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August 17, 2012

Ms. Anna Krasko

EPA New England

Superfund Project Manager

5 Post Office Square, Suite 100

Boston, Massachusetts 02109-3912

re: Centredale Manor Restoration Project, North Providence, RI proposed plan amendment

Dear Ms. Krasko,

I would like to first thank you and EPA New England for the opportunity to comment on this amendment and for giving me the opportunity to speak at the Centredale Manor hearing earlier. My concerns should become clear once you have read this letter, but first I would like to describe my special connection to the Woonasquatucket River because my life on the River gives me some unique insight into the instant proposal.

Four of my first five years were spent on Bowdoin Street in Providence, high on a hill overlooking the River as it flowed over a dam North of Delaine Street, before turning East to become the natural boundary between the Valley Street mills and the Valley Street park. In the summertime teenagers would dive from the dam structure into the river and take a refreshing swim in the water there. Other kids would use makeshift spears made of straight steel wire and try their luck at catching some of the large carp that populated the River at that time. I was too young to enjoy either of these activities but old enough to dream about the prospect. Shortly before my sixth birthday, my family moved to a three-decker on Redfern Street in Centredale. The street dead ended at the River leaving a convenient traffic-free recreation area for the neighborhood children. Before a large tree fell from the island side of the river, where Metro-Atlantic Chemical and New England Container were located, to the populated side at the end of Grover Street the youngsters would access the island only when the river was frozen and the ice was thick enough for them to cross. The serendipitous creation of the fallen-tree bridge provided easy access to the southern end of the island and the dump which was located there, some distance from the mill buildings. By today's protective and litigation prompted standards the place would be considered an attractive nuisance and hazardous chemical nightmare at best, but in those days Industry ruled and the few rules that did exist had Industry's imprimatur. We looked at the dump as a treasure

trove and, though we decried the fact that the river wore a cloak of a different color depending on what the mill dumped into it on that day, the disposal site provided discarded glassware from the mill laboratory's various chemical tests, trials, and failures. The strangely shaped items piqued our curiosity and we imagined our finds as talismans that could open doors to understanding the new and wonderful world of Chemistry. Life is simpler when you're eleven and twelve.

The island also provided a place in the reeds to safely hide the raft that our parents would never have condoned. Oddly enough, it also provided a kind of nature preserve in spite of the gross environmental degradation taking place in the water and on the northern half of the island. The Western shore of the island was washed by a healthy flow of water, unlike the nearly stagnant Eastern shore. But the whole lower end of the Island benefited from the fact that people never went there to dump their poisons.

High school, work and family responsibilities, acceptance into the Centredale Volunteer Fire Department all came along and there was neither time nor the inclination to visit the old chemical haunts. When I was eighteen or so the Fire Alarm at Station 1 went off and I sprinted, as I usually did, from Redfern Street to the station; it was much easier than taking a car for the 200 yard trip. In rapid succession firemen arrived, donned their coats, boots, and helmets. The crew promptly jumped onto the back step of Engine 1 and the truck took off.... Metro-Atlantic Mill was ablaze! A few of us donned Scott Airpacks (breathing apparatus for firefighters) and dragged 1 ½ inch hoses into the mill to attack the fire. The conflagration was brought under control in fairly short order but the fire, smoke, and water damage took its toll. Any hopes the company might have had of continuing their operations in Centredale were extinguished by the fire. The property remained vacant for years before it was put to use for housing.

I currently live on the banks of the Woonasquatucket in Smithfield where the water is fishable and where three generations of Poiriers still swim. I have devoted a lot of my time as an adult trying to preserve the environmental quality of the Woonasquatucket River and its associated wetlands and watershed. I have served on the Smithfield Conservation Commission, the Governor's Wetlands Task Force, the Smithfield Town Council; all the while keeping an eye out for environmental quality along the Woonasquatucket. My knowledge of, appreciation for, and respect for the River runs very deep.

It is because of my connection to the River that I want to offer my comments on the latest amendment to the Centredale Manor Restoration Project.

Let me list just a fraction of the funds that have been or are soon slated to be expended in an effort to restore the Woonasquatucket's health. All of the following fund expenditures refer to projects within a 4 mile radius of a Georgiaville Pond :

1. The Construction of the Smithfield Wastewater Treatment Plant: - \$10 Million (1978)
2. Davis Liquid Superfund Site: - \$50 Million
3. Associated Log Road Waterline: - \$5 Million
4. Closure/cleanup of the Gloucester/Smithfield Regional Landfill - \$?? Million
5. Smithfield Wastewater Treatment Plant upgrades 2000-2008: - \$7 Million
6. Further upgrades to be required at the Treatment Plant : - \$7.5 Million

7. Approximate range for cleanup costs under the amended proposal: \$90 - \$175 Million
8. Funds already expended toward cleanup of the Woonasquatucket from Centredale Manor to downstream: unknown \$??? Million

It is clear that the aggregate sum of funds devoted to cleaning up the Woonasquatucket is staggering at possibly more than a quarter Billion dollars! It was disheartening to be told, at the Centredale Manor Hearing, that, after all the cleanup is done, the waters of the Woonasquatucket downstream of route 44 would still not be swimmable/fishable. This is the standard that I believe most citizens think of when they think of post clean-up water quality. I understand that this standard is not easily attainable. I also understand that the role of EPA New England is different from the role of the Rhode Island Department of Environmental Management, and that their roles are both different from those of other agencies such as the local Conservation Commissions, the Army Corps of Engineers, citizens groups such as Clean Water Action and the Sierra Club. While I don't expect EPA to act as the sole party to reach the goal anticipated by the citizens I also appreciate the fact that most of the funding is obtained as a result of EPA holding polluters responsible for clean up. But I also believe that it is time and it is possible to find ways to effectuate total restoration of at least some of the upstream areas of the project site by giving EPA and the other watershed stakeholders some latitude in terms of how and where in the local watershed to expend available funds. A holistic approach to the wounded watershed, as well as the cadre of parties willing to cooperatively help heal the Woonasquatucket might work to achieve the goal that the people really want. Perhaps by seeking and obtaining consent agreements with the polluters who are forced to foot the bill we can be more effective in attaining these water quality goals .

Thanking you for your efforts on behalf of restoring our beloved but wounded Woonasquatucket River and its Watershed, I remain

Sincerely yours,

Richard A. Poirier