



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

28 September 2012

Mr. James T. Owens, Director
USEPA – New England, Region 1
Office of Site Remediation and Restoration
5 Post Office Square
Mail Code: OSR
Boston, MA 02109-3912

RE: Centredale Manor Restoration Project Superfund Site
North Providence, Rhode Island

Dear Mr. Owens:

The Office of Waste Management has conducted a review of the *Record of Decision* (ROD), dated September 2012, for the Centredale Manor Restoration Project Superfund Site (Site) located in North Providence, Rhode Island. The selected remedy the Environmental Protection Agency (EPA) has put forth includes upgrading the current interim caps, removal of contaminated soil and sediment, soil and sediment containment in confined disposal facilities (CDFs), and thin-layer capping in environmentally sensitive areas.

The Department of Environmental Management (the Department) has worked with your Agency and a host of other municipal and federal agencies and other stakeholders, from the early investigatory phases through this important decision milestone. Based on the Department's review of the ROD, we would like to offer our concurrence on this decision. This concurrence is based upon all aspects of the aforementioned ROD being implemented during the design, construction and operation of the remedy in a timely manner.

The Department would like to specifically emphasize the following aspects of the ROD:

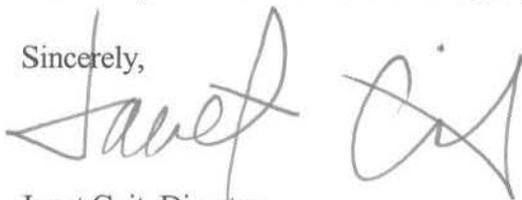
- The Department appreciates the EPA's commitment to addressing potential short-term impacts to residents adjacent to the Site that were brought to light following the dioxin reassessment released in February 2012. The Department looks forward to working with EPA in implementing interim measures to ensure every reasonable precautionary action is taken on the impacted residential properties while we await final remedy implementation.
- Source area caps are to be upgraded to RCRA Subtitle C, or equivalent, requirements. The permanency of these caps, and therefore the public health and safety, depend largely on adequate long-term regular maintenance. The operation and maintenance requirements should be well defined, and a consistent, reliable entity should be responsible for performing such requirements. Of particular concern is the Tailrace Area cap, which protects an area of soil and sediment which could become highly mobile if the integrity of that engineered cap were to be compromised.

- Specifically, the Department continues to advocate for a centralized mechanism for Long-Term Stewardship which will lessen the regulatory burden on EPA and RIDEM and ensure permanency of the remedy
- As a great deal of the remediation and disturbance of materials will be within or adjacent to areas of potential flooding, the Department would like to stress that all activities remain sensitive to the potential loss of flood storage. Loss of flood storage capacity, could directly and negatively impact local residents and businesses along the Woonasquatucket River, not only adjacent to the Site, but downstream as well.
- The Department also appreciates EPA's commitment to monitoring downstream areas of potential impact from the Site, using an adaptive management approach. The Department looks forward to coordinating with EPA in these efforts, and seeing the results thereof.
- Community participation is an extremely important to the Department and we believe it to be critical at this Site. We believe public outreach will be a critical part of remedy implementation due to the fact that remediation may be occurring in residents' back yards and in a river used for recreation.
- Finally, the Department urges EPA to take every measure necessary to ensure that the Responsible Parties perform and fund the remedial actions necessary at the Site. The financial burden should be kept off the taxpayers of Rhode Island and be consistent with the long standing notion that the polluter pays to the maximum extent feasible.

The Department looks forward to continued cooperation and working toward our mutual goals of remediating this Site and thanks you for the opportunity to review this important ROD.

If you have any questions please feel free to contact me or Matthew DeStefano of my staff at (401) 222-4700, extensions 2409 and 7141, respectively.

Sincerely,



Janet Coit, Director
Dept. of Environmental Management

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