NEWPORT ENVIRONMENTAL

May 15, 2017

Joseph Martella, II
Division of Waste Management - Rhode Island Department of Environmental Management
235 Promenade Street
Providence, Rhode Island 02908

RE: Addendum to April 2016 Site Investigation Report
Coffey's Texaco
48 Touro Street, Newport, RI 02840

Dear Mr. Martella:

Please consider this an addendum to the April 2016 Site Investigation Report pursuant to your request during our May 9th meeting. Meeting attendees, in addition to the two of us, included Ms. Sofia Kaczor representing the Underground Storage Tank section and Mr. Stephen Ostiguy, the Executive Director for Church Community Housing Corp (CCHC), the property owner.

As indicated in the SIR, CCHC purchased the property in early 2016 and intends to redevelop the property as a park with ownership ultimately transitioning to the City of Newport. Redevelopment plans are in progress and current plans include the demolition of the existing site building prior to redevelopment as a park.

As discussed at the meeting, the former Coffey's Texaco site has a long history as an active Leaking Underground Storage Tank (LUST) site. In December of 2011 after the performance of various corrective actions and the accumulation of approximately 16 years of groundwater monitoring data, the LUST section issued a No Further Action Letter changing the site's status from active to inactive, even though GB groundwater exceedances were present at the site. The many years of groundwater monitoring had shown there was no continued migration of petroleum constituents in groundwater occurring at the site and GB exceedances were limited to areas beneath the pavement of the Coffey's property where petroleum contaminated soil remains as well as select areas in adjacent Court House Street away from occupied structures.

The NFA letter also indicted that "Neither the Department's decision to halt further remedial work nor its deactivation of the site's LUST status should be construed as a determination by the Department that the site is "clean" or otherwise free of petroleum or other contaminants. Contaminated soil and/or groundwater may still be present in or around the area known to have been impacted by the release." In prior meetings with the property owner and DEM, LUST section representatives have made it clear that any residual petroleum impacts to soil encountered during UST closures would have to be remediated in accordance with the UST regulations. As discussed at the May 9th meeting, tank removal efforts would be initiated, and when contaminated soil is encountered the site will again become an active LUST site until subsequent corrective actions have been implemented to the satisfaction of the UST section.

As indicated in the SIR and release notification documentation, in addition to petroleum impacts resulting from operation of former USTs, the site was also impacted by PAHs (polyaromatic hydrocarbons) and metals consistent with urban fill, which required regulation under DEM's Site Remediation Section. The PAH compounds do not migrate significantly in groundwater and there are no GB standards for metals as these elements do not pose a vapor migration risk, and therefore there is no threat to groundwater from these contaminants. As a result, the preferred remedial alternative proposed for the site was a combination of limited excavation to remove petroleum residuals resulting from operation of former USTs, and installation of a two-foot thick soil cap to minimize any potential for direct exposure to impacted soil at the property.

The UST section is requiring the USTs at the site be closed this fall. During the pending tank closures, which will be overseen by the UST section, it is also CCHC's intention to remove the two hydraulic lifts in the building and to remediate any objectionable contamination that may have resulted from operation of the hydraulic lifts. During this effort it makes economic sense to install the proposed soil cap as it is CCHC's intention to backfill the UST and lift excavations using shallow soil (0 to 2 feet below grade to be excavated from surrounding site areas) to backfill the UST and lift excavations from the excavation bottom to 2 feet below grade level. Clean fill would be transported to the property to restore the original grade site-wide thereby establishing the proposed 2-foot thick soil cap to minimize the potential for direct exposures to underlying soil contaminants.

