



**Environmental  
Justice League of  
Rhode Island**

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September 21, 2010

Dear Mr. Martella,

Thank you for participating so actively in the recent community health consultation hosted by the Agency for Toxic Substances and Disease Registry (ATSDR) for Parcel C of the former Gorham Manufacturing site. Your knowledge and candor about the site was an important part of the presentation to residents.

I am writing today on behalf of the Environmental Justice League of Rhode Island (EJLRI) to formally request that DEM stop its review of the Remedial Action Work Plan (RAWP) for Parcel C that the City of Providence (City) recently submitted on August 26, 2010 until data gaps identified by ATSDR in its health consultation for Parcel C are filled and publicly discussed; and in the meantime, that DEM follow through on its order to the City to cover the soil stockpiled on Parcel C.

As you are aware, after reviewing the full range of site investigation documents available for Parcel C, ATSDR concluded that:

“...Parcel C of the Gorham site poses an *indeterminate public health hazard* based on inadequate site characterization (environmental data gaps) and uncertainties about future plans for Parcel C remediation and development. Detected levels of contamination in some available surface soil, groundwater, and soil vapor samples exceed health-based screening values. However, possible health impacts, if any, cannot be fully evaluated without more information about current site conditions, including the potential for methane gas production.” (page 12)

The ATSDR report, while in the public domain since 2009, was not explained to community members or other stakeholders until this August. In our public meeting in May of this year with RIDEM, Textron, and the City, a number of action steps were identified based on available knowledge, but not the ATSDR report calling for additional testing. One of the resulting actions the City took was to re-work the RAWP that had been approved for the YMCA development. Concerns about the stockpiled soil were raised at the meeting and a request to see the testing results was made. EJLRI then asked its technical assistance consultants, who began their review of site-related documents in August, to explain the testing results. Meanwhile, in July, DEM made its request to the City to cover the stockpile based on residents' concerns.

We are now concerned that rather than resolve the issue of the stockpile, DEM has given the City the opportunity to bypass residents' concerns by submitting a RAWP for Parcel C instead of immediately covering the stockpiled soil. The City has not indicated to EJLRI, residents, or in any

other public setting that they have already identified a source of funding to complete the remediation and redevelopment they are proposing in the RAWP. The City, therefore, can avoid taking any action outside of outlining their future plan, for which we have no agreed upon timeline for implementation, while the uncovered stockpile remains sitting on the parcel.

Our second concern is the ATSDR health consultation report itself, which recommended additional testing on Parcel C in order to address uncertainties regarding the nature and extent of Parcel C contamination and clarify contaminant source(s), including:

- Characterizing current surface soil conditions in order to understand what remediation activities will most effectively eliminate access to contaminated soil.
- If soil from the stockpile will be used as fill on Parcel C, conducting further testing to determine if limited composite sampling conducted to date adequately characterizes the soil contamination.
- Determining the current conditions of Parcel C groundwater and describing any continuing sources of groundwater contamination.
- Ensuring that groundwater contaminant sources, concentrations, and migration patterns at and near Parcel A continue to be monitored and evaluated so that its contribution to Parcel C groundwater contamination, if any, can be determined. Measures should be taken to carefully evaluate and document any potential changes in groundwater flow dynamics, especially those that might result from underground utility work (e.g., relining sewer pipes), as such actions could influence Parcel C groundwater.
- Collecting additional soil vapor data, including VOCs and methane, from various depths below ground surface. Any future analysis of samples should use methods that can achieve detection limits that are below ATSDR's health-based CVs.

Many concerns over adequate testing were raised at the May meeting, though the ATSDR report had not been fully explained to or understood by the community as a whole. Because of this, a determination about the need for additional testing on Parcel C was not made by residents at that time. ATSDR's report now serves as a third-party corroboration that the investigation of Parcel C has not been sufficiently thorough; an important issue that DEM should have been aware of and which should have informed DEM's follow-up with the City and Textron regarding this parcel.

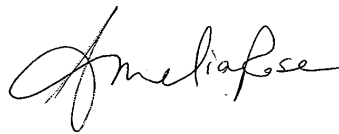
No one, including DEM, knows either the actual source of the contaminated groundwater plume on Parcel C or the full nature and extent of contamination on Parcel C. This is because, according to ATSDR, contamination of the parcel has not been fully characterized. We are particularly concerned that a cap remedy at Parcel C will not address the issue of groundwater plume exposures (by both humans and wildlife), especially as the plume impacts the Cove and shoreline of Mashapaug Pond. Moreover, treatment of that plume may involve disturbance or digging up of the proposed cap on Parcel C in the future and additional funds would have to be expended where otherwise they would not be necessary. Additionally, by remediating and redeveloping Parcel C to create green space and a small parking lot, public access to an unremediated Parcel D may increase even if there are fences and signs warning people about the ongoing cleanup.

Clearly, the City has limited financial resources to complete the necessary work at Parcel C. Not understanding the full extent of the contamination creates the potential for new risks from the contamination to arise, risks we did not anticipate, necessitating further investigation, remediation, and more money being spent that could have been avoided.

While EJLRI and many of the residents we have spoken to about the site are concerned about Parcel C remaining unremediated and undeveloped, as well as the soil stockpiled on the parcel, a greater concern is ensuring that the final remedy for the entire Gorham Site (including Mashapaug Pond) is as protective of public health and the environment as possible. After so many years, spending an additional few months conducting necessary testing with the goal of understanding current conditions would not be a significant burden. Nor will it burden the City to cover the stockpiled soil immediately while additional environmental data is gathered and analyzed.

EJLRI's hope is that we can work together with the responsible parties to find the most appropriate remedy that addresses the contamination that is present on the Gorham site. We would be happy to set up a schedule with RIDEM, Textron, and the City outlining the next steps for investigation and reporting back to residents, in an effort to move forward with the remediation of the entire Gorham site.

Sincerely,

A handwritten signature in black ink that reads "Amelia Rose". The signature is written in a cursive, flowing style.

Amelia Rose, Director