RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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6 November 2000

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

RE: Comments on the EE/CA Recommended Remedial Alternative at Centredale Manor Restoration Project Superfund Site, North Providence, Rhode Island

Dear Ms. Krasko,

This Office has conducted a review of the Final Engineering Evaluation / Cost Analysis (EE/CA), dated September 2000, associated with the recommended remedial alternative at the Centredale Manor Restoration Project Superfund Site. Pursuant to this review, we would like to offer our concurrence with EPA's recommended alternative for this EE/CA. This Office understands that, as it is stated in the EE/CA, these removal actions are not intended to be a final solution for all of the environmental concerns at the site, but rather, it is only an interim step in the Superfund clean-up process. Accordingly, this action is simply meant to achieve a more rapid risk reduction, in a shorter time frame, while also augmenting the traditional Superfund remedy at the site. This Office would also like to note that we are looking forward to working with the EPA and members of the community as the remediation effort continues over the next several years to do everything in our power to work towards making this river fully accessible for swimming and fishing. Our concurrence, however, is contingent upon the satisfactory incorporation or resolution of the attached comments.

If you have any questions please contact myself or Matt DeStefano at (401) 222-2797.

Sincerely,

Sarah R. Martino

Sarah R. Martino, Engineer
Office of Waste Management

cc: T. Gray, RIDEM-Assistant Director
L. Hellested, RIDEM-OWM
M. DeStefano, RIDEM-OWM
C. Horbert, OWM-OWR
F. Presley, RIDEM-OSP
I. Lang, Sen. Chafee's Staff

30% post-consumer fiber

Centredale Manor Site
Engineering Evaluation / Cost Analysis Recommended Remedial Alternative
September, 2000

Office of Waste Management Comments:

GENERAL COMMENTS:

1. It is likely that the on-going ecological risk assessment will find that a future removal of additional sediment may be warranted as part of a future remedial action. It is therefore our belief that either as much of the contaminated material should be removed prior to the flooding of the pond, or that the removal of any sediment based on future studies is not restricted due to this removal action. That is, if it is determined in the future that these areas need to be remediated, the fact that they have been submerged under water can not, and should not, be used as a reason for them not to be removed.

2. As this removal is only a part of the final remedy for the site, only portions of the contaminated sediments will be removed from the river at this time. This being the case, it must be clear to all that the "Do' s & Don'ts for the Woonasquatucket River" are to remain in place and will continue to be applied throughout this EE/CA. This includes no swimming, wading, bathing, playing, or drinking the water in the river along with not eating anything you may find in the river, including fish, eels, animals and plants.

3. Seasonal water level variations should be taken into account. It is possible that there will be less water at certain times of the year than is indicated in the EE/CA as the anticipated water level when the dam is replaced. As a result, the State would like EPA to evaluate historical water levels in the pond. If this evaluation reveals that there are times during low flow where the water level drops below the top of the dam, the State would advocate a more conservative removal of bank soils and flood plain sediments. Clearly one of the goals of this EE/CA is to eliminate contaminants that may cause elevated health risks. Therefore, either such a study should be conducted prior to the actual removal or an additional factor of safety should be calculated into the removal activities to take into account potential seasonal variations in the water level of Allendale Pond.

4. The State is also concerned about how any long and/or short-term usage restrictions would be implemented in order to keep receptors, particularly children, away from the river before the final remedy is implemented.

5. In replacing the dam, EPA needs to ensure that an adequate flow of water will be maintained downstream at all times to be protective of downstream aquatic life. This can be achieved through the incorporation of proper engineering controls for the dam to allow water to be passed through the dam if needed.

6. The document should address what will be done with the former raceway. Another goal of this removal action is to eliminate future migration downstream of contaminants. This EE/CA must ensure that the former raceway is properly closed and can not possibly be a vehicle for contaminated sediment transport around the dam and down stream towards Lymansville Pond.

SPECIFIC COMMENTS:

7. **Executive Summary; Page E-1, Paragraph 3.**

"Dioxins were first identified in 1998 in fish collected from this river."

Dioxins were first identified in 1996, not 1998, in fish tissues collected from the Woonasquatucket River. Please revise the document accordingly.

8. **Risk Evaluation Summary; Page 3-8, Paragraph 1.**

"The results of the streamlined risk evaluation indicate that aquatic sediments do not present an elevated level of risk to humans."

Please clarify if this is the case without any conditions, or if this is the case if the "Do's and Don'ts of the Woonasquatucket River" are followed.

9. **Short-Term Effectiveness; Page 4-25, Paragraph 4.**

"Dam restoration work under this alternative can be completed in approximately 6 months"

The restoration of Allendale Dam is not a feature within alternative 4. Please revise the document accordingly.