As discussed at the meeting, there are two likely scenarios for the completion of the remedy. In the first scenario, Option A, it is assumed that insufficient funding will be available to proceed with the remedy site-wide and the building will remain temporarily at the site. This option would be initiated by stripping asphalt from exterior areas of the property for subsequent off-site disposal (after securing the property with construction fence and installation of soil erosion controls) followed by implementation of the UST and hydraulic lift excavations and off-site disposal of impacted soil. Accessible shallow soil would be excavated from those areas surrounding the vicinities of the UST and hydraulic lift excavations and set aside to be utilized as back fill for these deeper excavations up to a depth of two feet below grade. Clean fill would be imported to the property to construct the two foot thick soil cap in exterior site areas as well as the interior locations where the hydraulic lifts were removed. The remaining existing concrete floor of the building would serve as a temporary cap until funding is sufficient to demolish the building and install a two foot thick soil cap. The building would not be occupied during the period when the concrete floor was being utilized as a temporary cap and would remain secured. Attached Figure A depicts the cap limits and types proposed in Option A.

In the event that sufficient funding is available to perform all necessary work, CCHC would proceed with option B, which includes demolition of the site building, allowing construction of a two foot thick soil cap site-wide (after performing UST removals and subsequent remedial excavations in the UST and hydraulic lift areas). In addition, limited sampling of shallow soil beneath the concrete slab would be performed to evaluate contaminant characteristics prior to use as backfill as these soils have yet to have been adequately characterized. Attached Figure B depicts the cap limits for Option B.

In either scenario, should shallow soil volumes be more than sufficient for needed back fill, excess shallow soil would be characterized for disposal and transported off-site to an appropriate disposal facility.

As indicated above, the redevelopment plans do not include reuse of the site building or any portions thereof. In the unlikely event that this changes, evaluation of soil gas beneath the building floor would be performed and vapor migration potential would be evaluated prior to proposing the existing concrete floor of the building be utilized as a permanent cap and/ or the building or any portions thereof be considered suitable for occupancy.

We are hopeful the above information addresses any concerns you may have regarding the implementation of the preferred remedial alternative such that a Program Letter can be issued for this site.

Should you have any additional questions, please do not hesitate to contact me.

Thank you for your assistance, and in advance for your timely response.

