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24 January 2006

Mr. Joseph T. Martella, II, Senior Engineer
Rhode Island Department of Environmental Management
Office of Waste Management
Site Remediation Program
235 Promenade Street
Providence, Rhode Island 02908

RE: Response to Public Comments, Former Gorham Manufacturing Facility,
Parcel B, 333 Adelaide Avenue, Providence, Rhode Island
Case No. 2005-029
EA Project No. 61965.01

Dear Mr. Martella:

On behalf of the Providence Department of Public Property (City), EA Engineering, Science, and Technology, Inc. (EA) is offering the following responses to the oral and written public comments received during the public comment period between 5 October 2005 and 2 January 2006 regarding the referenced site. For the purposes of this Response to Public Comments (RPCs), the term "site" is defined as Parcel B of the Former Gorham Manufacturing Facility, 333 Adelaide Avenue, Providence, Rhode Island. This letter and the associated attachments are intended to fulfill the Rhode Island Department of Environmental Management (RIDEM) requirements set forth in Rules 7.07 and 7.09 of the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations). In accordance with the Remediation Regulations, and as supported by statements made at the formal Public Hearing on 19 October 2005 by RIDEM's legal counsel (Public Hearing Transcript, Attachment A, pp. 2, 3, and 24), all substantive comments regarding the technical feasibility of the proposed remedial alternative for the subject site have been addressed in this RPC. For the purposes of this RPC, the phrase "technical feasibility" is defined in the same manner as expressed by RIDEM's legal counsel during the formal Public Hearing on 19 October 2005. Specifically, "technical feasibility" of the remedy addresses whether the remedy will protect the people on the property from exposure to contaminants in concentrations that exceed RIDEM's residential direct exposure criteria (RDEC) (Public Hearing Transcript, Attachment A, p. 3).

In some instances, the City was unable to provide RPCs not applicable to the technical feasibility of the proposed remedy for Parcel B, since they involved other regulated properties for which the City is not the responsible party. This RPC is structured as follows:

- **Section 1**—City's response to "general public comments" received
- **Section 2**—City's response to substantive public comments regarding the technical feasibility of the proposed remedy for Parcel B



- **Section 3**—City's RPCs regarding issues other than the technical feasibility of the proposed remedy for Parcel B
- **Attachment A**—Copies of Public Forum and Public Hearing Transcripts, 5 and 19 October 2005, respectively
- **Attachment B**—Copies of public comment letters received at City of Providence Department of Planning and Development during public comment period
- **Attachment C**—Supporting documentation.

To facilitate referencing during review of this document, the numbers located in the top right hand corner of the comment letters (Attachment B) correspond to the numbered comments and responses in this RPC.

1. CITY'S RESPONSE TO GENERAL PUBLIC COMMENTS

- 1.1 COMMENT: Several letters have been received regarding the public comment process set forth in the Remediation Regulations and the problems associated with the requirement to provide comment on the technical feasibility of a proposed remedy prior to preparation of a detailed Remedial Action Work Plan (RAWP).

Response—The City acknowledges that public comments regarding the *specific* details of the proposed remedy are not possible prior to submission of the RAWP. However, RIDEM's Remediation Regulations *require* that the public comment period occurs at this stage of the regulatory process to ensure that substantive public comments regarding the technical feasibility of the proposed remedy can be incorporated into the RAWP if applicable. The City is complying with the rules and procedures of the public comment process established by RIDEM's Remediation Regulations.

- 1.2 COMMENT: Several comments have been received regarding the public's desire for the "entire 37-acre former Gorham Manufacturing site" to be remediated "at once" and/or with "a single remedial plan."

Response—The City understands the public's desire that the entire site be remediated "at once" and/or with a single remedial plan. Unfortunately, this is not possible because the City and other responsible and voluntary parties are currently actively involved in RIDEM's regulatory process at different parcels that comprise the entire former Gorham property. The other responsible and voluntary parties have either already implemented RIDEM-approved RAWPs (e.g., Textron for the Stop and Shop parcel), submitted RAWPs for RIDEM approval (e.g., YMCA parcel), or submitted risk assessments and supplemental sampling work plans to support remedial activities (e.g., Textron for Parcel D which includes Mashpaug Pond). In addition, in a letter addressed to Senator Juan Pichardo, dated 22 December 2005 (copy provided in Attachment C), the Director of the Department, Dr. W. Michael Sullivan, acknowledges the multiple benefits of a phased remedial approach by multiple responsible parties (e.g.,



manageability, effectiveness, etc.). Dr. Sullivan's letter also states that waiting for a single party to take on such a site could result in the contamination not being addressed in an adequate manner or not being addressed at all, and that such a phased approach can be safely accomplished with the ultimate goal of a complete and compliant site-wide remedy that is protective of both human health and the environment.

- 1.3 COMMENT: A representative of the neighborhood groups Mashpaug Pond Coalition and Concerned Citizens of Reservoir Triangle and South Providence, Mr. Robert Dorr, has enlisted the services of an independent, U.S. Environmental Protection Agency (EPA)-funded, professional environmental subcontractor. The subcontractor, Environmental Research Institute of the University of Connecticut, works to provide technical assistance to community groups in the form of document review, explanation of technical issues, writing comments on proposed remedial plans, etc. On 30 December 2005, the City received a three-page comment letter from the Environmental Research Institute representative, Mr. Kevin Hood (former Environmental Health Director for the City of Hartford) on behalf of the aforementioned neighborhood groups (copy provided in Attachment B).

Response—In general, while pointing out certain site characteristics or areas of concern that have already been identified and documented during the course of ongoing or completed assessment/remedial activities, most of the comments provided support the applicability and technical feasibility of a remedy that would include an engineered cap with subsequent inspection and repair responsibilities and restricting access to potentially contaminated areas, namely, Mashpaug Cove. The consultant points out potential problems with fencing, most notably his opinion that fencing will not be effective in eliminating exposure pathways. However, the consultant, referring to the southern peninsula of Mashpaug Cove on the abutting parcel (Parcel D) and the fact that waterfowl nest in that area, later suggests, "cordoning it off as a refuge might be the least costly, most effective way to eliminate risk and perhaps the best use as well." The consultant goes on to suggest that fencing could be a challenge, and he suggests that landscaped barriers such as briars would be effective. At one point, again referring to the abutting parcel (Parcel D), the consultant states that "the southern peninsula is appropriately mentioned as the site that will most likely have exposure through contact with surface soil" and also suggests that "the southern peninsula could be a secured wildlife refuge and perennial school project."

Although such comments about possible remedies for the abutting parcel are not substantive regarding the proposed remedy for Parcel B, the City is encouraged by the fact that the consultant generally endorses the concept that contaminated parcels can be made safe for educational use. The consultant also supports the City's proposed remedy in concept, specifically, by endorsing capping and restricting access via fencing and/or other barriers to eliminate potential risk from exposure to contaminants. Furthermore, the City's proposed remedy will include a comprehensive fence installation, monitoring, and maintenance program, not simply installation of a fence without subsequent RIDEM oversight. Please refer to the City's response to Comments 1.4 and 2.4 for more information regarding the proposed fencing program.

- 1.4 COMMENT: Several comments have been received questioning the general effectiveness that fencing would have in prohibiting access to Parcel D by users of the proposed school parcel.



Response—It is the City's understanding that, in general, fencing or other means of prohibiting access to or cordoning off potentially hazardous areas with impenetrable brush (thickets, briars, etc.), have been included in other Department-approved RAWPs. Furthermore, please note that the City's RAWP for Parcel B will also include a comprehensive monitoring, maintenance, and inspection program to maximize the effectiveness of the fencing, and Departmental oversight will add another level of program effectiveness. The fencing component of the remedy is only needed due to the fact that potentially harmful contaminants have not yet been remediated at Parcel D. As soon as Parcel D is remediated and made protective for all site users, then the need for fencing between Parcel B and Parcel D will be eliminated. Therefore, the fencing component can be viewed as a short-term, temporary measure, since the responsible party for Parcel D is currently working under Departmental oversight to complete assessment and remedial activities at Parcel D. In summary, the use of fencing or other means of restricting access has been a Department-approved component of previous RAWPs, and the comprehensive fencing program proposed for Parcel B will be effective, especially in light of the fact that once Parcel D is remediated, the fencing component will no longer be a required element of the Parcel B remedy.



2. CITY'S RESPONSE TO PUBLIC COMMENTS REGARDING THE TECHNICAL FEASIBILITY OF THE PROPOSED REMEDY FOR PARCEL B

Each of the substantive public comments received during the public comment period regarding the technical feasibility of the proposed remedy is summarized below along with the City's response. Copies of the public forum/hearing transcripts and the public comment letters that include the below-numbered comments are provided in Attachments A and B, respectively.

- 2.1 COMMENT: The City of Providence lacks the skill to implement the proposed remedy. [S. Fischbach, letter dated 30 December 2005, p.1]

Response—The City is committed to using a professional, qualified environmental engineering firm experienced with this type of remedial project to develop and implement the proposed remedy. Furthermore, RIDEM's review, approval, and oversight of the remedy will ensure that the City fulfills its obligations and implements and maintains the remedy in a competent and satisfactory manner.

- 2.2 COMMENT: The proposed remedy fails to address portions of the Gorham Site that children using the school will have access to. [S. Fischbach, letter dated 30 December 2005, p.2]

Response—The City's proposed remedy addresses the entire parcel (Parcel B) via an engineered cap, a sub-slab venting system beneath the proposed school building, and a comprehensive fencing program to prohibit access to the abutting pond parcel. The comprehensive fencing program will include routine monitoring/maintenance/inspection of the fencing. The proposed remedy is designed to protect users of the proposed school site. Despite the comprehensive fencing program, the City acknowledges the possibility that a minority of students may trespass on other abutting parcels, including Parcel D. The responsible party for Parcel D has already compiled a vast amount of data, completed an in-depth risk assessment, is committed to perform additional analytical testing to supplement the existing data set, and is actively engaged in remediation planning for Parcel D in accordance with the Department's Remediation Regulations. Furthermore, it is the City's understanding that RIDEM has recently conducted its own site investigation. There is no reason to believe that new data will reveal unprecedented compounds or unexpectedly high concentrations not unlike those already identified at the Gorham site. Therefore, in light of the work completed to date or already in progress and the level of RIDEM involvement, it is logical to assume that remediation of Parcel D will occur within an acceptable timeframe, be unhindered by the proposed school development, and provide an even stronger level of protection to all users of Parcel B. This type of "phased" remedial approach by multiple responsible and voluntary parties is endorsed by RIDEM (refer to response provided to Comment 1.2 above). Lastly, the Remediation Regulations include provisions for Emergency and Short-Term Response Actions (Rule 6.00) in the event that hazardous materials are released or identified and pose an imminent hazard to human health and/or the environment. In the event that new or proposed assessment data for neighboring parcels reveal imminent hazards, the City requests that RIDEM exercise its regulatory authority to approve appropriate Emergency and Short-Term Response Actions to further ensure protection of Parcel B users that willingly trespass on abutting parcels with said hazards, if any.



- 2.3 COMMENT: The existence of data gaps renders any evaluation of the technical feasibility of the proposed remedy for Parcel B speculative. [S. Fischbach, letter dated 30 December 2005, p.4]

Response—The City disagrees that data gaps exist relative to the proposed school parcel. The City completed site investigation activities from January through March 2005 that included soil vapor screening and sampling, soil boring installation and soil sampling, and groundwater monitoring well installation and groundwater sampling. In August 2005, the City also completed additional RIDEM-approved soil and groundwater assessment activities to supplement the existing comprehensive data set. These activities included installation of soil borings and groundwater monitoring wells at multiple locations across the site, including two specific locations, personally selected by Mr. Dorr, a representative of the Mashpaug Pond Coalition and Concerned Citizens of Reservoir Triangle and South Providence. Upon completion of review of the site investigation data, RIDEM issued a Program Letter to the City in September 2005 that demonstrates its concurrence that the site investigation is complete.

- 2.4 COMMENT: Proposing that fencing would serve to eliminate exposure pathways by eliminating access to the area is not realistic. [K. Hood, letter dated 29 December 2005, p.2]

Response—The City disagrees that eliminating exposure pathways by eliminating access to the area is not realistic. See response to Comments 1.4 and 2.2 for more information regarding the proposed comprehensive fencing program.

- 2.5 COMMENT: There appears to be no information in your RAWP spelling-out the prevention of cross contamination from Parcel C and Parcel D during building construction. [S. Corey, letter dated 16 November 2005]

Response—It is unclear what document the author is referencing since the RAWP has yet to be completed or submitted to RIDEM. With respect to the proposed remedy and the potential for cross-contamination from abutting Parcels C and D during building construction, the City's RAWP will include a soil management plan with various provisions to prevent contamination to or from abutting areas. Groundwater will not be encountered during building construction and, therefore, is not a concern relative to cross-contamination. Application of water and the use of perimeter fence wind screens during previously completed (July-August 2005), RIDEM-approved site preparation activities have clearly illustrated, through extensive air monitoring activities, the effectiveness of these procedures in minimizing offsite fugitive dust migration.

- 2.6 COMMENT: The proposed remedy is not technically feasible due to the fact that a large part of the science on which the Parcel B remediation plan relies, is based upon safety standards derived using adult-based criteria and therefore, not protective of children. In addition, no further building should be done at the site, for the use of adults and particularly children, until data has been introduced that exposure to these many intermixed substances will be safe for all users. [C. Orloff, letter dated 10 November 2005]



Response—The City has utilized RIDEM’s RDEC published in the Remediation Regulations for comparative purposes when evaluating the soil data collected during the site investigations completed for Parcel B. Based upon the mathematical algorithms and default input parameters for children (body weight, averaging time, soil ingestion, and exposure duration) contained in Appendix D of the Remediation Regulations, it is the City’s understanding that RIDEM’s RDEC were developed to be protective of children. Furthermore, the proposed remedy for Parcel B is not a remedy designed to achieve a reduction of chemical concentrations to “acceptable” or “safe” levels, but rather is a remedy designed to eliminate exposure to potentially harmful chemicals through the construction of an engineered cap. Therefore, the comparative regulatory standards do not form the basis of the remedy, and how the standards were developed has no impact on the technical feasibility of the remedy. With respect to the second comment regarding exposure to many intermixed substances, as previously stated, the City’s proposed remedy is designed to prohibit exposure to potentially harmful contaminants. Therefore, there is no basis for prohibiting site development pending an evaluation of possible effects caused by intermixed contaminants.

- 2.7 COMMENT: Why is the City proposing a less protective remedy than the one used at another school? [S. Aldredge, letter dated 10 November 2005]

Response—The City is not proposing a remedy that is less protective than the one used at another school. The remedy for both school sites involves installation of an engineered barrier including paved parking areas, building footprints, and landscaped areas to prevent exposure to subsurface contaminants. Therefore, the proposed remedy for Parcel B will not be less protective than the one used at the other school.

- 2.8 COMMENT: Regarding the active soil vapor extraction system, until there are studies showing whether or not the system has an impact on bringing the plume from the neighboring Stop & Shop parcel into the building, this remedy is technically infeasible. [S. Fischbach, page 8 of 19 October 2005 Public Hearing Transcript]

Response—A plume of contaminated groundwater has been identified beneath the abutting parcel at a depth of approximately 25 ft below grade. The plume is currently undergoing remediation by the responsible party under the oversight of RIDEM. Furthermore, the proposed sub-slab venting remedy proposed for Parcel B will include installation of a layer of gravel-like material beneath the building slab and a series of low-flow vacuum extraction fans that will be appropriately sized to only remove potential vapors from the gravel zone beneath the building slab. The proposed remedy will be designed to eliminate potential vapor intrusion into the building, and will have absolutely no impact upon groundwater beneath Parcel B or any other abutting parcels.

- 2.9 COMMENT: Regarding the proposed sub-slab ventilation system, how will the City keep up (i.e., maintain) the ventilation system so that it is safe for the kids and adults working there? [T. DiPrete, page 16 of 19 October 2005 Public Hearing Transcript]

Response—The maintenance of the sub-slab ventilation system will include an approved schedule of periodic inspections and monitoring by qualified and properly trained personnel. Maintenance of the system will be overseen and regulated by RIDEM to ensure that the approved maintenance program is implemented.



3. CITY'S RESPONSE TO PUBLIC COMMENTS REGARDING ISSUES OTHER THAN THE TECHNICAL FEASIBILITY OF THE PROPOSED REMEDY

- 3.1 COMMENT: Regarding the Department-approved site preparation activities completed in July and August 2005, where are the manifests showing that all asbestos-contaminated materials located at these areas were properly disposed of, to ensure no safety hazards? [W.A. Martin, letter dated 29 December 2005]

Response—All suspect asbestos-containing building materials identified at Parcel B by an asbestos inspector were wetted, collected in double plastic garbage bags, sealed with duct tape, and placed within a dumpster designated for future offsite asbestos disposal by a trained asbestos abatement contractor wearing personal protective equipment from Pasquazzi Bros., Inc. (Pasquazzi) of Cranston, Rhode Island. A dedicated asbestos dumpster, containing a total of 34 bags of asbestos-containing building materials, was transported offsite by Pasquazzi on 7 September 2005. Transportation responsibility of the dumpster was transferred from Pasquazzi to Service Transport Group, Inc. of New Castle, Delaware. Ultimate disposal of the suspect asbestos-containing building materials was at A&L Salvage, Inc. (Permit No. OH EPA 139120) in Lisbon, Ohio on 13 September 2005. A preliminary copy of the Waste Shipment Record (No. 192707) was included in Appendix D of the September 2005 Limited Remedial Action Work Plan and Supplemental Site Investigation Summary Report submitted to RIDEM and distributed/made available for public review during the public comment period. A final copy of the Waste Shipment Record documenting that the asbestos-containing building materials were disposed at A&L Salvage, Inc. on 13 September 2005 is provided in Attachment C.

- 3.2 COMMENT: November 2005 sampling results indicate that a sample for lead was found to contain 7200 mg/kg of lead [S. Clark, letter dated 29 December 2005]

Response—The City acknowledges that the lead sample concentration referred to in the comment above is elevated. However, assuming that the data are valid, the City asserts that elevated concentrations of lead or other compounds have been identified in past site investigations (by the City and/or others) and the proposed remedy will protect users of the proposed high school by eliminating exposure to all Parcel B soils (via engineered cap) and potentially harmful soil at abutting parcels (via comprehensive fencing program). Also, it is important to note that responsible and voluntary parties for abutting parcels that contain documented high levels of lead and other compounds have been, and continue to be, actively engaged in RIDEM's regulatory process. The City has confidence that the responsible parties for abutting parcels, with RIDEM's continued timely oversight, will continue to make progress toward remedy implementation that will be protective of users of all of the former Gorham parcels.

- 3.3 COMMENT: Please explain why no testing has ever been done for dioxins at the proposed site for a school [B. Fonseca, letter dated 20 December 2005]

Response—Information obtained from the EPA website, Technical Factsheet on Dioxin (2,3,7,8 TCDD) – www.epa.gov/OGWDW/dwh/t-soc/dioxin.html, does not indicate that dioxin is released to the environment as a result of silver manufacturing processes. Furthermore, past site investigations completed by the City and others included field screening and/or laboratory analysis of numerous chemical compounds and did not identify dioxin as a compound of



concern. After review of the City's site investigation summary reports and the chemical data presented, RIDEM has deemed the City's site investigation complete. Lastly, if dioxin was to be located at Parcel B (e.g., via historical exhausts from leaded gasoline engines or some other type of release), the City's proposed remedy will effectively protect users of the proposed high school from exposure to this and other contaminants with similar chemical characteristics.

- 3.4 COMMENT: When will testing for polychlorinated biphenyls (PCBs) and dioxin occur? [W. Young and M. Sherman, undated letter received at EA Engineering on 14 October 2005]

Response—With respect to PCBs, and based upon information contained in a Method 3 Risk Assessment document (dated 10 August 2004) prepared by MacTec Engineering and Consulting, Inc. (MacTec, Wakefield, Massachusetts) on behalf of Textron for Parcel D (a.k.a. the Park Parcel), PCB soil sampling efforts were completed in 1994 at various depths and various locations across the former Gorham property, including the north bank area of Mashpaug Cove (area between Parcel B and pond). Only one of the soil samples revealed the presence of PCB (Arochlor 1254) at a concentration of 1 mg/kg, which is 10 times less than RIDEM's RDEC for PCBs (10 mg/kg). Please refer to RIDEM's files for more information regarding the MacTec Method 3 Risk Assessment (currently under review by RIDEM personnel). Furthermore, historical site documents indicate that Textron contracted with an environmental subcontractor who removed approximately 2.5 yd of PCB-impacted soil from the former Gorham property. Based upon this historical information documenting the lack of PCBs or the removal of PCBs from the site, PCBs were not further evaluated in recent site investigations. In addition, as previously mentioned, after review of the City's site investigation summary reports and the chemical data presented, RIDEM has deemed the City's site investigation complete. Lastly, if PCBs were to be located at Parcel B, the City's proposed remedy will effectively protect users of the proposed high school from exposure to this and other contaminants with similar chemical characteristics. With respect to dioxin, please refer to the previous response to Comment 3.3.

- 3.5 COMMENT: Public records provided on behalf of the City were not clear, complete or in chronological order, sections were missing and are often not legible. [S. Fonseca, letter dated 17 November 2005]

Response—As requested, a repository of documents related to the site investigations and proposed remedy was established at the Knight Memorial Library at the beginning of the public comment period. At the time the documents were brought to the library, they were complete and in chronological order.

- 3.6 COMMENT: In accordance with the Industrial Property Remediation and Reuse Act, I am requesting a site assessment and decision process with objective criteria – the City must use nonbiased, current and accurate data to drive the remediation of this site; not inaccurate, incomplete, biased data used by firms paid by Textron. [S. Fonseca, letter dated 17 November 2005]

Response—The City has not based the proposed remedy on inaccurate, incomplete, or biased data used by firms paid by Textron. The City's environmental consultant utilized several independent, certified laboratories that employed numerous, strict quality assurance and quality control procedures while following EPA or other standard analytical methods. Although a limited amount of historical data collected by others was included in the data set evaluated



during the site investigation phase of this project, the majority of data are current (2005) and included an extensive soil gas investigation, and the collection of soil and groundwater data from areas personally selected by Mr. Robert Dorr, a representative of the Concerned Citizens of the Reservoir Avenue Triangle and South Providence. Furthermore, RIDEM has evaluated the data provided in various site investigation reports and has deemed that the City's site investigation is complete.

- 3.7 COMMENT: Please explain why the RAWP approved by the RIDEM for Textron to remediate the entire 37 acre site, includes an agreement that "the site will be capped with at least 12 inches of clean fill within 6 months" was never done. Please explain how the current remedy, which is supposedly based upon the Textron RAWP being completed, is valid? [M. Fonseca, letter dated 12 November 2005]

Response—The City cannot speak for RIDEM or other responsible parties regarding the status or schedule of regulatory activities that RIDEM or other responsible parties are responsible for overseeing or implementing. With regard to the second comment, the City's proposed remedy is not based upon the Textron RAWP being completed, but rather is based upon current site data, a limited amount of historical data, and the future planned use of the site.

- 3.8 COMMENT: How can the City conclude that it is appropriate to base a remedy on investigations which cannot reflect current soil conditions? [M. Fonseca, letter dated 12 November 2005]

Response—Please refer to responses to Comments 3.6 and 3.7.

- 3.9 COMMENT: Regarding the SIR Addendum, April 2005, Final, only test results for soil borings 1, 2, 3, 4, and 5 are provided, yet Figure 6 shows 6, 8, 9, 10, 11, and 12. Where are the test results for the other half of the borings shown on the Figure? Secondly, why were these six borings not included in the testing, and/or the test results? In Figure 6, there is an unidentified soil boring that should be Soil Boring 7. Why is it not labeled? Thirdly, regarding the Limited RAWP and SSISR dated September 2005 Final, Appendix F, what is Figure (-)? [S. Clark, letter dated 12 November 2005]

Response—For this proposed school development project, 12 "geotechnical" and 5 "environmental" soil borings were installed at various locations across Parcel B. The purpose of the 12 geotechnical soil borings was to characterize the geologic soil conditions at Parcel B to evaluate the structural integrity of the site soil (i.e., can the site soil support the school structure). The purpose of the 5 environmental soil borings was to characterize the nature and extent of various potential site contaminants.

As explained in Section 4.2.3 of the SIR Addendum, the 12 borings illustrated on Figure 6 were geotechnical soil borings and not part of the environmental investigation. As such, unlike the environmental soil borings referenced in Section 4.2.1 of the SIR Addendum, no soil laboratory testing was performed. The 12 geotechnical borings are shown on Figure 6, although the "SB-7" label on Figure 6 was inadvertently omitted from the figure. This typographical error does not adversely affect the content or conclusions of the SIR Addendum. Geotechnical boring logs were provided for all 12 geotechnical borings in Appendix F of the SIR Addendum.



Please refer to Figure 5 of the SIR Addendum for an illustration of where the 5 environmental soil borings were installed. A table summarizing the environmental laboratory testing results collected during the site investigation was provided in Section 4.2.1 of the SIR Addendum. Copies of the environmental soil boring logs and laboratory analytical reports were also included in the SIR Addendum as Appendixes B and C, respectively.

Regarding the third comment, the Limited RAWP and Supplemental Site Investigation Summary Report contains figures taken from existing documents, and makes reference to these figures in an appendix to the report by "figure name" as opposed to "figure number." Therefore, figure numbers are not relevant with respect to the referenced document.

- 3.10 COMMENT: A member of the public, Mr. Robert Dorr, submitted results from a testing event that he conducted on the Gorham-Extron site. Mr. Dorr indicates that the samples were retrieved from various locations on the site, some of which were within sixty feet of Parcel B. Mr. Dorr claims that the property in question has not been adequately investigated or tested. [R. Dorr, letter dated 17 November 2005]

Response—The City acknowledges that a small percentage of the data (approximately 5 percent of the total amount of compounds analyzed, or approximately 15 compounds out of over 300 analyzed) provided by Mr. Dorr exceed than RIDEM's RDEC for soil. However, assuming that the data are valid, the compounds identified as exceeding the RDEC by Mr. Dorr are compounds already identified in previous site investigations. The proposed remedy will be protective of users of Parcel B with respect to these compounds through the elimination of exposure to soils via an engineered cap, a comprehensive fencing program, and a sub-slab venting system. It is important to note that responsible parties for abutting parcels that contain documented high levels of lead and other compounds have been, and continue to be, actively engaged in RIDEM's regulatory process. The City has confidence that the responsible parties for abutting parcels, with RIDEM's continued timely oversight, will continue to make progress towards remedy implementation that will be protective of users of all the former Gorham parcels.

- 3.11 COMMENT: The plan calls for clean fill to be covered by asphalt encapsulating the site to prevent the escaping of any vapors, which would be monitored on a regular basis. Would this be the same process used on the Stop and Shop parking lot? There are cracks on the lot that run from Adelaide Avenue to the front of the market. In light of the disastrous condition of the Parcel A parking lot, it is incumbent upon the City to document exactly what this portion of the remedy will be. [D. Kennedy, letter dated 16 November 2005]



Response—The proposed remedy calls for an engineered cap (combination of building footprint, clean fill over fabric filter, pavement), implementation of an environmental land use restriction to prevent exposure to subsurface soils, and installation of a sub-slab ventilation system to prevent potential intrusion of vapors into the proposed school building. Encapsulating the site with asphalt is not associated with preventing the escape of vapors. Regular inspection and maintenance of the cap, including asphalt areas, will be included in the RAWP. Annual inspections and reports will be submitted to RIDEM to ensure that the engineered cap and other environmental land use restrictions are being complied with. The City defers to RIDEM with respect to the condition of the parking lot at the abutting parcel, as they are providing regulatory oversight for the ongoing remedy in progress on this parcel.

- 3.12 COMMENT: Regarding the LRAWP and SSIR, trucking logs are incomplete, out of sequence, and many of them are illegible. In particular Daily Field Logs for August 16th do not coincide with manifests of waste sent to the landfill. Also, two manifests for disposal that occurred in May 2005 were obtained that were not included in the referenced report. These inaccuracies call into question the willingness to seriously and truthfully evaluate and ability to conduct a successful remediation of the site. [E. Barboza, letter dated 7 November 2005]

Response—All debris disposal documentation provided as an attachment to the referenced report were presented in chronological order, with the exception of those pertaining to 16 August and 17 August. Documentation pertaining to disposal activity that occurred in May 2005 was not included in the referenced report, since disposal activities completed in May were not part of the RIDEM-approved scope of work (August-September 2005) that was the subject of the Limited RAWP and Supplemental Site Investigation Summary Report. Two previous submittals to RIDEM (Response to the RIDEM's Site Investigation Report Comments, 14 June 2005 and Limited Remedial Action Work Plan, 12 July 2005) included copies of disposal documentation pertaining to the May 2005 activities. Due to the color of the original documents (pink) and the fact that information on some of the disposal documents received from the landfill was already somewhat difficult to read, the City acknowledges that the photocopies of said documents could also be difficult to read. Regarding the comment that Daily Field Logs did not accurately reflect the number of disposal trips to the landfill on 16 August, the City's environmental representative had not arrived at the site when two loads of debris were removed (before 7:00 a.m.) for disposal to the landfill. Therefore, disposal of these debris loads was not documented in the August 16th Daily Field Log. However, the fact that the date, time, quantity, and type of disposal are documented on the disposal receipt provided in the referenced report clearly demonstrates that there was no intentional effort to purposefully omit information or misrepresent any site activities. Lastly, none of the concerns raised in the comment letter in any way affect the City's ability to prepare and implement a successful remedy at the site.



The City trusts that this RPC satisfactorily fulfills the regulatory obligations set forth in the Remediation Regulations regarding responding to public comments, and respectfully requests formal approval of the site investigation and this RPC in the form of a Remedial Decision Letter.

On behalf of the City, if you have any questions or require additional information, please do not hesitate to contact either of the undersigned at 401-736-3440.

Sincerely,

EA ENGINEERING, SCIENCE,
AND TECHNOLOGY, INC.

A handwritten signature in black ink, appearing to read 'Peter M. Grivers'.

Peter M. Grivers, P.E., LSP
Project Manager

A handwritten signature in black ink, appearing to read 'Timothy C. Regan'.

Timothy C. Regan, P.E., M.B.A.
Client Manager/Senior Engineer

PMG/mkp
Attachments

cc: A. Sepe, Providence Department of Public Property
T. Deller, Providence Redevelopment Agency
B. Wagner, Esq., RIDEM Legal Services
K. Owens, RIDEM Office of Waste Management
L. Hellested, RIDEM Office of Waste Management
S. Rapport, City of Providence Legal Services
J. Ryan, Partridge, Snow, & Hahn

Attachment A

**Public Forum and
Public Hearing Transcripts**

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

IN RE: PUBLIC MEETING FOR *
PROPOSED HIGH SCHOOL *
372 ADELAIDE AVENUE, PROV. *

ORIGINAL

PLACE: RESERVOIR AVENUE SCHOOL
156 Reservoir Avenue
Providence, Rhode Island

DATE: October 5, 2005

TIME: 6:00 p.m.

MERANDI COURT REPORTING
15 CHEDELL AVENUE
EAST PROVIDENCE, RI 02914
(401) 434-4579

(COMMENCES AT 6:10 P.M.)

