



## **Reuse Assessment**

### **Western Sand and Gravel Burrillville and North Smithfield, RI**



**Office of Site Remediation and Restoration  
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## **PURPOSE**

EPA New England is responsible for the cleanup of over 100 Superfund sites throughout New England. Although protecting human health and the environment is the primary objective of these cleanups, EPA also recognizes the value in helping to return Superfund sites to beneficial reuse. Understanding the current and likely future uses of a site is fundamental to achieving both objectives.

Most importantly, accurate information on the likely uses of a Superfund site and the surrounding area is necessary to make reasonable assumptions about possible exposures to contaminants. These assumptions form the basis for establishing site-specific cleanup levels and, ultimately, for designing a protective remedy. Uncertainty in this information makes it difficult to appropriately tailor the site investigation and cleanup, and oftentimes leads to increased project costs and delays.

From the standpoint of facilitating site reuse, details regarding current or planned uses can enable EPA to consider those uses in the selection, design and implementation of a remedy. For instance, it may be possible to locate a soil or groundwater treatment system so as not to physically restrict the construction of future buildings. In other cases, the cleanup might be phased in a way that allows certain portions of the site to be available sooner. There are numerous Superfund sites across the country where reuse has already been facilitated in this manner. Such accommodations will only be considered if they do not compromise the protectiveness of the cleanup.

This Reuse Assessment summarizes information on the current reuse and potential future use of the Western Sand and Gravel Superfund site (the Site). Potential future reuse-related issues are also described. EPA will continue to work on future reuse issues with the Site owner, state, local community and other stakeholders.

The Reuse Assessment is presented in two sections:

- Section 1 - Site Background: Describes the physical, historical and environmental context of the Site.
- Section 2 - Use/Reuse Status: Describes the current and potential future uses of the Site, potential use/reuse considerations and a general summary of relevant findings and potential issues.

## SECTION 1 - SITE BACKGROUND

### General Description

The Site is located on the boundary of Burrillville and North Smithfield, in Providence County, Rhode Island. A map depicting the general vicinity is provided as Figure 1. The Site consists of approximately 25 acres of land in an area that can be described as semi-rural.

