



**WOONASQUATUCKET RIVER
WATERSHED COUNCIL**

Superfund Records Center
SITE: Centredale
BREAK: 3-10
OTHER: 506556

October 5, 2011

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SDMS DocID **506556**

**Re: Supplemental Baseline Human Health and Ecological Risk Assessment:
Oxbow Area Floodplain Soil and Sediment
Centredale Manor Restoration Project Superfund Site
North Providence, Rhode Island**

Dear Stacy:

We have reviewed the above document that was produced during the summer. As we are anticipating a significant amount of activity on the project in the fall and winter of 2011/2012, we thought it best to submit these comments to you now with the hope of resolving these concerns ahead of the forthcoming documents and meetings. Our comments are as follows:

1. In reviewing these reports it was difficult to follow the decision making process for the selection of the samples to be included in the risk assessments. Specifically we noted the following potential issues of concern and request additional background information:
 - Some individual sample point results were averaged and the average then used input to the risk assessment alongside individual point sample results.
 - In at least one instance (SS-G-01) it appears that the risk assessments use averages for the sample group which are based on differing sub-sets of the sample group.
 - In reviewing project records alongside the risk assessments, we came across approximately 97 samples that were potentially appropriate for use in one or both of the risk assessments. However some sample results were excluded from one or both assessments.
 - Both risk assessments in part used an estimate of the 100 year flood plain and field observations made during sample collection to determine the appropriateness of using samples in the risk assessment. In some instances it appears that some sample points that were in close proximity to one another and yet were not used in the same manner. As this approach is somewhat of a subjective decision we are concerned that this uncertainty was not evaluated in the assessment.

Please note that we do understand that it is possible that these points of concern are not significant and may not impact the proposed remediation plan for this portion of the site. However we would appreciate some details as to how samples were selected for the risk assessment. It would be useful if that explanation would begin with a table showing all of the individual samples in or nearby the Oxbow and the laboratory analysis results for at least 2,3,7,8 – TCDD.

2. Due to the sensitive nature of the Oxbow's environment and the significance that topographical elevations will most likely play in the remedial decision making process, we suggest that a topographical survey (delineating one-foot contours) of the Oxbow be developed assuming one is not already available. The survey coverage should include the current surface water channels, the location of the 100 year flood plain and the location of the soil and sediment sampling locations in the Oxbow. If this cannot be accomplished at a minimum we suggest that a graphic be developed that accurately shows the current hydrological connections between the main stem of the river and Lyman Mill Pond in the vicinity of the Oxbow along with the sampling locations in the area. The basis for this request is the observation that most Oxbow figures from project reports were developed using aerial photographs and consequently the identification of the river and surface water in the area is un-depicted in some instances as it covered with persistent aquatic vegetation.
3. We are concerned about the decision to divide the Oxbow into two study areas for the purposes of evaluating potential human health impacts. We have consistently observed a greater level of human activity in the Oxbow during the summer, when the river levels are at their lowest and the Oxbow at its driest. This observation leads us to suspect that use of the river's flood plain may not be appropriate as a consideration regarding the areas where people are most likely to congregate. Furthermore it appears that the area classified as the "General Use Area" almost entirely surrounds the "Human Health Concern Area" leading to the conclusion that the General Use Area is most likely used as often as the Human Health Concern Area.
4. We are concerned that the Human Health Risk Assessment does not consider risks associated with dust exposure. As previously mentioned we have observed the Oxbow to be most frequently used during the summer when the area is at its driest and we disagree with the assumption that the surface soil would have so high a moisture content so as to prohibit the generation of dust. Also as we have mentioned in prior correspondence, we have also observed all-terrain vehicle use in the Oxbow and suspect that this activity generates significant dust exposures.

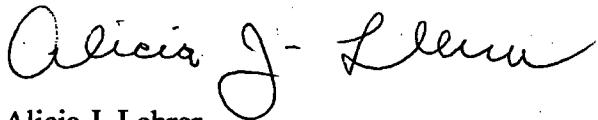
5. In the Baseline Ecological Risk Assessment it is stated that, "Following an evaluation of the applicability of the existing PRGs for floodplain habitats, specific PRGs for the Oxbow Area may be discussed in further detail in a separate document."

Has the referenced document been developed and if yes, is it available for review?

6. In reviewing the copy of the USEPA July 2011 PowerPoint presentation we noted that it appears to state that the 2,3,7,8-TCDD flood plain soil remedial objective is 35 parts per trillion (ppt). This differs from the Interim Final Feasibility Study, which has an objective of 17 ppt. Is this accurate and if so, what is the basis for this change?

Please understand that we are providing these comments now in an effort to clarify points of concern so as to enhance our ability to actively participate in the forthcoming discussions regarding the proposed plan. We are therefore open to whatever means you see fit to address these concerns as expeditiously as possible.

Sincerely,



Alicia J. Lehrer
Executive Director

cc: Anna Krasko, USEPA
Louis Maccarone, RIDEM