <u>EPA's comments on the scope of the proposed OU2 FS.</u>

One of the issues that RIRRC/GZA mentioned at the September 10 meeting and subsequent letters was the scope of the FS. Specifically, RIRRC wanted to know if an FS would have to be completed assuming the RI findings were for "no action", and if so, how detailed it would have to be. We have determined that while an FS will have to be done, its scope can be limited.

Though we could not find any specific guidance on completing an FS involving a "no action" decision, there was guidance on "no action" RODs. The guidance allows the following components to be eliminated from a "no action" ROD: 1) **Assessment of the Site**; 2) **Statutory Determinations**; 3) **Description of Alternatives**; 4) **Summary of Comparative Analysis of Alternatives**; 5) **Selected Remedy**; and 6) **Statutory Determinations**. Consequently, any related components from the FS could also be eliminated.

As I indicated to Ed Summerly, it is my understanding that there is a "no action" FS in the Records Center at EPA's Canal Street office. It is for the Darling Hill Dump site in Lyndon, Vermont. I told Ed he was welcome to come to Boston to review it, or I would be happy to make a copy (if it is not too voluminous).

3. <u>EPA's comments on RIRRC/GZA's request to delete Task 5C from the study.</u>

A concern EPA expressed at the September 10 meeting was how much time RIRRC/GZA will need to complete the RI/FS. RIRRC/GZA suggested that the schedule could be shortened by several months if EPA deleted Task 5C (conversion of select residential wells to monitoring wells and subsequent sampling and analysis) from the study. EPA and RIDEM conditionally agree that we can eliminate Task 5C at this time. The following discussion outlines our position.

GZA told EPA's contractor (HNUS) that preliminary groundwater elevation data showed that most of the residential wells located east to northeast of the landfill are in a different watershed than Central Landfill. The groundwater flow in this area is to the north, toward Almy Reservoir.

Based on this preliminary data, the wells appear to be in a different watershed. Therefore, EPA agrees that converting residential wells to monitoring wells in this area would not support the objectives of the OU2 RI. This determination, however, is contingent on a review of the extended area groundwater contour map being developed by GZA and the interpreted groundwater flow directions.

HNUS also noted that the area north to northwest of the landfill (south of Oak Swamp Reservoir) requires additional evaluation. Groundwater quality data from some private wells in this area has suggested the presence of contaminants at low (ppb) concentrations, as presented in the Central Landfill OU1 RI. It is my understanding that GZA has not completed their data collection and evaluation to determine the potential for these contaminants to have migrated from the landfill or from another source not associated with the landfill. RIRRC/GZA should evaluate the need to provide groundwater monitoring locations in this area following completion of GZA's ongoing data collection and evaluation.

Based on the information as we know it, one of two scenarios seems likely. The first scenario is that the extended area groundwater contour map that GZA is preparing will show that these residential wells are in a different watershed from Central Landfill, and that the contour map will identify other potential contaminant sources. The second scenario is that the groundwater contour map may indicate that the potential exists for landfill contaminants to migrate to this area. If the latter scenario is applicable, then RIRRC/GZA will need to further review the groundwater data and the aquifer tests conducted at the landfill "hot spot."

With the qualifications presented above, EPA and RIDEM agree that we can delete Task 5C at this time. However, we would like to keep the option open to revisit this issue after GZA's presentation of the supporting data being collected to support the deletion of the task.

Please call me if you have any questions. My number is (617)573-5779.

Sincerely,

John J. Courcier

John J. Courcier
Remedial Project Manager

cc: E. Summerly, GZA
L. Sclama, RIDEM
R. Boynton, EPA