1
2 **MR. GRIVERS:** May I have your attention,
3 please. May we have your attention. We'd like to get
4 started. My name is Peter Grivers. I work for
5 EA Engineering. We're an environmental consulting firm
6 hired by the City of Providence, and we're here to hold
7 a public forum relative to the site investigation that
8 has been recently completed for the proposed high
9 school location at the former Gorham Manufacturing
10 facility at Adelaide Avenue.

11 I'd like to thank you all for coming and I'd
12 like to spend a moment or two just to make some
13 introductory remarks. The purpose of tonight's meeting
14 is to present the site investigation that was performed
15 on the parcel piece of the former Gorham Manufacturing
16 site. This is I believe the fourth public meeting that
17 has been held to date and there will be another public
18 meeting actually called the Public Hearing on the 19th,
19 which I think most of you are aware of.

20 At this time we will accept verbal and written
21 comments on the site investigation and the technical
22 aspects of the proposed remedial action. We will have
23 a question and answer period at the end of this
24 meeting, so if you are thinking that you won't have a

1 chance to speak, you definitely will.

2 We do have copies of the site investigation
3 reports that have been prepared. They are available
4 today. We did not bring copies of the attachments.
5 It's a couple of inches thick worth of paper, and if
6 anybody wants those, there's a sign-in sheet at the
7 back. We'll be glad to get you those.

8 What I'd like to do at this point is introduce
9 you to Frances Gallo of the Providence School
10 Department to talk about the need for a school.

11 **MS. GALLO:** If you can't hear me, raise your
12 hand. Typical classroom teacher, so you should be able
13 to hear, right? Thank you. I'm here tonight just to
14 explain a little bit about the need for another school.
15 The fact is that we have increasing enrollment. It's
16 rolling through the system and it has hit the high
17 school. That coupled with some of the schools that are
18 older than the average that we would like to see our
19 schools and that are now having some serious problems
20 on their own.

21 And for example, the basement at Mount Pleasant
22 where we traditionally house 200 to 250 students has
23 been closed. So between the bubble of increasing
24 enrollment and the addition of another 200 to 250 seats

1 that we no longer can use, we find that we are
2 definitely in need of a new facility.

3 We do have children, students, high school
4 students at Harrison Street School, which is a former
5 parochial school. That facility is really not
6 suitable. It's not suitable in this day and age as a
7 school and certainly not for high school students. And
8 yet for another year, we still have our students there
9 to the tune of 300 students.

10 We opened DelSesto High School by closing one
11 of the middle schools, moving back our sixth grades
12 into the elementary as much as we could, really filling
13 to bursting the elementary schools to allow us to have
14 enough space to open DelSesto as a high school. We
15 expected to open it with 150 to 175 ninth-grade seats
16 and we already have 220 seats full.

17 So the issue is where do we put our high school
18 students. There's not enough seats for the bodies that
19 we have. As we maintain and correct our existing
20 facilities and bring them up to code, and as
21 appropriate and respectful an environment as we can
22 provide for your children, we need some space where we
23 can put our children in the meantime. That's basically
24 our need for the schools. And I'm willing to take

1 questions, but I don't think this is the time. Am I
2 correct? I see a hand. That's why I'm asking.

3 Mr. Sepe, are we taking questions now or wait until
4 later?

5 **MR. SEPE:** Let's get through the presentation
6 and then we'll take questions.

7 **MS. GALLO:** Okay. I'm here.

8 **MR. GRIVERS:** Regarding site selection for
9 the school, there's nobody here at this time for the
10 City's Planning Department. We'll get into that
11 subject later. What I'd like to do right now is go
12 through a couple more administrative-type announcements
13 or notes. I left a packet of information at the back
14 of the room which summarizes the City's efforts to date
15 making attempts to notify everybody about meetings,
16 such as this, mailings. Meetings that have been held
17 to date.

18 I know that at times there have been concerns
19 that the word is not getting out there. We are trying
20 our best. We're improving each and every day. We have
21 another sign-up sheet at the rear of the room. If
22 there's anybody that has not received mailings or
23 notifications in the mail and they wish to do so, we
24 will add those names to our existing data base that

1 we're compiling as we go along.

2 The other thing I'd like to announce is for
3 those who haven't heard yet, there's been a repository
4 established at the Knight Memorial Library, and located
5 275 Elmwood Avenue. The information as to its address,
6 its hours of operation and telephone number is on the
7 paper on the second page of that list that's been
8 included.

9 So we would just like this information along
10 with the subsequent list of all the documents that have
11 been submitted to DEM, received from DEM and/or
12 exchanged with DEM, they've approved them or anything
13 relative to the site investigation, the regulatory
14 process. We've included a list of all those documents
15 as well, just to let everyone know that there's a long
16 process in the history of regulatory involvement that
17 has been going on. So we would like both of those
18 documents entered into the record. And I'll provide a
19 copy to the stenographer at the end of this meeting.

20 I also would like to let everyone know that in
21 addition to the site investigation report that I said
22 are available, we have been given additional copies of
23 Rhode Island DEM's program letter to the city which
24 basically approves the site investigation, deem it --

1 not necessarily approve it, but basically concurs that
2 the site investigation is complete and also that they
3 agree conceptually to the remedial action work plan.
4 And those are the two items that I'll be presenting.
5 So we have extra copies of that program letter provided
6 by DEM tonight. So we thank them for bringing those,
7 and those are up here on the table.

8 Regarding the site investigation that was done
9 at Parcel B, which is the site that we are dealing
10 with tonight, basically, there's three major components
11 to the investigation. Three major areas that were
12 looked at. And that is soil, ground water and soil and
13 vapor, or soil gas that has a potential to migrate
14 upwards.

15 What I wanted to explain first of all briefly
16 is how exposure to contaminants and how it affects
17 human health, how that whole process works. If you
18 have contaminants somewhere or chemicals, you have to
19 be exposed to them. You have to either inhale them,
20 breathe them, eat them, inject them or somehow have
21 them touch you physically to get into your body to then
22 therefore cause a health effect.

23 And the important thing to remember is they
24 have to be at certain levels. You could be exposed to

1 a lot of chemicals. We are every single day. When
2 people apply makeup, there's chemicals in the
3 cosmetics. When people fill up their tanks with
4 gasoline at the gas station, they're being subjected to
5 chemicals. These are all harmful if you get a certain
6 amount of them into your body, either over a long
7 period of time or at once.

8 So just because they're contaminants, there has
9 to be exposure as well at certain levels in order for
10 there to be a health effect. So you need one plus the
11 other to get to an adverse health effect. Just going
12 to mention that now and we'll tie it all in at the end
13 when we talk about the selected remedy.

14 The goal of what I'm trying to do is present
15 what we found at the site and how we're going to deal
16 with it. What I want to make clear is that we've been
17 comparing all this data that we have collected to
18 applicable state standards that have been designed to
19 be protective of either human health or the
20 environment. And in the cases where there are no state
21 standards, we've compared the data to standards of
22 other states that have taken the regulatory process
23 that one step further in some instances and have
24 developed certain criteria that were not available for

1 the state of Rhode Island.

2 Regarding soil conditions at the site, we've
3 collected over approximately 19 samples at Parcel B,
4 and the majority of which were collected this year. So
5 the data is current and it represents existing site
6 conditions. We've collected the samples from the
7 surface to a couple of feet below the surface and all
8 the way down to the water tables, which is at 25 feet
9 below grade.

10 And I'm not going to go into every single
11 detail, we have the Site Investigation Reports for
12 that. But what I would like to point out is that we
13 have identified chemicals or compounds if you will that
14 consist of metals, total petroleum hydrocarbons,
15 something called PAHs or polycyclic aromatic
16 hydrocarbons and volatile organic compounds. Some of
17 you may be wondering what does that mean. Well, total
18 petroleum hydrocarbon, the TPH is just a general name
19 for just what it says, petroleum hydrocarbon. They
20 include things possibly like gasoline or fuel oil,
21 things of that nature.

22 Polycyclic aromatic hydrocarbon is just another
23 general term of over a long list of compounds that are
24 generated from incomplete burning of coal --

1 **MS. DIPRETE:** Excuse me. Is this in the
2 report? You're using technical terms and it's not in
3 the report.

4 **MR. GRIVERS:** I'm trying to explain it now.

5 **MS. DIPRETE:** If you've written something
6 down, then why isn't it explained also in writing.
7 You're talking about letters, public forums.

8 **MR. GRIVERS:** The Site Investigation Reports
9 are submitted to DEM. DEM has environmental experts
10 that review these. Typically, they're not written for
11 a level of understanding to the general public. I'm
12 doing my best to explain it. We'll answer any
13 questions that you have and we'll be happy to take
14 those question.

15 **SENATOR RICHARDO:** Knowing that we had a
16 meeting last week, knowing that you will be making a
17 presentation about the specific chemicals and what you
18 found, wouldn't it make more sense for the audience,
19 those who don't understand that type of language and
20 understanding of that, why not have that type of
21 breakdown in layman's terms as you're explaining it in
22 writing, just as you did provide the other information.

23 We're here pretty much to listen to your
24 presentation and recognize that there are other

1 officials here also from the city and also from the
2 state, wouldn't it make more sense, again, to have a
3 report for the general public to understand what
4 exactly it is that you found. Instead of, you know,
5 saying that it was sent through the DEM and they will
6 interpret it and make the final decision.

7 Is this a real forum to inform the public?
8 They're going to walk away from this hearing or meeting
9 with no real information. Yes, it's in the library,
10 again, probably the technical part, but more on the
11 level of where people could understand.

12 **MR. GRIVERS:** Respectfully, Senator, we are
13 trying to do that. Whether you agree that I'm doing a
14 good job of it or not, we're willing to answer any
15 questions that you have and --

16 **SENATOR RICHARDO:** I'm not questioning that
17 you're not doing a job, what I'm questioning is why not
18 have something already prepared for the public to go
19 back and review and really start looking at what has
20 been presented.

21 **MR. SEPE:** The forum here is you do have
22 questions, you can ask them. There's another meeting
23 on the 19th. That would be answered. If you get them
24 now, from the 19th, your questions will be answered.

1 **SENATOR RICHARDO:** It's not the question --

2 **MR. SEPE:** For the meeting of the 19th --

3 **MS. DIPRETE:** Excuse me, I can't hear you,
4 can you speak up?

5 **MR. SEPE:** You ask questions at this meeting
6 and the answers will be provided at the next meeting,
7 which is on the 19th.

8 **MS. DIPRETE:** My name is Tish DiPrete. I'm
9 with the Urban League of Rhode Island. And I can't
10 phrase my questions, and I've gone to college and I've
11 tried to work with environmental groups, and I cannot
12 phrase my question intelligently if I don't understand
13 exactly or if you're going over the information too
14 quickly. What you're talking about, because those
15 chemicals sound concerning to me, and I wonder if they
16 might be more concerning -- I live over the line in
17 Cranston, so I'm not quite as close, but I'm concerned
18 that, represent a lot of folks in the Urban League, and
19 those things would be, that kind of information written
20 down what the chemicals you found on a page with
21 layman's terms.

22 The way you're explaining them, but something
23 in writing so we can pose questions that are
24 intelligent for the 19th. So between now -- I forgot

1 two minutes ago, you said what those chemicals were,
2 it's gone out of my head. I'll tell you the truth, I
3 do love science, but I think I can explain it if it's
4 explained well enough, and I'm sure the people here in
5 the neighborhood could. But just throwing out these
6 technical terms, we're not all engineers and it's not
7 fair. So I do have a problem with the way it's being
8 presented.

9 **MR. GRIVERS:** My goal tonight is not to throw
10 out technical terms. As a matter of fact, I've just
11 only begun to try to explain some of the few terms that
12 I believe are important to know in layman's terms. And
13 so I would just encourage everybody to please hold
14 your questions to the end. We certainly will be able
15 to provide the type of written description that you're
16 seeking.

17 **MS. DIPRETE:** The three chemicals or four
18 chemicals that you mentioned already, will there be a
19 written description that I can get tomorrow?

20 **MR. GRIVERS:** Just the way you just said it

21 --

22 **MS. DIPRETE:** Can you go back and tell us
23 the chemicals?

24 **MR. GRIVERS:** I believe I only got to one or

1 two of them.

2 **MS. DIPRETE:** You only did, true. And it's
3 gone out of my head already.

4 **MR. GRIVERS:** I talked about metals -- we're
5 going to have a question and answer period at the end.

6 **UNIDENTIFIED SPEAKER:** Do you have an
7 interpreter, Spanish interpreter?

8 **SENATOR RICHARDO:** Again, I mean especially
9 in this community, we made a tremendous effort tonight,
10 people here last Wednesday and there was a meeting of
11 almost two hours with the questioning from residents
12 who didn't have a clue of what was going on. There was
13 interpreting services and made sure some of the
14 questions were answered from the Department of Health
15 and DEM. And this is not acceptable. Not to have
16 translation services or even a documentation that
17 people can follow your presentation even for me.

18 **MR. SEPE:** Okay.

19 **SENATOR RICHARDO:** So I would say that this
20 hearing of the meeting is not acceptable at this time.

21 **MR. SEPE:** Why don't we get through the
22 presentation. There will be another meeting. If we
23 have to have another meeting after that, we will.
24 Let's get through the presentation. If there are some

1 questions that can be answered --

2 **SENATOR RICHARDO:** But this is important to
3 this community. It's important to me. It's important
4 to the elected officials, and you're disregarding what
5 I just said.

6 **MR. SEPE:** No, I'm not. I said we can get
7 through the presentation, we can have another meeting
8 and another meeting after that if we have to.

9 **SENATOR RICHARDO:** Well, how are you going to
0 provide a service to those who don't speak English
1 right now?

2 **MR. SEPE:** I can't.

3 **SENATOR RICHARDO:** So too bad. That's not
4 acceptable.

5 **MR. GRIVERS:** Excuse me, I would like to ask
6 the representatives of ACORN if they have the ability
7 to provide interpreter services?

8 **MS. DIPRETE:** It's the city's responsibility.
9 And you need to provide interpreters that can interpret
0 that are familiar with the engineering terms and, yes,
1 you do by law. You do. I'm pretty sure. I'm not a
2 lawyer. I'm not sure. But a lot of the lawyers that
3 you -- in other words, if you had a medical interpreter
4 in the hospital, they have to understand medical terms.

1 You need someone that understands the engineering
2 terms.

3 **UNIDENTIFIED SPEAKER:** We have a person who's
4 going to interpret.

5 **MR. GRIVERS:** Ma'am, I'm just trying to get
6 the name of the woman who's going to be providing the
7 interpreter services. Vivian? If anybody needs
8 interpreter services, please see Vivian in the corner,
9 please. So besides the one person in the corner, is
0 there anybody else that needs interpreter services
1 tonight? It looks like there's two or three people.
2 Thank you very much for doing that.

3 So the polycyclic aromatic hydrocarbons is a
4 general term for over approximately 100 chemicals that
5 could be generated from a variety of sources, including
6 coal, oil, gas, tobacco or even charbroiled meats.
7 Also they're used to make medicines, dyes and plastics.
8 They're very common in today's world. Volatile organic
9 compounds are compounds that contain carbon and they
0 evaporate easily at room temperature. There are
1 thousands of different VOCs in our daily lives,
2 including paints, gasoline, solvents, cleaning
3 solutions and second-hand smoke. I provide that
4 information as background to help try to explain some

of these terms.

Again, going back to what we found at the site. We found an area that included some total petroleum hydrocarbons in this general area here. It was limited. We also found some PAHs, TPAS and VOCs throughout the site. Primarily again, one soil sample collected in this area and one soil sample collected here. We compared all the data we found to applicable Rhode Island DEM residential direct exposure criteria. And in cases where there was no criteria, we also compared it to the State of Connecticut's vaporization criteria. That is a term that is used to explain how likely the chemicals may volatilize and migrate up towards the surface. Most of this impact that we found was at 20 to 25 feet deep.

With respect to ground water at the site, there were a total of six ground water wells installed at the property. Again, in the ground water, we found total petroleum hydrocarbons, volatile organic compounds. However, they were all below the applicable DEM standards. And we did also find one ground water sample that showed one VOC compound known as trichlorethylene at a level that although less than DEM standards was greater than the Connecticut ground water

1 volatilization criteria, which again is just a
2 measurement of how likely that chemical might
3 volatilize and potentially cause an indoor air problem.

4 **UNIDENTIFIED SPEAKER:** I don't think it's a
5 valid connection if you're comparing it to, mention the
6 Connecticut standard.

7 **MR. GRIVERS:** What you have, it is in one of
8 the tables, and I believe that in when we did some
9 follow-up work, it's included in one of the appendices
10 and that's what I promised you would get.

11 **UNIDENTIFIED SPEAKER:** You don't know what
12 that is.

13 **MR. GRIVERS:** Like I said, I believe the
14 information, I believe the information you're asking
15 about is in one of the appendices, which is available,
16 will be sent to you and anybody else that requests
17 them. That's one of the sign-up sheets in the back.

18 **MR. SEPE:** Can we just wait until he makes
19 his presentation, and then the questions will come,
20 please. Thank you.

21 **MR. GRIVERS:** With respect to soil gas and
22 soil vapor, we divided the site up into a grid pattern
23 and we installed 33 points into the ground, which is I
24 call a point, I'm trying to use layman's terms. We

1 install probes into the ground which allowed us to take
2 a sample of the gas contained within the soil all
3 across the site. What we found through field testing,
4 not lab testing. We did do laboratory testing, but the
5 first stage was to do field testing, we found some low
6 levels of VOCs and some methane beneath the surface of
7 the site. That testing allowed us to focus on specific
8 areas that were most likely to contain the highest
9 concentrations of these compounds.

10 We subsequently went out and collected
11 additional soil gas samples, which we then submitted to
12 a laboratory for analysis of VOC compounds. We did
13 this on two separate occasions. The second time we
14 went out we included more compounds on the list to
15 search for. The first time we analysed maybe a dozen
16 compounds, the second time, 60 volatile compounds. And
17 what we found was that 13 of the 59 compounds were
18 detected at various locations of the site that exceeded
19 the Connecticut targeted air concentrations.

20 **UNIDENTIFIED SPEAKER:** Excuse me, 60 what?

21 **MR. GRIVERS:** Sixty compounds or chemicals.

22 So to summarize the site investigation, we focussed on
23 the three areas of soil ground water and soil vapor and
24 we found certain chemicals are present. What does all

1 this mean from a standpoint of a health risk? As I was
2 saying in the beginning of my discussion, you have
3 exposure to contaminants and then you have health risks
4 if the exposure is to the chemicals at certain levels.
5 If you're exposed to a chemical at a very low level for
6 a very short period of time, there's no health risk.
7 If you're exposed to contaminants at a certain level
8 which is dangerous, then it's a problem. If you don't
9 have exposure, then the contaminants -- if you don't
10 have exposure to the contaminants, there's no health
11 risks. If there's no contaminants, there's no health
12 risks.

13 But we've already identified certain
14 contaminants. So how does the city plan to remedy the
15 situation? Well, what we have purposed is a
16 combination of exposure elimination and also some
17 contaminant removal remedies that will reduce, I'm
18 sorry, will eliminate the health risk. The first part
19 of the remedy is called a cap, C-A-P. What a cap is is
20 a combination of clean fill material and other barriers
21 such as asphalt, pavement, and even the building itself
22 to eliminate exposure, to keep the contaminants where
23 they are far deep below the surface, below the clean
24 soil at the site and also below this cap of clean soil.

1 Additional clean soil being placed on top, fabrics and
2 asphalt paving, etc.

3 The compounds that we identified, they're
4 almost all at a depth of between 20 and 25 feet below
5 grid. So the additional cap material being placed on
6 top will add an additional layer of protection and
7 eliminate exposure. There's also another safety net
8 involved. There's something called an Environmental
9 Land Use Restriction which is a level deed restriction
10 which is being required for this site which basically
11 says it will be recorded in City Hall on the deed
12 itself, that only in accordance with a DEM approved
13 soil management plan will any type of soil disturbance
14 occur at the site. And on top of that, there will be
15 annual inspection and DEM certification requirements to
16 ensure that the city is performing the annual
17 inspections and certifications.

18 The second half of the remedy is a sub slab
19 beneath the building venting system. We are designing
20 this venting system, this proposed venting system based
21 on EPA guidance which has been created specifically for
22 school buildings and is primarily designed to deal with
23 radon intrusion into buildings. But it's the same
24 exact principle.

1 Radon like these volatile compounds, like these
2 PAH compounds wants to migrate to an area of less
3 pressure from -- so basically from where it's confined
4 in the ground to the atmosphere. So it's going to have
5 a tendency to want to rise towards the building. And
6 so what we're proposing is beneath the building itself
7 would be a four to six-inch layer of gravel or gravel-
8 type material which will basically allow us to evacuate
9 or vent any of these gases or vapors that accumulate
10 through the building out through a series of pipes and
11 pits and then carry those vapors up to the atmosphere
12 via piping.

13 More safety nets on this type of a proposal
14 include indoor sensors that will be inside the school
15 building at various locations to be continuously
16 checking for dangerous levels of these VOCs. There
17 will be routine monitoring, maintenance, sample
18 requirements built into the work plan. As the air is
19 being removed from below the building, if there is a
20 need to permit that discharge based upon what the
21 concentration and what the flow rate of the chemicals
22 are, then that would be something regulated by DEM if
23 the concentrations are found to require such
24 permitting.

1 **UNIDENTIFIED SPEAKER:** What do you mean by
2 that?

3 **MR. GRIVERS:** By permitting? The DEM has an
4 office of air resources, is that the correct term for
5 it? Looks at these air emissions and if they determine
6 based on the data that has been collected at the site
7 and testing that they will receive, if they require
8 that the discharge be permitted, or it may even need to
9 be treated. But, you know, we just don't know at this
10 time. These are proven remedies. They're not Band-Aid
11 approaches and they're based on a lot of research and
12 guidance.

13 I have a copy of that EPA guidance document for
14 construction of these radon systems beneath schools.
15 It specifically says that it's for schools and other
16 large buildings. I have a copy of that. If anybody
17 wants to look at it, and we can provide them with the
18 Internet address and/or give them a copy of this
19 document if they would like to read it.

20 That concludes my presentation. Thanks for
21 listening and we are open to more questions or
22 comments.

23 **MR. FOLEY:** My name is Tom Foley, and I live
24 on 151 Rounds Avenue, Providence. I have two comments.

1 I used to live near Gorham Silver. My daughter has
2 cancer. A very good friend of my mine died six months
3 ago. He used to live on Downing Street. I would like
4 the Health Department to do a survey of how many cancer
5 cases are from that area. And we've been accused of a
6 quality of life issue. Yes, it is a quality of life
7 free from disease. I am surprised after reading what
8 the DEM sent to Textron that you're even continuing
9 with this. It shocked me. I thought it was dead and
10 buried. Literally.

11 But, also, I have a comment to the School
12 Department. We paid a lot of money for a
13 superintendent. Two of them by the way. Where's their
14 planning? If I may, don't have any problem addressing,
15 where were they? They knew these kids were coming up.
16 They sprung Springfield and now they're springing this.
17 Where was the School Department in planning? Could you
18 answer me? I'm sorry. I forgot to write down your
19 name.

20 **MS. GALLO:** The School Department has done
21 its best to let the city understand in the ongoing
22 projections in enrollment. We've known the bubble was
23 coming and my understanding is that this school has
24 been on the agenda for a while and it's been proposed

1 through a series of other incidences.

2 **MR. FOLEY:** It was top secret. We didn't
3 even know about it. I'm on supposedly the Planning
4 Committee for that area, and I knew nothing about the
5 school. I knew about the Stop & Shop, but I knew
6 nothing at all about the school, or else you would have
7 heard from me a lot sooner. I don't care about
8 traffic, I don't live there, but I do care about the
9 quality of the kids life.

10 **MR. GRIVERS:** Henry Marciano. Just to let
11 you know, I'll call everyone who signed up and then
12 obviously if someone still has a desire to speak, raise
13 your hand at the end. There's only five or six more.

14 **MR. MARCIANO:** My name is Henry Marciano.
15 School teacher in Providence. I grew up on Adelaide
16 when I was a kid. My father worked at Gorham Silver.
17 My concern is that while you're searching the site
18 there, we have to look at the pond behind it because
19 many of the substances found at the site also exist in
20 the pond. And the main concern is the toxic vapors.

21 While you may cap them at the site, vapors will
22 still flow from the pond and the deepest set for that
23 pond is 18 feet. And so the children will be exposed
24 to those vapors. As the gentleman said before, what do

1 these vapors do to us. I don't want to see any kids
2 dying of cancer. I don't want to see anyone dying from
3 cancer. And while our School Department may need more
4 schools for our kids, they should build them in safe
5 sites.

6 **MR. GRIVERS:** S. Aldredge.

7 **MS. ALDREDGE:** I just cannot believe there's
8 not one other site other than the former site in the
9 city of Providence in which to build a school. You're
10 also stuck at Harrison Street while we're waiting.
11 This building we know it's been a school more than a
12 hundred years. We know that no one was manufacturing
13 anything at Harrison Street, was the choice of the
14 site. Why is it necessary to build this at this site
15 at massive expense? How the engineering built to date
16 of hundreds of those of thousands are dollars. I'm
17 guessing what are we doing here. Why build it there?

18 **MR. SEPE:** There's not that many sites in the
19 city of Providence. As you know, Providence does not
20 have that much vacant land. It is a site that the city
21 owned, it's four acres of land and that site was chosen
22 by the Planning Department --

23 **MS. ALDREDGE:** Why aren't they here today?
24 This is a very sad meeting.

1 **MS. DIPRETE:** I'm next. My name is next on
2 the list. Excuse me. If you ask a question, you've
3 got to let him answer.

4 **MR. SEPE:** That's needed for the high school
5 children. There aren't any other sites in the city of
6 Providence.

7 **MS. DIPRETE:** You're saying there's no other
8 --

9 **MR. SEPE:** The site was chosen because it's
10 owned by the city. It's in a part of town where it's
11 needed for the high school children. It worked well
12 for the YMCA with the programs that they're putting
13 together. And quite frankly, there's no other land in
14 the city of Providence.

15 **UNIDENTIFIED SPEAKER:** There's an American
16 Express Building.

17 **MR. GRIVERS:** Is Tish DiPrete here?

18 **MS. DIPRETE:** That's me. Hi, I'm Tish
19 DiPrete. I'm with the Urban League of Rhode Island. I
20 also am a neighbor but over the line in Cranston about
21 five blocks into Cranston, so I also have concern for
22 my nearly 18-month old son, but I don't have to send
23 him to schools here. I want to ask a few questions,
24 but my first comment though is that I'd really like to

1 ask or address the idea, the answer you had for the
2 last question.

3 The idea that this is the only site in the city
4 to put the neighborhood children. It's right there on
5 the Gorham plant. That is the only site that the city
6 has open for a high school of this size?

7 **MR. SEPE:** Large enough, yes.

8 **MS. DIPRETE:** Excuse me?

9 **MR. SEPE:** The only vacant site. We need
10 four or five acres.

11 **MS. DIPRETE:** You need four or five acres of
12 vacant land and you're saying this is absolutely the
13 only one in the city of Providence?

14 **MR. SEPE:** Yes.

15 **MS. DIPRETE:** So four or five acres. I'm
16 going to check this out. And you were going through,
17 and I appreciate your time, but this presentation where
18 you have to wait until the end of all these technical
19 descriptions, not technical, but all of it is
20 technical, so you need to really understand. When
21 you're talking about the petroleum hydrocarbon,
22 different chemicals that you found and you mention the
23 VOC compounds, what are, what did the 33 probes in the
24 soil, what did they find, because I didn't really feel

1 that that was clearly explained.

2 **MR. GRIVERS:** It's in --

3 **MS. DIPRETE:** You're going to ask me to go
4 through a 200-page report. I really would rather have
5 an answer than the report, please. So what are the VOC
6 compounds and what were the most concerning compounds;
7 soil vapor, soil ground water and VOCs?

8 **MR. GRIVERS:** The VOC compound list is very
9 large. I can't recite them.

10 **MS. DIPRETE:** What is a VOC compound? I
11 didn't hear an explanation and I was trying to listen.

12 **MR. GRIVERS:** I'll read something that
13 explains what a VOC is. VOC is a chemical. It
14 evaporates easily at room temperature. The term
15 "organic" indicates that the compounds contain carbon.
16 VOC exposures are often associated with an odor, while
17 other times there is no odor. There are thousands of
18 different VOC produced and used in our daily lives.
19 Many products emit VOCs. Some examples are benzine,
20 chloride, formaldehyde. Some of the sources of
21 emissions are gasoline, cleaning chemicals, carpets.
22 **MS. DIPRETE:** Are those all the chemicals
23 that are found at the school? What did you find at the
24 school site is what I'm asking.

1 **MR. GRIVERS:** I would need to refer to the
2 site investigation report that has been made available
3 here today, and the compounds are lengthy in name. And
4 for example, one that was found was trichloroethylene.
5 But the majority of compounds are a lot more difficult
6 to pronounce than that, and I'll be the first to admit
7 I can't recite them. So we could look at the documents
8 and I can show you the table where they're all listed
9 and what concentrations they were found, and whether or
10 not they exceeded any of the applicable standards.

11 **MS. DIPRETE:** And what about, and I don't
12 care whether I can pronounce them or not, which
13 compounds exceeded the applicable standards, and those
14 are our concerns for the kids that would be in the
15 buildings. And also while the school is being built
16 and the dust is being kicked up, I understand that
17 there's concern that there's not proper methods being
18 used to make sure the dust dissipates and isn't blowing
19 all over the neighborhood.

20 That seems to be either by the department,
21 maybe you can clarify, this gentleman. I could not dig
22 up my notes. Mr. Martello. You both were very helpful
23 last week in pointing out that the digging and the
24 construction work and the period during digging were

1 very concerning, and they also mentioned a hearing
2 coming up. And I never did get a chance to call, where
3 they were asking at least for a hold up on the
4 construction. And I'd like to know, you know, what
5 happened, what were the concerns for the hearing and
6 what happened with that and why is the city going
7 forward if they even said themselves they have a few
8 concerns.

9 **MR. GRIVERS:** I can address that.

10 Essentially, there was some work, about four weeks'
11 worth of work, which could be categorized as site
12 preparation activities. There was soil being
13 excavated. Pieces of concrete, metal, pipes, anything
14 that's not suitable for construction was removed and
15 the material was placed back into the ground and
16 compacted to facilitate future building foundation to
17 support that. The work was done in accordance with an
18 approved work plan. There was a very, very stringent
19 and comprehensive dust monitoring and sampling program
20 established.

21 And also daily samples were collected for
22 nuisance dust and for asbestos because that was a
23 concern by some members of the community. The samples,
24 every single one of them, there was three samples

1 collected each day for four weeks within the breathing
2 zone of the construction workers themselves. They were
3 the ones right there doing the digging, working the
4 machinery and basically the laborers. And also there
5 was one at the fence line upwind and one established at
6 the fence line down wind. Every single day these
7 samples were collected and analyzed, and none of the
8 results were in excess of any applicable Department of
9 Health or OSHA limits.