#### **QUICK FACTS**

**Location:** Burrillville, and partially in North Smithfield (Providence County), Rhode Island.

**ID Number:** RID009764929

**Site Area:** 25-acres

**Number of Parcels:** two

**Current Use:** Truck body assembly plant.

**Ownership:** Supreme Mid-Atlantic, Inc.

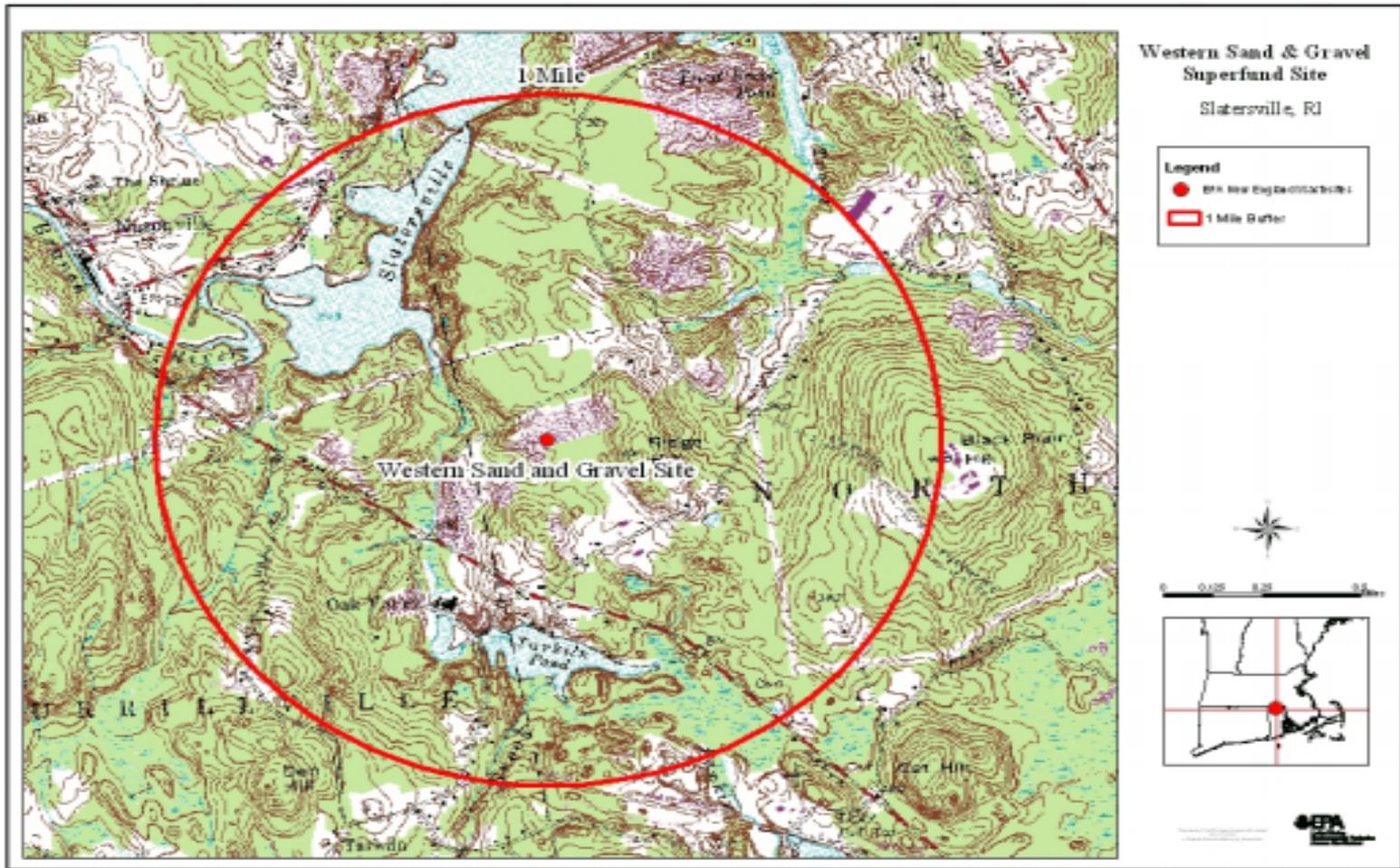
**Cleanup Status:** All cleanup construction activities are complete. Monitored natural attenuation of the groundwater is in progress.

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The Site was operated as a sand and gravel quarry from 1953 until 1979. From 1975 to April 1979, a portion of the property was used for the disposal of liquid wastes, including chemicals and septic waste. The Site owner, an operator at that time, was Western Sand and Gravel, Inc. and its president, James Cardi, Jr. (now deceased).

Supreme Mid-Atlantic, Inc. (Supreme) acquired the 25-acre Site from the Cardi family in 2001 after entering into a Prospective Purchaser Agreement (PPA) with the EPA in October of that year. The PPA provides Supreme with certain protections from Superfund liability that could otherwise have arisen from its purchase of the property. Supreme completed construction of a truck body assembly plant on the Site in early 2004. The truck body assembly plant is currently in operation. The current layout of the Site is shown on Figure 2. Supreme's development of the Site is discussed in greater detail in Section 2.

The Site is located over the Slatersville Aquifer that has been designated as a drinking water source by the State of Rhode Island. Other environmentally sensitive areas near the Site include Tarkiln Brook and the Slatersville Reservoir, both of which are classified as Class B water bodies. According to the Rhode Island Water Quality Standards, Class B water bodies are suitable for fishing, swimming, and other recreational purposes. There is also a wetland area near the Site that borders Tarkiln Brook. Groundwater has also been confirmed to discharge into Tarkiln Brook and the Slatersville Reservoir.



**Figure 1: Site Vicinity Map**



**Figure 2: Current Site Layout**

## Surrounding Land Uses

Residential areas are located to the south, east and west of the Site. Current use consists of light-density private residences. These nearby residences continue to rely on private drinking water wells and septic systems.

