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November 17, 2010

Project No. C656-003

Via Electronic and Regular Mail

Ms. Anna Krasko
Project Manager
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code OSRR07-1
Boston, MA 02109-3912

Subject: **Centredale Manor Restoration Project Superfund Site:
Administrative Settlement Agreement and Order on Consent,
CERCLA Docket No. 01-2010-0045 (Effective June 30, 2010)**

Dear Ms. Krasko:

This submission contains Emhart's revisions to the proposed Amended Sampling and Analysis Plan (SAP) that was included in our letter of November 4, 2010, to address EPA's comments. As we previously have discussed, the purpose for amending the SAP is to enable Emhart to collect sediment samples from the southern portion of the Oxbow area, and also to collect additional surface soil samples to assist U.S. EPA's further delineation of the Oxbow area.

In response to your request, we also have attached a revised proposed amended Scope of Work (SOW) for the above-referenced Administrative Settlement Agreement and Order on Consent (Settlement Agreement). That document includes, in Paragraph 2, the clarification that you requested, and the signature of counsel on Emhart's behalf signifying Emhart's agreement to the modified SOW. Together, the attached "First Amendment to Administrative Settlement Agreement and Order on Consent," this letter, and the map enclosed herewith, constitute Emhart's proposed amendment to the SOW and the SAP approved by U.S. EPA under the Settlement Agreement.

Our proposed amendments to the SAP are discussed below.

PROPOSED SEDIMENT SAMPLING

Emhart proposes to collect sediment samples at the locations identified as SD_G-XX (yellow dots) on the enclosed map. With the exception of SD_G-01, SD_G-11, and SD_G-12, these locations initially were identified in the SAP as proposed locations for collecting soil samples SS_G-16, SS_G-17, SS_G-19 through SS_G-25, and SS_G-28. However, as discussed, these proposed soil sampling locations were not sampled during the September 2010 field event because they were discovered not to contain vadose zone soil.

Emhart also proposes to sample sediment at SD_G-01. This sampling location was added to better define the extent of potential contamination in the southeastern-most part of the emergent palustrine wetland. Moreover, samples proposed to be taken at SD_G-11 and SD_G-12 are the locations of SS_G-23 and SS_G-26 in the SAP. As you may recall, SS_G-23 and SS_G-26 were relocated during the September 2010 field event to locations that were indicative of floodplain soils (i.e., vadose zone soil samples). Consequently, these two locations proposed for sediment sampling have not yet been sampled.

At each of the proposed sediment sampling locations shown on the enclosed figure, Emhart proposes to sample the 0-12 inch, 12-24 inch, and 24-36 inch depth intervals. Emhart will use dedicated, pre-cleaned sample core liners to collect the full 36 inch core, to the extent possible. The full core will be retrieved, water decanted or drawn off the surface of the sample with suction, and the sample extruded and segregated to yield samples indicative of the aforementioned sampling intervals. Once segregated into the appropriate sampling intervals, the sediment from each interval will be homogenized in a stainless steel bowl. For the 0-12 inch and 12-24 inch sampling intervals, samples will be collected for the list of analytes identified in the SAP (i.e., dioxins/furans, PCBs/pesticides, SVOCs, metals, grain size, and TOC). Samples will be logged, packaged and shipped to the laboratories identified in the SAP, Vista and CAS. For the 24-36 inch interval, sediment will be collected for dioxins/furans, but this sample will be place on "hold" in the laboratory. The determination of whether the 24-36 inch sample is analyzed will be made upon receipt and review of the data from the 0-12 and 12-24 inch intervals.