10 With respect to dust being generated, the
11 results themselves show that the controls in place were
12 being very effective, but I would also mention that
13 there was a minimum of one water tanker truck on site
14 every one of those days. Was making passes across the
15 site, wetting down all the soil. And in addition to
16 that, there were manual hoses. There were people
17 spraying water manually and we also had two sprinklers
18 going all day long applying water directly to the work
19 site. So we believe that all those -- and that work
20 has terminated because it was only a limited amount of
21 work that was approved and that's been done. And no
22 additional work has been done without DEM approval
23 since then.

24 And with respect to your question with the

1 specific VOCs, you know, again, we need to open up the
2 report and show you the table, show you. I can show
3 you exactly which compounds were analyzed for and we
4 can get into that trichloroethylene was one and none of
5 these chemicals are harmful as I was saying before if
6 there's no exposure. So that's what we're trying to
7 eliminate is to get the exposure eliminated from the
8 equation and then there's no health risk. I'm not sure
9 if I answered all of your questions.

10 **MS. DIPRETE:** There are other questions I
11 had. When you talk about the allowable, the allowable,
12 the concerns for the allowable level of contaminants,
13 the concerns for the allowable levels of contaminants,
14 what level is that monitored at, is that for adults, is
15 that for my 17-month old son, is that for a six-month
16 old child, is it allowable, what kind of contaminants
17 and someone either from DOH or DEM had pointed out a
18 concern about the construction and the digging and the
19 dust, and it's not being watered often enough. How
20 often does it need to be watered to keep the dust to
21 getting to the kids right here in the neighborhood. So
22 I'm asking about the levels, measures according to
23 adult risks, adult male risks, female, or are these
24 measures concerned with little children, babies and

1 the little children in the neighborhood. And also how
2 often should they be watering the site once they're
3 digging again and are they going to do that.

4 **MR. GRIVERS:** It's my understanding that the
5 standards that we are comparing everything to are the
6 most restrictive standards available. They do not
7 differentiate to the best of my knowledge between
8 elderly, healthy male versus child versus elderly.
9 There are different levels of contaminants or exposures
10 that certain populations such as elderly people or
11 small children or sometimes even, you know, that may be
12 more susceptible. There are at times groupings of
13 individuals that are more susceptible to certain
14 compounds. However, it's my understanding that these
15 standards are developed with not only a certain level
16 of safety and protection, they then take it to another
17 level of safety to make it even more cautious.

18 **MS. DIPRETE:** I just wondered if we can have
19 comments from DEM about the hearing because there was
20 concerns about digging and stopping and concerns where
21 it seems that measures were not being met or -- there
22 were concerns of measures not being met. And it would
23 be better of having both of you comment, if we could do
24 that.

1 **MR. MARTELLO:** My name is Joe Martello. I'm
2 from the Department of Environmental Management. I was
3 here at the last meeting. I recognize a lot of faces.
4 I think what you're referring to is initially,
5 approximately end of March, beginning of April, the
6 city went out without approvals and started digging.
7 At that point, we issued a letter of responsibility to
8 the city and basically told them to stop until they had
9 a plan in place. Since that time, we took the city to
10 court. And the upshot of that is essentially the judge
11 required us to allow the city to do prep work on the
12 site. That prep work was done to an approved plan.
13 Limited dust, no construction, no remediation to remedy
14 in place but a limited amount of work to prepare the
15 site for future building. And it's pretty much what
16 Peter was describing, dig up the concrete, metal, all
17 the material that was buried on the site allegedly
18 during the demolition of the former facility.

19 So that limited amount of work once we got past
20 the court case and were ordered by the judge
21 essentially to allow the city to do certain things that
22 were not part of the remedial process, and they were
23 considered prep work, not part of that, not
24 construction, they submitted a plan and we approved the

1 plan for that limited work. Now, it included watering
2 out there and dust control and all the measures, dust
3 monitoring and testing, that Peter described.

4 **MS. DIPRETE:** Are they following it?

5 **MR. MARTELLO:** Someone said last week by an
6 official, one of you two, someone from -- there was a
7 lawyer also from your department, one of the three of
8 you had pointed out some concerns about the dust rising
9 up and down and not watering it. And pointed out also
10 that it is a problem on many sites. For this site, you
11 know, the city is, you know, responsible. We feel that
12 they should be held more accountable. And I want to
13 know if that was happening or what did you find after
14 all the preliminary digging. Does DEM still have
15 concerns because it sounded very clearly that there
16 were concerns last week.

17 I think the site has to be managed, the dust
18 controlling in any plan that we would approve for
19 future work on the site. Whether there's a school or
20 something else, eventually the site is going to have to
21 be remedied whether there's a school put there or not.
22 There's going to have to be a remedy on the site.
23 Whatever that remedy is, whatever goes forward,
24 whatever plan is implemented, will have to be approved

1 by the department. We're not going to approve a plan
2 that doesn't include sufficient dust control. And
3 typically that's water. You wet everything down so you
4 don't have dust blowing around. There's not a lot you
5 can do beyond that. You have to dig to put in a cap,
6 to install sub slab system, you have to dig. So you do
7 create dust. And the best way to mitigate that dust is
8 to wet it down. To water it down.

9 **MS. DIPRETE:** One last question I have is
10 about the ventilators or the upkeep. How often does
11 that have to be in place, or what does the city have to
12 do to make sure that it indeed does work at all.
13 Because I'm skeptical that that would be kept up and
14 the kids and the teachers would be safe there eight
15 hours a day.

16 **MR. MARTELLO:** Because they're -- just like
17 going forward with the conceptual remedy, we don't have
18 a plan in front of us, full plan. All they've done is
19 put the remedy they want to do. They want to cap this
20 site. They want to put in a ventilation system. We
21 don't have specific specifications of the ventilation
22 system. It's going to have to meet the minimum
23 requirements for eliminating the vapors. They
24 basically want no vapors in the building. So there

1 will be margins, there will be alarms and what the
2 actual, the definitive specifications of how that
3 system will be built and everything hasn't been
4 submitted to us because we haven't formally approved
5 it, because they haven't formally responded. We're
6 counting on the remedy. An appropriate remedy.

7 **MS. DIPRETE:** That's what you're figuring out
8 now.

9 **MR. MARTELLO:** Does it make sense, does the
10 idea of capping a site like this and venting these
11 vapors does that make sense as a remedy. That's what
12 this meeting is about.

13 **MR. GRIVERS:** Before I get to anymore
14 questions, I just want to mention one more thing that I
15 inadvertently forgot to mention. After, should this
16 proposed school be built, DEM is going to require the
17 city, and the city has agreed, to allow any future
18 responsible parties access to the site to collect more
19 data, to do any type of remediation or investigation.
20 So should DEM determine that somebody other than the
21 city or maybe even if more work is needed, the city
22 will give access to the property. And I think that's
23 an important issue.

24 **UNIDENTIFIED SPEAKER:** You're opening up the

1 possibility that you have to dig up the basement, allow
2 the responsible party in there to get and remediate
3 this stuff and deal with the stuff and the city still
4 thinks this is a terrific idea, let's build this
5 school.

6 **MR. GRIVERS:** The DEM is requiring that just
7 in case somebody needs to do more sampling, it's my
8 estimation just a precaution, that DEM just wants to
9 make sure the city is on record of saying that they're
10 not going to stop if somebody else is required to take
11 more samples. We're not saying to dig up the
12 foundation or anything like that. That --

13 **UNIDENTIFIED SPEAKER:** We have gone leaving
14 possibilities open.

15 **MR. GRIVERS:** Those are all good questions
16 had we not done a thorough investigation, which if you
17 look at that page of the numerous documents that have
18 been reviewed or letters from DEM comments, their
19 people at DEM are technically sound and they deal with
20 this every day and they basically, you know, determine
21 that the level of effort made is complete at this point
22 as far as investigation. I don't know how many times
23 you can poke a hole and collect a sample from the same
24 location.

1 **UNIDENTIFIED SPEAKER:** Excuse me. As far as
2 the remedy, you have mentioned it's gravel. How is
3 gravel affected, is it --

4 **MR. GRIVERS:** The gravel, the gravel type
5 material is less dense than the existing soil, so that
6 will allow the vapors under the building to migrate
7 into the gravel and therefore make it easier to pull
8 them out of the ground.

9 **UNIDENTIFIED SPEAKER:** Excuse me, how much
10 are these experts getting paid for this? Is it
11 possible to declare to the public how much they are
12 getting that are working on this case?

13 **MR. GRIVERS:** I don't have that information.
14 Susan Fonseca. One moment, Susan. If anybody has a
15 spiral-bound document, those were not intended, I
16 didn't bring any extra copies of those. That's the
17 only copy I have from my office. That was not intended
18 to be distributed. It looks as though somebody, I
19 shouldn't have put the piles of documents so close
20 together, but if you have a Site Investigation Report,
21 that was not meant for distribution.

22 **MS. FONSECA:** The standards that were done
23 were done for adults and also originally the site was
24 zoned for commercial, so that does not mean children,

1 that does not mean babies, that does not mean
2 teenagers. So the information that they have with
3 excesses was in excess for adults.

4 And as an example, one of them they found in
5 one of the test was 14,000 and the required was what,
6 500? Five hundred. So to give you an idea of the
7 excess, and if we're not concerned about this, I feel
8 sorry for you having to get up and look at yourself in
9 the mirror, because these are our children and this is
10 our future. And Martin Luther King said, "The time to
11 do the right thing is always now." And comments that
12 were made last week about all the city can monitor,
13 look up at the ceiling folks, this is how we monitor.
14 And we're going to be looking at toxic fumes.

15 My other question relates to your previous
16 Remedial Action Report, where it was said that
17 dangerous vapors, the proposal that you're
18 recommending, which is that your radon intrusion is
19 potentially dangerous because it could pull vapors to
20 the surface. So who would like their children to be
21 exposed to that? Oh, I would. Thank you very much.
22 And I'm not sure that reports that I was looking at,
23 your new one or your previous one, you have different
24 soil samples, so I'll be getting the appendices to be

1 reviewing that.

2 But I think we have a real concern and we
3 should all be concerned about it, whether you have
4 children currently or not. The children are our future
5 and that fact that you want to put them on a toxic
6 dump.

7 **UNIDENTIFIED SPEAKER:** It's not their
8 children though.

9 **MS. FONSECA:** But it is because everybody's
10 children are our children. And as a mother, I take
11 offense that you would want to risk primarily minority
12 children in this neighborhood.

13 **MR. GRIVERS:** Hillary Noll.

14 **MS. NOLL:** I'm with the group called Toxic
15 Action Center. We work side by side with the
16 communities to help them work through problems. I'm
17 glad to be here in Rhode Island. This is pretty
18 amazing the way the site has been partitioned off.
19 Let's not joke around. This is a full hazardous waste
20 site. It includes a lake, 38 acres. You successfully
21 put your blinders on and that's not the nature of
22 the -- this site needs to be dealt with in its entirety
23 and it needs to be looked at. And my question is, if
24 anyone has an answer, I guess primarily DEM, I'm

1 wondering where Textron is tonight and they're truly
2 the responsible party in this. So where is Textron and
3 I think they should be at the table. So if one can
4 speak to that, please.

5 **MR. WAGNER:** Hi, my name is Brian Wagner and
6 I'm an attorney with DEM. The answer to your question
7 is fairly straightforward. What we are reviewing today
8 is a project. Textron negotiated a deal with the City
9 of Providence to convey the property to the City of
10 Providence to do remedy up to industrial, commercial
11 standards. If the city needed to do anything above and
12 beyond that, it was their responsibility because it's
13 residential.

14 Textron is still in the picture. We met with
15 them just last week with respect to the pond and the
16 literal area surrounding the pond. So they are still
17 being held responsible for further investigation of
18 those areas. But they are not present here tonight
19 because this is not their project. This is the city's
20 project.

21 **UNIDENTIFIED SPEAKER:** You said it has to be
22 brought up to living standards where a house could be
23 built on it?

24 **MR. WAGNER:** Correct. Schools are

1 considered residential activities, so they have to be,
2 the design, the remedy has to be brought up to the
3 residential criteria, which are the strictest criteria
4 DEM remediated remedies.

5 **UNIDENTIFIED SPEAKER:** Why are you even here?
6 There's no way you can build at that site and live with
7 it. I wouldn't want to live there. I don't think
8 anybody would. Or maybe they would. Do you have some
9 kind of remedy on the site? You do something else to
10 mitigate the risk, the cap, the venting. You get stuff
11 in the ground, you route the exposure, that's a lot of
12 regulations.

13 **MR. WAGNER:** If it's a residential
14 development, you're right, if they cleaned up to
15 residential standards. If they dug it all out and
16 hauled it away, we wouldn't have this meeting. But
17 they're not going to do that. The regulations do allow
18 what we consider, what's called, allows residential, in
19 this case schools, with restrictions on the property.
20 Those restrictions require certain remedies in this
21 place and so until the end.

22 But you cannot tell the city they cannot build
23 on that. This is what we want to build and we have to
24 enforce the regulations. The regulations will allow

1 certain development under certain conditions, and these
2 conditions that they're proposing this remedy is
3 allowable.

4 **UNIDENTIFIED SPEAKER:** By the time this is
5 all true, you should be able to get about a million and
6 a half dollars and people can build real nice homes
7 over there. I'm sure they would.

8 **MS. CURTIS:** My name is Cheryl Curtis. I
9 live on Adelaide Avenue. There's a plume of TCE,
10 trichloroethylene, which is currently partly under my
11 house. Now, the plume is not static. It's still in
12 motion. And it's underground and it goes towards and
13 you can guarantee that the plume is going to be under
14 the school and that it is not going to be ventilated by
15 the system. You are posing for the school. Tim Reed
16 himself told me my air quality in my home should have
17 been tested. It never was. Nobody ever asked to put
18 things on my property to see.

19 This plume is under my house. This plume is
20 still moving towards the pond and towards the area
21 where the school will be built. I don't know, I'm not
22 feeling happy about living in this house, but I've been
23 there for 20 years. Where do I go? But now you want
24 to put a school where the plume is currently moving. I

1 don't know who wants to answer that question.

2 **MR. GRIVERS:** Once again, Miss Curtis is
3 talking about an issue that is on separate parcels
4 being dealt with by DEM and the different responsible
5 party. I can't answer her question. I do not know
6 anything about the PCA plume which she claims is going
7 under her property, which I believe is on this side of
8 Adelaide Avenue. The pond is here (indicating).
9 Typically ground water moves in a specific direction.
10 At times it does fan out in multiple directions, but
11 that is not part of our site investigation. We do not
12 have any information on that.

13 **MS. DIPRETE:** What site is that then?

14 **MR. GRIVERS:** I would like to refer to
15 questions about the PCA and on abutting parcel to DEM
16 because they're actively regulating that and working
17 with the responsible party.

18 **UNIDENTIFIED SPEAKER:** You said you only went
19 25 feet down.

20 **MR. GRIVERS:** That's all the way to the water
21 table, yes.

22 **UNIDENTIFIED SPEAKER:** The water table.
23 Well, let me tell you something. That building before
24 you tore it down had pipes that went into the ground

1 more than 25 feet. Okay. You don't know what those
2 pipes that went in the ground more than 25 feet were
3 putting into the pond and all that area in the back,
4 okay. I've been here for 30 years. I've been here for
5 30 years. Nobody mentioned anything about schools,
6 YMCAs or anything. And every time a politician came
7 around to get voted on, they talked about something
8 altogether different.

9 Okay, the city had that property given to them
10 tax-free. Okay. Gorham says do whatever you want with
11 that property. Sure. They're going to come up and
12 meet the city halfway. Go 25 feet deep and see what
13 you come up with. The politicians sit around and talk
14 about you only have to go 25 feet, right? Go a little
15 further than 25 feet and see what you can come up with.
16 The only way you're going to clean that site is turn
17 around and take all that dirt out of there and put in
18 new soil.

19 And I'll tell you something else, I wouldn't
20 even let my dog go over there because I don't know what
21 my dog would get. And let me tell you something, my
22 dog cost me a thousand dollars, so why don't you
23 politicians go over there and live for a week. Besides
24 that, you don't even have the people here that turned

1 around and so everybody here can ask their question.
2 They're too afraid to come in that door because they're
3 going to get questioned that they can't answer. And
4 Gorham is not going to come in here and open a can of
5 worms. Okay. So, do yourself a favor, go 25 feet
6 deeper than what you did and tell me what you find.

7 **SENATOR RICHARDO:** Thank you for your
8 comments. I'm state Senator Richardo. That's exactly
9 what we're trying to do and that's why we had the
10 meeting last week, because this has been a hot potato
11 as you know. You live in the community for 30 years,
12 and I haven't met you, but many of the communities have
13 lived here and expressed concern. And I've heard the
14 concerns of many of you. But I'm also investigating
15 about the site, not just only Parcel B. Parcel B, the
16 proposed school, we all can be in agreement, we all
17 understand that our school that is made of almost
18 70 percent of minority students, okay. The majority of
19 those students whether they will be attending there,
20 and I'm sure by the time they attend there, it will
21 increase another one to two percent.

22 I cannot in good conscious allow this project
23 to move forward without addressing the entire site.
24 There is too much question. And as been stated before,

1 we have the meetings and discussion with a couple of
2 the parties here, this is not acceptable. We're
3 putting blinders. Yes, does it cost a lot of money to
4 address this entire issue? I would want the
5 responsible party to address this issue. I would want
6 Textron or the city or even the state to step in and
7 take care of this site. Because time and time again, I
8 have noticed in this community, the south side or the
9 west end, we are always overlooked. We're always not
10 provided with the resources. The children should not
11 be placed in this position.

12 Now, a question last time I was asked and
13 there were a lot of comments at the last meeting, we
14 had an opportunity to address certain questions. The
15 questions that people had from the community, the DEM
16 and the Health Department, because that's critical.
17 This was the first time that the Health Department was
18 asked to come and address questions of concern for the
19 residents. And so, they're going through the process,
20 the city is going through the process of trying to get
21 an answer, or at least about building the school there.
22 The requirement was that they needed participation from
23 the neighborhood, whether they wanted it or not. And I
24 think they've seen enough and thank them for being

1 here.

2 In fact, this issue is so important in the
3 community that many have been here and are still
4 present. We have an attorney from the Planning
5 Department, from the City of Providence, right,
6 Providence Redevelopment Agency. The DEM, the Health
7 Department, the City of Providence. The Planning
8 Department, Alan Sepe. State representative, John
9 Slater. And we've demonstrated over a period of about
10 four to six months that this issue is so important.
11 Truly disappointed not to see the necessary steps to
12 include everyone. Everyone so they can get the
13 information.

14 And very disappointed as I stated before, yeah,
15 we continue hearing it because it's not fair for you to
16 have shown up here to listen to their proposal. And
17 from what I've gathered over time, on this site, I will
18 tell you that I will not recommend anyone to send their
19 kids here. I wouldn't, and I'm a state senator. Why?
20 I'll tell you why. Because you know how kids are. If
21 we don't address the entire site, there's a pond next
22 to it. You go into that pond right now and what
23 happens, you see signs, hidden signs that people
24 shouldn't be there in that area. Shouldn't be fishing,

1 swimming. But a couple of year's ago, there was a
2 boating program there and they had to cancel it. Why?
3 And it's not acceptable. It is time that DEM hears
4 this, the city hears this.

5 You know, there might not be another site, but
6 children should not be put in this place. We as
7 elected officials should not be put in this place. And
8 I've been saying this for a long time, so it's loud and
9 clear so people can hear me, we should not allow that
10 until the responsible party, whether it's Textron,
11 whether it's the city, whether it's the state, to come
12 in and test the entire site. That is not acceptable.

13 **MR. GRIVERS:** Diane LiBrandi.

14 **MS. LIBRANDI:** Hello. My name is Diane
15 LiBrandi and I live on Adelaide Avenue. There's
16 several concerns basically with this site. One of them
17 being that it was used by Gorham, Textron for many
18 years as a silver manufacturing, which we all know.
19 Another concern, one concern that I really, really have
20 is they've been doing all these testing for different
21 chemicals, and one of the chemicals that I have not
22 seen on any report is cyanide. If anybody knows,
23 cyanide has been used and was used in silver
24 manufacturing for cleaning or whatever, I'm not a

1 chemical expert, and that has been known to cause
2 cancer. And I would like to see that on any of these
3 reports, which I do not see.

4 I'm also looking at the copies of the reports
5 today. Living over right across from the site, I
6 should say, they did a lot of digging back in April or
7 May. I do not see any type of soil testing from back
8 in April, May. There was a lot of soil being dug up.
9 A lot of areas being dug up in the front and the back.
10 There is no water that was fully watering it down.
11 There was soil and dirt being brought away. It was not
12 properly covered. There were a lot of different I
13 guess what you would say, I don't if they would be
14 health risks definitely.

15 And even with the new, they also did some soil
16 testing back here in August when digging. Now, they
17 said they had two sprinklers. Yes, they had two
18 sprinklers in the back of the property, but they were
19 digging in the front of the property and those
20 sprinklers would not reach the front of the property.
21 So basically, that's another concern of mine. I know
22 that there's nobody here from the city today. The
23 traffic would definitely be another issue.

24 I know that is not part of this issue, but

1 there are definitely traffic issues being a school in
2 that corner. They say that there's no other site for a
3 school, how about the American Express Building down in
4 the city? I believe that's vacant. From what I heard,
5 they want to keep it vacant for four years. At least
6 if you have a school in there, it could be put to good
7 use. At least the students would have a place to go.
8 So why can't they use that?

9 There again, I know they say that they've done
10 some testing for PC, or actually I think Cheryl
11 mentioned that PC, have they tested for that. I'm not
12 really a chemist, so I'm not really sure on that. I
13 guess that's my concerns right now. I just don't feel
14 that this would be a site for children, students,
15 teachers, anyone to be on. And I know it's a
16 commercial site right now. I don't think it's rezoned.
17 It's not a residential site, never was a residential
18 site and I don't think it's a place for a high school.

19 **MS. DULCE:** Dulce, D-U-L-C-E. If this parcel
20 was given to the city, why can't they spend the money
21 to remediate the site if it was given to them?

22 **MR. GRIVERS:** I don't know anything about
23 whether the city was given the site or anything like
24 that, but the city is required to develop a plan to

1 deal with the issues that were found and that's why
2 we're here to present the proposed remedial action
3 which is to, as I discussed before, to cap and also to
4 subsurface venting system.

5 **MS. DULCE:** How about the proposed venting
6 system, has this system been previously used on a
7 public building where our children are going to be?

8 **MR. GRIVERS:** Yes, it has. It's a proven
9 technology. Any examples? I'm not exactly sure, but I
10 believe there's at least one another school in the city
11 that has this type of system.

12 **MS. BORG:** My name is Linda Borg with the
13 Providence Journal. I just need a clear answer about
14 the site as it is currently constructed. Does it pose
15 a health hazard?

16 **UNIDENTIFIED SPEAKER:** We can't hear you.

17 **MR. GRIVERS:** The question was does the site
18 pose a health hazard as it currently exists.

19 **MS. BORG:** Yes. Just right now the parcel
20 that the school is going on, does that currently pose
21 with the PC, whatever it is, a health hazard?

22 **SENATOR RICHARDO:** I'm looking for an answer
23 too.

24 **MR. GRIVERS:** I can try to answer that. If

1 there is exposure, if somebody goes to the site and is
2 exposed to any of the chemicals that we have
3 identified, yes, there could be health risks associated
4 with that. Depends how long they're there, what
5 activities are being done, whether they're intrusive.

6 **MS. BORG:** Okay. One quick follow-up
7 question. Are any of the presence of a volatile,
8 organic and the other chemicals, are they currently
9 above DEM levels, any of those chemicals you mentioned.

10 **MR. GRIVERS:** Yes, at certain standards
11 located at certain depths. That's something that I
12 clearly tried to present that they do exist. And the
13 remedies are appropriate to deal with them.

14 **THE INTERPRETER:** Um, excuse me, I just want
15 to state for the record that this gentleman here he has
16 20 years of experience in plating and he has questions.
17 Yet because of the technical terms used here, I had no
18 time for preparation, and therefore he cannot give the
19 inquiry, although he really wants to. And I just
20 wanted you to know, the next time to bring interpreting
21 equipment and to have an interpreter that is
22 highly-qualified to do this with the terms.

23 **MR. GRIVERS:** Is his language Spanish?

24 **THE INTERPRETER:** Yes.

1 **MR. GRIVERS:** Well, I would also recommend
2 that the gentleman write them in his language on paper
3 and we will be able to have them translated for us so
4 that we can address them.

5 **THE INTERPRETER:** Because he didn't get the
6 terms properly translated.

7 **MR. GRIVERS:** I understand. Mr. Marciano.

8 **MR. MARCIANO:** Mr. Marcello. I also have a
9 comment. I also have a comment. It's obvious to me
10 and obvious to most people that these parcels are all
11 one in the same. They have the same problem. My
12 concern is when DEM looked at that parcel to have a
13 high school built on it right in back of it is a pond
14 with toxic chemicals that will have an impact on those
15 children. Doesn't DEM look into that factor before
16 saying yes or no to building a new school on this site?

17 The vapors from that alone have not been
18 tested. The same substance that exist in that pond,
19 18 feet, 25 feet, that pond had been polluted for the
20 last 90 years. The Providence Police Department in
21 1987 sent a team of divers down to that pond and they
22 found barrels, hundred of barrels labeled toxic waste
23 which had been there since 1977. Obviously that may
24 have a tremendous impact on the entire area.

1 Mr. Foley mentioned how his daughter died of
2 cancer. My father worked on that Gorham place. He
3 died of Parkinson's disease. You know, you're talking
4 human life here. We should all be conscious of that
5 fact and be more concerned about that, whether the city
6 loses bond money to build something on a site to me is
7 catastrophic.

8 **MR. FOLEY:** For the record, my daughter,
9 thank God, is not dying of cancer.

10 **MR. MARCIANO:** I'm sorry.

11 **MS. SYLVIA:** Sylvia. Does the city have a
12 plan to prevent people from coming into contact with
13 the historic fill area, which I believe is Parcel D. I
14 know there's no real plan for that. Are we going to
15 fence off the school site, how are we going to keep
16 people from contact with that pond?

17 When I was in high school, body of water, a lot
18 of trees, it's a very attractive part. Is there a plan
19 or are we just going to hope that nobody wanders over
20 there and have contact with that water. People come in
21 contact with that water, gets rashes.

22 **MR. GRIVERS:** Correct me if I'm wrong, Alan,
23 correct me if I am wrong, but I believe that there is a
24 fence and signage and landscaping, combination of those

1 factors proposed for that portion of the site to do
2 whatever is possible to restrict access. But as DEM
3 mentioned last week, you know, if somebody wants to get
4 there, the fence will be effective, but --

5 **MS. SYLVIA:** That's a really bad area for
6 people to go in. You wouldn't want people to go in
7 there.

8 **MR. GRIVERS:** That is something that DEM has
9 put in their letter and their approval to date
10 basically requiring that there be some contingencies to
11 limit access to that area.

12 **MS. SYLVIA:** I think it's madness to build a
13 school on this site. If I couldn't step into the back
14 yard because I was afraid to come in contact with toxic
15 chemicals, I'd want to move. It's crazy, crazy to put
16 a school on this site. It's insane.

17 **UNIDENTIFIED SPEAKER:** You made several
18 comments of the remedial suggestion. Will I find those
19 in the packet what I received or will that come in the
20 appendices?

21 **MR. GRIVERS:** The packet --

22 **UNIDENTIFIED SPEAKER:** The height of the
23 fence, how many bushes, that kind of thing.

24 **MR. GRIVERS:** That type of information would

1 be in the Remedial Action Work Plan, which has not been
2 submitted yet. That is -- one of those provisions I
3 believe is outlined in DEM's program letter. There's
4 no more names on the list, so you'll just have to raise
5 your hands. Yes, in the back. Diane.

6 **MS. LIBRANDI:** One thing you just mentioned
7 about the fencing. I don't know how many people were
8 here for the YMCA dedication, it was at the end of
9 Adelaide Avenue and I was there and I did happen to
10 speak to some of the heads of the YMCA. From what I
11 understand, the YMCA did not, that's what they told me,
12 they had not put any type of fencing around the YMCA
13 back.

14 So that means that there's going to be a fence
15 in the back of the high school if that's what they're
16 going to do, to prevent students from going into the
17 pond or the water, what prevents them from going a
18 little ways down to the back of the perimeter of the
19 property and walking in the water there, or going down
20 to the pond.

21 Because from what I understand, the YMCA did
22 not have the budget. They made no mention about any
23 kind of a fence around the perimeter of their property
24 in the back of the pond area on, I guess that would be

1 the second site over from the high school. Right, one
2 over to the left. That one. So I don't know if
3 there's anyone that can answer that just, by just
4 putting a fence behind that high school area would
5 prevent from walking further down to the corner and
6 going to the pond or into that property.

7 **MR. GRIVERS:** It's my understanding that DEM
8 is working with Textron on, as both either Joe or
9 Attorney Wagner mentioned, that they initiated a
10 process with Textron regarding the pond. It's probably
11 thousands of points of entry to that pond, and yes,
12 this fence will not restrict access to all areas of the
13 pond. But it will do what its intention is to deal
14 with Parcel B and access to the pond from Parcel B from
15 the students.

16 **MR. TALON:** David Talon on Santiago Street.
17 We heard a lot of reference to the Springfield schools
18 which were built on basically a hazardous waste dump,
19 and those schools have been there for five years. I'm
20 just curious, is there any comparison on the stuff
21 under the Springfield school compared to what we're
22 talking about here and what has the five years shown.

23 **MR. GRIVERS:** I'm not sure if there's anyone
24 here from DEM that has that information.

1 **MR. WAGNER:** I can answer that question.
2 Mr. Martello who was the project manger on this site
3 was not the project manager on the Springfield Street
4 School site, so we don't have the right people here to
5 compare the two sites together unfortunately. I did
6 work on that site as an attorney, but I would be
7 reluctant to dabble in the engineering issues.

8 **UNIDENTIFIED SPEAKER:** I have a question.
9 From what I understand, getting back to that fence
10 issue, from what I understand, our councilman, who is
11 not here today, may have received \$250,000, I don't
12 know why he isn't here, to have some kind of fence
13 built around that site or around I guess the back of
14 the pond area. And I have lived there over 25 years.
15 Twenty-eight years.

16 So 28 years and I've never seen a fence go up
17 around there. So that might be something that somebody
18 might want to look into to see where that money went
19 that was supposed to be for a fence. Thank you.

20 **MR. GRIVERS:** Once again, if anybody
21 inadvertently took one of my file documents, I'll be
22 glad to get them a copy tomorrow. And also, whoever
23 has signed up for the appendices, if you provided your
24 mailing address, we'll get those out within the next

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day or two at the latest. Thank you.
(Hearing concluded at 7:55 p.m.)

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C E R T I F I C A T E

I, Pauline C. Bunker, Notary Public, do hereby certify that the foregoing is a true, accurate and complete transcription of my stenographic notes taken at the time of the aforementioned hearing.

IN WITNESS WHEREOF, I have hereunto set my hand this 10th day of October 2005.