## Environmental History

From 1975 to April 1979, a portion of the Site (approximately 12 acres) was used for the disposal of liquid wastes including chemicals and septic waste. Contents of tank trucks were emptied directly into open lagoons and pits, none of which were lined with protective materials. Initially the Site was only permitted to accept sewage wastes. Over time, the wastes disposed of at the Site included chemical wastes that eventually penetrated underlying porous soils and contaminated the groundwater. The total volume of materials disposed of at the Site is unknown. Rhode Island Department of Environmental Management (RIDEM) records indicate that approximately 470,000 gallons of waste were deposited at the Site during its last year of operation.

A fire occurred in one of the chemical pits in March 1977. At that time, local fire officials ordered the Site owner and operator to remove the chemicals from the waste pit. Reportedly, the Site owner responded by burying the contents from the waste pit. It was also during 1977 that nearby residents began complaining about odors from the Site. During February 1979, due to concerns regarding local water supplies, nearby wells were sampled by the Rhode Island Department of Health (RIDOH).

### SITE HISTORY

1953 to 1979 - Site was operated as a sand and gravel quarry.

1975 to 1979 - A portion of the Sites was used for the disposal of liquid chemical and septic waste.

1977 - Fire occurred in one of the chemical pits. Local fire officials ordered owner to remove the chemicals from the waste pit.

1979 - RIDEM issues Cease and Desist Order.

1980 - EPA removes approximately 60,000 gallons of VOC-contaminated liquid waste.

1983 - Final listing on NPL.

1984 - First ROD

1985 - Second ROD

1987 - First Consent Decree

1991 - Third and final ROD

1992 - Construction of remedy required by First and second ROD is complete. Second and final Consent Decree is entered.

2001 - Site purchased by Supreme Mid-Atlantic, Inc.

## **Federal and State Response Actions**

**Initial State and EPA Involvement:** In 1979, the RIDEM issued a Cease and Desist Order This for violations of water and air pollution regulations at the Site.

In 1980, EPA performed a removal action at the Site during which approximately 60,000 gallons of VOC-contaminated liquids were pumped and removed from the lagoons. This action was taken under the authority of Section 311 of the Clean Water Act, prior to the passage of the Comprehensive Emergency Response, Compensation, and Liability Act (CERCLA), commonly known as “Superfund.”

The Site was proposed for listing on the Superfund National Priority List (NPL) in October 1981. In 1983, EPA included the Site on the NPL of Superfund sites.

In 1982, RIDEM as the lead agency, began a groundwater recirculation system in an effort to control the spread of groundwater contamination. RIDEM and EPA conducted Remedial Investigation/Feasibility Studies (RI/FS) at the Site during 1982 to 1985 for Operable Units (OU) #1 and # 2.

**Superfund Cleanup Actions:** EPA has issued three Records of Decision (RODs) for this Site. Under the first ROD (1984), water filters were installed on private wells until a water supply system was constructed to serve the affected area (approximately 56 parcels) in 1992. The second ROD (1985) addressed contaminated soils at the Site. Contaminated soils were excavated and consolidated in a designated area within the Site. A Resource, Conservation and Recovery Act (RCRA) Subtitle C cap was installed over the two-acre soil disposal area in 1987. This area of the Site was graded, and the cap and graded area were fenced and posted with warning signs. The fenced area of the Site comprises approximately six (6) acres. Post-closure monitoring and inspections of the cap and graded Site area are ongoing. EPA issued the third ROD in 1991 to address groundwater contamination. The groundwater remedy selected for the Site is monitored natural-attenuation until drinking water standards are attained, site monitoring, and institutional controls. The 1991 ROD includes a contingency remedy for active pump and treat of the groundwater, which would take effect in the event that natural attenuation does not occur at or faster than the predicted rate.

In 2003, EPA issued a Five-Year-Review for the Site. In this review, EPA concluded that natural attenuation is occurring at, or faster than, the predicted rate. At this point in time EPA is optimistic that active pump and treat of the groundwater will not be necessary for this Site. EPA will continue to oversee monitoring of the groundwater.

