Centerdale
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Woonasquatucket River Watershed Council
56 Pine Street, Suite 3B
Providence, RI 02903

December 4, 2000

Anna Krasko, Project Manager
U.S. EPA, Region 1, New England
One Congress Street, Suite 1100 (HBO)
Boston, MA 02114-2023

Dear Ms. Krasko:

We appreciate the opportunity to comment on the Final Engineering / Cost Analysis (EE/CA), dated September 2000, associated with the recommended remedial alternative for the interim non-time critical response at the Centerdale Manor Restoration Site. We are in general concurrence with the comments of the Rhode Island Department of Environmental Management. As organizations focused on the river communities, we do have additional comments regarding the impact of this proposal.

We believe that the best action is to remove all of the contaminated soils and sediments at Allendale Pond prior to the reconstruction of the dam. The levels of contamination at this site are actionable, and postponing this removal now only delays the cleanup and will add to the cost of future efforts to restore the Woonasquatucket as a fishable, swimmable river.

We cannot support alternative three if it compromises, in any way, the future removal of all the soil and sediment that is contaminated above actionable levels. The current condition of the Superfund area at this point in time should be the baseline for all future actions. Under the proposed action, waters of the Woonasquatucket River will cover existing contaminated soils in the area referred to as Allendale Pond. If future congressional action restricts sediment removal, it should be made clear now that if the current exposed and contaminated soil is covered by water, that will not reclassify the soil as sediment, thus eliminating remediation opportunities.

Future treatment of these contaminated soils should not be affected by the temporary action, which EPA labels an "aqueous cap". The proposed "aqueous cap" is part of a moving river and the "aqueous cap" is penetrable. Removing all of the exposed contaminated soil now would be better for the residents of North Providence who see the pond as an aesthetic and recreational resource. If EPA proceeds with the current proposal, it should include a commitment to future dredging to remove all contaminated sediment from the pond and riverbed.

General Comments:

1. In addition to the comments by RI DEM, we also note that to ensure the future health of humans and the river ecosystem it is likely that additional sediment removal downstream of Allendale Dam may be warranted as part of a future action to remove all human health risks. The current "aqueous cap" in Lymansville Pond in combination with the Lymansville Dam has not effectively prevented the downstream migration of contaminated sediments.

2. In addition to the comment 2 of RI DEM, we are concerned about the mixed messages the community is receiving from EPA. Our concern is heightened by information given at the informal poster session in October at North Providence Town Hall. A North Providence resident asked if, under the proposed action, the pond would be swimmable. The answer from EPA was yes, as far as the dioxin contamination was concerned, although given other factors including bacteria contamination they would not recommend it. While this is consistent with a statement in the risk evaluation summary, it is not consistent with past practices along the Woonasquatucket River. We have spent hours with representatives from EPA, the RI Department of Health and the RI Department of Environmental Management, crafting appropriate messages for the public relating to the dioxin contamination. We have spent many additional hours working with community residents to ensure that they use the resources of the river appropriately. We have strongly cautioned against swimming in the river and eating fish from the river. We need clarity, consistency and accuracy in the way this issue is presented to the public. We need an unambiguous message that is supported by EPA, the RI Department of Health, and the RI Department of Environmental Management. The message imparted in October, and the statement in the risk assessment is contrary to current practice and all that we have been told by these agencies.

3. We agree with RI DEM that more study is needed to evaluate the impact of the proposal as it relates to actual low flow water levels so that the appropriate amount of contaminated soil and sediment is removed during the initial removal action. The river is at times very turbulent, and in the summer months there are long periods of low flow. Removal of all the contaminated soil and "low flow" sediment now, coupled with constant monitoring of the water levels, will lessen the likelihood of emergency removal actions in the future because low flow conditions will not create added risks to human health.

4. We concur with RI DEM comment #4.

5. In addition to the concerns itemized by RI DEM in this comment, we have additional issues. The aesthetic quality of the Woonasquatucket River is an economic and recreational asset of the state of Rhode Island. The Woonasquatucket River, designated as one of 14 American Heritage Rivers in the nation, is used by paddlers and is home to a canoe and kayak rental facility. It is the centerpiece of WaterPlace Park in downtown Providence, and an important element in the powerful art installation, WaterFire, a regional tourist attraction. Maintenance of flow is critical to the economic and recreational health of our state and our capital city

6. We concur with RI DEM, and add that monitoring of downstream sediment is essential until it has been clearly established that remedial actions have contained the contamination.

Finally, in RI DEM specific comment number 8, they request clarification about the statement that "...aquatic sediments do not present an elevated level of risk to humans." We agree, and reiterate our concern for the mixed messages the community is receiving about the relative dangers of this contamination.

Sincerely,

Jane B. Sherman
Chair

Jennifer Pereira
Coordinator

cc.
EPA Regional Administrator Mindy Lubber
Senator Jack Reed
Senator Lincoln Chafee
Congressman Patrick Kennedy
Congressman Robert Weygand
Governor Lincoln Almond
Mr. Jan Reitsma