Pauline C. Bunker

PAULINE C. BUNKER, CERTIFIED COURT REPORTER/NOTARY PUBLIC

MY COMMISSION EXPIRES FEBRUARY 5, 2006

DEPARTMENT OF PUBLIC PROPERTY
GORHAM/MANUFACTURING SITE
PROPOSED SCHOOL
PUBLIC HEARING
OCTOBER 19, 2005

The Department of Public Property – Gorham/Manufacturing Site, Proposed School meets this evening at 6:00 o'clock, p.m. at Reservoir Avenue School, Providence, R.I.

PRESENT: Timothy W. Pavilonis, Legal Counsel, State of Rhode Island, Department of Environmental Management, Office of Legal Services, Joseph Martella, Office of Waste Management, Rhode Island Department of Environmental Management, Dr. Francis Gallo, Providence School Department, Alan Sepe, Acting Director, Department of Public Property, Thomas Deller, Director, Department of Planning and Development, Sara Rapport, Senior City Solicitor, Law Department, Councilman Ronald W. Allen, Representative Tom Slater, Ms. Melissa Sherman, Ms. Susan Fonseca, Ms. Silvia Aldredge, Steve Fischbach, Esquire, Mr. David Kennedy, Ms. Kathy Orloff, Ms. Maggie Meany, Ms. Betty Bailey, Mr. David Fleming, Mr. Henry Marciano, Ms. Tish DiPrete, Rhode Island Urban League, Mr. John Prince, Making Connections/DARE, Mr. Joseph Lackey, Ms. Ramona Wallace, Ms. Stephanie Kennedy, Ms. Pricilla Pitterscox, Mr. Ernest Barboza.

LEGAL COUNSEL PAVILONIS: If I could have your attention please, I would like to call this meeting to order. Thank you, today is Wednesday, October 19th, 2005. My name is Timothy Pavilonis. I'm a Legal Counsel at the Rhode Island Department of Environmental Management. With me today is Joseph Martella. He's from the Office of Waste Management, Rhode Island Department of Environmental Management and also Dr. Francis Gallo, she is with the Providence School Department. Also is Deborah Hudson. She will be recording this evenings hearing. She will also receive any written comments that anyone may wish to include in the formal record that will be created this evening. We're

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here today for a Public Hearing concerning a proposed remedy for property located at 333 Adelaide Avenue, Providence, Rhode Island. A portion of the former Gorham Textron Manufacturing Facility. This remedy has been proposed by the City of Providence for the purpose of using the property for a public school. The City has proposed a remedy based on the results of a site investigation which includes the cumulative work of a number of different parties conducted over a span of several years. On September 26, 2005, Rhode Island DEM issued a program letter which identified the work included in the site investigation. Founded the site investigation was complete and concurred with conceptual remedy proposed by the City. Rhode Island DEM has required this hearing this evening to be conducted to meet certain provisions in Section 7.07 and 7.09 of DEM's Rules and Regulations for the investigation and remediation of hazardous material releases often known as Remediation Regulations. In Section 23-19.14-5.1 of the Rhode Island Industrial Property Remediation and Reused Act also known as the Rhode Island Brown Fields Act. The public notice of this meeting has been given to various abutters and interested parties by certified mail, regular mail, hand delivered. The public posting on or about September 27, 2005 and October 12, 2005 and publication in the Providence Journal. The purpose of this Public Hearing is for abutters and other interested parties an opportunity to comment on the City's proposed remedy by submitting data, opinions or arguments either orally tonight or in writing on the technical feasibility of the proposed remedy. This hearing is a formal proceeding for the receipt of public comment into the official record of the Adelaide Avenue site. This hearing is not a public forum for discussion of the proposed remedy. It's not a quorum for debating, arguing or otherwise engaging DEM or the City in a dialogue regarding the proposed project. The only questions that will be answered by DEM or the City this evening are questions relating to the procedure of the hearing. As previously stated, the purpose of the Public Hearing is to receive comment regarding in the technical

feasibility of the City's proposed remedy. The phrase "technical feasibility of the remedy" relates to the ability of the proposed remedy to be protective of human health given the use of the proposed for the property. According to the comments related to the technical feasibility of the remedy could address whether the remedy will work or whether the remedy will protect the people on the property of exposure to contaminants in concentrations that exceed DEM's residential direct exposure criteria. The procedure that we'll use this evening for those persons that wish to speak is as follows. People have signed up on the list in the back of the room which I have here now. I believe that there is still another list. If there isn't or if you want to sign up still, we can accommodate that. Speakers will be called in order of their registration on the list. Five minutes will be allotted per speaker for the presentation unless the number of speakers becomes so great that we have to shorten the time. That doesn't appear to be the case. When your name is called please come forward to the recorder station. Identify yourself by name and any affiliation if you like. Please make your presentation. I ask everyone else to please be courteous and be quiet so that the speaker has the opportunity to be heard and the record is clear with the comments. Please try to limit your comments to the technical feasibility of the proposed remedy because that's the purpose of tonight's hearing. If you have a written copy for your comments or any other materials that you would like to submit you may provide them to me. I'll identify them for the record and then I will provide them to our recorder this evening for inclusion with the formal record. It's my understanding that past meetings in this location have run until nine p.m. at the latest at which time we're asked to leave. I don't know if that's the case this evening but bare that in mind if you're making comments just to leave adequate time for other people to make comments as well. By order of the Rhode Island Superior Court following the conclusion of this Public Hearing there will be a thirty day public comment period during which the public can submit additional written comments regarding the technical feasibility of the proposed

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remedy. Anyone may submit written comments during the public comment period regarding whether or not you chose to make a statement this evening. Written comments must be submitted to the City of Providence, Department of Planning and Development, 400 Westminster Street, Providence, RI 02903. Thirty day public comment period shall conclude on the close of the business on Friday, November 18, 2005. After the time collapse of the submission of written comments the City will review the oral and written comments and submit the comments to DEM along with the proposed response comments for DEM to review. At this point you'll now be able to hear from anyone who wishes to comment. With regards to the addressed comments, I said City of Providence, Department of Planning and Development. That is to the attention of Marcia Jennings on those comments please. There are notices in the back of the room that contain that address with the appropriate contact. Again my name is Timothy Pavilonis.

???? Do you have a copy of what you just said?

LEGAL COUNSEL PAVILONIS: I don't have copies to provide, no. Ok at this time we'll now hear from persons who signed up to provide comment. The first person is Melissa Sherman. Ms. Sherman, thank you.

MS. SHERMAN: Hi, I'm Melissa Sherman, I live on Alvin Street. I reviewed the paper work that we were given last time about the soil sifting results. I'd like to note that there is the absence of two contaminants that have been found in the fish in the pond, dioxin and PCP's which are quite dangerous and have not been accounted for either in the planning for the remediation of the site nor have been tested for as far as I can tell. So that is my question. When are these going to be evaluated and what remediation will be done for them? Thank you.

LEGAL COUNSEL PAVILONIS: Thank you. Second is Ms. Susan Fonseca.

MS. FONSECA: My name is Susan Fonseca. I'm a twenty five year resident. I'm a mother and a concerned party. I have a question regarding the site investigation report addendum. It says April, 2005, final version and in Section 5 which says remedial alternatives E A Engineering has written in Section 5.2.2 Remedial Alternative Engineering Controls and Environmental Land Usage Restriction. Do you have the terminology for what that is?

LEGAL COUNSEL PAVILONIS: So that I clarify for the record the terminology for what ELUR?

MS. FONSECA: Yes. There will be no response is that correct at this time?

LEGAL COUNSEL PAVILONIS: No, not at this time. Responses will be consolidated for review by the department.

MS. FONSECA: So with that ELUR since that it was not explained in any of the materials that were given, I would like to know its importance. Is it an important part of the RAWP? Is it legally binding and does it transfer with the deed? And another question I have is in relationship to the limited RAWP, the supplemental site investigation summary report that was dated September, 2005. It says final. There was some inconsistencies as to the number of borings compared to the April site investigation report that was given so those comments will come further in written comment but I would like to know in response to this it shows borings for one, two, three, four, five, six, eight, nine, ten, eleven and twelve yet none of the data for six, eight, nine, ten, eleven and twelve are included in any of the materials and also I would like to know what happened to seven? It's there on the diagram but it's not documented and it's not listed and I'd also like to make a comment that I think that its important that we realize we're discussing Parcel B but we also need to be discussing and concerned about the pond, the cove, the whole thirty seven acres need to be addressed in order to insure the safety of the public and environmental health. Thank you.

LEGAL COUNSEL PAVILONIS: Next we have Silvia Aldredge.

MS. ALDREDGE: My name is Silvia Aldredge. I'm a neighbor on Crescent Street. The current industrial commercial level that the site has been remediated to was achieved through a remedial action work plan that was conducted by Textron. That remedial action work plan was approved by the Rhode Island DEM in October of 2001. That remedial action work plan includes an environmental land usage restriction which says, lets see in Section A, the purpose in accordance with the remedial decision letter, the purpose of this environmental land usage restriction is to assure that number two, I'm sorry, number four that the property remained for commercial or industrial purposes that residential or institutional purposes e.g. childcare, school be prohibited and Section B, the restrictions applicable to the contaminated site in furtherance to the purposes of the environmental land use restriction. The grantor shall assure that use occupancy and activity of and that the contaminated site are restricted as follows. The property shall not be used for residential or institutional purposes such as a school, childcare facility or a hospital. The ELUR is a binding legal document which is attached to the deed on a piece of property and it is unclear to me how the City of Providence proposes to violate this ELUR in the building of the school and a daycare on the property. Thank you.

LEGAL COUNSEL PAVILONIS: The next commenter is Mr. Steve Fischbach.

MR. FISCHBACH: Hi my name is Steven Fischbach. I represent the plaintiffs in a lawsuit that was brought against the City of Providence and the Department of Environmental Management concerning the construction of the Springfield Street School and fortunately we just won that case and it looks like we got another one brewing right here. The first comment has to do with the process that is supposed to follow after today's meeting. Last Friday before Judge Procaccini, the Department of Environmental Management, the City of Providence were arguing over whether the public had the right to a ten day or fourteen day

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public comment period starting from the date the notices that went out to some of you a week ago was going to be put into place. Ten or fourteen days, that's what your government officials wanted to allow you to be able to comment on this particular proposal. I went to court and spoke out and said that this was not enough time and asked for a ninety day comment period and Judge Procaccini fortunately ordered a thirty period comment period starting today with the opportunity for people to request extensions. Extensions that need to be addressed to him personally so in order for the community to really to be able to respond to what the DEM and the City is put in front of you. The community clearly needs more time and I advise you to do what you need to do to get the time that's need so that the requisite scientific information can be put in front of the agency and instead of trying to keep the public from having the opportunity to do what they are impounded to do by law. Government lawlessness needs to stop and unfortunately it's going to take our community to make that happen. Now I'm going to address the technical feasibility of the remedy. This remedy is unfeasible for several reasons. The most important being that children do not respect property boundaries. They will go all over that site including the part of the site that has not been properly investigated, that has not be properly characterized and for which no cleanup plan exists. Until this entire site is, there is a cleanup plan for the entire site any remedy is technically unfeasible because we have no way of knowing what cleanup will be done to protect children who will wonder from that high school and go around the pond. That's the first thing. The second has to do with the soil The DEM in its infinite wisdom says that the only, the best way to clean up a contaminated site is to throw two feet of dirt on it and that's it. That is not protective of health or the environment. There needs to be a detailed engineered cap, a multilayered cap including a crushed stone layer to prevent burrowing animals from bringing contaminates to the surface. We are fighting with DEM over this very issue about a proposal to make a park out of a former garbage dump

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near the Hartford Park Housing Project. It is absolutely essential to have a crushed stone barrier as part of the engineer cap. Otherwise it is not protective of human health or the environment. The third issue has to do with soil, the active soil vapor extraction system. It is unclear from the documents that exist whether the action of the vacuum pump is going to draw the TCB, the TCB or PCB plume that is coming off the Stop & Shop Center into the building. Until there are studies showing whether or not that system has an impact on bringing the plume into the building this remedy is technically unfeasible. Finally, it is beyond believe that DEM would entertain any remedial action plan for this site when it knows that the remedial plan for the Stop & Shop site is not working properly. If the (clapping) that was approved, if the (clapping) by the scientists with the know how, if that isn't working, what makes you think that this remedy will work and until that problem is solved, it makes no sense to go forward with this site. In summary the Gorham Site is a single contaminated site. The City of Providence and working with Textron or on their behalf is taking away the responsibility of Textron to deal with the polluted site, the whole site, that includes the pond, the cove, Parcels A, B, C and D and unless there is a unified process, a unified plan, a unified remedy it is, it is not going to protect the public to piece meal subdivide these things and look at each parcel in a vacuum because again children don't respect property, property lines and for that matter neither contaminates and pollutants so in summary then this plan should be rejected and a new site light plan that includes everything, the pond, the cove, Parcels A, B, C and D until one cleanup plan for that whole site is proposed nothing else should go forward, thank you.

LEGAL COUNSEL PAVILONIS: Thank you. Our next commenter is Mr. David Kennedy.

MR. KENNEDY: My name is David Kennedy. I live on Humes Street and speaking of caps coincidentally I got a copy of a letter in September, 2001 who Mr.

Mark Silvetti, they're the ones that did the remedial testing and everything before and it says, item seven. The response to item seven was to provide the criteria for quote no other viable development plans or edit to indicate the rest of the developed parcel will be capped within six months if there are no imminent development plans. Now as of 2001, this is four years later and still never capped, alright. Was it DEM? Was it the City? Textron? Where the neighbors supposed to get out there and...you know but the bottom line it's still not covered, alright a couple of other just...every time I see or hear a article in the paper about there's reports of hazardous barrels in the cove and DEM keeps telling us there's no concrete evidence of it. We have the police report but, excuse me one second. In 1987, Providence Police divers were summoned to the northeast shoreline of Mashapaug Pond. Providence divers and DEM discovered submerged steel drums labeled "hazardous waste" that had been in the pond at least ten years. Many of the drums were identical to those found on the shoreline as well within the Textron complex itself. As a result of this investigation Mark Denham included ledgers in his files and immediately contacted the EPA and requested a super-fund designation for this site. Now how we went from a Super Fund Site to a Brownfield is kind of beyond me but and was one other point I wanted to make which was I keep hearing and keep hearing and keep hearing, I'm tired of hearing it about there is no available property the City of Providence and we look. Comprehensive City Plan comes with a twenty-twenty vision. A company that's hired, a Boston company no less, couldn't keep the money in Rhode Island to try to develop the land in the City of Providence. The consulting firm tried to develop, try to find land to develop the believe that Providence is built out. They identified a hundred and thirty acres of land that generated a potential twelve million square feet of building space for future development. The properties were deemed non important, non contributing, alright so there's a hundred and thirty acres. Some of not being important. Let's see park along River Road on the East Side is

remarkable but the area is right behind high end residential developments. Alternate rate long term property of the city. This talks about Fields Point. If Casino gambling isn't available, ...have a spin off identifying bid in Providence optimizing by opening the city at Fields Point where well controlled up scale mix use development. Well if we can put it there, why can't we put a school there since we already have students there, Johnson and Wales so we obviously are not out of land in the City of Providence. That's all, thanks.

LEGAL COUNSEL PAVILONIS: Thank you. Our next speaker is Ms. Kathy Orloff.

MS. ORLOFF: My name is Katherine Orloff. I've lived on Crescent Street for eighteen years and I'm a parent and I'm a concerned, a very concerned citizen as well. I'd like to put into the record an incident there that I don't think has been reported to the public before and I think it illustrates very dramatically how the proposed remedy is not feasible. Not only in scientific aspects but also in the aspects of the supervision that's required by our government agencies while the proposed remediation is supposedly happening. This incident was reported upon regarding Parcel C and Parcel A and B, partially on the Textron/Gorham Site dating back to March of 2003. So the Stop and Shop was already up but the other sites were vacant and this site, this report is from the Department of Environmental Management and signed by Joseph T. Martella who is here this evening. Approximately 8:30 am on 24, March, 2003 I visited the Gorham/Textron Site to check the status of two Parcels B and C which have not yet been fully remediated. The entire property, all three parcels is owned by the City of Providence and Parcels A and B are leased to Churchill and Banks. I noted that several trucks and trailers had been parked on the unkept and unremediated Parcel B. Some of the vehicles were labeled Rockwell Amusements and carried carnival type rides and concession stands. Contaminates of concern previously detected in soil at the site include, arsenic, lead, copper, polycyclic elimomited hydrocarbons and total

ketroleum hydrocarbons at levels which exceed the departments method one residential and industrial direct exposure criteria. Portions of Parcel B were also used as the staging area for the extensive remedial activities for example stockpiling highly contaminated soil. Treatment to bind the contamination and temporary storage pending post treatment analytical results conducted on a very large volume of sulfur surface soils for Parcels A and B which contain PPH contaminated soil at levels exceeding the departments upper concentration limits. There is currently no existing barrier or Parcel B or C preventing potential exposure to the contaminated soil. When I arrived at the office and discussed the matter with my supervisor, Kelly Owens. She recommended that I call Thomas Deller, Director of Planning for Providence. I called Mr. Deller that morning and left a verbal message with his secretary about the situation and the departments concerns. Mr. Deller was in a meeting. The voice mail message from Richard Baccari of Churchill and Banks prompted by a call he received from Mr. Deller. I returned Mr. Baccari's call, discussed the departments concerns about the potential exposure risk presented by unrestricted recreational use of a contaminated site and explained that it was the departments decision that this was not an appropriate use of this site in it's current unremediated state. Mr. Baccari did not agree with the departments position. He also indicated that the carnival would only last four days. After several more minutes of vigorous discussion, Mr. Baccari asked if it would be acceptable to the department to set up the rides and amusements on the paved Stop N Shop parking lot and keep the generators and other non-public use equipment on the unpaved Parcel B. I said that would acceptable if they did that and restricted public access to the unpaved areas. He replied that this is what they would do. I later informed my supervisor of the resolution of the issue. Late that afternoon and the following two mornings I again drove by the site and the trucks were still entirely on the unpaved area and workers had begun unpacking and setting up the rides in that area. Posters on nearby telephones indicated that the

carnival would be open from March 28th to April 13th. That's a lot more than four days. It is not clear whether C & B intends to heed the departments concerns and suggestions. So, as we all know the carnival went forward and many of thousands of young people, adults, children of all ages rode on the rides and walked on this uncontaminated, I mean very highly contaminated soil and government officials were notified by the DEM but did nothing to really prevent that from happening so I think that's a very good example of what Mr. Fischbach was saying that we the people kind of need to look out for ourselves here. Thank you very much.

LEGAL COUNSEL PAVILONIS: Thank you. Our next speaker is Ms. Maggie Meany.

MS. MEANY: Hi, my name is Maggie Meany. I'm a resident of Crescent Street and I just wanted to reiterate actually a couple of things that have come up. I've a more general concern about the City's disregard for public safety and how they have allowed a carnival to take place that they have allowed that area to remain uncapped for years and never done anything about it and never worried about the citizens that live in this area that could be harmed by the contaminates on that site as well as the fact as Mr. Fischbach was saying about Parcel B. How can remediate Parcel B when the remediation plan for Parcel A isn't even working and how do we know then that the contamination from Parcel A isn't going to travel to Parcel B or the usage on Parcel B is going to cause people to be on Parcel A. Also, we already know, we have results from the cove. We know how badly contaminated the earth and the soil is in that area and there is no way that they're going to have high school kids on Parcel B and they're not going to come in contact with contaminates in other areas. So I would strongly urge the DEM, the City to look at this and their remediation plan because really the safety of our citizens and our children are you know are at hand here. Thank you.

LEGAL COUNSEL PAVILONIS: Thank you. Our next speaker is Betty Bailey.

MS. BAILEY: Hi, I'm Betty Bailey from 18 Crescent Street. I've been in the neighborhood for three years and by the many who have spoken before I just want to reiterate that I really prefer the idea of a unified remediation plan for that entire parcel and the cove and the pond before any more development is done, however I do have a question for the department then and that is should we fail in our attempts to slow this down so that the parcels are all cleaned before any development happens. If a school is slated to go in there what will you do to keep the children barricaded in to that particular parcel and off the cove and the surrounding parcels? I'm clear that where there's a will, there's a way and when there is a pond children will get out there and they'll be fishing and they'll be canoeing and they'll be everything else out there and smoking next to the pond and whatever. I mean we all know children. We've been children so that would be my serious concern is and what would be the cost of whatever this barricade or whatever this plan is that you have to help those properties. What would the cost of that be? Would it involve security and big barb wire fences and stuff like that? Now, should we succeed and stopping any additional development on those parcels until the clean up has happened then that means all of a sudden after all this who ...over things might get real quiet in the neighborhood and that scares me too because like others have said I don't think we really want everyone to go away and not deal with what we have on those sites. It's important that DEM stay with us, the City of Providence, the State of Rhode Island and probably the Fed's get back involved and let's get this thing cleaned up. Thanks.

LEGAL COUNSEL PAVILONIS: Thank you. Our next speaker is Mr. David Fleming.

MR. FLEMING: Hello, my name is David Fleming and I am a Acorn member. I live on Wildwood Avenue just a few streets up the street there. We would like to see the whole site cleaned up including the pond. There are barrels full of waste chemicals in that pond. In fact it's so bad that they have a sign up

saying "Do not let any of this water touch you. If it does wash it off with clean soap and water" and then I took the bolt and trigger off and came back home because I lifted the lid...we would like to see all the parties at the table addressed and clean the entire site. As a community of color we've very concerned that the appendices as well as other materials have not be translated. The proposed remedy against, the proposed remedy can not possible be flexible because as made clear by past testimonies all toxics that exist at the site have not thoroughly been tested and the investigation is unclear. We demand that the entire site including the pond be addressed and cleaned up before the construction of a high school or even the YWCA is approved. Thank you.

LEGAL COUNSEL PAVILONIS: Thank you. Our next speaker is Mr. Henry Marciano.

MR. MARCIANO: Hi my name is Henry Marciano. I'm a teacher in the Providence School System and also a member of ACORN. I have a prepared statement and please bear with me. I've only had only about two hours sleep in the last four days that's why I have a prepared statement so that I won't forget. Beside educating my students I am interested in their health and safety. For this reason I came to this meeting to offer testimony regarding the wisdom of constructing a new high school on Parcel B located on a portion of the former Gorham Manufacturing Plant. According to my research Building N located in the northeast corner of Parcel B may pose problems that need to be looked into further prior to any construction being carried out. In 1995 the Rhode Island Department of Environmental Management directed Textron Corporation to excavate a series of underground storage tanks located under Building N to determine if they contained fuel oil or hazardous materials. The Textron Corporation hired ABB Environmental Services, Inc. to carry out a preliminary investigation. As to the contents to the underground storage tanks. Rhode Island DEM gave this company permission to excavate and remove the tanks. However, prior to commencing tank

removal activities ABBES undertook an exploratory excavation to determine tank size, orientation and contents. ABBES uncovered two storage tanks. Each tank is approximately thirty feet long and eight feet wide in diameter with an estimated capacity of fifteen thousand gallons each. The tanks are located side by side with the two tanks oriented in a northerly, southerly direction. According to it's preliminary findings ABBES concluded that the storage tanks contained only water and not fuel oil or hazardous materials. ABBES claimed that the tanks were likely used for water storage for fire fighting purposes. As a result of their findings they decided that the tanks would not have to be removed. Unfortunately like many of my students ABBES did not do a thorough job in completing their homework.

According to my own research Building N had a large steam pump that distributed water through out the entire Gorham Manufacturing Complex which was used for both drinking and cleaning purposes. A series of pumps drew water from Mashapaug Pond and piped it to a thirteen thousand gallon tank located in the main clock tower near Building V, the site of the projected new high school. In the 1950's, the Gorham Manufacturing Plant hired an insurance company by the name of Manufacture's Appraisal Company to perform an appraisal of it's buildings.

According to this document any underground facilities were uninsurable including the storage tanks under Building N. If one looks at this document carefully, they will notice that the holding tanks are listed as containing solvents. Those are degreasers my friends and not water as ABBES Environmental Management Services, Incorporated contends. The steam pump diluted the solvents with water vapor to be used in the cleaning process of all metals prior to the final manufacturing process. This may help to explain why the cove portion of Mashapaug Pond has been found to be contaminated with solvents. It is possible that the storage tanks became porous and leaked the solvent mixture into the pond as well as nearby Parcel B. One must remember that if ABB Environmental Services only performed a preliminary study almost ten years ago. That was ten

years ago. If a simple layman like me could uncover this information imagine what an expert performing a comprehensive investigation would discover. I believe the residents of this community especially the children warrant a more thorough investigation of the toxic contaminates prior to the construction of any new buildings especially a school and a daycare center.

LEGAL COUNSEL PAVILONIS: Thank you. Tish DiPrete.

MS. DIPRETE: Hi, I'm Tish DiPrete, I with the Urban League of Rhode Island. I'm also a neighborhood just down the side of Providence into Cranston and a mother of an eighteen month old child. The Urban League is concerned about this site and what the facts that the Remediation Plan has been said not to be working at this point. Had that said at a previous meeting by DEM. My question tonight, I keep looking up looking up at these tires and I think of the articles I've seen in the past years each winter. We say that the schools heating a few, I think two or three schools systems have broken down. Not just once, a few times during the year. What is the cost of the ventilation system that is needed to supposedly take the fumes and make them safe so that they're not going into the building. Into the high school. Into the YMCA and what's the cost of continued proper upkeep of the ventilation system which DEM tells us is necessary to keep the toxic fumes out and can the school system afford to properly keep this ventilation system up? I read recently in the past week that there's a new school, I keep forgetting the name of the high school where they hadn't afforded books. Pens, paper, basic supplies for the kids to learn. Del Sesto High School. How are we going to keep up this ventilation, how is the City going to keep up this ventilation system so that it is safe for the kids, for the adults working there? That's what I would like to know.

LEGAL COUNSEL PAVILONIS: Thank you. Mr. John Prince.

MR. PRINCE: Good evening. My name is John Prince. I with an organization call DARE, Direct Action for Rights and Equality and also for making connection run the Andy Casey Foundation. The Andy Casey Foundation

is all about family and children. As I listen to all testimony tonight and I kind of agree with the lady, woman over there, she said "we must have to look out for own too" because I feel as though if we leave it to the devices of the City of Providence, we'd all be walking around sick right now. So, I feel as though with the school where they want to do with the contaminated soil. It's not going to be a right site for anything like that. I feel as though that they need to go back to the drawing board and draw up something else. Something that will please the City of Providence and the public and the residents that live here. Thank you.

LEGAL COUNSEL PAVILONIS: According to the sign up list this is the last speaker. Joseph Lackey.

MR. LACKEY: I'm not in this neighborhood but I work in the City and I wouldn't live in the City so I pay taxes like most of you do. It's a school, it shouldn't be on contaminated land, that's it. I mean there is no questions asked but the main problem, the main, forget we don't need schools. We have a terrible and I mean terrible education system, it stinks. We have math teachers leaving the system because they have, the system want investigative math. It's like the old modern math that was thrown out. It's a new modern math. Can you imagine doing algebra and trig and geometry with investigative math. They don't even teach the times table...thing but lets' get back, this is one, ever see it, this came out twenty two years ago. The Federal Government, it's a nation at risk, the imperative educational rapport. April, 1983, the report to the nation to the Secretary of Education by the National Commission on Excellence and Education. Ladies and gentlemen, this report, you mind as well, it'll be showed. The only thing that we've seen so far is no child left behind. Testing is not the way to do it. You know the old adage "anybody can cheat the test". That's the name of it. Let me read just two paragraphs, the very beginning of this. If an unfriendly nation...had attempted to impose on America the remedial educational performance that exists today we might well have viewed as an act of war. As it

stands we have allowed this to happen to ourselves. We have even squandered the gains in student achievement may in a wake of the Sputnik challenge moreover we have missed, we have dismantled essential support systems which helps make these gains possible. We have in effect been committing an act of unthinking. Unilateral education disarmament. We have terrible mathematics, out the window. Who knows mathematics? Nobody. Who respects that? Anybody hear of trig, you know. We have this down sizing classrooms. That has proved absolutely nothing. I graduated from a parochial school, there was forty-five students in my classroom, in my classroom. We stayed in that classroom for six periods. The teacher, the nuns came in and out. That was it. That class was sixty minutes long. And that was for nine years but now we have this thing colleges, remedial math in colleges. Remedial math in high school and I just heard something about, we're not even teaching English anymore. I mean never mind a second language, we're not teaching English.

LEGAL COUNSEL PAVILONIS: Mr. Lackey I ask to make some comments about the proposed project.

MR. LACKEY: The proposed project as any City project, as any City project has no sense. I worked for the City for twenty-seven years. Nothing is done beyond tomorrow, its today, that's it. Forget tomorrow, who cares.

LEGAL COUNSEL PAVILONIS: According to the list I have there are no other speakers. Is there anyone else who would like to comment please? Sir could you please state your name for the record?

COUNCILMAN ALLEN: Hi, I'm Ron Allen. I'm a Councilman in this ward. Have been involved with this project for about, well as long as I've been a Councilman for ten years and to give an historical perspective. When Gorham left the facility and left it abandoned there was about twelve neighborhood people that was involved almost on a monthly basis, meeting trying to determine what kinds of activity would go on at the Gorham site and the commitment that the City made at

that time was that whatever went into that site would have to be condoned or approved by this committee and that hasn't happened and I think what you see here is the result of an activity on the City that didn't include the neighborhood. So, it's important that we, that we hear what the neighbors are saying. I don't think anybody is saying the school shouldn't go there alone. What they're saying is the school should be part of a holistic approach to solve the problem of the whole facility. You cannot, if you have cancer of the arm, you can't just say I'm going to treat the arm. You got to treat the whole body and we have to treat this whole, this whole facility, the cove, the pond and the two remaining parcels. So I've been meeting with City folk and I've meeting with the Mayor and I've been talking with and I will be talking with Tom and to Allen about, listen when this project started it was supposed to be September. Had to have a school for September. Well September has come and gone and we're not there yet. If we didn't have to have it this past September, let's slow down, let's look at the whole parcel. Let's figure out a way to remediate the parcel in a realistic kind of way and if it takes another three or four, five months for us to get an action plan, that's what we need to do because short of that the price we're going to pay it may not be today but it's going to have a hell of a price for our kids of the future.

LEGAL COUNSEL PAVILONIS: Thank you. Were there more commenters? Please state your name for the record.

MS. WALLACE: Hi, my name is Ramona Wallace. I've lived in Providence all my life. I'm almost thirty-five years old and I've never come across a problem like this. I didn't anticipate to speak up here tonight because honestly when I came here I didn't even know what we were talking about tonight but I honestly feel that for a company that's been in that ground for a hundred years and contaminating it for a hundred years. There's no way in hell you're going to fix that problem in less that a year. Not five years. I don't even see it being done in ten years. I have two high school children and if you built a high school over there

today I would not send my kids over there. I don't feel that there's been enough clean up done over there for anything to go there. Stop N Shop or Shaw's whatever that is that's over there shouldn't be there. People have to go in there and buy their food that they now have to feed to their families and I don't feel that it's cleaned up the way it should be. That's all I needed to say.

LEGAL COUNSEL PAVILONIS: Thank you. Next speaker please. If I could remind people that the purpose of tonight's meeting is to try to present comments on the proposed remedy. Please state your name for the record.