During the September 2010 field sampling event, we noted the presence of a fine-to-medium sand at the surface of sediment in the northern-most portions of the palustrine scrub/shrub wetland, located just south of the Oxbow area forested wetland. However, subsequent reconnaissance has suggested that the presence of a sand layer may be limited. Nevertheless, this area is net depositional, and the fine-to-medium sand, where present, may be indicative of recent deposited material with a lower probability of re-suspension and subsequent transport in the future. Accordingly, Emhart proposes to sample this fine-to-medium sand layer where it is present at the proposed sediment sampling locations. Unless this sand layer is present throughout the top 12 inches, the sand layer sample will be in addition to the other samples identified above (0-12 inch, 12-24 inch and 24-36 inch samples) that will be taken for each proposed sediment sampling location. Therefore, if the sand is present, but is not present for the entire 0-12 inch interval, four samples will be collected – 0-12 inch, 12-24 inch, 24-36 inch, and the sand layer. However, if the sand layer is present throughout the top 12 inches, only three samples will be collected - 0-12 inch, 12-24 inch, and 24-36 inch. Where possible, this sand layer will be analyzed for the analytes listed in the SAP. However, if the sand layer is thin, we may not be able to sample an adequate volume of material to support analysis of all of the listed analytes. If the sand layer is discovered to be thin, Emhart proposes analyzing this layer for dioxins/furans and grain size only. The determination of the presence and thickness of the sand layer will be made from visual observations of the sediment core discussed above.

PROPOSED SURFACE SOIL SAMPLING

Emhart proposes to sample surface soil (0-12 inches) at four locations surrounding SS_G-01, as shown on the enclosed Figure 1. These samples will provide data to help further delineate the presence of dioxin surrounding this location. Based on the unvalidated results, sample SS_G-01 was found to contain 11.5 ppb of 2,3,7,8-TCDD, whereas EPA sample LPX-SD-4405, which is collocated with SS_G-01, was found to contain 4.4 ppb of 2,3,7,8-TCDD. The locations shown around SS_G-01 (SS_G-01-01 through SS_G-01-04) are 50 feet from the location of SS_G-01. Additionally, a vertical profile sample is proposed at the location of SS_G-01. This vertical profile sample will be collected from a depth of 1-2 feet and will be analyzed for dioxins/furans, PCBs/Pesticides, SVOCs, metals, TOC and grain size as per the SAP. Furthermore, Emhart proposes to collect two surface soil samples (0-12 inches) surrounding sample SS_G-29, located behind the former North Providence Boys and

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Girls Club. The unvalidated result for 2,3,7,8-TCDD at SS_G-29 is 5.1 ppb. The two proposed soil sampling locations shown on the enclosed figure (SS_G-29-01 and SS_G-29-02) are 50 feet south and east of SS_G-29. Data from these samples will aid in delineating the concentrations of 2,3,7,8-TCDD in surface soil around SS_G-29. Data from the surface soil sample, SS_G-26, located approximately 50 feet north of SS_G-29, show a TEQ of 0.5 ppb. The subsurface soil sample at SS_G-26 contained 0.0149 ppb TEQ, indicating that dioxins are limited to the upper strata. Furthermore, groundwater was encountered at SS_G-26 at approximately 16 inches below ground surface so the vadose zone in this area is very limited in depth. Consequently, we are not currently proposing any additional vertical sampling in the vicinity of SS_G-29.

Finally, although not sampled in the September 2010 field effort because they are located in an area discovered to contain obvious fill material, Emhart now proposes to collect surface soil samples from SS_G-10, SS_G-12, and SS_G-13. Data from these samples will provide information concerning the western boundary of the Oxbow wetland area, which may be helpful in understanding the extent of contamination in this direction. These samples will be collected from the top 0-12 inches of soil.

Integral will describe in the field sample log the physical attributes of each sampling station both vertically and spatially about the sampling locations, and will photo document the specific sample location and its general surroundings. This information may be useful in identifying any specific features that could potentially be correlated with dioxin concentrations.

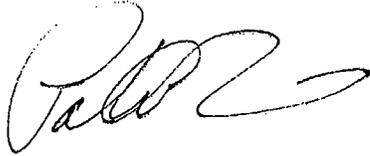
* * *

All of the proposed sampling would be conducted in a manner consistent with the SAP and the proposed amendments thereto, with respect to project management, data generation and acquisition, assessment and oversight, data validation and usability, field documentation, and waste generation and disposal.

As you know, Emhart would like to commence the additional field sampling as soon as possible, weather permitting. Therefore, EPA's expedited attention to issuing the attached proposed First Amendment to Settlement Agreement, and approving the amended SAP thereunder, would be appreciated. Should you have any questions, please call me at (207) 874-9000 ext. 206.

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Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick O. Gwinn', with a stylized flourish at the end.