**Superfund Enforcement Actions:** In 1987, EPA and the State entered into a Consent Decree with approximately forty-five (45) potentially responsible parties (PRPs). Under the 1987 Decree, the settling parties agreed to pay EPA for the costs to construct the water supply system

called for by the first ROD and to perform all the other activities required by the first and second RODs.

Pursuant to a 1992 Consent Decree, five (5) PRPs are currently performing the remedy required by the third ROD for the Site. In 1993, EPA finalized an Administrative Settlement with one PRP that had failed to join the 1992 Decree.

## SECTION 2 - USE/REUSE STATUS

### Background

In October 2001, a Prospective Purchaser Agreement between EPA and Supreme Mid-Atlantic, Inc. (Supreme) was signed. Supreme purchased the 25-acre Site in 2001. Supreme is a subsidiary of Supreme Corporation, a publicly-owned corporation. Supreme's headquarters are located in Jonestown, Pennsylvania.

The approximately 25-acres that comprise the Site includes two distinct parcels. The larger, 20-acre parcel is located in the town of Burrillville (Map 149, Lot 15) and the other 5-acre parcel is in North Smithfield (Map 7, Lot 38). The Burrillville parcel and North Smithville parcels are zoned "industrial" and "residential", respectively.

### Current Use

Supreme constructed a truck body assembly plant on the Site in 2003-2004. The development consists primarily of a 20,000 square foot assembly building and open space for truck parking (see photo). Part of Supreme's development of the site included extending a water line from the existing public water supply system constructed as part of the Superfund cleanup. Supreme's water needs are domestic use only. Due to a state-required wetland buffer and land use restrictions on the approximately six acre fenced in portion of the Site, about 13 of the 25 acres were actually available for development.



*20,000 square feet assembly building*

The truck body assembly plant is currently in operation and employs about 30 people. The truck bodies are manufactured primarily at the Jonestown, Pennsylvania manufacturing facility and are then assembled and mounted on the trucks at the Burrillville Site.

## **Potential Future Use**

Supreme's future plans at the Site include significantly expanding the 20,000 square foot building and adding more truck body manufacturing capabilities to its operation.

## **Potential Use/Future Reuse Considerations**

Institutional Controls, in the form of deed restrictions that run with the land, are in place at the Site. These restrictions and future reuse considerations are discussed as follows.

### **Land Use Restrictions:**

The Declaration of Restrictions and Protective Covenants imposed upon the Western Sand & Gravel Hazardous Waste Disposal Site, signed April 23, 1986. Under this restriction, EPA, the State, and Olin Hunt are granted access to the Site. In addition, the restriction prohibits, among other things, activities that would disturb the integrity or effectiveness of the cap or groundwater monitoring system that was constructed at the Site.

### **Groundwater Use Restrictions:**

The Declaration of Groundwater Use Restrictions and Protective Covenants, was signed on August 23, 1991. This restriction prohibits, among other things, use of the groundwater, excavation below the groundwater level, and activities that would alter the groundwater flow at the Site.

Confirmatory Declaration of Groundwater Use Restrictions and Protective Covenants, signed on June 6, 1996, confirmed the Declaration signed on August 23, 1991.

### **Other Reuse Considerations:**

To use any of the six acre fenced in area (see photo), Supreme would have to demonstrate that its planned reuse would not violate any of the land use restrictions discussed above.



*6-acre fenced in area, view looking north*

Additionally, since the use of groundwater under the Site is prohibited, any future expansion of Supreme's operations would have to rely on the continued use of public water.

## **General Findings/Recommendations**

**Reasonably-Anticipated Future Land Uses (RAFLUs):** There is every indication the current truck assembly plant will continue operating at the Site into the foreseeable future. The property is well-maintained and Supreme has long-term plans to continue, and possibly expand, its manufacturing facilities.

Based on EPA's Five Year Review of the Site completed in September, 2003, the current plant operations do not appear to be adversely impacting the Site cleanup. The landfill cover and groundwater monitoring wells are in good working condition. It is likely that Supreme's presence at the Site has minimized the likelihood of nuisance trespassers and vandalism that might otherwise occur.

EPA is unaware of any recent or planned changes in the surrounding land uses that would significantly impact the groundwater flow conditions at the Site (such as housing developments or highway projects).