MS. KENNEDY: My name is Stephanie Kennedy and this would be remedy if I could just bring it back a little bit. I'm not a native Rhode Islander, I'm from Massachusetts. Fortunately enough I'm thankful enough to be able to have a very good education. Unfortunately ever since I've been here, I've been fighting in every aspect keeping this children "no child left behind" and it seems as though it reminds me of story that I read a long time ago. I don't know if anybody understands the Red Kiss. It was back in the eighteen hundreds and there was a man named William Lynch, he had what they called "The Plan". I don't want to make this really racial but it seems that it is kind of racial to a certain extent because you wouldn't do this in Cumberland. You wouldn't do this in...this really insults my intelligence because back then they did what they called lynching people out of a tree. That's what you're doing to us lynching us with chemicals. You don't have the noose around my neck because the noose is going to be in my nose and in my chest. This happened way back in eighteen hundreds and we've been trying to be free for I don't know how long. Hundreds and hundreds of years so instead of that not being the plan anymore you've decided something a little better. Well let's to this in this neighborhood. Why is it because there's more Blacks, more Latinos, more low income people, more poor people, more, what is it? I don't understand but I know one thing clean this site. Clean this site. Clean this site.

COUNCILMAN ALLEN: Clean the site.

LEGAL COUNSEL PAVILONIS: Thank you. Sir, do you have a comment?

REPRESENTATIVE SLATER: Yes.

LEGAL COUNSEL PAVILONIS: Please state your name for the record.

REPRESENTATIVE SLATER: Thank you, my name is Tom Slater. I'm the State Representative in the area of this ward and let me say that the politicians that are in this area were not notified properly of the planning of a school in this area. It wasn't until Cheryl called us sometime like six thirty in the morning to tell us they were doing something with the lot and we were kind of shocked to find out that they were doing something with the lot. We went through four or five meetings over at Super Stop N Shop so we spent a lot of time on this here issue then we came here. We had three meetings over there on the same site and I haven't heard anybody say they were against the school but I have heard people say they were against the site because of the contamination. We've heard more and more stuff about contamination. We heard about the levels of tricholethylene in that site. Tricholethylene is a caseinogens that will cause cancer. Make no mistake about it. It does cause cancer. We had heard people....(clapping) lived in the area and who have contacted from the area over there...determination by the Health Department of how many people in the area have been affected and how many people have become ill for several years with cancer because of the environment of the contamination of the Gorham Site. When I first ran for office, 67, 94 three for four years later I took a video picture of that site. I took a camera and we went in and we traveled around that site. There was certain areas we couldn't even go into because it was so bad. So I think it behooves the School Department with all their highly trained professional people not to pick a contaminated site for schools and it behooves the City not to pick a contaminated site for schools and I assure you that come January when the Legislator is back in

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session I will be putting in a bill that says the State will not give the 65% for school construction to any district that builds a school on a contaminated site. I think it also behooves the City to make sure that Gorham gets out there, not only cleans the site but cleans that Mashpaug Pond. Mashpaug Pond....was an area that the neighborhood could go out there boating. Could go out there fishing. Could go out there with their ski's and do whatever they wanted on the water but now they can't go near it. Why, because it is contaminated. Has the City done anything about posting it? They do not have a posted sign up there. You can walk around there now, you won't find it posted. Why haven't there been postings? We talked about that three or four meetings ago that that pond had to be, had to have signs posted on it that it was contaminated. That we shouldn't have people fishing in there. We know that some people from our immigrant community went in there fishing where some of them were eating that fish. What are we going to wait for some bad catastrophic illness to come down before we do anything about it. Let's clean up that site. Let's clean up the pond and let it get...(clapping). Another issue we heard about it, another issue we heard about is this is a neighborhood school. Ask the School Department was is a neighborhood school. A neighborhood school is any school in the area within a three mile area. Well then the whole City of Providence is a neighborhood school. How many people, how many students from Reservoir Triangle are going to that school? Try four. You hit the magic number. Where are they all coming from? There still going to have to take a UTC, a UTC, that's how far back I'm going. A RIPTA bus to go downtown come up Reservoir Avenue, come up Reservoir Avenue with the students that go to Feinstein, with the students going to ALP and go past the school of the students going to Classical, the students going to Central. Just in that one area alone Reservoir and Elmwood. We have five schools where students will be coming up on the buses. Let's use some logic. Let's find another site for the school and let's get that contaminated area cleaned up.

LEGAL COUNSEL PAVILONIS: Thank you. Yes, Ma'am, could you please state your name for the record?

MS. PITTERSCOX: Good Evening. My name is Priscilla Pitterscox. First of all I'm a member of Rhode Island ACORN and I don't want to take away from the organization ACORN that is like my family since I moved here from South Florida five years ago with my kids but I'm going to wear no disrespect another hat tonight. The hat of a parent. I'm a parent of, those are all my kids out there in the yard. Five kids who go to five elementary schools here in Providence. George J. West, Alfred Lima Elementary, Nathaniel Greene and 155 Harrison Street. This is my oldest who just started high school and this a future student you're looking at going into that site over there. I was delighted when he was selected to go to that school over at 155 Harrison Street formerly known as the Harrison Street School then they called it the new school about to switched over to the Adelaide Avenue High School under the wonderful leadership of Dr. Matter Pengby a Liberian principal who happened to be the Assistant Principle. When he was a middle school student over at Oliver Hazard Perry Middle School over on Hartford Avenue. So it was a wonderful transition when he goes into high school when the Assistant Principal now becomes the Principal at the school where he's at and for those of you who are out there who are parents of children who are no offense kind of small in stature, below their peers. I was uneasy of him entering high school especially the area that I live in. I was told he was probably would be going to Hope High School. Hope High School doesn't have the best rep so I went over to 797 Westminster Street and I met with Kim Rose personally and I asked her to please look out for me and hope my son be placed somewhere where I wouldn't have to worry about getting those types of phone calls concerning children's safety because he was thrown down a flight of stairs at Perry Middle School resisting gang indoctrination over at Perry Middle School. So I was only imagining the worst, the high school. When I first went to 155 Harrison Street, the first day he

started school. There were a hundred students there, I was very pleased to see how small and cozy and intimate the setting was and I met personally with the teachers and I was very pleased so I was very happy and very delighted when they said they were going to be building a school and he was going to be one of the good students to go to this new school therefore he'd be a part of the very first graduation class and how does...pay when I learned at what an atrocious decision that had took place behind the community's back at the site chosen for a high school. My son is going to be a future police officer. We're going to stay here in Rhode Island. He's going to be working, he's educated through the public system and he's going to jump on City payroll. He's going to be one of Providence's finest. He's been saying this since he was three. He's now fourteen and he's still in the main stream so what is it that you are doing to our future attorneys, architects, engineers, scientists, nurses, doctors, police officers, legislators. What are you, the danger, the health dangers that are going to be impending on, it's not fair. You either to either, A, be considering another site for a high school. I mean I go to the PTO meetings and all the parents there over at Hazard Street School are so excited about building of the school. They, the principal has the sketch up and we're all supped but we are disheartened. We are nervous concerned...so I do not trust the plan that is in the works for the remediation of a toxic waste site. It was a poor choice. It was a poor choice.

LEGAL COUNSEL PAVILONIS: Thank you. I'd like to remind everyone that the purpose of tonight's meeting is for technical comments so if you make comments that aren't technical or don't address the remediation plan unfortunately there will be no responses to those comments because they are essentially not the purpose of tonight's meeting because they are not the purpose of tonight's meeting.

? How do you get the answers to the questions?

LEGAL COUNSEL PAVILONIS: I can't answer that right now in terms of your asking questions but I advise you to work through your political representatives.

MR. BARBOZA: My name is Ernest Barboza and I've been here forty years. Right in this neighborhood here. My kids used to swim in that pond. One day we all went down there and we found these two pipes coming out from...they told us it was water. Yet the stuff was milky and all like after you took a bath ok. A couple of years after that we stopped the kids from going in that water. Gorham has been there a long time. I have uncles and aunts that worked that joint. I delivered there. I want to know what happened after they closed it. It was contaminated, it was so bad that the fish was dying in that place. Now all of a sudden they're telling me they're going to put a building over there. They put up that Stop N Shop and they never told nobody. Then they put up the gas station and they never told anybody. They can laugh, I've been there a long time. If I get a chance to sell my place and get out of here, I will and I know Tom for a long time. I've helped people get...but it's a shame because there's nobody telling us the truth. I'll tell you right out point blank. It's a good thing that I'm in a good mood tonight because I'd tell them where to go but the truth is that water down there is no good neither is the rest of that site. They can put all the caps they want down there. Show me the one place where it's working and then I'll go along with you.

LEGAL COUNSEL PAVILONIS: Does anyone have any technical comments regarding the proposed remedy? Is this something different? Give a brief...

MS. ALDREDGE: I just have a comment about the question of the health and the RI Residential Domestic Exposure Criteria. Nothing is known about the effect of environmental exposure to heavy metals, TCE's, PCE's, PAH's, in concert with each other. So if all of the chemicals are present in this site and

people can be exposed to them that's an almost unheard of circumstance. What is known is that the children in Providence already have higher rates of environmentally induced illnesses that do children statewide including elevated blood lead levels, higher rates of asthma, higher malnutrition rates and the conditions at that site mean that already at risk children could potentially be exposed to an alphabet soup of chemicals whose collective and cumulative affects are largely unknown. The RI Residential Domestic Exposure Criteria do not address the specific needs of an already at risk population and therefore it may not necessarily be applicable to this site. I believe that the Health Department should be working with the Rhode Island DEM and the City of Providence on a site specific standard which would address and meet the special needs of the population that will be attending this school and the daycare that's to follow on Parcel C. Thank you.

LEGAL COUNSEL PAVILONIS: Thank you. Is there anyone who has not yet commented and would like to.

MR. PRINCE: Now I got a question for you guys. Everyone is over here and we right, we getting a lot of feedback from all the bodies in here and I don't understand why nobody here can give us any answers or to even answer our questions but we got all these high powered developers or whatever you guys are in here and nobody can tell us nothing. So how are we going to get responses from you guys? In the mail or are you going to get in touch with all the residents here on your time...

LEGAL COUNSEL PAVILONIS: This is a very limited purpose to tonight's hearing. It really is to provide technical comments on....

MR. PRINCE: It's all about control...

? ...we should be able to voice our opinions because we live here. You don't live here. We have to search for our...your children are not going to breathe these chemicals.

LEGAL COUNSEL PAVILONIS: I believe that you've been provided that opportunity Ma'am.

? ...you're in our neighborhood. You're going to answer our questions...

LEGAL COUNSEL PAVILONIS: Mr. Allen.

COUNCILMAN ALLEN: A question on the process. I...how do these questions get, how do they get answers and how do...

LEGAL COUNSEL PAVILONIS: There was already a workshop. There was a dialogue. It's my understanding that it wasn't. I wasn't present for that workshop. I can only comment tonight on the limited purpose of tonight's hearing.

? Right that was technical. A lot of people didn't understand that.

COUNCILMAN ALLEN: A lot of people spent a lot of time trying to provide for the technical question based on...I don't think it's asking too much for us, for these people to know what happened to the information and how do they get the feedback on it.

LEGAL COUNSEL PAVILONIS: What happens next is the City of Providence will consolidate the comments that were received tonight. Analyze them and then provide a response to DEM. It's their proposed response and DEM will evaluate that response before the response is made public. That's the process regarding tonight's meeting.

SENIOR ASSISTANT CITY SOLICITOR RAPPORT: What we will do. The regulations are pretty strictly written and we're trying to comply with the law but we will respond to this because we think it's important for you to have answers to the technical questions raised. What the regulations tell the City to do is as follows. The regulations tell us to put together the technical criticisms. That means the criticisms that were voiced by Mr. Fischbach about whether it's going to work and how it's going to work and how we're going to protect the site and we have consultants who are trained and the best we can offer who look at the information and give answers to those technical questions. Then what we're

supposed to do is give the answers to DEM. The City is supposed to provide the answers to DEM. That's what the law is written to say including the law that the State has directed us to comply with. What we're going to do...let me tell you what we'll do...let me tell you what we'll do and then you can ask that question. What we will do is we will have, it is a technical subject, there's no way of moving around it. It requires some science understanding and it's technical. It requires that you have some understanding of the basic science. What we will do is we will have our experts, our consultants answer these questions in a lay, a language as we can and we put that answer in the repository that we have now put together at Knight Memorial Library. If you look at the notices that the City prepared, we currently have all of the technical information in the Knight Memorial Library for you to copy and review. We will take that same, what we call repository or site or location and we will put the answers that our experts put together in basic language. We will put the written answer to your technical questions not all the protests but the technical questions in the Knight Memorial Library and you will be able to review that. Now what you do with that, I honestly can't advise you. I'm not your attorney but I will tell you that we will provide that information for you to read and review.

? Will that be in Spanish also?

SENIOR ASSISTANT CITY SOLICITOR RAPPORT: Yes, I don't speak Spanish but we will have it translated. The consultants are, will the consultants please stand? These are the men who have been on the site. Pretty much regularly over the summer answering questions as best they can and they will, they work with the City. They have degrees that none of us have and I confess that some of what they explained to me is sometimes difficult to understand but they will put it in language that I will review personally to make sure it's as user friendly as it can be. Excuse Mr. Fischbach. Oh, were you laughing at something that I said?

MR. FISCHBACH: Oh no. No.

SENIOR ASSISTANT CITY SOLICITOR RAPPORT: Oh, ok. So what we'll do is we will put that in Knight Memorial Library beyond that I think the process is pretty clearly written out in the statute. What happens next is DEM, the state agency and Joe Rotella if he could stand up. They review these comments and if they are comfortable with the answers then they review the final proposal to protect and what they call remediate the site, Parcel B and address the questions of how students...will be children. These are high school students that will be prevented from getting to the site and if DEM is comfortable with that then it will be approved and I personally can't do any more than that as a representative of the City. I do represent the Providence School Department and I can say that no one has taken lightly the concerns that are expressed but we will make this information available in the Knight Memorial Library in Spanish and English. Well the comment period that the judge ordered was to end on November 18th. We expect that people will submit comments to the address on that piece of paper. Please pay attention to the notice that we have in the back of the room which is in Spanish and English. The technical comments will be sent to a particular location in the City at this address and as soon as that location gets them Mr. Deller who heads up that office will have the comments sent to our, to Mr. Vegan and Mr. Rivers so it could, we won't have it, an answer until obviously the thirty day period is over because we want to wait until we see. We're not going to do it piece meal once the thirty day period is over our people will have, they'll be looking at it but they'll have this, you know within I would say a few days to a week after that November 18th date. So, we will make that available in the Knight Memorial Library and I will even suggest that we put notice to the community in a mailing that the information is now available. Yes, Mr. Fischbach.

MR. FISCHBACH: Two questions. First as a point which is all the comments that were heard tonight are people raising safety concerns about putting a school on a contaminated site. Comments on the technical feasibility of the

remedy because the remedy is putting the school on a contaminated site. If you do not address those comments, you are violating the law.

SENIOR ASSISTANT CITY SOLICITOR RAPPORT: I understand your position.

MR. FISCHBACH: The second is a question for the Department of Environmental Management. After the comments are responded to by the City. Does the department plan on making the City's response what's been heard public so that public can respond to the comments that the City responded to?

LEGAL COUNSEL PAVILONIS: I don't see why you couldn't make a public records request for that document.

MR. FISCHBACH: Well that's not good enough because you have an obligation to involve the community under that...the Department of Environmental Management has a statutory obligation to involve the community through the entire investigation and remediation process. If the Department of Environmental Management does not make available to the interested parties the comments response to the...that the City of Providence submits to the department. The department too is now on notice that the department is in violation of...

SENIOR ASSISTANT CITY SOLICITOR RAPPORT: Mr. Fischbach I think you misconstrued the law because the comments that the City is, let me tell...

MR. FISCHBACH: I've been told that before and making the...I know...I'm...

SENIOR ASSISTANT CITY SOLICITOR RAPPORT: Ok. Let the people understand and putting aside the banter the comments of the City are what I just described as being deposited in the Knight Memorial Library. I'm not sure what you're talking about Steve but the comments of the City will be the comments of EA, that is our experts which are not only that I said we would make available but we've said we'll put them in a public place and I just said that we would give notice that they're readily available so the aura of secrecy that your suggesting is

really not, not correct. We will make the City's response to the comments here, to the technical comments here available in the Knight Memorial Library in Spanish and English and that will be the City's response that we are now, we will also be sending to DEM. You will be able to see what we are sending to DEM and decide for yourself whether the answered or relayed the concerns. When we say we that's our experts. We personally can't answer, we have to rely on people who have some knowledge of this information and expertise so if there are any other...

MS. PITTERSCOX: First of all I have two things to say. The first comment that was directed to the young woman that was speaking. I don't understand in all fair conscience how you could insult a room of people not knowing what college they went to. John J. College of Criminal Justice, what university they went to, Florida Metropolitan University, Brown University. To sit here to say people who high levels of education, degrees of expertise in other words lets go here beneath them and there...then they should be on the forefront to say we need to really remediate this site or consider another piece of land else where. First of all, you have no idea what degrees we the underdogs, the ignorant people of the community are holding so you owe us an apology if you be big enough to grant us that. Second of all I would like to know any of the experts, upper class, higher intelligent more educated, higher degreed individual members of society...Parcels A, B, C and D free of your charge, your state taxes paid for the next hundred years would you accept the land and build an estate on it for you and your family? I don't think so.

LEGAL COUNSEL PAVILONIS: Thank you. Does any have any written documents they would like to provide for tonight? Are there any written comments that you want to submit now to be entered into the record?

SENIOR ASSISTANT CITY SOLICITOR RAPPORT: ...for a period of time after the period for submission written comments closes. The date of closure is November 18th. I can't be certain whether it will be the nineteenth, the twentieth

or when ever but what I also offered on behalf of the City is that we will send out a notice to the people that were legally to notice advising them that the materials will be available at Knight Memorial Library by a date certain. So you don't have to guess. Is that what you're asking?

? Well again I wanted a date and... since I'm not a legal person who will be getting that. How do I get that...

SENIOR ASSISTANT CITY SOLICITOR RAPPORT: Well you may or not be, I don't know...

? I know that for a fact so I have to be, how I can be certain that I'll know...

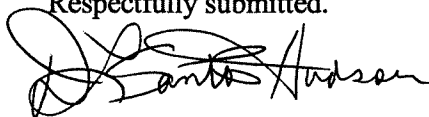
SENIOR ASSISTANT CITY SOLICITOR RAPPORT: You can call, if you could pick up one of those notices that has the address and information and then you could call either one of those phone numbers. Actually I'm not sure of those phone numbers. You can call the Department of Planning and find out.

REPRESENTATIVE SLATER: I just have one final technical question for EA and the Department of Environmental Management. At the last meeting a resident had said that there was a plume on Adelaide Avenue. EA going to explain the plume and how much that affects that site near the pond and what remedy is the DEM going suggest for that plume?

LEGAL COUNSEL PAVILONIS: Thank you. That concludes this evenings meeting. Thank you on behalf of the Department of Environmental Management and the City of Providence.

The Public Hearing adjourned at 7:45 o'clock, p.m.

Respectfully submitted.



Deborah L. Santos Hudson

Assistant City Clerk

Attachment B

**Public Comment Letters
Received at
City of Providence Department of
Planning and Development
During Public Comment Period**

1.1

S.K.C. Fonseca
Citizens Concerned for our Future – People and the Environment
71 Humes Street
Providence, RI 02907

December 20, 2005

Thomas Deller, AICP
Providence Redevelopment Agency
ATTN: Marcia Jennings
400 Westminster Street
Providence, RI 02903

Mr. Deller:

RE: former Gorham/Textron Disposal Site; EPA Superfund Listing: ID: RID982542318

I have read and re-read reams of information about what has *already been done*, but less than a full page of *what* the technical plan *will include*. I encourage the RIDEM and the City to review The State of Rhode Island, TITLE 23 Health and Safety CHAPTER 23-19.14 Industrial Property Remediation and Reuse Act, SECTION 23-19.14-5: "(a) The department of environmental management shall consider the effects that clean-ups would have on the populations surrounding each site and shall consider the issues of environmental equity for low income and racial minority populations. The (RIDEM) will develop and implement a process to ensure community involvement throughout the investigation and remediation of contaminated sites."

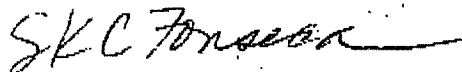
The current process is obviously flawed. I understand RIDEM has been following the *letter of the law*, however I would challenge that the *spirit of the law* is being violated. It is obvious that the process currently in place does NOT actually include a way for concerned citizens to be involved in any *real way* with the process or a positive solution.

We have only been given the "opportunity to appear to be making a difference"; while not being allowed to be actively involved in the technical or remedial processes, since there isn't a technical plan yet. To date, the City has attempted to do what it wants to do – build a school on a toxic dump site, regardless of the numerous potential health hazards. We as concerned citizens have only been able to comment on completed work. We have NOT been able to comment as *part* of the process. How is this allowing community involvement when we're locked out of what's REALLY going on?

Also, why have concerned citizens need to be on the defensive regarding the potential dangers of this project? We, as citizens who will be directly impacted by a decision to build a school on a toxic dump site, have not been given proof or factual information on how this project will be "safe". In fact, we have been told "trust us" and have been *intentionally?* misinformed – large tanks found at the Cove near Parcel B were for "water" the City, EA Engineering and Textron told us. Yet research shows the truth is that these large tanks were for solvents and have leaked into the soils (and waters).

I encourage all parties involved to ensure that concerned citizens are not marginalized but are truly allowed to be part of the process as stated in the law. We could begin a true partnership in 2006.

Thank you.

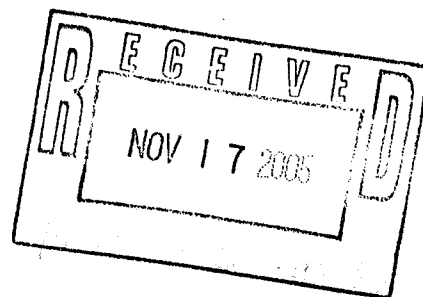


S.K.C. Fonseca
Citizens Concerned for our Future – People and the Environment

cc: W. Michael Sullivan, Executive Director, RIDEM
Joseph T. Martella II, RIDEM/OWM
Brian Wagner, Esq., RIDEM/OLS
Darryl Paquette, Esq.
Steven Fischbach, Esq.
Hon. Daniel A. Procaccini, Superior Court Judge

Hon. David N. Cicilline, Mayor, City of Providence
Sen. Juan Pichardo, City of Providence
Rep. Tom Slater, State of RI
John J. Lombardi, City of Providence

Silvia M. Aldredge
28 Crescent Street
Providence, RI 02907
401-781-6550



November 10, 2005

Thomas Deller- AICP, Director
City of Providence Department of Planning and Development
Attn: Marcia Jennings
400 Westminster Street
Providence, RI 02903

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RE: Request for "technical comment" on the Proposed RAWP for the Former
Gorham/Textron Disposal Site at 333 Adclaide Avenue, Providence, RI

Dear Mr. Deller,

I strongly object to this part of the Public Comment process for the above referenced site. While the City and RIDEM have repeatedly stated they will only consider public comment on the "technical feasibility" of the proposed remedy (*per Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases section 7.09 Remedy Selection: "All preferred remedial alternatives which include on-site treatment and/or containment of hazardous materials as part of the final contaminated-site remedy shall be subject to public notice as specified in Rule 7.07 (Public Notice), and shall be subject to public review and comment regarding the technical feasibility of such preferred remedial alternative prior to issuance of the Remedial Decision Letter".*) they have provided little to no documentation, scientific data, or even basic general information as to what that remedy will be.

A survey of the SIRs and RAWPs for this site turns up exactly three paragraphs related to the remedy. The rest of the information provided deals exclusively with what toxic material has been found at the site, reports on the limited RAWP of May 2005, and on that part of the work the City illegally completed prior to receiving approvals. Absolutely no data is provided on the rationale for or comparative efficacy of these preferred remedial alternatives.

The City proposes to "cap" the site with the building, parking lot, and 12" (SIRA April 2005) of "clean fill to prevent contact with contaminated soils". No mention is made of whether the clean fill will be virgin soil, taken from other sites, or remediated soil from the site itself. A "fabric liner" is mentioned with no description of what material is to be used, its fatigue life, or its permeability. The Springfield Street school, which was built over a municipal landfill, not a Superfund Site, received at least 24" of clean fill and an RCRA cap of multiple layers and materials. Why is the City proposing a less protective remedy than the one used at another school?

Secondly, the City proposes a "sub-slab ventilation system" to vent any hazardous vapors from the school building. However, no technical description of this proposed system is provided. No information on the system's capacity, detection alarms, maintenance procedures or any scientific information about the efficacy and reliability of such a system is included in the RAWP or SIR. There is no information provided on what procedures will be in place should hazardous levels of VOC vapors accumulate in the building.

Lastly, the City proposes a "fence with impenetrable brush" (LRAWP, October 2005) to prevent students from accessing the toxic sediments and poisoned waters of Mashapaug Pond and the un-remediated dump on 'Parcel D'. Yet again, absolutely no technical information

Silvia M. Aldredge
 28 Crescent Street
 Providence, RI 02907
 401-781-6550

is provided on this aspect of the remedy. How high will the fence be, what material will be used for it, what kind of greenery will make up the 'impenetrable brush'?


The City of Providence and the RIDEM have violated both the letter and the spirit of the law (*RIGL 23-19.14-5, RI GL 23-19.14-11*) and of DEM regulations (*Rules and Regulations for the Investigation and Remediation of Hazardous Material- Section 7.07 Public Notice*) in insisting that they will only consider "technical commentary" on the proposed remedy and then offering the public virtually no information regarding that remedy. Moreover, the City has attempted to bury the public in very specialized scientific and very poorly organized data related to the Site Investigation and to work that has long since been completed.

I do not believe that the DEM or anyone, for that matter, would have enough information to make technical comment on much less to determine if the preferred remedial alternatives are in any way adequate to protect the end users of the school from the contaminants discovered at the site. For my part, that Tim Regan of EA Engineering and Alan Sepe say that it will be safe, is simply not enough.

I would request that the City of Providence and the RIDEM make the technical details of the proposed remedy available to the public and integrate them into the public comment process. I would also request that the Public Comment period be extended to accommodate review of this information, which should have been provided in the first place. In addition, I would ask for an explanation as to why the City has no technical data on its proposed remedial alternatives available, especially in light of the City and the RIDEMs repeated emphasis that this part of the public comment process is solely for the consideration of "*technical feasibility of the proposed remedy*".

Lastly, I would ask that the City abandon its attitude of condescension and outright rudeness to those Citizens who have asked questions of a non-technical nature and simply attempt to answer these questions in as forthright and honest a manner as possible. Since the City has made no technical information available regarding the remedy the least that can be done is to be respectful of the neighborhoods concerns, and to try and address all questions.

Sincerely,



Silvia M. Aldredge

CC: W. Michael Sullivan- Director RIDEM
 Brian Wagner, Deputy Chief- DEM-OLS
 Joseph Martella II, Engineer- DEM- OWM
 Hon. Judge Daniel A. Proccacini- RI State Superior Court
 Alan Sepe, Acting Director- Department of Public Property, City of Providence
 Tim Regan, PE- EA Engineering
 Hon. David Cicilinc, Mayor- City of Providence
 Hon. John Lombardi, Chair- Providence City Council
 Hon. Ronald Allen, Rep Ward 8- Providence City Council
 Sen. Juan Pichardo, District 2- Rhode Island State Senate (via email)
 Rep. Thomas Slater, District 10- Rhode Island House of Representatives
 Darryl Paquette, Esq. (via email)
 Steven Fischbach, Esq. (via email)

December 29, 2005

Attn Ms. Marcia Jennings

Providence Department of Planning and Development

400 West minister Street,

Rhode Island 02903

Dear Ms. Jennings

At the request of Mr. Robert Dorr, representative of the neighborhood groups Mashapaug Pond Coalition and Concerned Citizens of Reservoir Triangle and South Providence, and a neighbor of the "Gorham Site," the Environmental Research Institute (ERI) offers the following comments on the technical feasibility of the remedy proposed for Parcel B of the Gorham Site.

The Environmental Research Institute (ERI) of the University of Connecticut is an independent center of excellence in pure and applied environmental sciences. As a public institution the University makes its resources in a wide array of disciplines available to federal, state and local governments, the public sector and community organizations. In this instance, ERI is funded through the EPA's nationwide TOSC program (Technical Outreach Services for Communities). ERI works in the TOSC program as a subcontractor to the Johns Hopkins University's Center for Hazardous Substances in Urban Environments, providing technical assistance to community groups in EPA Region 1, which includes all of New England. ERI's core mission under the TOSC program is to empower communities to meaningfully understand and participate in the decision making process regarding their hazardous substance problems. ERI's services include document review, explanation in the "Kings English" of complex technical issues, writing comments on proposed clean up plans and providing various facilitation services. ERI is involved with a score of projects throughout New England, including Ninigret Park, in Charlestown, Rhode Island. My position with ERI is Urban Initiatives Coordinator, and I am the former Environmental Health Director for the City of Hartford (Ret).

ERI certainly applauds the efforts of the RIDEM to more fully characterize the entire Gorham Site and adjacent Mashapaug Pond, as reflected by RIDEM's efforts to conduct its own tests of the Gorham Site and the document "Supplemental Site Investigation Work Plan to Support Human Health and Ecological risk assessment activities Park Parcel Mashapaug Cove," MACTEC November 2005. As the entire Gorham Site has not yet been fully investigated and the risk assessments are not yet finalized, ERI cannot fully evaluate risks to human health and the environment to future users of the entire Site in

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general, and Parcel B, in particular, where a high school is proposed to be built. Any comments by ERI on the older draft reports and assessments will be outdated by the soon to be revised/updated reports, risk assessments and any proposed remedial actions.

My first task was to take a walking tour of the Gorham site, which I did on November 23, 2005. During the tour the odor of petroleum/ tar was detectable in about 25 degree weather. The apparent source was a hole in the ground a foot or so deep from subsidence, and was located a good 30 yards away from Parcel B, where the school is proposed. I also observed that the vegetation on the sites described as parcels B and C (where the proposed YMCA is to be built) was very, very sparse. I met with the committee after the walking tour to try to understand all the concerns of the group

In the very short time since the tour we have reviewed documents provided by Mr. Dorr. The reports and documents fill a 5,000 page cardboard box and we have not determined if these reports and documents are all of the documents and reports available. We will review and comment promptly on the revised site investigation and revised risk assessment documents and proposed remedial actions upon receipt. We understand the short timetable as the City of Providence needs to begin school construction as soon as weather permits in order to make the start of the 2006 school year.

