

Superfund Records Center
SITE: Centredale
BREAK: 5-3
OTHER: 506552

FOR INCLUSION IN THE ADMINISTRATIVE RECORD

February 1, 2012

BY ELECTRONIC MAIL AND FIRST CLASS MAIL
RETURN RECEIPT REQUESTED

Ms. Anna Krasko
On-Scene Coordinator, Region 1 EPA
5 Post Office Square, Suite 100
Mail Code: OSRR07-1
Boston, MA 02109-3912

Eve Stolov Vaudo, Esquire
Senior Enforcement Counsel, Region 1 EPA
5 Post Office Square
Mail Code OES04-4
Boston, MA 02109-3912

Re: Centredale Manor Restoration Project Superfund Site: Request for Supplemental Extension of Public Comment Period Regarding Proposed Remedial Action Plan and Supporting Documentation

Dear Eve and Anna:

We are writing on behalf of Emhart Industries, Inc. ("Emhart") to request an additional 60 days beyond the current deadline of February 13, 2012 for submission of comments regarding the October 2011 Proposed Remedial Action Plan (the "PRAP") and supporting documentation for the Centredale Manor Restoration Project Superfund Site (the "Site"). We ask that this request be included in the Administrative Record (the "AR") for the Site. The basis for our request is set forth below.

By letter dated December 5, 2011 from Ms. Vaudo (enclosed herein), EPA agreed to extend the original public comment period for an additional 30 days, until February 13, 2012. Since that time, additional issues have come to light that necessitate further extension. For example, the Town of Johnston has now stated, in writing, that it will unequivocally oppose the siting of any type of Confined Disposal Facility within Town boundaries. Thus, among other



Ms. Anna Krasko
Ms. Eve Vaudo, Esquire
Page 2
February 1, 2012

reasons, additional time is necessary to assess the implications of the Town of Johnston's position on the "implementability" of the remedy proposed by EPA.

In addition, as discussed in more detail in our original request of November 14, 2011 for a 120-day extension of the public comment period (enclosed herein), the complexity of the issues presented by the Site necessitate a significantly longer period for public comment than that customarily provided by EPA with respect to proposed remedies at Superfund sites. EPA's proposed remedial approach for the Site is complicated and controversial, both from a technical and a legal standpoint. This is witnessed by the fact that the AR contains in excess of 500 substantive documents. Although Ms. Vaudo correctly points out in her December 5, 2011 letter that EPA has made several drafts of the AR available to Emhart and other interested parties prior to the formal public comment period, the last such version was dated June 2010. Thus, the October 18, 2011 version, on which the PRAP is based, incorporated more than an entire year's worth of new documentation. A further complicating factor is that the October 2011 version is organized in a wholly different fashion than earlier versions, and the index to the October 2011 version provides no cross-references to the very dissimilar prior versions.

Moreover, the October 2011 version of the AR contains, for the first time, an "Addendum" to the Feasibility Study for the Site which is 1,116 pages in length. The Addendum addresses issues identified by EPA and the National Remedy Review Board that only have recently been brought to the attention of interested parties.

Finally, despite the extensive documentation set forth in the October 2011 version of the AR, it is apparent that there are many substantive issues that are not addressed anywhere therein. Under these circumstances, it is difficult and quite timely for an interested party to formulate meaningful comments.

Please advise me at your earliest opportunity of EPA's response to this request.

Sincerely,


Jerome C. Muys, Jr.

Direct line: 202 370 3920
jmuys@sandw.com

Enclosures