RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
235 Promenade Street, Providence, RI 02908-5767 TDD 401-222-4462

July 16, 2021

Michael P. Donegan, Esq.
Environmental Law
Orson and Brusini Ltd.
144 Wayland Avenue
Providence, RI 02906

Re: Supplemental Site Investigation Report
Former Truk-Away Landfill
Industrial Drive
Warwick, Rhode Island

Dear Mr. Donegan,

The Rhode Island Department of Environmental Management (the "Department") Office of Customer and Technical Assistance (OCTA) has received the following document regarding the above listed Site:

- Supplemental Site Investigation Report, Former Truk-Away Landfill, Warwick Industrial Drive, Warwick, RI, Prepared by GZA GeoEnvironmental, Inc., received April 5, 2021.

Upon review of the above listed document, and in consultation with the EPA Region 1 TSCA PCB Program, the Department has generated the attached comments.

If you have any questions regarding this letter, please contact me by telephone at (401) 222-4700 x77135 or by e-mail at chris.walusiak@dem.ri.gov .

Sincerely,

Chris Walusiak, P.E.
Principal Civil Engineer
Office of Customer and Technical Assistance
Department of Environmental Management

cc: Ronald Gagnon, P.E., Administrator, RIDEM/OCTA
Mary Kay, Esq., Executive Counsel, RIDEM/OLS
Susan Forcier, Esq., Deputy Chief Legal Counsel, RIDEM/OLS
Matthew Destefano, RIDEM/OLR&SMM
Kimberly Tisa, U.S.E.P.A./TSCA Program
Ed Summerly, P.G., GZA
Richard Carlone, P.E., GZA

Comments Regarding the
Supplemental Site Investigation Report
Former Truk-Away Landfill
Warwick Industrial Drive, Warwick, RI
Submitted by: GZA GeoEnvironmental, Inc.

1. **Remedial Alternative #3 <u>Environmental Monitoring</u>, Page 9: "As part of groundwater monitoring, LNAPL (where observed) will be manually bailed and containerized on a quarterly basis."**

Under the U.S.E.P.A. Toxic Substances Control Act (TSCA 40 CFR 761) the presence of PCBs greater than or equal to (≥) 50 parts per million (ppm) in free-phase petroleum product is considered an ongoing release. The manual bailing of free-phase petroleum and PCBs (light non-aqueous phase liquids - LNAPL) that has been encountered in groundwater monitoring wells MW-3 and MW-EA-01 is not considered an acceptable remedial alternative to address a PCB source.

The final remedy must propose an alternative to remove/control the apparent on-going PCB source or provide enough data to show that leaving the PCB source in place will not pose an unreasonable risk of injury to health or the environment. As the current data set does not support a finding of "no unreasonable risk", additional investigation of the PCB source and nature and extent of the contamination will be required. The Department recommends that prior to moving forward with the PCB source area investigation that a Site Investigation (SI) Work Plan be submitted to both the Department and EPA TSCA PCB Program prior to performing additional investigation work relating to the PCB source area.

[NOTE: Please refer to the following EPA guidance which may be helpful in developing a risk-based disposal plan under 40 CFR 761.61(c): *PCB Facility Approval Streamlining Toolbox (FAST): Streamlining the Cleanup Approval Process* (see Tool 4: TSCA Risk Based PCB Cleanups Checklist – 61(c)).] *https://www.epa.gov/pcbs/pcb-facility-approval-streamlining-toolbox-fast-streamlining-cleanup-approval-process*

2. **Remedial Alternative #3 <u>Environmental Monitoring</u>, Page 9: "As part of groundwater monitoring, LNAPL (where observed) will be manually bailed and containerized on a quarterly basis."**

Be advised that the area associated with elevated levels of PCBs in groundwater appear to be associated with possible, stain area/berm or lagoon on aerial photographs. As such, it would be prudent to utilize historical aerial photographs, as well as other historical information, to help guide the upcoming investigation. It might also be worthwhile to evaluate whether geoprobes and test pits can be employed as part of this effort.

3. **Wetlands Sampling and Plume Delineation**

Additional characterization of the nature and extent (delineation) of potential PCB plume migration from the source area to surrounding wetlands is needed to fully understand the extent

of the PCB contamination and potential risk to health and the environment. The SI Work Plan should address additional wetland (surface water and sediment) sampling as well as groundwater sampling for total PCBs. As PCB Aroclor analysis may not be sufficient to determine total PCBs due to weathering and partitioning into groundwater, and/or may not be adequate to evaluate both human health and ecological risk, the SI Work Plan should include both PCB Aroclor and congener analysis.

4. Sediment Tables and Benchmarks

a. A number of the sediment benchmarks were designated as either NE or incomplete. In an effort to assist in this endeavor, please incorporate the following PCB benchmarks:

	TEC	PEC
PCBs (ppb)	14 @ 1% TOC	
Aroclor 1016	7	530
Aroclor 1248	30	1500
Aroclor 1254	59.8	340
Aroclor 1260	5	240

b. Section 6.4 SEDIMENT ANALYTICAL RESULTS of the Site Investigation Report references the Massachusetts approach to PECs and the associated limitation. Please remove this PEC limitation and perform the SLERA using TEC values.

c. Be advised that addressing the comments included in this comment package may change the conclusions noted in the SI, such as, ecological risks associated with the site.

5. Figures /Tables

a. Please include separate figures depicting the sampling results for all of the investigations conducted at the site for all media (soil, groundwater, surface water and sediment sampling efforts).

b. Please include separate "hits" only tables for all media from all studies that have been conducted at the site.

c. The groundwater contours in certain locations do not match observed water level observations. Please explain and/or revise the contours.

d. Please include a figure demarcating the areas where waste is believed to be located in the wetlands based on analytical and visual observations.

e. Figures should be revised to show pertinent information such as the location of former structures and potential source areas. Please annotate the figure(s) with the locations of the dry well, the former structures, the oily soil disposal area, medical waste area, waste in wetlands, etc.