



WRWC Commends on Amendment

Alicia Lehrer to: Anna Krasko, Stacy Greendlinger

08/17/2012 03:31 PM

From: "Alicia Lehrer" <alehrer@wrwc.org>
To: Anna Krasko/R1/USEPA/US@EPA, Stacy Greendlinger/R1/USEPA/US@EPA
Please respond to <alehrer@wrwc.org>

History: This message has been forwarded.

1 attachment

Dear Anna and Stacy,

The WRWC is grateful for the opportunity to comment on the Amendment to the Proposal Cleanup Plan for the Centredale Manor Superfund Site.

We appreciate your hard work on this difficult issue.

Sincerely,

Alicia

Alicia J. Lehrer

Executive Director

Woonasquatucket River Watershed Council

27 Sims Avenue

Providence, RI 02909

401-861-9046

401-861-9038 (fax)

alehrer@wrwc.org

Woono River Ride - Sept. 22nd. REGISTER TODAY!



Woonasquatucket River Watershed Council

Comments to the USEPA

Amendment Proposed Plan for the Centredale Manor Restoration Project

August 2012

Mission Statement

The mission of the Woonasquatucket River Watershed Council (WRWC) is to encourage, support and promote the restoration and preservation of the Woonasquatucket River Watershed as an environmental, recreational, cultural, and economic asset of the State of Rhode Island. We share with the United State Environmental Protection Agency (USEPA) the goal of returning the river to a fishable/swimmable condition. The WRWC greatly appreciates the work that the USEPA and their contractors have done to assess the portion of the river that has been impacted by the Centredale Manor site and their education of residents during remediation. We enthusiastically await the large-scale final remediation of the Centredale Manor property and the downstream portions of the Site, including the areas further downstream that have not yet been evaluated adequately by USEPA.

Document Organization

This document provides commentary from the WRWC relative to the USEPA document entitled, "Proposed Plan Amendment July 2012, Centredale Manor Restoration Project" (the "Proposed Plan Amednment"). It is important to note that the WRWC provided comments on the entirety of the USEPA's proposed plan in February of 2012.

Comments on the USEPA's Proposed Plan Amendment

1. We fully support the USEPA in its efforts to clean up the Woonasquatucket River via excavation and disposal of impacted sediment and soil and view the remediation as critical and beyond a condition where the merits of remediation versus "no action" should be debated. We anticipate selection of alternatives that will best protect human health and ecosystem function in the long term.
2. The lowering of the residential and recreational soil cleanup levels increases the importance of precision and accuracy in the soil data set. With regard to the Oxbow, we are concerned that the USEPA views this matter as having minimal effect on the preferred remedy because the agency has not adequately evaluated the use of the Oxbow as a recreational area. The USEPA's information appears to be limited to observations of surface litter/debris and surface water elevation. We believe that USEPA's understanding of the current human activities in the Oxbow is inaccurate and

thus that the USEPA's use of the river's flood plain elevation as a guideline for differentiating between soil and sediment may not be appropriate. People are using various topographies in this area. During our visits to the Oxbow we have observed evidence that people are using the area as a gathering place, for fishing, hunting, camping and riding all-terrain vehicles. We are concerned that these activities occur during summer when river levels are at their lowest and the Oxbow flood plain soil and sediment is driest. This situation allows for greater use of the area and the creation of dust (which is likely to contain actionable levels of dioxin). It appears that both the increase in the intensity of use and generation of potentially impacted dust have not been adequately assessed.

While we understand that the USEPA proposes to use a recreational use cleanup objective for soil in the area, we are concerned that the recreational use extends far beyond the area that the USEPA has proposed for remediation via excavation. The importance of this differentiation is increased by USEPA's proposal to remediate the remainder of the Oxbow contamination via a three inch cap which will provide limited protection to recreational visitors to the Oxbow that wander beyond the USEPA's defined soil area, nor will such a "cap" provide a long-lasting remedy, due to future flooding, tree fall, and other disturbances of the land that can reasonably be anticipated.

3. We strongly encourage USEPA to extend the remediation project further downstream from Lyman Mill Dam. Sample WRM-SD-2054 appears to have been taken immediately downstream of the dam and is significantly (2,620 parts per trillion ~ ppt) above the USEPA revised residential cleanup objective of 50 ppt. This area should be sampled further. Access to the area is unrestricted and if it is not addressed as part of the contemplated remedial action it is likely to remain in place for decades and susceptible to downstream migration.
4. We respectfully request that the USEPA provide clarification as to what the agency's plans are for the area downstream of Lyman Mill dam and what the schedule is for implementing these plans. The majority of the USEPA's data for downstream of the dam is over ten years old and will be at least over fifteen years old prior to the implementation of remedial actions. Since the time of the data collection there have been two significant flood events (October 2005 and March 2010) which have redistributed river sediment. With the lowering of the soil cleanup objectives it is critical that the USEPA improve the precision of its data downstream of the dam.

We urge USEPA to take a more active role in the area downstream of Lyman Mill Dam. Contamination above the remediation objectives exists in these areas and at the present it appears that the USEPA's only idea is to wait for the sedimentation rate to dilute or cover the contamination. The users of the downstream portion of the river should also have the benefit of the river being fishable and swimmable. A Superfund site is supposed to be defined by "the extent of the contamination", which seems not to have

been applied here, as shown by the limited samples that have been taken and the obvious expectation that the contamination would have traveled further downstream.