



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

DATE: August 16, 2005

SUBJ: Site Investigation Closure Memorandum
Hartford Avenue Gravel Pits Site
Johnston, Rhode Island 02919

FROM: Melanie Morash, On-Scene Coordinator
Emergency Response and Removal Section II, EPRB, OSRR

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

TO: Hartford Avenue Gravel Pits 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 Hartford Avenue Gravel Pits Site ("Site") in Johnston, 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.

Site conditions meet the requirements for a Removal Action under section 300.415 of the NCP. This project is proceeding as a Potentially Responsible Party (PRP)-lead Removal Action, with the current owner of the Site, the City of Providence, conducting the cleanup under the oversight of the Rhode Island Department of Environmental Management (RIDEM). Should the City of Providence no longer be willing and/or able to conduct cleanup activities, EPA may conduct the Removal Action.

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. Preparation of a PA/SI report by EPA's contractor, Weston Solutions, Inc., Superfund Technical Assessment and Response Team (START), entitled *Removal Program Preliminary Assessment/Site Investigation Report for the Hartford Ave. Gravel Pits Site*, dated October 2004.
 - ii. Review of analytical results generated by EPA entitled *Hartford Ave., Johnston, RI - XRF Field Analytical Screening Results* dated June 28, 2004;
Hartford Ave. Gravel Pits - Metals in Water by ICP dated July 15, 2004;
Hartford Ave. Gravel Pits - PCBs Medium Level in Soils and Sediments dated July 2, 2004;
and
Hartford Ave. Gravel Pits - Bulk Asbestos Analysis by PLM dated July 29, 2004

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- iii. Review of a report prepared by START entitled *Trip Report for Hartford Avenue Gravel Pits - Johnston, Rhode Island* dated February 12, 2004.
 - iv. The Site Investigation on June 14, 15, and 16, 2004.
 - v. Review of a report prepared by START entitled *Draft Expanded Site Inspection Report for Hartford Avenue Gravel Pits - Johnston, Rhode Island* dated February 10, 2005.
 - vi. Review of correspondence from RIDEM to the Providence Water Supply Board and City of Providence Building Authority, entitled *Letter of Responsibility - Case #2004-082* dated February 21, 2005.
 - vii. Review of correspondence from EPA to the Providence Water Supply Board regarding a request for comments on EPA's *Draft Expanded Site Inspection Report for Hartford Avenue Gravel Pits, Johnston, Rhode Island* dated February 23, 2005.
 - viii. Review of correspondence from the Providence Water Supply Board to RIDEM, entitled *Comments Regarding the "Draft Expanded Site Inspection Report for Hartford Avenue Gravel Pits, Johnston, Rhode Island" - CERCLIS No. RID98746810* dated March 18, 2005.
 - ix. Review of correspondence from RIDEM to the Providence Water Supply Board regarding RIDEM's approval of a thirty (30) day extension of the submittal deadline for Providence Water Supply Board's proposed schedule of investigative and remedial activities at the Hartford Avenue Gravel Pits property, dated April 4, 2005.
 - x. Review of correspondence from Fuss & O'Neill, Inc. on behalf of the Providence Water Supply Board to RIDEM, entitled *Proposed Schedule for Response Actions, Hartford Avenue Gravel Pit* dated April 7, 2005.
 - xi. Review of correspondence from RIDEM to the Providence Water Supply Board regarding RIDEM's review and acceptance of Providence Water Supply Board's *Proposed Schedule for Response Actions*, dated April 11, 2005.
 - xii. Review of correspondence from Providence Water Supply Board to RIDEM regarding Providence Water Supply Board's financial commitment to site work at the Hartford Avenue Gravel Pits property, dated May 6, 2005.
- 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

metals (lead)

soil

ignitable chemicals

paint and aerosol cannisters

asbestos (chrysotile)

floor tiles

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.
- 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.

- (X) Actual or potential contamination of drinking water supplies or sensitive ecosystems.
 - (X) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.
 - (X) 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.
 - (X) Threat of fire or explosion.
 - (X) 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 at this time.

On behalf of the Providence Water Supply Board, Fuss & O'Neill, Inc. submitted to RIDEM on April 7, 2005 a letter proposing investigative and remedial activities in support of a Removal Action at the Hartford Avenue Gravel Pits Site ("Site"). This proposed schedule of response actions included a timetable for submitting to RIDEM a Remedial Action Work Plan (RAWP) to conduct an Emergency and Short Term Response Action under Rule 6.00 of the RIDEM Rules and Regulations for the Investigation and Remediation of Hazardous Materials Releases. The RAWP includes plans for removal and disposal of contaminated soils, debris, and building materials on-site identified during the EPA Site Investigation on June 14, 15, and 16, 2004.

Site hazards consist of surface soils contaminated with metals (including, but not limited to, lead), miscellaneous containers of potentially ignitable chemicals (including, but not limited to, paints and aerosols), and floor tiles contaminated with asbestos (10% chrysotile). On-site contamination is co-located with miscellaneous junked debris piles throughout the property. These piles consist of household debris, junked tires, paint cans, containers and a rusted 55-gallon drum carcass. Contaminated soils are exposed to the environment and may pose a direct contact threat to those who may enter the Site.

The property is bordered to the south and east by residences and to the south by a restaurant business and an ice cream shop. The nearest private residence is located approximately 100 feet south of the Site. According to the 2000 census, 31 people live within 1/4 mile of the Site and 2,112 people live within 1 mile of the Site. One (1) public school and 6 public water supply wells are located within 1 mile of the Site. The Kimball Reservoir is located approximately 1,000 feet west of the Site.

Access to the Site is partially restricted to vehicular traffic by way of a cable cord at the entrance, however, this cord is not secured. Pedestrian access to the Site is unrestricted. Materials observed on-site during the Site Investigation including beer cans, a soccer ball, and a partial skateboard, provide evidence that individuals access the Site.

RIDEM indicated its approval of Providence Water Supply Board's proposed schedule of response actions in a letter to the Providence Water Supply Board dated April 11, 2005. On May 6, 2005, RIDEM received a letter from the Providence Water Supply Board regarding Providence Water Supply Board's financial commitment to site work at the Site.

Providence Water Supply Board's removal activities under the RAWP will be performed under the direct oversight of RIDEM. EPA will continue to coordinate closely with RIDEM regarding the status of Site activities. Should Site conditions deteriorate and/or the Providence Water Supply Board and/or Providence Public Buildings Authority's activities become unacceptable to either EPA or RIDEM, renewed EPA involvement in investigation and remediation work at the Site may be appropriate.

- 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____ Not Applicable____

5. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion and due to the availability of other appropriate State and private party response mechanisms to respond to the release.

- 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 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.

A discharge of oil into or upon the navigable waters of the United States and adjoining shorelines, the waters of the contiguous zone, or waters of the exclusive economic zone, or which may affect the natural resources belonging to, appertaining to, or under the exclusive management authority of the United States **has not** occurred at this time.

cc: Cynthia Gianfrancesco, Rhode Island Department of Environmental Management
Joan Taylor, Rhode Island Department of Environmental Management
Robert Vanderslice, Rhode Island Department of Health
Robert Troiano, Providence Public Buildings Authority
Richard Blodgett, Providence Water Supply Board
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