Based on our preliminary review, we completely disagree with any plans for the development of Parcels "B" (Planned High school) or "C" (planned YMCA) that would not include remediation of Parcel "D" (Park Parcel). This is primarily due to the potential human health risk, because the pond waters edge and other areas will be an attractive nuisance for students that would be attending the school. Having walked the site the day before Thanksgiving, it is blatantly apparent that waters edge will be very attractive to students looking for a place to "hang out" even in its current unimproved, rough condition. The embankment drops off at such an angle that observation of activities from the proposed school would be difficult to impossible, making the area even more attractive to students and impractical for school authorities to monitor. ~~Proposing that fencing would serve to eliminate exposure pathways by eliminating access to the area is not realistic. There is fencing and signage in place now, it has been breached in several places and not repaired. It is its own best example that it simply will not work. If anything, fencing can be its own attraction.~~

It is also our belief that the concrete foundations and cellars at the site should be knocked down/filled in for safety reasons. It was mentioned during the site tour that waterfowl nest on the peninsulas in the cove; perhaps the southern Peninsula could be a secured wildlife refuge and perennial school project (the Northern Is mentioned as a possible canoe launch site). The southern peninsula is appropriately mentioned as the site that will be most likely have exposure through contact surface soil. Cordoning it off as a refuge might be the least costly, most effective way to eliminate risk and perhaps the best use as well. As stated earlier fencing here would also be a challenge; perhaps, a landscape barrier such as briars would be effective. Upcoming risk assessments will help determine if the peninsula is suitable for that purpose or if a canoe launch is appropriate. The

Garofalo and Associates design shows the Northern peninsula capped for use as canoe launch.

In conclusion "Parcel D" should be remediated/capped /landscaped or risks somehow controlled in conjunction with any project on either parcel B (School) or parcel C (YMCA).

Some sort of capping is the likely to be proposed remedy for the sites, due to costs, timetables and minimizing the disturbance of contaminants and the disruption to the neighborhood. The cap design itself is the most important factor and the later inspection and repair and the responsibilities should be spelled out and assigned. Any capping remedy should include a warning barrier of snow fence or other indicator that the cap has been breached or eroded. I have worked for a Municipality for 25 years where shared interdepartmental responsibilities usually mean in practice that no one is responsible. Inspection, monitoring, repair, and reporting responsibilities and schedules need to clearly fixed.

Kevin P Hood R.S.



University of Connecticut

Environmental Research Institute

270 Middle Turnpike Storrs CT 06269

860 486 2546

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TDD: (401) 272-5335
FAX: (401) 453-0310

December 30, 2005

BY FACSIMILE AND REGULAR MAIL

Gorham Site Environmental Comments
ATTN: Marcia Jennings
Providence Department of Planning and
Development
400 Westminster Street
Providence, RI 02903

To Whom It May Concern:

I am submitting the enclosed comments on behalf of Robert Dorr, a neighbor of the Gorham Site. These comments address the proposed remedy for Parcel B of the former Gorham Industrial Facility on Adelaide Avenue, where the City of Providence proposes to construct a new high school. For the reasons set forth below, the remedy to build a high school on Parcel B, install an active sub slab venting system beneath the proposed school, and to cap the remaining portions of parcel B with an engineered cap is not technically feasible and/or cannot be determined to be technically feasible, and should be rejected.

1. The City of Providence Lacks the Skill to Implement the Proposed Remedy.

Coincidentally, I represent the plaintiffs in the Hartford Park Tenant Association v. R.I. Department of Environmental Management litigation that concerns the elementary and middle schools built on top of the former Providence City Dump. A Remedial Action Work Plan (RAWP) was approved for that site which, like the proposed remedy for Parcel B, included the construction of school buildings, installation of active sub-slab ventilation systems beneath the buildings and capping the remaining portions of the site with an engineered cap (which I refer to as the "soil cap.") The RAWP also requires the City to conduct quarterly tests of soil gas, indoor air and groundwater, and to maintain the soil cap. A court order issued in the litigation also required the City to notify plaintiffs counsel when quarterly tests were to take place, to allow plaintiffs to be present for the tests, and to send test results to plaintiffs.

In spite of the litigation and the publicity about the schools built on top of the former Providence City Dump ("Dump Site"), the City has failed to properly maintain the

soil gas system and the engineered cap, and has not taken any action to address persistently high levels of carbon dioxide found in the sub-slab ventilation systems and the soil gas monitoring wells. On more than one occasion, the sub-slab ventilation systems at the two school buildings have been shut down for days, even weeks, despite the RAWP's requirement that these systems be in constant operation. During a prolonged shut down of the systems during the winter of 2001-02 it was only after DEM threatened to fine the City \$25,000 per day per violation of the RAWP that the City restored the systems to proper working order.

To illustrate how the City has failed to maintain the soil cap, I am enclosing with these comments 23 photographs I took at the former Dump Site on December 3, 2005. The photos show areas where the ground has settled, eroded or been burrowed into, such that the two feet of "clean fill" that comprise the cap has been reduced to a lesser amount. For example, in the court yard on the north side of the middle school, a drainage basin is sticking out of the ground where the surrounding soil has settled and soil is exposed (Pictures 1-3). Also, on the north side of the middle school building the concrete adjoining a covered drainage basin is buckling so badly that soil underneath the concrete is visible (Pictures 5-8). Both of these conditions present obvious tripping hazards to users of the site, yet have been in a state of disrepair for years. Ponding of water is occurring at various portions of the site where soil has settled, including the west and south sides of the middle school building and behind the elementary school building (Pictures 10, 13 and 15, respectively). Moreover, the soil cap has visibly eroded in several areas behind the elementary school building (Pictures 14, 16-19, 21 and 23). At one area eroded soil has exposed solid rock (Picture 14), which calls into question whether two feet of clean fill was actually deposited at that location. Finally, the cap has been compromised by burrowing animals (Picture 22, taken behind the elementary school building).

The monitoring of soil gas at the site has shown persistently high levels of carbon dioxide (i.e., levels exceeding the RAWP's action level of 1,000 ppm) in both soil gas monitoring wells and the sub-slab ventilation systems. The RAWP requires that when actions levels are exceeded additional soil gas monitoring wells are to be installed; and, if actions levels continue to be exceeded, the monitoring wells be converted to soil vapor extraction wells. Neither the installation of additional wells nor conversion of existing monitoring wells to extraction wells has occurred.

Given the City's six year history of failing to properly implement and comply with the RAWP at the former Dump Site, the City cannot be expected to successfully implement a nearly identical remedy at Parcel B. Thus, the remedy proposed by the City for Parcel B is not technically feasible and should be rejected.

2. **The Proposed Remedy Fails to Address Portions of the Gorham Site That Children Using the School Will Have Access To.**

Parcel B is part of a much larger contaminated site, the former Gorham Industrial Facility. To date, only that part of the Gorham Site known as Parcel A (the site of the

Stop and Shop Plaza) has been remediated, and only to commercial / industrial standards. Plans exist for remediating a portion of Parcel C in connection with plans to construct a YMCA facility due West of Parcel B. However, no plans exist for remediating portions of parcel C that abut Mashapaug Pond and the Cove area. At the public meetings about Parcel B many residents have voiced concerns that the entire Gorham site is not being remediated; only the areas where the school and YMCA are proposed to be built. The City has responded that the undeveloped portion of the site will be fenced off, but not cleaned up.

DEM's Site Remediation Regulations reject the City's clean-up as you go approach to site remediation, and require responsible parties such as the City to remediate an entire "contaminated site." See Remediation Regulations, Section 3.11 defining "contaminated site" as "any Source Area [(i.e., area impacted by a release of hazardous materials—See Section 3.62)] or series of Source Areas that have not reached final resolution under the Remediation Regulations . . . [including] unimpacted land between multiple Source Areas in close proximity to one another. A Contaminated Site shall be considered to be independent of property lines." The portion of parcel C not proposed for development and located behind the proposed school has been impacted by a release of VOCs, lead and arsenic, according to the July 1999 Site Investigation Summary Report and Risk Assessment, Former Gorham Manufacturing Site prepared by Harding Lawson Associates. Thus, that portion of parcel C is a "contaminated site"; in fact, the entire former Gorham facility is a "contaminated site" under the Remediation Regulations.

DEM's legal counsel concurs that the City's clean-up as you go approach and proposed remedy to fence off the undeveloped portion of Parcel B without additional clean-up is both legally inadequate and technically unfeasible. In a letter dated November 17, 2005 from Brian Wagner, Esq. to James W. Ryan, Esq., Mr. Wagner states:

While the remedies for the park parcel, including Mashapaug Pond/Cove ("Parcel C), and the school site ("Parcel B) may be separate; neither can be viewed in a vacuum. The City, which owns both parcels of property, cannot separate the risks associated with the Pond/Cove from the sensitive public use that it has proposed for parcel B simply by subdividing its own property. Regardless of the location of property boundaries or even signs or fences, the Pond/Cove area will be an attractive nuisance for the 400-500 students that the City plans to bring to Parcel B. Given the ability of teenagers to ignore warnings, signs and fences, the risk presented by the adjacent Pond/Cove area must be evaluated before the appropriateness of the remedy can be determined.

Construction of a school building on Parcel B (and a YMCA on Parcel C) will affect access to the undeveloped portion of the Gorham site, and, possibly, the ability to effectively clean up the entire site. Until a remediation plan for the entire former Gorham site is proposed, and a community involvement process for that plan developed and

implemented, DEM should reject any remediation plans for Parcel B (and for that matter, the remediation plan for the portion of Parcel C where the YMCA is proposed).

3. The Existence of Data Gaps Render Any Evaluation of the Technical Feasibility of the Proposed Remedy for Parcel B Speculative.

There are significant data gaps that prevent the public and DEM from completely evaluating the technical feasibility of the proposed remedy. This conclusion is supported by Attorney Wagner's November 17, 2005 letter to Attorney Ryan quoted above ("Wagner letter"). Those data gaps include the following.

First, additional soil testing of the undeveloped portion of Parcel C and Cove sediments must be undertaken to assess potential exposure risks to future users of Parcel B. Mr. Dorr has conducted tests of soil behind the school site on Parcel C and of Cove sediments and found levels of both lead and arsenic 50 and 100 times higher, respectively, than the Residential Direct Exposure Criteria for those two substances.

Second, the site investigation for Parcel B did not include tests for PCBs and dioxins, despite those substances being found in tissue samples taken from fish caught in Mashapaug Pond. (See Wagner letter at page 2, paragraph 5(a)). Moreover, PCBs were found on another portion of the Gorham site in previous investigations.

Third, the area surrounding former Building "N" (a former pumping station) on corner of Parcel B has not been properly investigated. Beneath Building N were two 15,000 gallon underground tanks. In prior investigations those tanks were said to have contained water; but further research by Mr. Dorr revealed that solvents were stored in those tanks. According to Mr. Dorr's research, solvents stored in those tanks were delivered by rail car along a rail spur that traversed Parcel B. However, neither the area around former Building N was properly investigated for solvents.

Fourth, the remedy put in place to contain a plume containing PCE's on Parcel A has been found by DEM to have failed, creating yet another data gap. Attorney Wagner's letter states that "Textron's willingness to promptly implement a new remedy that will successfully remediate or at least halt the migration of this plume towards the down-gradient Parcel B could have a significant impact on the remedial requirements for the school site." Wagner letter at page 5, paragraph 9.

Until these data gaps are filled, DEM should make no finding as to the technical feasibility of the proposed remedy for Parcel B and withhold approval of any remediation plan for Parcel B.

Conclusion

The proposed remedial alternative for Parcel B, based on the information presently available is not technically feasible and/or cannot be determined by DEM to be technically feasible. The same holds true of the remediation plan proposed for the

01/04/2000 10:10 AM 1010010000

portion of Parcel C where a YMCA is proposed. Mr. Dorr respectfully requests that the City develop a remediation plan for the entire Gorham Site, after putting into operation a community involvement process as required by both the Industrial Properties Remediation and Reuse Act and DEM's Remediation Regulations.

Respectfully Submitted,



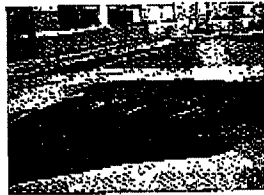
Steven Fischbach
Community Lawyer / Unit Head

CC: Joseph Martella, RIDEM

Enclosures (not included with faxed copy)



Picture 001



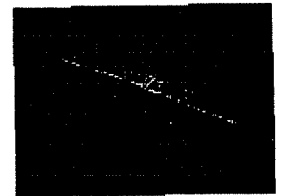
Picture 002



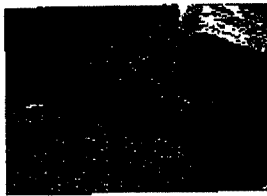
Picture 003



Picture 004



Picture 005



Picture 006



Picture 007



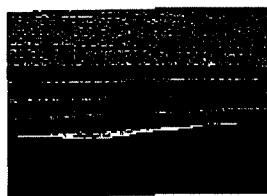
Picture 008



Picture 009



Picture 010



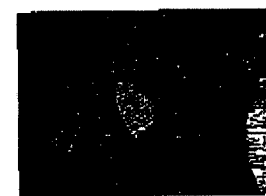
Picture 011



Picture 012



Picture 013



Picture 014



Picture 015



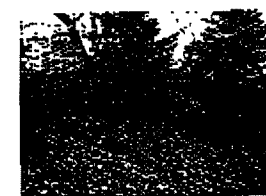
Picture 016



Picture 017



Picture 018



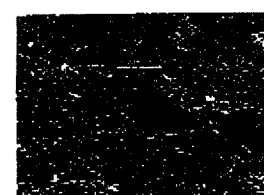
Picture 019



Picture 020



Picture 021



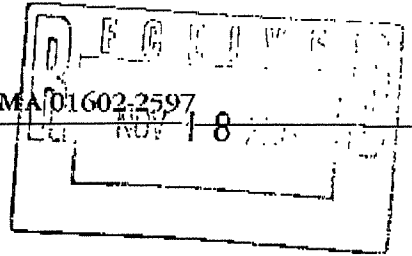
Picture 022



Picture 023



486 Chandler Street • Worcester, MA 01602-2597



November 16, 2005

Thomas Deller, AICP
Providence Redevelopment Agency
400 Westminster Street
Providence, RI 02903
ATTN: Marcia Jennings

2.5

RE: Technical Feasibility of the proposed remediation for 333 Adelaide Avenue,
Providence, RI, former Gorham/Textron Disposal Site, Parcel B.
Superfund EPA ID: RID982542318

Dear Mr. Deller:

I would like to comment on the need to conduct a thorough historical assessment of the land use on, and inventory of potential hazards located in, the above referenced site and its neighboring parcels. While it may be "technically feasible" to remediate Parcel B to meet the RIRDEC, it seems extremely irresponsible to do so while leaving Parcel D, the so called "historical fill area" essentially untouched.

For over a century, Gorham Manufacturing and the Gorham Division of Textron contoured Parcel D to its current topographical configuration by dumping industrial and manufacturing debris, including 55-gallon barrels of chemicals, in this area. Those investigations completed so far on this locus have, to my knowledge, been funded and guided entirely by Textron. Since no neutral third party has ever performed a thorough investigation of this area, I strongly question the wisdom and the scientific validity of remediating only one area in a site of this magnitude. In addition, there also appears to be no information in your RAWP spelling-out the prevention of cross contamination from Parcel C and Parcel D during building construction.

As a professor of public policy and historical consultant on environmental sensitive land use issues, I would strongly urge the City of Providence to consider what lies beneath all parcels that comprise the former Gorham/Textron manufacturing site and not just those in Parcel B. As a professional planner, I am sure that you understand the ecologically sensitive nature of former industrial sites and the need to thoroughly examination how the area in question was used in the past as waste sink; only then can future generations of Providence schoolchildren be assured that they will not be needlessly exposed to an array of potential dangerous hazards.

I thank you for your time in this matter.

Sincerely,

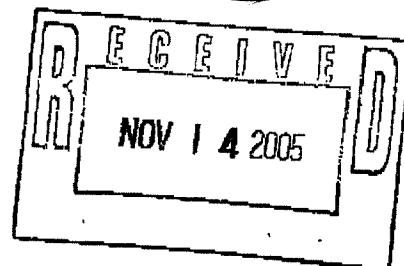
A handwritten signature in cursive script, appearing to read "Steven A. Corey".

Steven A. Corey, Ph.D.
Professor and Chair of Urban Studies
scorey@worccster.edu
[Residence: 975 Smith Street, Providence, RI 02908]

64 Crescent St. Providence, RI 02907

November 10, 2005

2.6



Gorham Site Environmental Comments
 ATTN: Marcia Jennings
 Providence Dept. of Planning and Development
 400 Westminster Street
 Providence, RI 02903

Dear Ms. Jennings:

I am writing as a concerned Providence citizen and long-time resident of the Reservoir Triangle. I feel that the proposed remedy for the Gorham/Textron site is not technically feasible for the following reasons:

1) It has been brought to my attention that all of the RIDEM safety standards for exposure to various chemicals are based on calculations from ADULT bodies: e.g. blood volume, organ size, etc. However, the proposed Parcel B use is for a high school, which will be attended by adolescents. Further, the school use will surely attract younger children to the site, as parts of families which attend school functions, or who play on the site during off hours. As a high school teacher I can attest to the fact that many high school students are still very SMALL! Many of the documents from EA Engineering, Inc. report "no exceedences" for various chemicals; but those are adult exceedences. The EA reports are a large part of the science on which this Parcel B remediation plan relies. So it is clear to me that until safety levels for children are provided, the proposed plan is NOT technically feasible; it CANNOT ensure the safety of the children who will be the major users of the site; and the plan should be reworked to be based on child-derived data.

2) A further point along the same line is that the scientific studies focus on exposure to ONE chemical only. However, it is widely known that the Gorham/Textron soil and subsurface waters contain a large number of potential toxins that are not separated from one another. Just as a person can safely take two separate medications at different times in his/her life; there is no guarantee that he/she can safely take those same two AT THE SAME TIME. They can and frequently do have toxic side effects from being in the body contemporaneously. Since it is a given that there are large amounts of potentially lethal chemicals on this site, no further building should be done, for the use of adults and particularly children, until data has been introduced that exposure to these many, intermixed substances will be safe for all users.

There are many other technical problems with the proposal; but I have focussed on these two because they seem to me so clear in the moral imperative to protect the children and users of this site. As I have written before, the best way will be for all responsible parties to completely and thoroughly clean all of the 37 acre site and Mashpaug Pond and Cove, rather than propose band-aid, parcelized remedies.

Thank you for your attention, and I await your response to the points I have raised.

Sincerely,

 Catherine Orloff

01/02/2000 10:10 FAX 4010020000
W. A. Martin

46 Wildwood Avenue

Providence, RI 02907

December 29, 2005

3.1

Thomas Deller, AICP
Providence Redevelopment Agency
ATTN: Marcia Jennings
400 Westminster Street
Providence, RI 02903

RE: RI Analytical Laboratories, Inc. CERTIFICATION OF ANALYSIS of 7/18/2005
testing at 333 Adelaide Ave, EPA Superfund Listing: ID: RID982542318

What happened to the contaminated debris found during excavation at Parcel B regarding samples reported 7/19/05 from the above testing done for EA Engineering and the City?

Six of the eight Bulk Samples listed below were identified as POSITIVE for ASBESTOS on 7/19/05.

Sample 001:	Transite found in excavation trench
Sample 002:	Roofing found in "excavation" (excavation) trench
Sample 003:	Suspect insulation found in excavation" (excavation trench
Sample 004:	Mosaic linoleum found in excavation" (excavation trench
Sample 005:	Brick linoleum found in excavation" (excavation) trench
Sample 008:	Suspect insulation found @ middle of site

Where are the manifests showing that all asbestos-contaminated materials located at these areas were properly disposed of, to ensure no health or safety hazards? I did not find them in the materials provided for public review by EA Engineering. Please provide all manifests of all the asbestos-contaminated debris found at and disposed of from this site. There were also documented records of many tons of debris that were taken to the RIRRC, but none of the tonnage would have included this asbestos-ridden debris would it? So the asbestos-laden debris was in addition to the tons of debris that were disposed of at the landfill?

Let's get real. This contaminated debris should not have been found in the soils since Textron remediated the asbestos. The City has been in court with the Asbestos Abatement Contractors for non-delivery of contracted services at another site. How do we know this same contracting company that was to originally remove the numerous asbestos-ridden buildings and materials at the former Gorham/Textron disposal site didn't "take the money and run"? We don't! Therefore we can't assume that the soils have been properly remediated as stated by EA Engineering and the City. Especially in light of the large amounts of (contaminated) debris and construction materials found in this "clean" soil.

The soils, and waters need to be REALLY cleaned up before we build anything else on this site. We have the opportunity to make this 37 acre site located on the 69 acre Pond and cove something great. Make it safe, then build on it.

If this site is safe, send YOUR children and grandchildren – or don't build it yet. Clean it up first.

Sincerely,



W. A. Martin

cc: Joseph T. Martella II, RIDEM/OWM
Brian Wagner, Esq., RIDEM/OLS
Darryl Paquette, Esq.
Steven Fischbach, Esq.
Hon. Daniel A. Procaccini, Superior Court Judge

Hon. David N. Cicilline, Mayor, City of Providence
Sen. Juan Pichardo, City of Providence
Rep. Tom Slater, State of RI
John J. Lombardi, City of Providence

Contaminated Soils
ASBESTOS found in supposedly "clean" soils. Why?

S. Clark

141 Roger Williams Avenue

sclarkri@yahoo.com

Providence, RI 02907

3.2

December 29, 2005
Thomas Deller, AICP
Providence Redevelopment Agency
ATTN: Marcia Jennings
400 Westminster Street
Providence, RI 02903

RE: LEAD LEVEL EXCEEDANCES found at 333 Adelaide Avenue, Providence, RI, former Gorham/Textron Disposal Site, EPA Superfund Listing: ID: RID982542318

It has come to my attention at a recent meeting that testing done last month (11/05) at the former Gorham/Textron Disposal Site includes:

Test results found LEAD at 7200 mg/kg dry.

The acceptable standard is less than 10 mg/kg dry!

What is the exact acceptable standard – 7 mg/kg dry? Please respond.

Let's see, that's **over 700 times** the acceptable standard for LEAD, as well as exceedences of other toxins and carcinogens!! **Why is the City so blindly determined to put Providence children on a toxic site? Why don't you want to clean the site up first, then build?**

MSDS data found at <http://www.epa.gov/superfund/programs/er/hazsubs/sources.htm>

Common Sources	Contaminants	Potential Health Effects
Various Commercial and Industrial Manufacturing Processes	arsenic; beryllium; cadmium; chromium; lead; mercury	All are toxic to kidneys. Decreased mental ability, weakness, headache, abdominal cramps, diarrhea, and anemia. Also affects blood-forming mechanisms and the peripheral nervous system. Long-term exposure to lead can cause permanent kidney and brain damage. Chromium, beryllium, arsenic, and cadmium have been implicated as human carcinogens.
	PCBs	Various skin ailments, including chloracne; may cause liver toxicity; carcinogenic to animals.

Who will be paying for the potential law suits that are likely to happen: the City – i.e.: the taxpayers?? How the City attempt to build a school on a site that potentially can be harmful, if not deadly? Whether you want to publicly admit it or not, this TRULY IS an environmental issue that needs leadership that is willing and wants to do what is right for humankind and the environment.

I hope that the New Year brings the reality that these decisions you are currently making, to go ahead with a flawed and unprepared plan, will have a dangerously profound/harmful human and environmental affect on many – perhaps for generations.

It's not too late – yet. **Clean the entire site before you build.**

Sincerely,

S. Clark

cc: Joseph T. Martella II, RIDEM/OWM
Brian Wagner, Esq., RIDEM/OLS
Darryl Paquette, Esq.
Steven Fischbach, Esq.
Hon. Daniel A. Procaccini, Superior Court Judge

Hon. David N. Cicilline, Mayor, City of Providence
Sen. Juan Pichardo, City of Providence
Rep. Tom Slater, State of RI
John J. Lombardi, City of Providence

Last month's **Lead levels 7200 mg/kg/dry** at 333 Adelaide Ave.
Acceptable standard: **less than 10 mg/kg/dry.**

Bridget Fonseca
71 Humes Street
Providence, RI 02907

December 20, 2005

3.3

Thomas Deller, AICP
Providence Redevelopment Agency
ATTN: Marcia Jennings
400 Westminster Street
Providence, RI 02903

Dear Mr. Deller:

Please explain why no testing has been done for dioxins at the proposed site for a school? This site has a Superfund listing ID: RID982542318; and was a silver manufacturing plant for over 80 years. Dioxins are known chemicals found in soils of sites like this.

As you may (or may not) be aware, dioxins are carcinogenic toxins. Dioxins are airborne and soluble to lipids – therefore they stay in the ground. Dioxins can also be found in fatty tissue of fish...Dioxins don't sink, they hang out in the first 10 cm of soil. Therefore, they can be detected if they are tested for – which the City chose not to do.

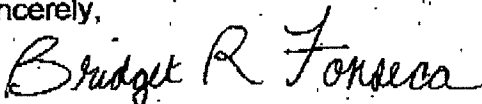
Dioxins are organochlorine compounds – also known as 2,3,7,8-tetrachlorodibenzo-para-dioxin. The MSDS cites this as a carcinogenic toxin. Just because you don't test for certain toxins doesn't mean they aren't there and won't cause potential health damages. Who will be liable for potential damages that may be caused by these toxic compounds? Will the City be burdened with costly medical negligence settlement costs– i.e. taxpayers? Is this why no one wants to test for these?

The City must test for these chemicals, so that the neighbors, students, staff and visitors to the proposed site know what is REALLY there. Whether you want to publicly admit it or not, this TRULY IS an environmental issue that will not go away without leadership that wants to do the right thing.

I hope that the New Year brings the reality of the impact your decisions have on the citizens of Providence – both immediate and future generations.

Realize THE POND, and COVE and the WHOLE SITE must be remediated in order to make this process a success and not a tragedy!

Sincerely,



Bridget Fonseca

cc: W. Michael Sullivan, Executive Director, RIDEM
Joseph T. Martella II, RIDEM/OWM
Brian Wagner, Esq., RIDEM/OLS
Darryl Paquette, Esq.
Steven Fischbach, Esq.
Hon. Daniel A. Procaccini, Superior Court Judge

Hon. David N. Cicilline, Mayor, City of Providence
Sen. Juan Pichardo, City of Providence
Rep. Tom Slater, State of RI
John J. Lombardi, City of Providence

3.4

Alan Sepe, Providence Department of Public Property
25 Dorrance St.
Providence, RI 02903

69 Alvin St.
Providence, RI 02907
October 10, 2005

RECEIVED

Timothy Regan
Chief Engineer, EA Engineering
Warwick, RI 02886

OCT 14 2005

EA ENGINEERING, SCIENCE
AND TECHNOLOGY, INC.
BY _____

Dear Mr. Sepe and Mr. Regan:

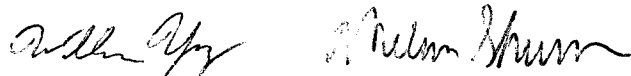
We are writing as part of the public comment regarding the proposed school on Adelaide Avenue. From information we have learned from the public domain, we are specifically concerned that EA Associates and the City of Providence have not tested for PCBs and dioxin on the premises of the proposed school. The final site report shows no indication of their having done so. **Our question for the next public meeting is when such testing will occur.** Recent studies of fish tissues in Mashapaug Pond have resulted in advisories warning residents not to eat the fish. These warnings were necessary because dioxins and PCB's (polychlorinated biphenyls) have been found in both carp and bass in the pond.¹ A number of the PCBs found are considered among the "highest toxicity" and "high toxicity" PCBs, in a 1996 study by the National Center for Environmental Assessment.² The State of Rhode Island has not identified the source of these contaminants. However, the source could be the Gorham site, particularly since the EPA has it on record that PCBs were found in soil that was removed from the Gorham site in 1997.³

The proposed high school site may have already been tested for dioxin and PCBs. If not, it is extremely important that the City of Providence test the site of the proposed High School for dioxin and PCBs prior to any additional movement of soil. PCBs and dioxin are resistant to degradation and therefore persist for many years in the environment. Furthermore, they bind to soil and airborne contamination of the construction workers and nearby residents could have a health impact. The fact that the City has already completed some site preparation, over the objections of RI DEM, may have already caused some contamination issues. More importantly, in terms of both student health and future legal liability on the part of the city, it is imperative that the site be tested, so as to avoid potentially disastrous consequences down the road. It is frightening that the city would feel the need to build a school on a site potentially contaminated with substances known to create learning deficits, without testing for such substances.

We therefore request the necessary testing for these substances at the site, as overseen by DEM. The haste with which the City builds schools on contaminated sites is of serious concern for us, and should be for all city residents.

Thank you for your leadership on this issue.

Sincerely,



William Young and Melissa Sherman

Cc: Sen. Juan Pichardo, Councilman Ronald Allen, Rhode Island Department of Environmental Management

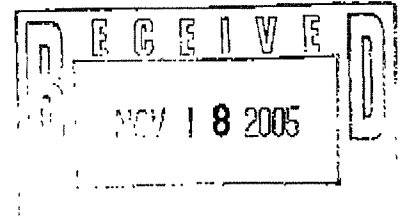
¹ Data tables from Mashapaug Pond study, 2001, RI DEM.

² <http://www.epa.gov/opptintr/pcb/pcb.pdf>. See table 3-3, p. 36.

³ http://yosemite.epa.gov/r1/npl_pad.nsf/0/e05d104ae2da713685256b4200606cf5?OpenDocument

November 17, 2005

Thomas Deller, AICP
 Providence Redevelopment Agency
 400 Westminster Street
 Providence, RI 02903
 ATTN: Marcia Jennings



RE: Technical Feasibility of the proposed remediation for 333 Adelaide Avenue,
 Providence, RI, former Gorham/Textron Disposal Site, Parcel B.
Listed as Superfund EPA ID: RID982542318

3.5
 3.6

Mr. Deller:

First, I am outraged that the City is still considering the construction of a school on a toxic site; especially in light of the fact that the ELUR that is attached to the entire 37 acres, which includes Parcel B, states: ***"That the property remains used for restricted recreational activities and that residential or institutional uses or unrestricted recreational activities (e.g. childcare, school, and athletic fields) be prohibited."*** (A.-5).

- Please explain how the City of Providence has come to the conclusion that they are not bound by the previous ELUR that by law follows the deed which has been part of the Textron "remediation"(RAWP 10/2001 Appendix D).?
- Moreover, since the Textron ELUR contains a non-compliance D. Release of Restriction; Alterations of Subject Area; how can we even still be considering building a school on this parcel?

Secondly, the State of Rhode Island, TITLE 23 Health and Safety CHAPTER 23-19.14 Industrial Property Remediation and Reuse Act, SECTION 23-19.14-5 **Environmental equity and public participation states:**

(a) ...The department of environmental management will develop and implement a process to ensure community involvement throughout the investigation and remediation of contaminated sites. That process shall include, but not be limited to, the following components:

(2) Adequate availability of all public records concerning the investigation and clean-up of the site, including, where necessary, the establishment of informational repositories in the impacted community; and

The records provided on behalf of the City were not clear, complete or in a chronological order, sections were missing and are often not legible. If you can't even put together a clear, concise report that will ensure environmental and human safety?

Also, it took me 15 phone calls and three faxes to your office and Mr. Alan Sepe's office (dating from 10/7/05 until 11/15/05). As of 11/17/05—a month and 10 days since my first contact—I am **still** waiting for all of the public information I requested.

- How is this providing "adequate availability" in accordance with the RI Law?

