

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Superfund Records Center

SITE: Centredale

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285161

August 14, 2007

Jeffrey M. Karp, Esq.
Sullivan & Worcester LLP
1666 K Street, NW
Washington, DC 20006

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

Dear Jeff:

I am writing in response to your letter dated July 18, 2007, concerning the remedial alternatives that the U.S. Environmental Protection Agency is considering for the source area soils at the Centredale Manor Restoration Project Superfund Site.

According to the National Contingency Plan ("NCP"), 40 C.F.R. Part 300, the primary objective of the Feasibility Study is to ensure that appropriate remedial alternatives are developed and evaluated reflecting the scope and complexity of the remedial action under consideration and the site problems being addressed. 40 C.F.R. § 300.430(e)(1). In particular, EPA looks at the short and long term aspects of the following three criteria to guide the development and screening of remedial alternatives, as appropriate and to the extent sufficient information is available: (i) effectiveness; (ii) implementability; and (iii) cost. 40 C.F.R. § 300.430(e)(7). EPA will then perform a more detailed analysis of a limited number of alternatives that represent viable approaches to remediation. 40 C.F.R. § 300.430(e)(9).

EPA believes that it has followed this approach when screening remedial alternatives for the source area soils, and has selected viable alternatives for further analysis. As a result, EPA will continue to evaluate the three potential alternatives in accordance with the nine selection criteria set forth in the NCP. However, in addition to the evaluation already underway, EPA will revisit its initial screening efforts to confirm that the three alternatives represent the appropriate universe of potential approaches for the source area soils. If EPA determines that an additional alternative should be added to the Feasibility Study, it will do so.

In your letter you state that there are two locations beneath the capped materials that contain constituents at concentrations exceeding Rhode Island Department of Environmental Management's ("RIDEM") GB pollutant mobility criteria. That is not correct. There are contaminant concentrations in vadose zone soils under the interim caps or pavement that are above residential direct exposure and GB leachability criteria at numerous locations throughout the source area. The contaminants detected most

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frequently at concentrations exceeding the residential direct exposure criteria are dioxin, polychlorinated biphenyls, polycyclic aromatic hydrocarbons and several inorganic compounds. Volatile organic compounds ("VOCs") also exceed the direct exposure criteria in some locations. Furthermore, RIDEM leachability criteria for VOCs are exceeded in samples from six locations. A more comprehensive discussion of the data is provided in the July 2004 technical memorandum, "Approach for Developing a Long-Term Remedy for Source Area Soils (Battelle, 2004)", included in the Administrative Record previously provided to you.

With respect to any operation and maintenance that is required for any of the selected remedial action components, EPA will expect such work to be performed by the PRPs implementing the remedy. Paragraph 31(b) of the Consent Decrees (Civ. Act. No. 05-195S) requires Brook Village Associates Limited Partnership and Centerdale Manor Associates to perform maintenance that is customary for a residential apartment building. It does not require that the building owners perform any additional maintenance that may be required by the Record of Decision ("ROD").

With respect to the obligations of the Rhode Island Department of Transportation ("RIDOT"), EPA will expect RIDOT to continue to maintain the storm drain outfall structure intended to separate soil, sediment, debris and other materials at the outfall of the storm drain line as long as that work is required by the ROD to maintain any overall remedy selected for the Site.

EPA welcomes your additional thoughts and suggestions in connection with our evaluation of remedial alternatives for the Site. We look forward to working with you and the other PRPs to address the contamination at the Site.

Sincerely,

A handwritten signature in black ink, reading "Eve Stolov Vaudo". The signature is written in a cursive, flowing style.

Eve Stolov Vaudo

cc: Anna Krasko