Sincerely,

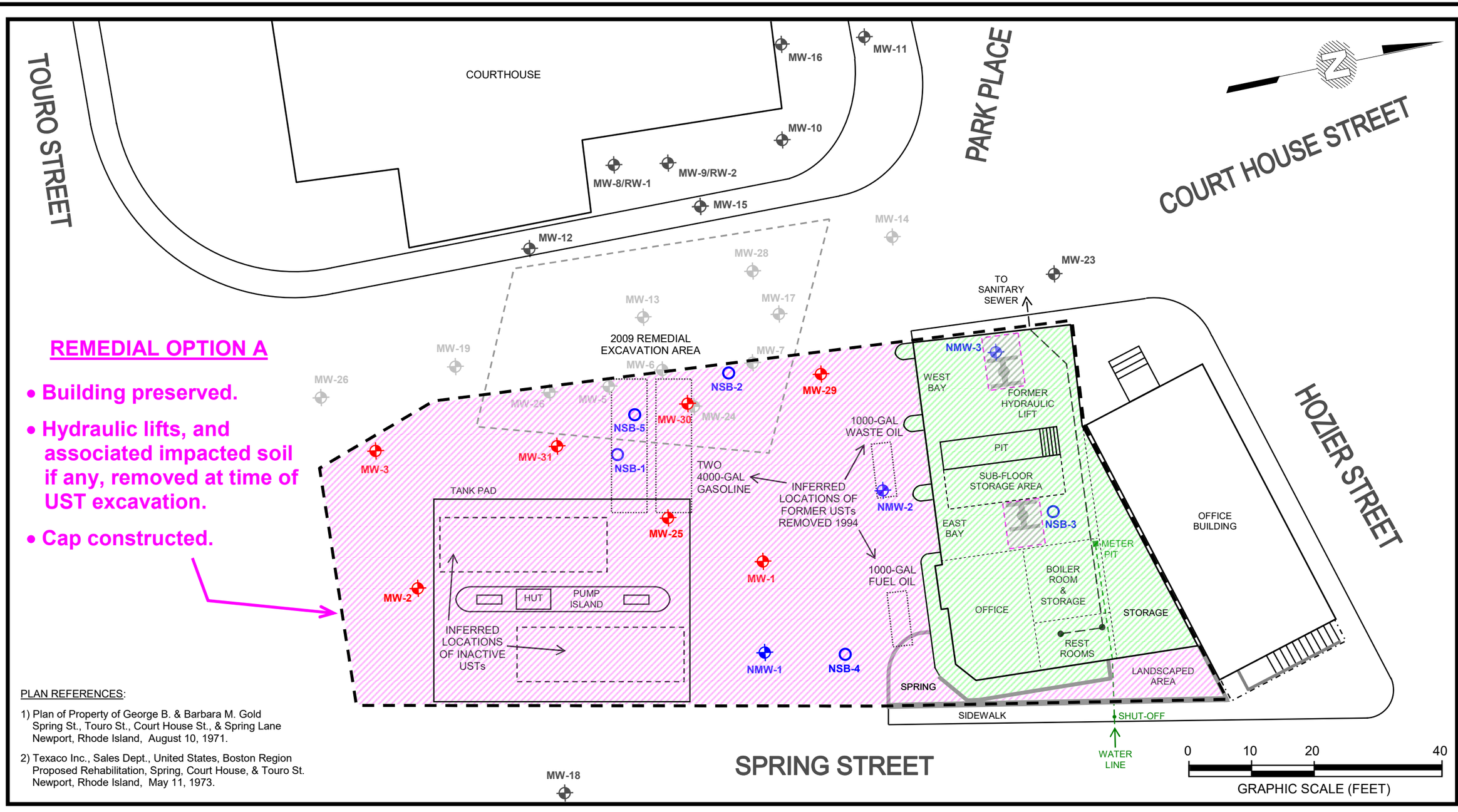
Newport Environmental, Inc.

Bruce Clark
Senior Project Manager

Erik Gottlieb, PhD
Senior Environmental Scientist

cc: Stephen Ostiguy, CCHC
Sofia Kaczor, DEM UST Section

Attachments: Figure A – Option A – Building Preserved
Figure B – Option B - Building Demolished



REMEDIAL OPTION A

- **Building preserved.**
- **Hydraulic lifts, and associated impacted soil if any, removed at time of UST excavation.**
- **Cap constructed.**

PLAN REFERENCES:

1) Plan of Property of George B. & Barbara M. Gold Spring St., Touro St., Court House St., & Spring Lane Newport, Rhode Island, August 10, 1971.

2) Texaco Inc., Sales Dept., United States, Boston Region Proposed Rehabilitation, Spring, Court House, & Touro St. Newport, Rhode Island, May 11, 1973.