Patrick O. Gwinn
Senior Managing Scientist

Enclosures

cc: Eve Vaudo, USEPA
Lou Maccarone, RIDEM
Deirdre Dahlen, Battelle
Laura Ford Brust, Esq.
David N. Scotti, LEA
Jeffrey M. Karp, Esq.
Jerome C. Muys, Jr., Esq.



Figure 1.
 Proposed Supplemental Oxbow Area Sediment and Surface Soil Sampling Locations November 4, 2010 Proposed Amendment to Integral's July 21, 2010 Sampling and Analysis Plan

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 1 - NEW ENGLAND

IN THE MATTER OF:

Centredale Manor Restoration Project
Superfund Site

North Providence, Rhode Island

Emhart Industries, Inc.

Respondent

FIRST AMENDMENT TO
ADMINISTRATIVE SETTLEMENT
AGREEMENT AND ORDER ON
CONSENT

U.S. EPA New England
CERCLA Docket No. 01-2010-0045

Proceeding Under Sections 104, 107, and 122
of the Comprehensive Environmental
Response, Compensation, and Liability Act,
as amended, 42 U.S.C. §§ 9604, 9607 and
9622.

Pursuant to paragraph 90 of the Administrative Settlement Agreement and Order on Consent, the EPA Project Coordinator and Respondent agree to amend the Statement of Work as follows:

Paragraph 2 of the Statement of Work, which originally read:

- "2. Emhart will collect soil samples from the vadose zone in the Oxbow area, the emergent wetland east of the Oxbow area, the forested and emergent scrub/shrub wetlands at the confluence of the Assapumpset Brook and the Woonasquatucket River, and at the emergent wetland in the southeastern portion of the Lyman Mill Pond. Samples will be analyzed for dioxins/furans, PCBs and pesticides, semivolatile organic compounds, and heavy metals."

shall now read:

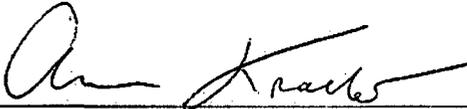
- "2. Emhart will collect soil samples from the vadose zone in the Oxbow area, the emergent wetland east of the Oxbow area, the forested and emergent scrub/shrub wetlands at the confluence of the Assapumpset Brook and the Woonasquatucket River, and at the emergent wetland in the southeastern portion of the Lyman Mill Pond. Emhart will also collect sediment samples from the palustrine scrub/shrub and emergent wetlands at the southern extents of the Oxbow area and east of the Oxbow area. Emhart will, to the extent possible, collect a full 36 inch sediment core from each sediment sampling location. Samples from the 0-12 inch and 12-24 inch intervals will be analyzed for dioxins/furans, PCBs and pesticides, semivolatile organic compounds, and heavy metals. Samples from the 24-36 inch interval will be collected and placed on "hold" for potential dioxin/furan analysis. Samples potentially collected from the surface sand layer or any other thin substrata layers will be analyzed for dioxin/furans and grain size only."

Paragraph 3 of the Statement of Work, which originally read:

- "3. Once the data are validated, Emhart will prepare and submit a technical report to EPA summarizing field activities, analytical work, data validation results, and final validated analytical results. Emhart will also prepare and submit an electronic data deliverable to EPA, which will contain the soil sampling analytical data."

shall now read:

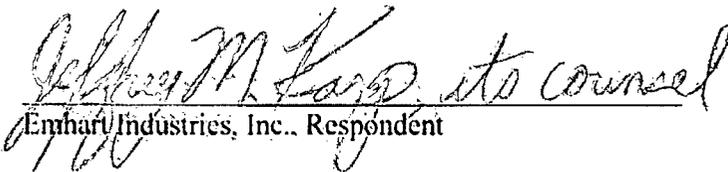
- "3. Once the data are validated, Emhart will prepare and submit a technical report to EPA summarizing field activities, analytical work, data validation results, and final validated analytical results. Emhart will also prepare and submit an electronic data deliverable to EPA, which will contain the soil and sediment sampling analytical data."



Anna Krasko, Project Coordinator
Office of Site Remediation and Restoration, Region 1

11/18/10

Date



Jeffrey M. Karp, its counsel
Emhart Industries, Inc., Respondent

11/9/10
Date