

TOWN OF
NORTH PROVIDENCE



STATE OF
RHODE ISLAND

North Providence
Environmental Commission

Tree Board
Conservation Commission
Environmental Commission
Beautification Commission

February 6, 2012

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

Dear Ms. Krasko,

Thank you for the opportunity to provide comment on the proposed Centerdale Manor Superfund remediation project. The North Providence Environmental Commission (NPEC) is a volunteer group in the Town of North Providence that works on issues of open space, community environmental improvement, beautification, tree planting and maintenance, etc.

We are generally quite supportive of the project as proposed by EPA in autumn, 2011 provided certain issues are addressed well. These include:

- * It is crucial to include funds for restoration of remediated lands to a safe, recreationally and ecologically productive status, in the original financial arrangements.
- * During the work, the health of people in the local area should not be adversely impacted, and the impact on their lives should be minimized.
- * We would like the opportunity to comment on the "design phase" of the project once the remedy has been agreed to as we felt issues relegated to that phase and not specified in the current EPA proposal could be significant.

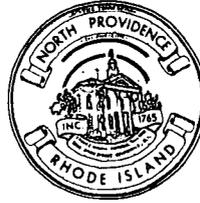
We would also like to repeat selected comments from our July 19, 2010 letter below for emphasis:

- * We believe that at the end of the remediation project that the existing pond and wetland system should be restored to their current conditions. By this statement, we mean that the alternatives involving the containment of the dioxin contaminated sediment in the near shore confined disposal facilities or under isolation caps be eliminated. Furthermore we believe that the present size of the ponds, the flood plains and the wetlands be maintained and that the dams at Lyman Mill Pond and Allendale Mill Pond be preserved.



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* The NPEC supports the EPA's general approach to the remediation of the contamination in and along the river. Specifically we are glad to see that remediation is proposed for the Centredale Manor property or the "source area" as identified by EPA as well as the downstream sections of the river including Allendale and Lyman Mill ponds and the abutting areas. We would want the entire remediation as proposed to be completed by EPA.

* Recent flooding has affected residents of our Town, and the unfortunate loss of much green space in North Providence over the last few decades makes (uncontaminated) flood plains and wetlands even more crucial both for our Town and for Narragansett Bay (a crucial resource that the entire state relies upon economically and recreationally.)

* We were glad to see that the proposal relies largely upon upland containment sites due to the strong likelihood of future flooding.

* The "Oxbow" area remediation, on the other hand, does not rely upon upland containment. We are somewhat concerned that future flooding could exceed generally accepted predictions and dislodge contamination from the sediment proposed to be capped in this area. Extreme weather events appear to be increasing in many areas of the country.

* We would also strongly prefer that any upland containment site chosen, not destroy existing wooded space, but rather be sited upon former industrial areas nearby. North Providence has the least amount of Open Space of any town in Rhode Island (according to RI Monthly Magazine) and our Commission has worked very hard to preserve the last few green areas left. We value these upland wooded spaces not only for their contribution to water quality and flood alleviation, but also for reduction of summer temperatures, recreational opportunities, habitat, air quality improvement, and psychological benefits to residents in urban areas. Upland areas with oak trees offer the additional benefit of forest largely immune to the potential threat of the Asian Longhorn Beetle, a devastating insect that could largely destroy Rhode Island's maple forests if containment efforts in nearby Worcester, MA are not successful.

* Finally, we were pleased to see that the proposal from EPA considers future monitoring and maintenance costs associated these types of remedies, as our Towns are likely to vary in institutional memory of the site's hazards in future decades.

Thank you very much for your concern regarding these issues.

Sincerely,

Barry Schiller, Secretary

Yvonne Federowicz, Co-Chair