

US EPA ARCHIVE DOCUMENT



REUSE IN RHODE ISLAND
A State-Based Approach To Complex Exposures



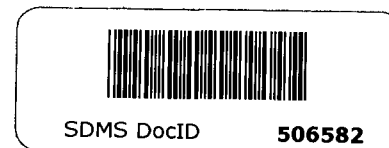
BROWN

Anna Krasko
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Superfund Records Center
SITE: Centredale
BREAK: 5-3
OTHER: 506582

February 20, 2012

Superfund Research Program
Brown University
182 Hope Street, Box D
Providence, RI 02912



SDMS DocID 506582

Re: Proposed Plan for the Centredale Manor Restoration Project: Comments to the USEPA

Dear Ms. Krasko,

For some time now, the Brown University Superfund Research Program, through its Community Engagement Core and more recently also its Research Translation Core, has engaged with the Woonasquattucket River Watershed Council (WRWC) in an effort to better help them understand and analyze the USEPA Proposed Centredale Manor Restoration Project. Our involvement with, and knowledge of, the site includes involvement of our Community Engagement Core in stakeholder meetings with EPA, discussions with WRWC over the years, assistance in training high school teachers in relevant curriculum, conducting Centredale Manor-related curricula at the Ferri School, as well as our role in helping select the contractor for the TAG grant. We have also read the Proposed Plan and engaged in a walk-through of the area in order to determine community use of the Oxbow area and to help judge the likelihood of unexpected alterations in water course. We share some of the same concerns as WRWC regarding the proposed remediation of the Oxbow area, and this letter supports the questions raised by the Woonasquattucket River Watershed Council related to the Oxbow area. We would hope for the ideal of a thorough cleanup that relies neither on land use restrictions nor long-term monitoring, but at the very least a sound analysis should be presented that compares the real costs and benefits of this latter option against other options that might fall short of the ideal.

We are concerned that the proposed limited excavation and application of a 3-inch thin layer soil cover to the Oxbow area is potentially less effective than the excavation strategies proposed for the Allendale and Lyman Mill ponds. This conclusion is not based upon a scientific study, but rather on what appears to be a well-founded fear of potential for washing away such a thin cover, resulting in the potential for new exposure. It is worth also noting that our own walk-through of the Oxbow area indicated its use for activities such as camping. For these reasons, we recommend possible further study of the proposed remedy of the Oxbow area, and definitely presentation of a plan that contains more supporting information regarding the expected efficacy of the cleanup strategy, taking into account community use patterns. In its current form, the Proposed Plan lacks some of this information, which makes it difficult for the public to truly understand and/or comment on this portion of the plan.





The Brown University Superfund Research Program would certainly be interested in helping with any study that the USEPA might still perform to better understand the remediation plan and activities. We look forward to working with both the USEPA and the community on this important restoration project.

Sincerely,

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