ELUR is binding

Thirdly, the State of Rhode Island, TITLE 23 Health and Safety CHAPTER 23-19.14 Industrial Property Remediation and Reuse Act, SECTION 23-19.14-5 Environmental equity and public participation states:

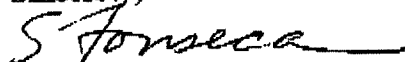
(c) The department of environmental management will develop and implement a process by which a person that is or may be affected by a release or threatened release of a hazardous material at a site located in the community in which the person works or resides may request the conduct of a site assessment; and a decision process, with objective criteria, specifying how the department will consider and appropriately respond to such requests.

- Under the law as stated above, I am requesting a site assessment and decision process with **objective criteria** – the City must use nonbiased, current and accurate data to drive the remediation of this site; not inaccurate, incomplete, biased data used by firms paid by Textron.

You have no scientific, empirical data that shows that this site is safe enough to build anything, let alone a school for kids.

It's not too late to begin to "do the right thing."

Sincerely,



S.K.C. Fonseca
A Concerned Citizen

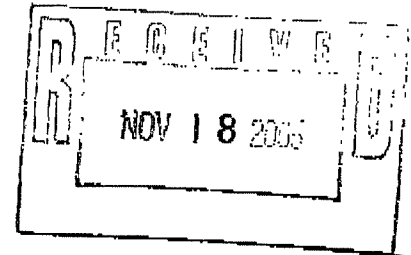
cc: W. Michael Sullivan, Executive Director, RIDEM
Joseph T. Martella II, RIDEM/OWM
Brian Wagner, Esq., RIDEM/OLS
Darryl Paquette, Esq.
Steven Fischbach, Esq.
Hon. Daniel A. Procaccini, Superior Court Judge

Hon. David N. Cicilline, Mayor, City of Providence
Sen. Juan Fichardo, City of Providence
Rep. Tom Stater, State of RI
John J. Lombardi, City of Providence

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11/10/2005 10:01 AM 101010000
42000

November 12, 2005

Mr. Thomas Deller
Providence Redevelopment Agency
400 Westminster Street
Providence, RI 02903
ATTN: Marcia Jennings



3.7
3.8

RE: Technical Feasibility of the proposed remediation for 333 Adelaide Avenue, Providence, RI, former Gorham/Textron Disposal Site.
Superfund Information Systems, EPA ID: RID982542318

Dear Mr. Deller:

EA Engineering's characterizations of site soils at the above referenced site are NOT accurate or correct for the following reasons:

The Remedial Action Work Plan (RAWP) approved by the RIDEM for Textron to remediate the entire 37 acre site, includes an agreement that the "site will be capped with at least 12 inches of clean fill within 6 months."¹

- Please explain why was this never done?
- Please explain how the current remedy, which is supposedly based upon the Textron RAWP being completed, is valid?

In a June 14, 2005 letter (pg 1)², EA Engineering responded to RIDEM's Question 1: The DEM requests "complete and accurate documentation regarding all recent unapproved preparation activities involving the disturbance of regulated soils."

Mr. Regan documents only those activities which took place during May of 2005, not those activities that occurred during the week of March 28, 2005 when the City dug several large holes, moved stockpiles of soil around, and removed several truckloads of material from the site.

No manifests or logged daily activities (as required by law) are included in the documentation despite the fact that 4000 cubic yards of materials were excavated during the week of March 28, 2005. (pp 2)²

- Please explain why these unapproved construction activities took place when EA Engineering and the City of Providence were fully aware that there was no clean fill from the supposed "Textron Remediation" at the site?
- Why has no documentation about the March 2005 excavations and removal of materials included in the Mr. Regan's response to the RIDEM? Please provide it.

Throughout the daily field logs of August 2005, EA Engineering staff monitoring the site mention "laborers separating wood/metal (out of screened material.)" If the site was previously remediated, as we have been told time and time again:

- Then why was so much construction debris landfilled on Parcel B?

- How does this construction debris impact the characterization of site soils, the overall conditions of the site and the ability of the engineered cap to be effective?
- How far down did/does this debris go?
- What is the condition of the soil beneath it?

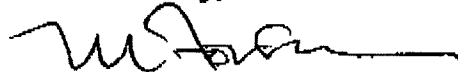
EA Engineering (pp 3)²: "...does not propose further characterization of Site soils." The engineered cap, which EA Engineering is proposing as a remedy to isolate these soils, is then based upon "surface soil samples collected in October 1994 and March 2001 as part of the RAWP submitted by Harding ESE."¹ Since the City performed illegal site excavations in March, April and May of 2005, and nature has acted upon this piece of land continuously since October of 1994 (11 years):

- How has the City concluded that it is appropriate to base a remedy on investigations which CANNOT reflect CURRENT soil conditions?

It is appalling to me that Textron was never held to the completion of their remediation; that throughout the spring of 2005 the City of Providence knowingly conducted illegal and potentially dangerous site preparation activities, that the current remediation plan is essentially based upon work that was done in 2001 and that the only thing standing between children and contaminated soil is going to be 12 inches of "clean fill or equivalent."

The City of Providence and the RIDEM have the opportunity to do the right thing by the taxpayers and the children of this city. I would urge you to take that opportunity and abandon this ill-considered plan to build a high school on a former Superfund Site, with known and extensive soil contamination.

Sincerely,



Mark Fonseca
A Concerned Citizen

REFERENCES

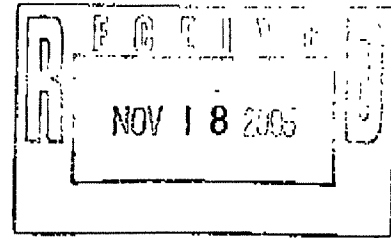
1. Remedial Action Work Plan, Textron Inc. to RIDEM, October 2001.
2. Personal correspondence. Tim Regan, PE, EA Engineering to Joseph Martella, II, RIDEM. June 14, 2005.

cc: W. Michael Sullivan, Executive Director, RIDEM
Joseph T. Martella II, RIDEM/OWM
Brian Wagner, Esq., RIDEM/OLS
Darryl Paquette, Esq.
Steven Fischbach, Esq.
Hon. Daniel A. Procaccini, Superior Court Judge

Hon. David N. Cicilline, Mayor, City of Providence
Sen. Juan Pichardo, City of Providence
Rep. Tom Slater, State of RI
John J. Lombardi, City of Providence

November 12, 2005

Mr. Thomas Deller
Providence Redevelopment Agency
400 Westminster Street
Providence, RI 02903
ATTN: Marcia Jennings



RE: Technical Feasibility of the proposed remediation for 333 Adelaide Avenue, Providence, RI, former Gorham/Textron Disposal Site.
Superfund Information Systems, EPA ID: RID982542318

3.9

Dear Mr. Deller:

First, *The SIR Addendum, April 2005, Final* only provides test results for Soil Borings for 1, 2, 3, 4, 5. Yet Figure 6 shows 6, 8, 9, 10, 11 and 12.

- Where are the test results for the other half of the soil borings shown in the Figure? Why were these six Soil Borings not included in the testing, and/or the test results?

Secondly, in Figure 6, there is an unidentified Soil Boring, that should be Soil Boring 7 – (SB7). As you may be aware, the soil borings are in numerical order. The Figure goes from SB6 to SB8, even though there is a soil boring shown without a label.

- Why is it not labeled, and why is it not referenced in the testing results?

EA Engineering, a scientifically technical consulting firm, has charged the City (the taxpayers) nearly \$50,000 to date for consulting fees, yet the apparently are not held accountable for complete, accurate and scientifically sound work by the City in representing the Taxpayer. Why not?

Thirdly, in the Limited RAWP and the SSISR dated September 2005 Final, *Appendix F Boring Logs Log of Soil Borings "using Figure (-)"*

- What is "Figure (-)"?

Again, this sloppiness, ineffective record keeping, lack of organization and poor presentation of data clearly shows the sub par abilities of EA Engineering's/The City's to monitor and maintain a project of such magnitude as this remediation of a former Superfund Site with known toxic chemicals in the soils.

Please halt construction of this proposed school until the Parcel B and the entire site that impacts Parcel B are remediated.

Sincerely,

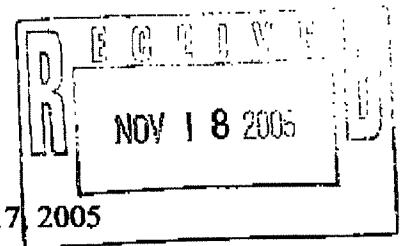
S. Clark
A Concerned Citizen

cc: W. Michael Sullivan, Executive Director, RIDEM
Joseph T. Martella II, RIDEM/OWM
Brian Wagner, Esq., RIDEM/OLS
Darryl Paquette, Esq.
Steven Fischbach, Esq.
Hon. Daniel A. Procaccini, Superior Court Judge

Hon. David N. Cicilline, Mayor, City of Providence
Sen. Juan Pichardo, City of Providence
Rep. Tom Slater, State of RI
John J. Lombardi, City of Providence
Ron Allen, Councilman

Gorham-Textron Site Environmental Comments

November 17, 2005



HAND DELIVERED

3.10

Marcia Jennings
Providence Dept. of Planning and Development
400 Westminster Street
Providence, R. I. 02903

RE: Comments Gorham-Textron Site

Dear Marcia Jennings:

Enclosed is a copy of results from a testing event, which I conducted on the Gorham-Textron contaminated waste site. These samples were retrieved from various locations on the site, some of which were within sixty feet of Parcel B. The contamination levels are extraordinary. It is clear that the property in question has not been adequately investigated, or tested. Request at this time that you include these results into the public comment record being chronicled for this site.

Our community group has hired a private environmental engineering firm to review both the remediation plan proposed for Parcel B, as well as these most recent test results. How the test results gathered on site will impact the school children and their safety needs to be examined. It is unconscionable to press forward without considering all the factors, which will ultimately decide the fate of both this site and our children you are forcing to spend their adolescence here.

Regards,

A handwritten signature in cursive script that reads "Robert F. L. Dorr".

Robert F. L. Dorr

Enclosures

C.C. Brian Wagner, Esq.
Joseph Martella, RIDEM
Steven Fischbach, Esq.
Associate Justice Daniel A. Proccini

Project Name: Mashapaug Pond

Project ID: N/A

ESS Project ID: 0509039

METHODNAME	ANALYTE	UNITS	0509039-01 09/05/2005 11:30 #1 0= -32"	0509039-02 09/05/2005 11:30 #1 @ -32"	0509039-03 09/05/2005 12:05 #2 0-32"	0509039-04 09/05/2005 12:05 #2 @ -32"	0509039-05 09/05/2005 12:15 #3 0-36"	0509039-06 09/05/2005 12:15 #3 @ -36"
6010B	Antimony	mg/kg	<27.3	<44.0	<7.3	<6.5	<13.1	<55.9
6010B	Arsenic	mg/kg	50.4	592	<7.3	<6.5	19.2	717
6010B	Beryllium	mg/kg	1.65	1.38	0.11	0.11	0.44	1.76
6010B	Cadmium	mg/kg	7.16	<4.40	<0.73	<0.65	<1.31	<5.59
6010B	Chromium	mg/kg	464	<8.8	7.4	4.0	10.6	<11.1
6010B	Copper	mg/kg	1680	<8.8	19.8	<1.3	58.6	<11.1
6010B	Lead	mg/kg	985	<44.0	10.8	<6.5	69.2	<55.9
6010B	Nickel	mg/kg	1770	4.6	4.6	4.0	16.1	70.1
6010B	Selenium	mg/kg	<27.3	<44.0	<7.3	<6.5	<13.1	<55.9
6010B	Silver	mg/kg	173	6.64	2.97	<0.65	12.5	8.62
6010B	Thallium	mg/kg	<27.3	65.6	<7.3	<12.9	<13.1	<55.9
6010B	Zinc	mg/kg	1930	1680	27.0	10.3	168	116
7471A	Mercury	mg/kg	2.01	<0.248	<0.043	<0.039	<0.073	<0.317
8100M	Total Petroleum Hydrocarbons	mg/kg	735	---	<31.8	---	164	---
8260B	1,1,1,2-Tetrachloroethane	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,1,1-Trichloroethane	ug/Kg	---	23400	---	1590	---	<1190
8260B	1,1,2,2-Tetrachloroethane	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,1,2-Trichloroethane	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,1-Dichloroethane	ug/Kg	---	<1160	---	149	---	2310
8260B	1,1-Dichloroethene	ug/Kg	---	<1160	---	78.1	---	<1190
8260B	1,1-Dichloropropene	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,2,3-Trichloropropane	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,2,3-Trichlorobenzene	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,2,4-Trichlorobenzene	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,2,4-Trimethylbenzene	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,2-Dibromo-3-Chloropropane	ug/Kg	---	<5790	---	<275	---	<5960
8260B	1,2-Dibromoethane	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,2-Dichlorobenzene	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,2-Dichloroethane	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,2-Dichloropropane	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,3,5-Trimethylbenzene	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,3-Dichlorobenzene	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,3-Dichloropropane	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,4-Dichlorobenzene	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	1,4-Dioxane - Screen	ug/Kg	---	<116000	---	<5500	---	<119000
8260B	1-Chlorohexane	ug/Kg	---	<1160	---	<55.0	---	<1190

8260B	2,2-Dichloropropane	ug/Kg	***	<2320	***	<110	***	<2390
8260B	2-Butanone	ug/Kg	***	<29000	***	<1380	***	<29800
8260B	2-Chlorotoluene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	2-Hexanone	ug/Kg	***	<11600	***	<550	***	<11900
8260B	4-Chlorotoluene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	4-Isopropyltoluene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	4-Methyl-2-Pentanone	ug/Kg	***	<11600	***	<550	***	<11900
8260B	Acetone	ug/Kg	***	<29000	***	<1380	***	<29800
8260B	Benzene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Bromobenzene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Bromochloromethane	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Bromodichloromethane	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Bromoform	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Bromomethane	ug/Kg	***	<2320	***	<110	***	<2390
8260B	Carbon Disulfide	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Carbon Tetrachloride	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Chlorobenzene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Chloroethane	ug/Kg	***	<2320	***	<110	***	<2390
8260B	Chloroform	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Chloromethane	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	cis-1,2-Dichloroethene	ug/Kg	***	<1160	***	<55.0	***	9780
8260B	cis-1,3-Dichloropropene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Dibromochloromethane	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Dibromomethane	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Dichlorodifluoromethane	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Diethyl Ether	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Di-isopropyl ether	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Ethyl tertiary-butyl ether	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Ethylbenzene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Hexachlorobutadiene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Isopropylbenzene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Methyl tert-Butyl Ether	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Methylene Chloride	ug/Kg	***	<5790	***	<275	***	<5960
8260B	Naphthalene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	n-Butylbenzene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	n-Propylbenzene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	sec-Butylbenzene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Styrene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	tert-Butylbenzene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Tertiary-amyl methyl ether	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Tetrachloroethene	ug/Kg	***	23600	***	<55.0	***	<1190
8260B	Tetrahydrofuran	ug/Kg	***	<5790	***	<275	***	<5960
8260B	Toluene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	trans-1,2-Dichloroethene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	trans-1,3-Dichloropropene	ug/Kg	***	<1160	***	<55.0	***	<1190
8260B	Trichloroethene	ug/Kg	***	89100	***	2210	***	1690

8260B	Trichlorofluoromethane	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	Vinyl Acetate	ug/Kg	---	<5790	---	<275	---	<5960
8260B	Vinyl Chloride	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	Xylene O	ug/Kg	---	<1160	---	<55.0	---	<1190
8260B	Xylene P,M	ug/Kg	---	<2320	---	<110	---	<2390
8260B	Xylenes (Total)	ug/Kg	---	<3480	---	<165	---	<3580

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #1 0= -32"
Date Sampled: 09/05/05 11:30
Percent Solids: 20

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-01
Sample Matrix: Soil

3050B/6000/7000 Total Metals

<u>Analyte</u>	<u>Results</u>	<u>Units</u>	<u>MRL</u>	<u>Method</u>	<u>DF</u>	<u>Analyst</u>	<u>Analyzed</u>	<u>I/V</u>	<u>F/V</u>
Antimony	ND	mg/kg dry	27.3	6010B	1	SVD	09/06/05	1.83	100
Arsenic	50.4	mg/kg dry	27.3	6010B	1	SVD	09/06/05	1.83	100
Beryllium	1.65	mg/kg dry	0.27	6010B	1	SVD	09/06/05	1.83	100
Cadmium	7.16	mg/kg dry	2.73	6010B	1	SVD	09/06/05	1.83	100
Chromium	464	mg/kg dry	5.5	6010B	1	SVD	09/06/05	1.83	100
Copper	1680	mg/kg dry	5.5	6010B	1	SVD	09/06/05	1.83	100
Lead	985	mg/kg dry	27.3	6010B	1	SVD	09/06/05	1.83	100
Mercury	2.01	mg/kg dry	0.166	7471A	1	SVD	09/07/05	0.6	40
Nickel	497	mg/kg dry	5.5	6010B	1	SVD	09/06/05	1.83	100
Selenium	ND	mg/kg dry	27.3	6010B	1	SVD	09/06/05	1.83	100
Silver	173	mg/kg dry	2.73	6010B	1	SVD	09/06/05	1.83	100
Thallium	ND	mg/kg dry	27.3	6010B	1	SVD	09/06/05	1.83	100
Zinc	1930	mg/kg dry	13.6	6010B	1	SVD	09/06/05	1.83	100

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #1 0= -32"
Date Sampled: 09/05/05 11:30
Percent Solids: 20
Initial Volume: 30.2
Final Volume: 1
Extraction Method: 3550B

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-01
Sample Matrix: Soil
Analyst: JLS
Prepared: 09/06/05

8100M Total Petroleum Hydrocarbons

<u>Analyte</u>	<u>Results</u>	<u>Units</u>	<u>MRL</u>	<u>DF</u>	<u>Analyzed</u>
Total Petroleum Hydrocarbons	735	mg/kg dry	124	1	09/07/05
<i>Surrogate: O-Terphenyl</i>	<i>46 %</i>	<i>%Recovery</i>	<i>Qualifier</i>	<i>Limits</i>	

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #1 @ -32"
Date Sampled: 09/05/05 11:30
Percent Solids: 13

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-02
Sample Matrix: Soil

3050B/6000/7000 Total Metals

<u>Analyte</u>	<u>Results</u>	<u>Units</u>	<u>MRL</u>	<u>Method</u>	<u>DF</u>	<u>Analyst</u>	<u>Analyzed</u>	<u>I/V</u>	<u>F/V</u>
Antimony	ND	mg/kg dry	44.0	6010B	1	SVD	09/06/05	1.75	100
Arsenic	592	mg/kg dry	44.0	6010B	1	SVD	09/06/05	1.75	100
Beryllium	1.38	mg/kg dry	0.44	6010B	1	SVD	09/06/05	1.75	100
Cadmium	ND	mg/kg dry	4.40	6010B	1	SVD	09/06/05	1.75	100
Chromium	ND	mg/kg dry	8.8	6010B	1	SVD	09/06/05	1.75	100
Copper	ND	mg/kg dry	8.8	6010B	1	SVD	09/06/05	1.75	100
Lead	ND	mg/kg dry	44.0	6010B	1	SVD	09/06/05	1.75	100
Mercury	ND	mg/kg dry	0.248	7471A	1	SVD	09/07/05	0.62	40
Nickel	1770	mg/kg dry	8.8	6010B	1	SVD	09/06/05	1.75	100
Selenium	ND	mg/kg dry	44.0	6010B	1	SVD	09/06/05	1.75	100
Silver	6.64	mg/kg dry	4.40	6010B	1	SVD	09/06/05	1.75	100
Thallium	65.6	mg/kg dry	44.0	6010B	1	SVD	09/06/05	1.75	100
Zinc	1680	mg/kg dry	22.0	6010B	1	SVD	09/06/05	1.75	100

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #1 @ -32"
Date Sampled: 09/05/05 11:30
Percent Solids: 13
Initial Volume: 7
Final Volume: 15
Extraction Method: 5035

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-02
Sample Matrix: Soil
Analyst: RES

5035/8260B Volatile Organic Compounds / Methanol

<u>Analyte</u>	<u>Results</u>	<u>Units</u>	<u>MRL</u>	<u>DF</u>	<u>Analyzed</u>
1,1,1,2-Tetrachloroethane	ND	ug/Kg dry	1160	1	09/07/05
1,1,1-Trichloroethane	23400	ug/Kg dry	1160	1	09/07/05
1,1,2,2-Tetrachloroethane	ND	ug/Kg dry	1160	1	09/07/05
1,1,2-Trichloroethane	ND	ug/Kg dry	1160	1	09/07/05
1,1-Dichloroethane	ND	ug/Kg dry	1160	1	09/07/05
1,1-Dichloroethene	ND	ug/Kg dry	1160	1	09/07/05
1,1-Dichloropropene	ND	ug/Kg dry	1160	1	09/07/05
1,2,3-Trichlorobenzene	ND	ug/Kg dry	1160	1	09/07/05
1,2,3-Trichloropropane	ND	ug/Kg dry	1160	1	09/07/05
1,2,4-Trichlorobenzene	ND	ug/Kg dry	1160	1	09/07/05
1,2,4-Trimethylbenzene	ND	ug/Kg dry	1160	1	09/07/05
1,2-Dibromo-3-Chloropropane	ND	ug/Kg dry	5790	1	09/07/05
1,2-Dibromoethane	ND	ug/Kg dry	1160	1	09/07/05
1,2-Dichlorobenzene	ND	ug/Kg dry	1160	1	09/07/05
1,2-Dichloroethane	ND	ug/Kg dry	1160	1	09/07/05
1,2-Dichloropropane	ND	ug/Kg dry	1160	1	09/07/05
1,3,5-Trimethylbenzene	ND	ug/Kg dry	1160	1	09/07/05
1,3-Dichlorobenzene	ND	ug/Kg dry	1160	1	09/07/05
1,3-Dichloropropane	ND	ug/Kg dry	1160	1	09/07/05
1,4-Dichlorobenzene	ND	ug/Kg dry	1160	1	09/07/05
1,4-Dioxane - Screen	ND	ug/Kg dry	116000	1	09/07/05
1-Chlorohexane	ND	ug/Kg dry	1160	1	09/07/05
2,2-Dichloropropane	ND	ug/Kg dry	2320	1	09/07/05
2-Butanone	ND	ug/Kg dry	29000	1	09/07/05
2-Chlorotoluene	ND	ug/Kg dry	1160	1	09/07/05
2-Hexanone	ND	ug/Kg dry	11600	1	09/07/05
4-Chlorotoluene	ND	ug/Kg dry	1160	1	09/07/05
4-Isopropyltoluene	ND	ug/Kg dry	1160	1	09/07/05
4-Methyl-2-Pentanone	ND	ug/Kg dry	11600	1	09/07/05
Acetone	ND	ug/Kg dry	29000	1	09/07/05
Benzene	ND	ug/Kg dry	1160	1	09/07/05
Bromobenzene	ND	ug/Kg dry	1160	1	09/07/05
Bromochloromethane	ND	ug/Kg dry	1160	1	09/07/05
Bromodichloromethane	ND	ug/Kg dry	1160	1	09/07/05
Bromoform	ND	ug/Kg dry	1160	1	09/07/05

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #1 @ -32"
Date Sampled: 09/05/05 11:30
Percent Solids: 13
Initial Volume: 7
Final Volume: 15
Extraction Method: 5035

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-02
Sample Matrix: Soil
Analyst: RES

5035/8260B Volatile Organic Compounds / Methanol

Bromomethane	ND	ug/Kg dry	2320	1	09/07/05
Carbon Disulfide	ND	ug/Kg dry	1160	1	09/07/05
Carbon Tetrachloride	ND	ug/Kg dry	1160	1	09/07/05
Chlorobenzene	ND	ug/Kg dry	1160	1	09/07/05
Chloroethane	ND	ug/Kg dry	2320	1	09/07/05
Chloroform	ND	ug/Kg dry	1160	1	09/07/05
Chloromethane	ND	ug/Kg dry	1160	1	09/07/05
cis-1,2-Dichloroethene	ND	ug/Kg dry	1160	1	09/07/05
cis-1,3-Dichloropropene	ND	ug/Kg dry	1160	1	09/07/05
Dibromochloromethane	ND	ug/Kg dry	1160	1	09/07/05
Dibromomethane	ND	ug/Kg dry	1160	1	09/07/05
Dichlorodifluoromethane	ND	ug/Kg dry	1160	1	09/07/05
Diethyl Ether	ND	ug/Kg dry	1160	1	09/07/05
Di-isopropyl ether	ND	ug/Kg dry	1160	1	09/07/05
Ethyl tertiary-butyl ether	ND	ug/Kg dry	1160	1	09/07/05
Ethylbenzene	ND	ug/Kg dry	1160	1	09/07/05
Hexachlorobutadiene	ND	ug/Kg dry	1160	1	09/07/05
Isopropylbenzene	ND	ug/Kg dry	1160	1	09/07/05
Methyl tert-Butyl Ether	ND	ug/Kg dry	1160	1	09/07/05
Methylene Chloride	ND	ug/Kg dry	5790	1	09/07/05
Naphthalene	ND	ug/Kg dry	1160	1	09/07/05
n-Butylbenzene	ND	ug/Kg dry	1160	1	09/07/05
n-Propylbenzene	ND	ug/Kg dry	1160	1	09/07/05
sec-Butylbenzene	ND	ug/Kg dry	1160	1	09/07/05
Styrene	ND	ug/Kg dry	1160	1	09/07/05
tert-Butylbenzene	ND	ug/Kg dry	1160	1	09/07/05
Tertiary-amyl methyl ether	ND	ug/Kg dry	1160	1	09/07/05
Tetrachloroethene	23600	ug/Kg dry	1160	1	09/07/05
Tetrahydrofuran	ND	ug/Kg dry	5790	1	09/07/05
Toluene	ND	ug/Kg dry	1160	1	09/07/05
trans-1,2-Dichloroethene	ND	ug/Kg dry	1160	1	09/07/05
trans-1,3-Dichloropropene	ND	ug/Kg dry	1160	1	09/07/05
Trichloroethene	89100	ug/Kg dry	1160	1	09/07/05
Trichlorofluoromethane	ND	ug/Kg dry	1160	1	09/07/05
Vinyl Acetate	ND	ug/Kg dry	5790	1	09/07/05
Vinyl Chloride	ND	ug/Kg dry	1160	1	09/07/05

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #1 @ -32"
Date Sampled: 09/05/05 11:30
Percent Solids: 13
Initial Volume: 7
Final Volume: 15
Extraction Method: 5035

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-02
Sample Matrix: Soil
Analyst: RES

5035/8260B Volatile Organic Compounds / Methanol

Xylene O	ND	ug/Kg dry	1160	1	09/07/05
Xylene P,M	ND	ug/Kg dry	2320	1	09/07/05
Xylenes (Total)	ND	ug/Kg	3480		09/07/05

	%Recovery	Qualifier	Limits
Surrogate: 1,2-Dichloroethane-d4	114 %		70-130
Surrogate: 4-Bromofluorobenzene	106 %		70-130
Surrogate: Dibromofluoromethane	114 %		70-130
Surrogate: Toluene-d8	109 %		70-130

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #2 0-32"
Date Sampled: 09/05/05 12:05
Percent Solids: 78

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-03
Sample Matrix: Soil

3050B/6000/7000 Total Metals

<u>Analyte</u>	<u>Results</u>	<u>Units</u>	<u>MRL</u>	<u>Method</u>	<u>DF</u>	<u>Analyst</u>	<u>Analyzed</u>	<u>I/V</u>	<u>F/V</u>
Antimony	ND	mg/kg dry	7.3	6010B	1	SVD	09/06/05	1.76	100
Arsenic	ND	mg/kg dry	7.3	6010B	1	SVD	09/06/05	1.76	100
Beryllium	0.11	mg/kg dry	0.07	6010B	1	SVD	09/06/05	1.76	100
Cadmium	ND	mg/kg dry	0.73	6010B	1	SVD	09/06/05	1.76	100
Chromium	7.4	mg/kg dry	1.5	6010B	1	SVD	09/06/05	1.76	100
Copper	19.8	mg/kg dry	1.5	6010B	1	SVD	09/06/05	1.76	100
Lead	10.8	mg/kg dry	7.3	6010B	1	SVD	09/06/05	1.76	100
Mercury	ND	mg/kg dry	0.043	7471A	1	SVD	09/07/05	0.6	40
Nickel	4.6	mg/kg dry	1.5	6010B	1	SVD	09/06/05	1.76	100
Selenium	ND	mg/kg dry	7.3	6010B	1	SVD	09/06/05	1.76	100
Silver	2.97	mg/kg dry	0.73	6010B	1	SVD	09/06/05	1.76	100
Thallium	ND	mg/kg dry	7.3	6010B	1	SVD	09/06/05	1.76	100
Zinc	27.0	mg/kg dry	3.6	6010B	1	SVD	09/06/05	1.76	100

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #2 0-32"
Date Sampled: 09/05/05 12:05
Percent Solids: 78
Initial Volume: 30.2
Final Volume: 1
Extraction Method: 3550B

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-03
Sample Matrix: Soil
Analyst: JLS
Prepared: 09/06/05

8100M Total Petroleum Hydrocarbons

<u>Analyte</u>	<u>Results</u>	<u>Units</u>	<u>MRL</u>	<u>DF</u>	<u>Analyzed</u>
Total Petroleum Hydrocarbons	ND	mg/kg dry	31.8	1	09/07/05

	<u>%Recovery</u>	<u>Qualifier</u>	<u>Limits</u>
Surrogate: O-Terphenyl	71 %		40-140

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #2 @ -32"
Date Sampled: 09/05/05 12:05
Percent Solids: 85

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-04
Sample Matrix: Soil

3050B/6000/7000 Total Metals

<u>Analyte</u>	<u>Results</u>	<u>Units</u>	<u>MRL</u>	<u>Method</u>	<u>DF</u>	<u>Analyst</u>	<u>Analyzed</u>	<u>I/V</u>	<u>F/V</u>
Antimony	ND	mg/kg dry	6.5	6010B	1	SVD	09/06/05	1.82	100
Arsenic	ND	mg/kg dry	6.5	6010B	1	SVD	09/06/05	1.82	100
Beryllium	0.11	mg/kg dry	0.06	6010B	1	SVD	09/06/05	1.82	100
Cadmium	ND	mg/kg dry	0.65	6010B	1	SVD	09/06/05	1.82	100
Chromium	4.0	mg/kg dry	1.3	6010B	1	SVD	09/06/05	1.82	100
Copper	ND	mg/kg dry	1.3	6010B	1	SVD	09/06/05	1.82	100
Lead	ND	mg/kg dry	6.5	6010B	1	SVD	09/06/05	1.82	100
Mercury	ND	mg/kg dry	0.039	7471A	1	SVD	09/07/05	0.6	40
Nickel	4.0	mg/kg dry	1.3	6010B	1	SVD	09/06/05	1.82	100
Selenium	ND	mg/kg dry	6.5	6010B	1	SVD	09/06/05	1.82	100
Silver	ND	mg/kg dry	0.65	6010B	1	SVD	09/06/05	1.82	100
Thallium	ND	mg/kg dry	12.9	6010B	1	SVD	09/06/05	1.82	100
Zinc	10.3	mg/kg dry	3.2	6010B	1	SVD	09/06/05	1.82	100

