

JOSEPH M. POLISENA
MAYOR



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Superfund Records Center
SITE: Centredale
BREAK: 5-3
OTHER: 506529

EXECUTIVE CHAMBERS

TOWN HALL
1385 HARTFORD AVENUE
JOHNSTON, RHODE ISLAND 02919

December 29, 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

Dear Ms Krasko:

Please be advised that the Town of Johnston is no longer supportive of consideration of any upland disposal of contaminated material associated with the Centredale Manor Superfund site. This includes consideration of the Department of Public Works site at 100 Irons Avenue, with recreational reuse. We remain supportive of cleanup efforts to restore the Woonasquatucket River as contamination has adversely affected the quality of life of Johnston (and North Providence) residents, but not at a cost to the Town of Johnston.

None of the pollution was generated in Johnston and yet all five potential upland confined disposal facilities (CDF) are located in Johnston. The Town of Johnston bears a disproportionate share of landfill disposal statewide. This legacy includes numerous Superfund sites and critical ongoing issues with operation of Rhode Island Resource Recovery Corporation's Central Landfill.

The Town of Johnston is specifically concerned with the following:

- We cannot be assured that the Town will not be liable for the maintenance or failure of any future confined disposal facilities located within Johnston. We understand that the EPA cannot be held liable for long term issues as this will be the responsibility of the Potentially Responsible Party (PRP). The PRP or PRPs are private businesses with no assurance that they will even be in business in future years.
- We understand that the PRP and not the EPA will be responsible for construction and therefore we cannot be assured that work will be conducted by contractors and workers located in the State of Rhode Island
- The Town cannot be assured that long term disposal (10, 50, 100 years plus) will remain safe for current and future residents of Johnston. We are concerned that state of the art disposal methods now under consideration will not withstand the test of time and that the health of residents may be adversely affected. We are not assured that the PRP will assume this long term liability.



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- We are concerned with short term construction impacts including contaminated airborne dust in proximity to residential neighborhoods.
- The burden of negotiating with the PRP will fall to the Town of Johnston, requiring dedication of limited staff and fiscal resources. This is an unacceptable distraction from more pressing town issues and regulated mandates.
- Location of upland disposal sites would adversely affect property and tangibles tax revenue to the Town of Johnston as these sites would be taken off the tax rolls or would have lower value than if developed for industrial use, in accordance with zoning.
- Location of upland disposal in Johnston has the potential to displace long term 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.
- We are not assured that access to and the integrity of the Narragansett Bay Commission sewer interceptor located on the west side of the Woonasquatucket River will not be compromised by upland disposal along the river.

In closing, the Town is supportive of restoring water quality in the Woonasquatucket but not at a cost to residents of the Town of Johnston.

Sincerely,



Joseph M. Polisena, Mayor

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