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449070

**RE: Centredale Manor Restoration Project Superfund Site
NECC as a Likely Source of Dioxin Based on Geochronology Data**

Dear Eve:

We are writing to continue our recent discussions regarding the New England Container Corporation (NECC) Customer Group's view that the U.S. Environmental Protection Agency's (EPA's) conceptual site model presented in the report of the Interim Final Remedial Investigation (RI) for the Centredale Manor Restoration Project Superfund Site (Site) (USEPA, 2005) does not implicate NECC as a likely dioxin source. Potential support for this view may be understandable given, for example, the manner in which EPA singled out Metro-Atlantic as the potential source of the dioxin in the Woonasquatucket River (River), in connection with its evaluation of the Geochronology Analysis component of Quantitative Environmental Analysis, LLC's (QEA's) Sediment Stability Study (QEA, 2004).

The RI states that radiometric age dating results that were evaluated and presented in the QEA study show good correlation with dioxin concentrations, with no significant contamination found in sediments deposited prior to 1940 and peak concentrations corresponding, generally, to samples dated from about 1950 to 1970. EPA further states that these dates encompass the period during which hexachlorophene was manufactured at the Site in 1965.¹ By virtue of its identification solely of the hexachlorophene (HCP) manufacturing process as a potential source of dioxin in the radiometric dating analysis, EPA seems to imply that the HCP process alone is responsible for the dioxin in the sediment.

However, EPA's proposition that the radiometric age dating results implicate the HCP manufacturing process as the sole source of the dioxin in the sediment samples is not supported by other information that is presented in the RI. In Section 1.3.2 of the RI, EPA states that NECC operated an incinerator-based drum reconditioning facility on a portion of the site from 1952 to 1970. NECC's period of operation is nearly identical to the time frame in which EPA identified the highest concentrations of dioxin in sediment (about 1950 to 1970)². Moreover, in Section 7.1.1 of the RI, EPA states that "Chemical residues were

¹ See EPA RI at 4-9.

² See EPA RI at 1-3.

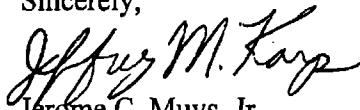
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dumped or burned prior to drum reconditioning. Residues and combustion products associated with drum reconditioning operations also may have been a source of dioxin and other chemicals at the site.”³ Thus, it would seem logical for EPA to identify NECC as a likely source of dioxin to the River, given that NECC’s operations were contemporaneous with the deposition of dioxin in sediment according to EPA’s own interpretation of QEA’s assessment of the radiometric data presented in the RI.

In fact, based on the radiometric data (1950 to 1970), NECC’s period of operation (1952 to 1970) more completely overlaps and coincides with the time period in EPA’s conceptual site model regarding dioxin releases to sediment than does Metro Atlantic’s HCP manufacturing process, which occurred, at most, for a portion of one year, in 1965. Additionally, the range of concentrations detected over the 20-year time-frame can be better understood in the context of NECC’s drum reconditioning operations, during which feedstock, production rates, and refurbishing processes likely fluctuated throughout the time period. Such fluctuations would lead to varying levels of dioxin production and release with time. Finally, the inclusion of NECC’s drum reconditioning operations in its conceptual site model is the only way that EPA may account for the dioxin detected in sediments that date to time periods prior to 1965 (i.e., time periods preceding HCP manufacturing at the Site.)

Based on the foregoing summary of information that is presented in the RI, we respectfully request that EPA augment the conclusions reached from the geochronology assessment to include NECC as a likely source of dioxin at the Site. Moreover, we renew our request that EPA staff seek to dissuade the NECC Customer Group of its views that: 1) EPA does not consider NECC a likely source of dioxin at the Site; and (2) the NECC customers are entitled to de minimis status in settling their Site liability with EPA.

Sincerely,



Jerome C. Muys, Jr.
Jeffrey M. Karp

³ See EPA RI at 7-1