



Superfund Records Center
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
1 Congress Street, Suite 1100
BOSTON, MA 02114-2023



SDMS DocID 455648

July 21, 2008

Jeffrey J. Loureiro, P.E., LEP
Loureiro Engineering Associates, Inc.
100 Northwest Drive
Plainville, CT 06062

Re: Administrative Settlement Agreement and Order on Consent
CERCLA Docket No. 01-2007-0163
Centredale Manor Restoration Project Superfund Site
North Providence, Rhode Island

Dear Mr. Loureiro:

This letter is written to you in your capacity as the designated project coordinator for the studies and investigations to be performed pursuant to the Administrative Settlement Agreement and Order on Consent, CERCLA Docket No. 01-2007-0163, which was signed by the Director of the Office of Site Remediation and Restoration on September 25, 2007.

The U.S. Environmental Protection Agency ("EPA") has reviewed Emhart Industries, Inc.'s April 2008 Comparative Ecological Assessment Report ("Report"). It was expected that the revised Report would incorporate all of the comments prepared by Cornell Rosiu and submitted to you on February 14, 2008. Although some of our suggested changes were made, other significant comments are not addressed in the revised Report. These comments relate to accurate evaluation of existing river conditions and identification of ecological remedial action objectives needed for accurate, non-skewed comparison with post-alternative conditions.

Before EPA can approve the Report, the following revisions must be made:

1. The Report's description of baseline physical conditions is inaccurate. In particular, the current Woonasquatucket River as "adjacent to the Centredale Manor and Brook Village Apartment complexes" is incorrectly described as having "imperceptible flow" and evaluated as a "lower perennial" riverine subsystem of "low gradients and poorly defined riffles."

2. The Report's description of baseline biology/ecology is inaccurate. There are commonly observed fish and wildlife species missing from the narratives in Section 3.1.1 such as white sucker, amphibians, river otter, white egret, tree swallow, American woodcock, sea ducks and sandpipers, which influence evaluation of the types, amount and local and regional importance of habitat to be lost/replaced. White sucker are by far the fish species with largest total biomass in the river, yet it is missing in all site-specific descriptions in the report. Likewise, tree swallow are an extremely common bird species but are missing.
3. Audubon Society comments dated February 27, 2008 on current River habitat and species characteristics and post-alternatives and downstream impact.

Please submit a revised Report by September 1, 2008. The Comparative Ecological Assessment is a critical element of EPA's review of the dam replacement alternatives. EPA will continue to analyze these alternatives. However, until the Report is revised as discussed above, EPA cannot rely on the Report's entire evaluations and conclusions.

If you have any questions, please call me at (617) 918-1232.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anna Krasko', with a long horizontal flourish extending to the right.

Anna Krasko
Project Coordinator