



Friends of the Blackstone

John Marsland, President

February 13, 2017

Assistant Attorney General
U.S. DOJ – ENRD
P.O. Box 7611
Washington, DC 20044-7611

**Re: United States v. ACS Industries, Inc. et al, Civil Action No. 1:16 – cv – 00665-S-LDA,
DJ Ref. No. 90-11-3-1233/9**

The Blackstone River Watershed Council/Friends of the Blackstone (BRWC/FOB) was the recipient of the Technical Assistance Grant (TAG) from the EPA in 2010 that enabled its informed participation in the remediation of OU2 of the Peterson Puritan Superfund Site (the Site) in Cumberland and Lincoln, RI and has submitted comments and questions on the remediation through 2016. BRWC/FOB has now reviewed the Proposed Consent Decree and Statement of Work (SOW) published in the *Federal Register* on January 26, 2017 and hereby submits the following comments.

BRWC/FOB continues to support a RCRA C on the J.M. Mills Landfill and Nunes Parcel to contain hazardous wastes that will remain on the site and the removal of all contaminated waste from the Unnamed Island.

BRWC/FOB appreciates the fact that the major issues addressed in earlier comments have been incorporated into the Proposed Consent Decree and SOW, namely requirements for:

1. *Additional testing and characterization* of the wastes currently on the Site
2. *Leachate assessment and control*, including shallow leachate
3. *Flood assessment and protection* for the cap and the banks of the Blackstone River
4. *Restoration and stabilization* of natural riparian habitat
5. *Access to the Pratt Dam* for the Town of Cumberland's first responders.

The first three of these will presumably begin during the Pre-Design Investigation while the remaining will be planned and executed in later phases.

BRWC/FOB appreciates EPA's acknowledgement, as the basis for including us in the Peterson Puritan Superfund Site remediation process, of our sustained involvement, knowledge and commitment to river restoration and water quality improvement. We respectfully expect and ask that our involvement continue throughout the Remedial Design and Remedial Action phases. We anticipate that such involvement will include representation at meetings of interested parties and placement on the distribution list for, for example, testing and assessment reports, work progress reports, minutes and other documents as permitted by existing regulations.

Again, as the steward and advocate for the Blackstone River for the past 25 years, BRWC/FOB has welcomed the opportunity to submit comments in earlier phases of the project and remains committed to actively participating in the planning, design and remediation of this Site so important to the health of our river and our community. To facilitate our participation and to enable us to keep the community up to date, the TAG would welcome information on progress made after the finalization of the Consent Order, on the currently expected schedule of the work, and on all opportunities for the TAG to be actively engaged in the remediation process.

Sincerely yours,

Alice R. Clemente
BRWC/FOB Peterson Puritan Superfund Site Project Manager