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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I



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DATE: July 13, 2009

SUBJ: Site Investigation Closure Memorandum
Centredale Manor Restoration Project Site
2072 and 1074 Smith Street
North Providence, RI

FROM: Ted Bazenas, On-Scene Coordinator *TB*
Emergency Response and Removal Section II, EPRB, OSRR

THRU: Steven Novick, Chief *SN*
Emergency Response and Removal Section II, EPRB, OSRR

TO: Centredale Manor Restoration Project Site File

In accordance with section 300.410 of the National Contingency Plan (NCP), a Removal Site Evaluation, consisting of a Preliminary Assessment and Site Investigation (PA/SI), has been undertaken at the Site Centredale Manor Restoration Project ("Site" or "CMRP") in North Providence, Rhode Island. The findings of the Removal Site Evaluation have been evaluated under the criteria set forth in section 300.415 of the NCP, section 104(a) and (b) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a) and (b) and Clean Water Act (CWA) § 311(c)(i) as amended by the Oil Pollution Act (OPA) § 4201(a). The Removal Site Evaluation has led to the determination that a Removal Action is appropriate at this time.

The findings of the Removal Site Evaluation are outlined below.

1. Source and nature of the release or threat of release
 - a. The Removal Site Evaluation consisted of the following actions.
 - i. Review of analytical results generated by EPA on samples collected by the contractor for the Responsible Parties. The samples were collected on January 31 and February 03, 2008, and were analyzed at SGS Environmental Services from December 23, 2008 to January 13, 2009.
 - ii. Review of other documents - *Field Oversight Trip Report, LEA Monitoring*

Wells Installations, Centredale Manor Restoration Superfund Site, North Providence, Rhode Island, located in the EPA site files in Boston, MA.

iii. Preliminary Assessment dated March 26, 2009.

- b. Based on the information available at this time, the principal hazardous substances or pollutants or contaminants that are being released or for which there is threat of release include but are not necessarily limited to the list below.

Hazardous Substances or
Pollutants or Contaminants

Media

Dioxins – 1,3,7,8 TCDD

in soil, up to 33.4ppb

2. Evaluation of the threat to public health, welfare and the environment

- a. Federal Agency for Toxic Substances and Disease Registry:

Threat _____ No Threat _____ Evaluation Not Necessary x

- b. Endangerment to the ecosystem:

Threat _____ No Threat _____ Evaluation Not Necessary x

3. The Removal Site Evaluation was terminated pursuant to section 300.410(f) of the NCP for the following reason(s).

- () There is no release.
- () The source is neither a "vessel" nor a "facility" as defined in section 300.5 of the NCP.
- () The release involves neither a hazardous substance, nor a pollutant or contaminant that may present an imminent and substantial danger to public health or welfare of the United States.
- () It is subject to the limitations on response specified in §300.400(b)(1) through (3). The release is
- () of a naturally occurring substance in its unaltered form, or

altered solely through naturally occurring processes or phenomena, from a location where it is naturally found.

- ☐ from products that are part of the structure of, and result in exposure within, residential buildings or businesses or community structures.
 - ☐ into public or private drinking water supplies due to deterioration of the system through ordinary use.
 - ☐ The amount, quantity, or concentration released does not warrant a Federal response.
 - ☐ A party responsible for the release, or any other person, is providing appropriate response, and on-scene monitoring by EPA is not required.
 - ☒ The Removal Site Evaluation is complete.
4. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.
- a. The factors listed below, found in Section 300.415(b)(2) of the NCP, are applicable to this Site.
 - ☒ Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.
 - ☒ Actual or potential contamination of drinking water supplies or sensitive ecosystems.
 - ☐ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.
 - ☒ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.
 - ☒ Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
 - ☐ Threat of fire or explosion.

The availability of other appropriate Federal or State response

- () mechanisms to respond to the release.
 - () Other situations or factors that may pose threats to public health or welfare of the United States or the environment.
- b. The existence of the conditions specified in Section 4.a., above, indicate that a Removal Action under section 300.415 of the NCP is necessary.

A series of Removal Actions, both time critical and non-time critical, have occurred at the CMRP National Priorities List Site over the past ten years. Soil samples were most recently collected on January 31 and February 03, 2008 by contractors for the responsible parties. The soil samples were collected during monitoring well installation, and then placed in archive for future use. The samples were retrieved from archive at EPA request in December, 2008, and shipped to SGS Environmental Services for analysis funded by EPA. This work was completed under the EPA Region 1 Remedial Program.

Analytical results revealed that dioxin (2,3,7,8-TCDD) is present in soil samples at or near the surface of the riverbank at levels up to 33.4 parts per billion. Migration of dioxin from these soils due to erosion or other physical transport mechanism will continue to re-contaminate river sediments downstream from this source area. OSWER 9200.4-26 recommends a clean-up starting point of 1 ppb dioxin (TEQ) for surface soils that are reasonably expected to be used as residential property, and for sediments that are considered to be a direct exposure pathway for human receptors.

Although dioxin has been found elsewhere on the Site at levels up to 140ppb in soil, those soils are not a current source for migration of dioxins and will be addressed in a long term remedy for the Site. The Site is on the National Priorities List, and EPA Region 1 is in the process of completing the Remedial Investigation/ Feasibility Study (RI/FS) and subsequent remedy selection. However, the EPA Region 1 Emergency Removal Program has been requested to address this limited area as a Time-Critical Removal Action. A responsible party has come forward to fund and perform this action under Removal Program oversight.

- c. In light of the magnitude of the threat or potential threat to health, welfare, or the environment, the appropriate categorization of a Removal Action at this Site is:

Emergency____ Time-Critical__x__ Non Time-Critical____

5. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.

- a. As found in section 300.410(e)(1) of the NCP, the OSC shall determine whether a release governed by CWA section 311(c)(1), as amended by OPA section 4201(a),

has occurred.

- () There is a release, or potential threat of release, as governed by the CWA as amended by OPA.
- (x) There is not a release, or potential threat of release, as governed by the CWA as amended by OPA.

- b. The [existence/absence] of the conditions specified in Section 5.a., above, indicate that an Oil Spill Response under Appendix E to Part 300 of the NCP is **not** necessary.

cc: David McIntyre, Chief, Emergency Response and Removal Section I, OSRR (w/o attachments)
Meghan Cassidy, Chief, Technical Support & Site Assessment Section, OSRR (w/o attachments)
Patricia Ludwig, CERCLIS Coordinator
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Encl: PA/SI Report