



Fw: EPA Centredale Manor Hearing Comment by Johnston Town Planner

Stacy Greendlinger to: Anna Krasko, Eve Vaudo, Gretchen Muench, Mike Jasinski

12/07/2011 11:29 PM

From: Stacy Greendlinger/R1/USEPA/US
To: "Anna Krasko" <krasko.anna@epa.gov>, "Eve Vaudo" <vaudo.eve@epa.gov>, "Gretchen Muench" <muench.gretchen@epamail.epa.gov>, "Mike Jasinski" <jasinski.mike@epa.gov>

1 attachment



Johnston Town Planner Comments on EPA Centredale Manor Hearing.pdf

From: "Pam Sherrill" [planner@johnston-ri.us]

Sent: 12/07/2011 04:54 PM EST

To: Stacy Greendlinger

Cc: <Tony_simon@whitehouse.senate.gov>; "Janet Whiteley" <jwhiteley@johnston-ri.us>; "Doug Jeffrey" <djeffrey@johnston-ri.us>; "William J. Conley, Jr." <wconley@wjclaw.com>; <avecchione@johnston-ri.us>; <Icaruso@johnston-ri.us>; <louis.maccarone@dem.ri.gov>; <alehrer@wrwc.org>; "Brueckner, Tom" <TBrueckner@narrabay.com>; "Matt Robbie" <mrobbie@skeo.com>; "Miranda Maupin" <mmaupin@skeo.com>
Subject: EPA Centredale Manor Hearing Comment by Johnston Town Planner

Stacy –

See attached letter summarizing my comments at today's hearing (to be mailed). These are preliminary comments based on my current understanding. I reserve the right to comment in more detail at a later date.

Thank you for extending the comment period to February 13, 2012. - Pam

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JOSEPH M. POLISENA, MAYOR

December 7, 2011

Anna Krasko
EPA New England
5 Post Office Square, Suite 100
Mail Code OSRR07-1
Boston MA 02109-3912

RE: Centredale Manor Superfund Proposed Plan
December 7, 2011 Hearing Comments

Dear Ms Krasko:

The following summarizes my testimony today at the EPA hearing held at Centerdale Manor. I reserve the right to provide additional comment as I undertake a more thorough review of the Proposed Plan. As presented by the EPA, the preferred option is the permanent disposal of contaminated dredged sediment in upland Confined Disposal Facilities (CDF) at one or more sites in Johnston along the Woonasquatucket River.

Mayor's Comments

The following reiterates Mayor Polisena's requests as expressed in previous meetings with the EPA:

- The Town of Johnston must be assured that the Town will not be liable for the maintenance or failure of any future confined disposal facilities located within Johnston.
- Remediation and construction must be conducted by contractors and workers located in the State of Rhode Island

Town Planner's Comments

- Background
 - None of the pollution was generated in Johnston and yet all five potential upland confined disposal facilities (CDF) are located in Johnston.
 - You will agree that the Town of Johnston bears a disproportionate share of landfill disposal statewide.
- The Town will only be supportive of CDF in Johnston if it meets the following:
 - Does not adversely affect tax revenue to the Town of Johnston. This includes property and tangibles tax.
 - Does not displace jobs. This is a very important consideration as it is much easier to support job retention than it is to attract new business. These workers have a very important multiplier effect on the local economy as they spend their earnings in local businesses.

- CDF in Johnston must be a win/win for the Town. Any disposal within the Town must be mitigated by development of appropriate surface reuse so that not just the Town of North Providence and EPA are winners, but that the Town of Johnston is a winner as well.
- At this time, the Town is supportive of use of the DPW site at 100 Irons Avenue and of the former tire dump off Railroad Avenue. This is based on currently available information. The Town is working on visioning for recreational reuse of the DPW site and has scheduled a workshop on January 11, 2012 at 7:00 PM at the Sarah Barnes School, 24 Barnes Avenue, Johnston to gather public comment. Our preliminary support for use of the DPW is predicated on the following:
 - DPW operations be relocated elsewhere in town, to be paid by the EPA/Potentially Responsible Party (PRP) with no Town fiscal participation.
 - DPW site be developed for recreational use above the CDF, with development costs to be paid by the EPA/PRP with no Town fiscal participation.
 - EPA provide assistance in public education regarding health risks for use of recreational facilities located above CDFs.
 - EPA provide support and financial assistance to the Town to carry on negotiations with the PRP. Again, none of the pollution was generated in Johnston, and yet we will bear the burden of this negotiation.
 - Access to the Narragansett Bay Commission sewer interceptor located under the DPW must be assured, not just at the manholes, but along the length in the event the line has to be repaired or replaced. We are concerned about the loading of the CDF and any effect this would have on the structural integrity of the sewer line. We recommend that the EPA request separate comment from the Bay Commission on this issue.

In closing, the Town is supportive of restoring water quality in the Woonasquatucket but it must be a win/win for the Town of Johnston.

Sincerely,



Pamela M. Sherrill, AICP, Town Planner

cc: Tony Simon, Senator Whitehouse's Office
Mayor Joseph M. Polisena, Mayor
Doug Jeffrey, Chief of Staff
William J. Conley, Town Solicitor
Arnold Vecchione, Director, Department of Public Works
Lorraine Caruso, PE, Town Engineer
Louis R. Maccarone, Department of Environmental Management
Alicia Lehrer, Woonasquatucket River Watershed Council
Tom Brueckner, Narragansett Bay Commission