Coffey's Texaco
48 Touro Street
Newport, Rhode Island

Newport Environmental Project No. NS0502

FIGURE A

NEWPORT ENVIRONMENTAL

LEGEND

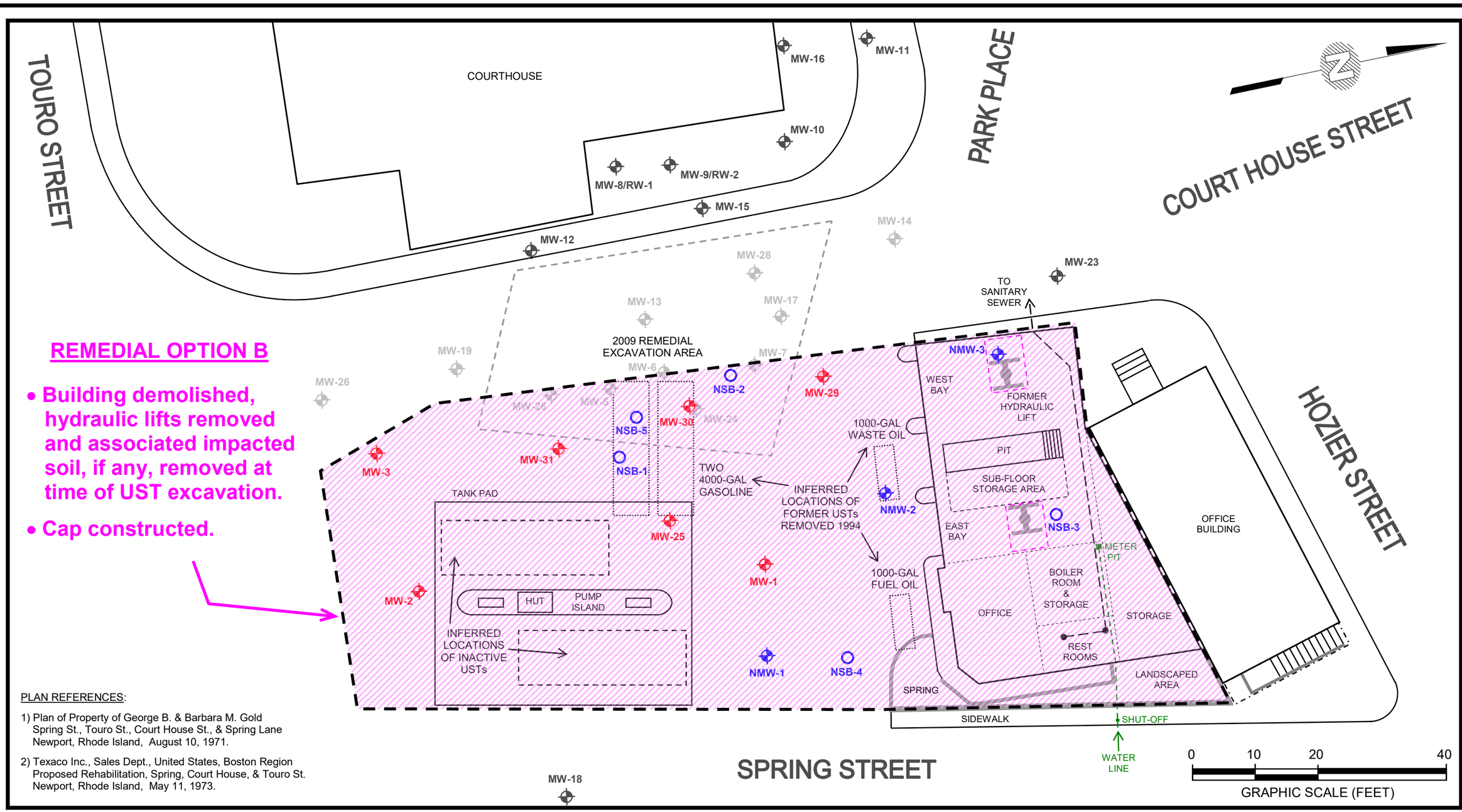
= SITE BOUNDARY (APPROXIMATE)
= RETAINING WALL
= FENCE
= 2-FOOT SOIL CAP CONSTRUCTED OF CLEAN BACKFILL
= TEMPORARY CAP FORMED BY EXISTING CONCRETE SLAB AND APRON

FORMER / EXISTING MONITOR WELLS:

MW-30 = EXISTING ON-SITE
MW-18 = EXISTING OFF-SITE
MW-24 = CLOSED OR DESTROYED

INSTALLED MAY 28, 2014:

NMW-1 = MONITOR WELL
NSB-4 = SOIL BORING



REMEDIAL OPTION B

- **Building demolished, hydraulic lifts removed and associated impacted soil, if any, removed at time of UST excavation.**
- **Cap constructed.**

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FIGURE B

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