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Health and the Environment

July 13, 2004

Ms. Kimberlee Keckler
U.S. Environmental Protection Agency, Region 1
1 Congress Street
Suite 1100 (HBT)
Boston, MA 02114-2023

Dear Ms. Keckler:

I am writing this letter in reference to my scheduled appearance as a speaker at the meeting on July 15, 2004 regarding the sediment investigation and cleanup of the Centredale Manor/Woonasquatucket River. I will be appearing on behalf of the customers of New England Container Corporation (see attached list).

Since I have not yet had an opportunity to review the conceptual site model and the risk assessment, I wish to qualify these brief remarks as being preliminary. I have given some thought to the site, particularly with a focus on identifying sources and responsible parties. As I understand it, historically two primary operations were conducted on the site and there could be other sources as well. Of importance to all of the potentially responsible parties is the need to clearly define the sources of contamination. The risk assessment process offers this opportunity. Baseline risk assessments usually focus on existing risk rather than source allocation as a basis for remediation. Despite this focus, however, with a carefully executed sampling protocol that addresses the entire area of the site, risk assessments can be used to address sourcing issues.

Having served on the National Academy of Sciences panel for "A Risk-Management Strategy for PCB-Contaminated Sediments," I believe that a careful assessment of the sources of contamination must be done early so that decisions can be made about the appropriateness of actions to contain these sources. If data are collected at Centredale Manor that cover the full area and analyzed using GIS and appropriate statistical techniques, it may be possible to assign responsibility more definitively to the different contributing parties. Consequently, I recommend careful data collection and analysis be carried out for two purposes: to define the need for effective containment and remedial decisions, and to define the sources that are important to identifying the potentially responsible parties.

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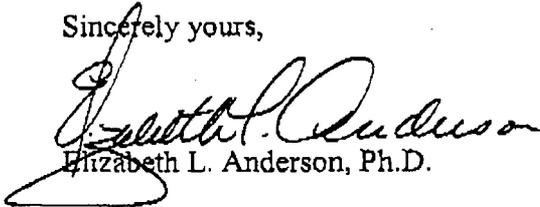
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I look forward to discussing these issues in more detail at the upcoming meeting.

Sincerely yours,



Elizabeth L. Anderson, Ph.D.

Enclosure

cc. Ms. Anna Krasko, Centredale RPM

Attachment

Ciba Specialty Chemicals, Inc.

CNA Holdings, Inc.

Cranston Print Works, Inc.

Organic Dyestuffs, Inc.

Original Bradford Soap Works, Inc.

Sequa Corporation

Teknor Apex Co.

Unocal, Inc.