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #2 @ -32"
Date Sampled: 09/05/05 12:05
Percent Solids: 85
Initial Volume: 19.1
Final Volume: 15
Extraction Method: 5035

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-04
Sample Matrix: Soil
Analyst: RES

5035/8260B Volatile Organic Compounds / Methanol

<u>Analyte</u>	<u>Results</u>	<u>Units</u>	<u>MRL</u>	<u>DF</u>	<u>Analyzed</u>
1,1,1,2-Tetrachloroethane	ND	ug/Kg dry	55.0	1	09/07/05
1,1,1-Trichloroethane	1590	ug/Kg dry	55.0	1	09/07/05
1,1,2,2-Tetrachloroethane	ND	ug/Kg dry	55.0	1	09/07/05
1,1,2-Trichloroethane	ND	ug/Kg dry	55.0	1	09/07/05
1,1-Dichloroethane	149	ug/Kg dry	55.0	1	09/07/05
1,1-Dichloroethene	78.1	ug/Kg dry	55.0	1	09/07/05
1,1-Dichloropropene	ND	ug/Kg dry	55.0	1	09/07/05
1,2,3-Trichlorobenzene	ND	ug/Kg dry	55.0	1	09/07/05
1,2,3-Trichloropropane	ND	ug/Kg dry	55.0	1	09/07/05
1,2,4-Trichlorobenzene	ND	ug/Kg dry	55.0	1	09/07/05
1,2,4-Trimethylbenzene	ND	ug/Kg dry	55.0	1	09/07/05
1,2-Dibromo-3-Chloropropane	ND	ug/Kg dry	275	1	09/07/05
1,2-Dibromoethane	ND	ug/Kg dry	55.0	1	09/07/05
1,2-Dichlorobenzene	ND	ug/Kg dry	55.0	1	09/07/05
1,2-Dichloroethane	ND	ug/Kg dry	55.0	1	09/07/05
1,2-Dichloropropane	ND	ug/Kg dry	55.0	1	09/07/05
1,3,5-Trimethylbenzene	ND	ug/Kg dry	55.0	1	09/07/05
1,3-Dichlorobenzene	ND	ug/Kg dry	55.0	1	09/07/05
1,3-Dichloropropane	ND	ug/Kg dry	55.0	1	09/07/05
1,4-Dichlorobenzene	ND	ug/Kg dry	55.0	1	09/07/05
1,4-Dioxane - Screen	ND	ug/Kg dry	5500	1	09/07/05
1-Chlorohexane	ND	ug/Kg dry	55.0	1	09/07/05
2,2-Dichloropropane	ND	ug/Kg dry	110	1	09/07/05
2-Butanone	ND	ug/Kg dry	1380	1	09/07/05
2-Chlorotoluene	ND	ug/Kg dry	55.0	1	09/07/05
2-Hexanone	ND	ug/Kg dry	550	1	09/07/05
4-Chlorotoluene	ND	ug/Kg dry	55.0	1	09/07/05
4-Isopropyltoluene	ND	ug/Kg dry	55.0	1	09/07/05
4-Methyl-2-Pentanone	ND	ug/Kg dry	550	1	09/07/05
Acetone	ND	ug/Kg dry	1380	1	09/07/05
Benzene	ND	ug/Kg dry	55.0	1	09/07/05
Bromobenzene	ND	ug/Kg dry	55.0	1	09/07/05
Bromochloromethane	ND	ug/Kg dry	55.0	1	09/07/05
Bromodichloromethane	ND	ug/Kg dry	55.0	1	09/07/05
Bromoform	ND	ug/Kg dry	55.0	1	09/07/05

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #2 @ -32"
Date Sampled: 09/05/05 12:05
Percent Solids: 85
Initial Volume: 19.1
Final Volume: 15
Extraction Method: 5035

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-04
Sample Matrix: Soil
Analyst: RES

5035/8260B Volatile Organic Compounds / Methanol

Bromomethane	ND	ug/Kg dry	110	1	09/07/05
Carbon Disulfide	ND	ug/Kg dry	55.0	1	09/07/05
Carbon Tetrachloride	ND	ug/Kg dry	55.0	1	09/07/05
Chlorobenzene	ND	ug/Kg dry	55.0	1	09/07/05
Chloroethane	ND	ug/Kg dry	110	1	09/07/05
Chloroform	ND	ug/Kg dry	55.0	1	09/07/05
Chloromethane	ND	ug/Kg dry	55.0	1	09/07/05
cis-1,2-Dichloroethene	ND	ug/Kg dry	55.0	1	09/07/05
cis-1,3-Dichloropropene	ND	ug/Kg dry	55.0	1	09/07/05
Dibromochloromethane	ND	ug/Kg dry	55.0	1	09/07/05
Dibromomethane	ND	ug/Kg dry	55.0	1	09/07/05
Dichlorodifluoromethane	ND	ug/Kg dry	55.0	1	09/07/05
Diethyl Ether	ND	ug/Kg dry	55.0	1	09/07/05
Di-isopropyl ether	ND	ug/Kg dry	55.0	1	09/07/05
Ethyl tertiary-butyl ether	ND	ug/Kg dry	55.0	1	09/07/05
Ethylbenzene	ND	ug/Kg dry	55.0	1	09/07/05
Hexachlorobutadiene	ND	ug/Kg dry	55.0	1	09/07/05
Isopropylbenzene	ND	ug/Kg dry	55.0	1	09/07/05
Methyl tert-Butyl Ether	ND	ug/Kg dry	55.0	1	09/07/05
Methylene Chloride	ND	ug/Kg dry	275	1	09/07/05
Naphthalene	ND	ug/Kg dry	55.0	1	09/07/05
n-Butylbenzene	ND	ug/Kg dry	55.0	1	09/07/05
n-Propylbenzene	ND	ug/Kg dry	55.0	1	09/07/05
sec-Butylbenzene	ND	ug/Kg dry	55.0	1	09/07/05
Styrene	ND	ug/Kg dry	55.0	1	09/07/05
tert-Butylbenzene	ND	ug/Kg dry	55.0	1	09/07/05
Tertiary-amyl methyl ether	ND	ug/Kg dry	55.0	1	09/07/05
Tetrachloroethene	ND	ug/Kg dry	55.0	1	09/07/05
Tetrahydrofuran	ND	ug/Kg dry	275	1	09/07/05
Toluene	ND	ug/Kg dry	55.0	1	09/07/05
trans-1,2-Dichloroethene	ND	ug/Kg dry	55.0	1	09/07/05
trans-1,3-Dichloropropene	ND	ug/Kg dry	55.0	1	09/07/05
Trichloroethene	2210	ug/Kg dry	55.0	1	09/07/05
Trichlorofluoromethane	ND	ug/Kg dry	55.0	1	09/07/05
Vinyl Acetate	ND	ug/Kg dry	275	1	09/07/05
Vinyl Chloride	ND	ug/Kg dry	55.0	1	09/07/05

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #2 @ -32"
Date Sampled: 09/05/05 12:05
Percent Solids: 85
Initial Volume: 19.1
Final Volume: 15
Extraction Method: 5035

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-04
Sample Matrix: Soil
Analyst: RES

5035/8260B Volatile Organic Compounds / Methanol

Xylene O	ND	ug/Kg dry	55.0	1	09/07/05
Xylene P,M	ND	ug/Kg dry	110	1	09/07/05
Xylenes (Total)	ND	ug/Kg	165		09/07/05

	%Recovery	Qualifier	Limits
Surrogate: 1,2-Dichloroethane-d4	95 %		70-130
Surrogate: 4-Bromofluorobenzene	93 %		70-130
Surrogate: Dibromofluoromethane	97 %		70-130
Surrogate: Toluene-d8	95 %		70-130

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #3 0-36"
Date Sampled: 09/05/05 12:15
Percent Solids: 42

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-05
Sample Matrix: Soil

3050B/6000/7000 Total Metals

<u>Analyte</u>	<u>Results</u>	<u>Units</u>	<u>MRL</u>	<u>Method</u>	<u>DF</u>	<u>Analyst</u>	<u>Analyzed</u>	<u>I/V</u>	<u>F/V</u>
Antimony	ND	mg/kg dry	13.1	6010B	1	SVD	09/06/05	1.82	100
Arsenic	19.2	mg/kg dry	13.1	6010B	1	SVD	09/06/05	1.82	100
Beryllium	0.44	mg/kg dry	0.13	6010B	1	SVD	09/06/05	1.82	100
Cadmium	ND	mg/kg dry	1.31	6010B	1	SVD	09/06/05	1.82	100
Chromium	10.6	mg/kg dry	2.6	6010B	1	SVD	09/06/05	1.82	100
Copper	58.6	mg/kg dry	2.6	6010B	1	SVD	09/06/05	1.82	100
Lead	69.2	mg/kg dry	13.1	6010B	1	SVD	09/06/05	1.82	100
Mercury	ND	mg/kg dry	0.073	7471A	1	SVD	09/07/05	0.65	40
Nickel	16.1	mg/kg dry	2.6	6010B	1	SVD	09/06/05	1.82	100
Selenium	ND	mg/kg dry	13.1	6010B	1	SVD	09/06/05	1.82	100
Silver	12.5	mg/kg dry	1.31	6010B	1	SVD	09/06/05	1.82	100
Thallium	ND	mg/kg dry	13.1	6010B	1	SVD	09/06/05	1.82	100
Zinc	168	mg/kg dry	6.5	6010B	1	SVD	09/06/05	1.82	100

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #3 @ -36"
Date Sampled: 09/05/05 12:15
Percent Solids: 10

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-06
Sample Matrix: Soil

3050B/6000/7000 Total Metals

<u>Analyte</u>	<u>Results</u>	<u>Units</u>	<u>MRL</u>	<u>Method</u>	<u>DF</u>	<u>Analyst</u>	<u>Analyzed</u>	<u>I/V</u>	<u>F/V</u>
Antimony	ND	mg/kg dry	55.9	6010B	1	SVD	09/06/05	1.79	100
Arsenic	717	mg/kg dry	55.9	6010B	1	SVD	09/06/05	1.79	100
Beryllium	1.76	mg/kg dry	0.56	6010B	1	SVD	09/06/05	1.79	100
Cadmium	ND	mg/kg dry	5.59	6010B	1	SVD	09/06/05	1.79	100
Chromium	ND	mg/kg dry	11.1	6010B	1	SVD	09/06/05	1.79	100
Copper	ND	mg/kg dry	11.1	6010B	1	SVD	09/06/05	1.79	100
Lead	ND	mg/kg dry	55.9	6010B	1	SVD	09/06/05	1.79	100
Mercury	ND	mg/kg dry	0.317	7471A	1	SVD	09/07/05	0.63	40
Nickel	70.1	mg/kg dry	11.1	6010B	1	SVD	09/06/05	1.79	100
Selenium	ND	mg/kg dry	55.9	6010B	1	SVD	09/06/05	1.79	100
Silver	8.62	mg/kg dry	5.59	6010B	1	SVD	09/06/05	1.79	100
Thallium	ND	mg/kg dry	55.9	6010B	1	SVD	09/06/05	1.79	100
Zinc	116	mg/kg dry	27.9	6010B	1	SVD	09/06/05	1.79	100

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #3 @ -36"
Date Sampled: 09/05/05 12:15
Percent Solids: 10
Initial Volume: 10.1
Final Volume: 15
Extraction Method: 5035

ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-06
Sample Matrix: Soil
Analyst: RES

5035/8260B Volatile Organic Compounds / Methanol

<u>Analyte</u>	<u>Results</u>	<u>Units</u>	<u>MRL</u>	<u>DF</u>	<u>Analyzed</u>
1,1,1,2-Tetrachloroethane	ND	ug/Kg dry	1190	1	09/07/05
1,1,1-Trichloroethane	ND	ug/Kg dry	1190	1	09/07/05
1,1,2,2-Tetrachloroethane	ND	ug/Kg dry	1190	1	09/07/05
1,1,2-Trichloroethane	ND	ug/Kg dry	1190	1	09/07/05
1,1-Dichloroethane	2310	ug/Kg dry	1190	1	09/07/05
1,1-Dichloroethene	ND	ug/Kg dry	1190	1	09/07/05
1,1-Dichloropropene	ND	ug/Kg dry	1190	1	09/07/05
1,2,3-Trichlorobenzene	ND	ug/Kg dry	1190	1	09/07/05
1,2,3-Trichloropropane	ND	ug/Kg dry	1190	1	09/07/05
1,2,4-Trichlorobenzene	ND	ug/Kg dry	1190	1	09/07/05
1,2,4-Trimethylbenzene	ND	ug/Kg dry	1190	1	09/07/05
1,2-Dibromo-3-Chloropropane	ND	ug/Kg dry	5960	1	09/07/05
1,2-Dibromoethane	ND	ug/Kg dry	1190	1	09/07/05
1,2-Dichlorobenzene	ND	ug/Kg dry	1190	1	09/07/05
1,2-Dichloroethane	ND	ug/Kg dry	1190	1	09/07/05
1,2-Dichloropropane	ND	ug/Kg dry	1190	1	09/07/05
1,3,5-Trimethylbenzene	ND	ug/Kg dry	1190	1	09/07/05
1,3-Dichlorobenzene	ND	ug/Kg dry	1190	1	09/07/05
1,3-Dichloropropane	ND	ug/Kg dry	1190	1	09/07/05
1,4-Dichlorobenzene	ND	ug/Kg dry	1190	1	09/07/05
1,4-Dioxane - Screen	ND	ug/Kg dry	119000	1	09/07/05
1-Chlorohexane	ND	ug/Kg dry	1190	1	09/07/05
2,2-Dichloropropane	ND	ug/Kg dry	2390	1	09/07/05
2-Butanone	ND	ug/Kg dry	29800	1	09/07/05
2-Chlorotoluene	ND	ug/Kg dry	1190	1	09/07/05
2-Hexanone	ND	ug/Kg dry	11900	1	09/07/05
4-Chlorotoluene	ND	ug/Kg dry	1190	1	09/07/05
4-Isopropyltoluene	ND	ug/Kg dry	1190	1	09/07/05
4-Methyl-2-Pentanone	ND	ug/Kg dry	11900	1	09/07/05
Acetone	ND	ug/Kg dry	29800	1	09/07/05
Benzene	ND	ug/Kg dry	1190	1	09/07/05
Bromobenzene	ND	ug/Kg dry	1190	1	09/07/05
Bromochloromethane	ND	ug/Kg dry	1190	1	09/07/05
Bromodichloromethane	ND	ug/Kg dry	1190	1	09/07/05
Bromoform	ND	ug/Kg dry	1190	1	09/07/05

ESS Laboratory

Division of Thielsch Engineering, Inc.

CERTIFICATE OF ANALYSIS

Client Name: Pawtucket River Water Shed
Client Project ID: Mashapaug Pond
Client Sample ID: #3 @ -36"
Date Sampled: 09/05/05 12:15
Percent Solids: 10
Initial Volume: 10.1
Final Volume: 15
Extraction Method: 5035

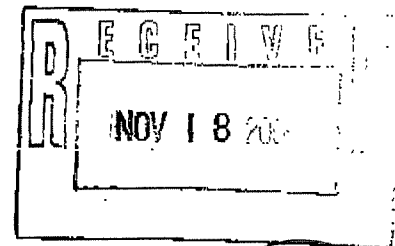
ESS Laboratory Work Order: 0509039
ESS Laboratory Sample ID: 0509039-06
Sample Matrix: Soil
Analyst: RES

5035/8260B Volatile Organic Compounds / Methanol

Bromomethane	ND	ug/Kg dry	2390	1	09/07/05
Carbon Disulfide	ND	ug/Kg dry	1190	1	09/07/05
Carbon Tetrachloride	ND	ug/Kg dry	1190	1	09/07/05
Chlorobenzene	ND	ug/Kg dry	1190	1	09/07/05
Chloroethane	ND	ug/Kg dry	2390	1	09/07/05
Chloroform	ND	ug/Kg dry	1190	1	09/07/05
Chloromethane	ND	ug/Kg dry	1190	1	09/07/05
cis-1,2-Dichloroethene	9780	ug/Kg dry	1190	1	09/07/05
cis-1,3-Dichloropropene	ND	ug/Kg dry	1190	1	09/07/05
Dibromochloromethane	ND	ug/Kg dry	1190	1	09/07/05
Dibromomethane	ND	ug/Kg dry	1190	1	09/07/05
Dichlorodifluoromethane	ND	ug/Kg dry	1190	1	09/07/05
Diethyl Ether	ND	ug/Kg dry	1190	1	09/07/05
Di-isopropyl ether	ND	ug/Kg dry	1190	1	09/07/05
Ethyl tertiary-butyl ether	ND	ug/Kg dry	1190	1	09/07/05
Ethylbenzene	ND	ug/Kg dry	1190	1	09/07/05
Hexachlorobutadiene	ND	ug/Kg dry	1190	1	09/07/05
Isopropylbenzene	ND	ug/Kg dry	1190	1	09/07/05
Methyl tert-Butyl Ether	ND	ug/Kg dry	1190	1	09/07/05
Methylene Chloride	ND	ug/Kg dry	5960	1	09/07/05
Naphthalene	ND	ug/Kg dry	1190	1	09/07/05
n-Butylbenzene	ND	ug/Kg dry	1190	1	09/07/05
n-Propylbenzene	ND	ug/Kg dry	1190	1	09/07/05
sec-Butylbenzene	ND	ug/Kg dry	1190	1	09/07/05
Styrene	ND	ug/Kg dry	1190	1	09/07/05
tert-Butylbenzene	ND	ug/Kg dry	1190	1	09/07/05
Tertiary-amyl methyl ether	ND	ug/Kg dry	1190	1	09/07/05
Tetrachloroethene	ND	ug/Kg dry	1190	1	09/07/05
Tetrahydrofuran	ND	ug/Kg dry	5960	1	09/07/05
Toluene	ND	ug/Kg dry	1190	1	09/07/05
trans-1,2-Dichloroethene	ND	ug/Kg dry	1190	1	09/07/05
trans-1,3-Dichloropropene	ND	ug/Kg dry	1190	1	09/07/05
Trichloroethene	1690	ug/Kg dry	1190	1	09/07/05
Trichlorofluoromethane	ND	ug/Kg dry	1190	1	09/07/05
Vinyl Acetate	ND	ug/Kg dry	5960	1	09/07/05
Vinyl Chloride	ND	ug/Kg dry	1190	1	09/07/05

November 16, 2005

Thomas Deller, AICP
Providence Redevelopment Agency
400 Westminster Street
Providence, RI 02903
ATTN: Marcia Jennings



RE: Technical Feasibility of the proposed remediation for 333 Adelaide Avenue, Providence, RI, former Gorham/Textron Disposal Site, Parcel B.

SUPERFUND Information Systems, EPA ID: RID982542318

Dear Mr. Deller:

I am writing to voice my concerns regarding certain technical problems with the remediation for the proposed Adelaide Avenue School project.

The plan calls for clean fill to be covered by asphalt encapsulating the site to prevent the escaping of any vapors, which would be monitored on a regular basis.

Would this be the same process used on the Stop & Shop parking lot? If so, my concern is that the Stop & Shop parking looks a whole lot like seismic activity is taking place. There are cracks on the lot that run from Adelaide Avenue to the front of the market. A quick survey of these cracks shows many of them are from $\frac{1}{2}$ " to $\frac{3}{4}$ " inches wide.

You have not spelled out any technical information on depth or composition of this parking lot, or how it will be pitched to avoid runoff into the Pond. There is no information given on any plans to monitor the parking area to ensure contaminated soils are not exposed.

Per the RI REMEDIATION REGULATIONS, SECTION 7, 7.04 D: "The ability of the performing party to perform the preferred remedial alternative" must be documented. You have not documented what it is that you plan to do to encapsulate the contaminated soils and to ensure that they remain encapsulated.

In light of the disastrous condition of the Parcel A parking lot, it's incumbent upon the City to document exactly what this portion of the remedy will be.

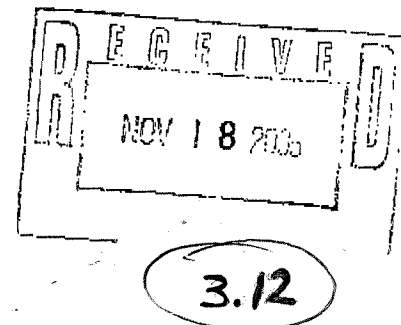
I am deeply concerned that there seems to be no specific plan to deal with soils that contain known neurotoxins and carcinogens and multiple chemicals that are known to be specifically toxic to aquatic environments. However, in light of the City's cavalier attitude toward this process to date, I am sadly not surprised.

Sincerely,

David Kennedy
31 Humes Street
Providence, RI 02907

November 7, 2005

Mr. Thomas Deller
Providence Redevelopment Agency
400 Westminster Street
Providence, RI 02903
ATTN: Marcia Jennings



RE: Technical feasibility questions regarding the proposed school on the former
Gorham/Textron Disposal Site
Listed on SUPERFUND, EPA ID: RID98254231

Dear Mr. Deller:

As a truck driver for over 40 years, I am well aware of the importance of documentation. In my experience, people who aren't consistently documenting their activities; aren't closely following procedures and there is usually a reason why they aren't following procedure.

The trucking logs provided by EA Engineering in the LRAWP and SSIR are incomplete, out of sequence, and many of them are illegible. In response to a request for cleaner copies, two additional manifests (5/13/05 and 5/16/05) were provided by Corey Construction which were not provided by EA Engineering. How many other manifests of additional debris hauled off the site have not been provided? How much undocumented waste was removed from the site, beginning in March of 2005?

The records regarding the Daily Activity Logs and the Bills of Lading were provided in illegible photocopies, were incomplete, out of chronological order, and needed hours of my time to decipher. What I discovered is that on May 11, one driver was able to unload over 25 tons of waste from a transfer trailer in 15 minutes and was then able to depart from the landfill at 6:17am and return to Johnston with 10.7 tons of waste less than 30 minutes later. This kind of record-breaking speed is highly improbable but does not seem to be unusual for the drivers used by EA Engineering.

The Daily field logs do not coincide with the manifests of waste sent to the landfill. For example: On August 16, Darnell Anderson of EA Engineering documents "1 (One) 30 yd dumpster hauled off site" yet the Aug 16, 'Waste Disposal Paperwork logs' show 3 (Three) separate deliveries to the landfill including 1 pickup truck/van of "timbers" at 19.89 tons, 1 transfer trailer of "steel pipes" at 19.00 tons and 1 roll off of "creosote timbers" 18.62 tons.

In the EA Engineering response sent to the RIDEM dated June 14, 2005 Attachment A entitled "figure - Lateral Extent of Site Preparation Activities" includes nothing. There is no figure provided.

The examples given above are by no means the only examples of egregious omissions or outright misrepresentations that plague the RAWP and SSIR. It is clear to me that liberties have been taken with the complete and accurate documentation of all site activities to date. These inaccuracies call into question the City and EA Engineering's willingness to seriously and truthfully evaluate and ability to conduct a successful remediation of this former Superfund Site.

I am requesting that the RIDEM conduct a complete review of the waste manifests, and of all documents pertaining to "site preparation" activities to date. What will become apparent to anyone who conducts such a review is that the City is not acting in a manner which will guarantee the safety of those who will used the facilities planned for this site.

Sincerely,

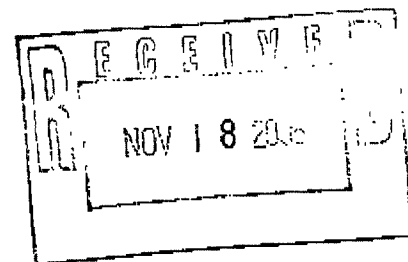


Mr. Ernie Barbosa
A Concerned Citizen

Cc: Brian Wagner, RIDEM OLS
W. Michael Sullivan, RIDEM, Director
Steven Fischbach, Esq.

To
Attn Marcia Jenning
Providence Dept of Planning & Development
400 West Minister St
Providence R.I 02903

October 20,2005



For
Proposed High school
At Gorhams site
Providence R.I.

No Response

Dear Marcia,

This is to make you aware of a few objections to the placement of the proposed high school at the Gorham site, I have lived here when Gorham silver was still operating and the traffic in the morning and in the afternoon was terrible, not even counting the pollution from all these vehicles and at least 450 students and faculty, and support personal it will be even worse,

Any one who knows Mashpaug pond knows it is a death trap, there have been at least three drownings that I know of in the last fifteen years, because there are underground springs which act like an undertow and pulls these teenagers down and they drowned I know I saw two of them when this happened So you are proposing to put a high school there I think this would be a big Mistake for the safety reasons alone.

They also say in this letter from Providence Redevelopment that the site under the school will be vented cap, I must point out that Gorhams silver was operating there for approx 130 years and even if you could contain these hazardous waste how about the other approx 29 acres that are part of this property

There is also the question of the movement of the groundwater, which several neighbors Have complained that some of it is under their property and moving towards the proposed school, and this water from the pond has barrels labeled toxic which were dumped into it, .

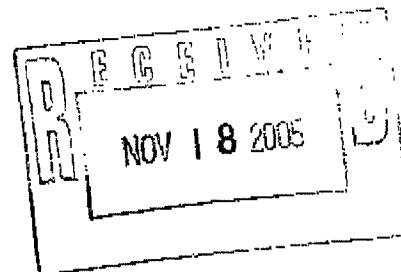
There is also the argument made by Planning & Development that there are no other sites available, I must point to the old mill off Hartford Ave, Providence which burned down several years ago and is now I believe empty land,

I say that for all the aforementioned reasons this would be a bad place to site a high school

Sincerely

To
Attn Marcia Jenning
Providence Dept of Planning & Development
400 West Minister St
Providence R.I 02903

October 20,2005



For
Proposed High school
At Gorhams site
Providence R.I.

No Response

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Sincerely

Dina Zibrandi

December 20, 2005

Thomas Deller, AICP
Providence Redevelopment Agency
ATTN: Marcia Jennings
400 Westminster Street
Providence, RI 02903

No Response

RE: Technical Feasibility of the proposed remediation for 333 Adelaide Avenue,
Providence, RI, former Gorham/Textron Disposal Site

EPA Superfund Listing: ID: RID982542318

Dear Mr. Deller:

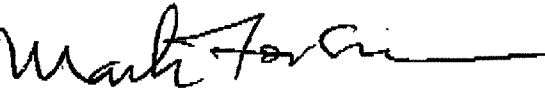
The original plan for this site was to include a "walkway" along Mashapaug Pond and Cove. The latest rendition of the City's proposal states that humans must be kept away from the Pond and Cove, so a fence is the recommended remedy. This is City Planning at its finest? This is how we care for our environment and our kids?

Mashapaug Pond is the LARGEST body of water in the City of Providence (69 acres) . It feeds Roger Williams Park's ponds. Why don't we all see how we need to care for the environment NOW, while we still can? We can clean up the Pond and Cove that impacts the success of Parcel B and Parcel C's safety for human and animals. It also impacts the thousands of people from Rhode Island and other states who visit Roger Williams Park each year and come in contact with the waters there that are fed by Mashapaug Pond.

You can't build a school (or day care) on a site that hasn't been properly remediated, unless you truly don't care for the kids from the City of Providence.

Please do the right thing. Step back, look at what needs to be done to make this 37 acre site a place the City can truly be proud to have been a part of vs. finding out that you've poisoned people for generations to come.

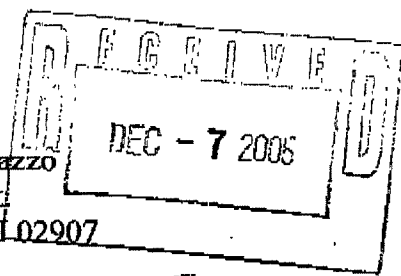
Sincerely,



Mark Fonseca
71 Humes Street
Providence, RI 02907

cc: W. Michael Sullivan, Executive Director, RIDEM
Joseph T. Martella II, RIDEM/OWM
Brian Wagner, Esq., RIDEM/OLS
Darryl Paquette, Esq.
Steven Fischbach, Esq.
Hon. Daniel A. Procaccini, Superior Court Judge

Hon. David N. Clifline, Mayor, City of Providence
Sen. Juan Pichardo, City of Providence
Rep. Tom Slater, State of RI
John J. Lombardi, City of Providence



Rocky Giovinazzo
50 Crescent St
Providence, RI 02907

December 5, 2005

Rappart
Grivers
Pagan
Martella

No Response

Gorham Site Environmental Comments
Attn: Marcia Jennings
Providence Department of Planning and Development
400 Westminster Street
Providence, RI 02903

Dear Marcia Jennings,

I understand that the required environmental investigation of the Gorham site is complete. I am writing, because what is "required" does not include an important consideration.

In recent years, the heavily polluted Mashapaug Pond has significantly improved to the point where the Trust for Public Land refers to it as a "success story." Building a school on this land will increase the amount of run-off into the pond and will reverse any progress we've made. The pond will become more polluted in just a short time. In fact, this water feeds into Roger Williams Park and Zoo where animals and water plants live, and brings in many visitors every year.

In fact, TPL helped the city acquire the land in the first place. You are abusing that trust by developing it in this way. Their website describes it as follows, "The largest natural fresh water lake in Providence, Mashapaug Pond also supplies water for the man-made lakes in popular Roger Williams Park. In 1996 TPL helped the city of Providence purchase two parcels of land and a building along Mashapaug Pond, which now houses environmental education programs and the city's first freshwater community boating program." I find it hard to believe that TPL wants this land used in some other way.

I am astonished by your decision. As a side comment, I would like to add that the city should not be building tiny schools in the first place, and that is part of the problem. Providence real estate is far too expensive for this approach.

Sincerely,

Rocky Giovinazzo

Attachment C

Supporting Documentation



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

December 22, 2005

Senator Juan M. Pichardo
Deputy Majority Leader
Room 308, State House
Providence, RI 02903

RE: Proposed Remediation of Former Gorham/Textron Disposal Site, 333 Adelaide Ave, Providence, RI, 02907. "Parcel B" and entire 37-acre site.
Case No. 97-030 (Including Case No. 2005-029 - Proposed Providence Public School and Case No. 2004-014 - Proposed YMCA Facility).

Dear Senator Pichardo:

Thank you for writing to express your concerns about the environmental and regulatory status of the above-referenced site. As you indicate in your letter, this site is subject to a number of conflicting issues, such as:

- The commercial uses approved based on Textron's original cleanup proposal vs. the City's new cleanup proposal for educational/residential reuse;
- The City's aggressive pursuit of its development schedules vs. the Department's mandate to insure an appropriate level of public participation;
- Realistic economic considerations in the investigation, design and construction of a remedy vs. insuring that the remedy is protective of the site's occupants, neighbors and the environment; and
- The need to investigate and remediate the entire site vs. the difficulty of encouraging performing parties to remediate and redevelop brownfield sites.

Further complicating matters at this particular site, is the fact that the Department was compelled to take the City of Providence to court in April regarding its proposed public high school project, in order to restrain the City from moving forward with investigation and construction activities without first fully complying with the State's Industrial Property Remediation and Reuse Act ("IPRARA") and DEM's Remediation Regulations and its April 1, 2005 Letter of Responsibility (LOR) to the City.

With respect to your concerns about public notification and participation, DEM notes that there is no comparison between the public participation process used in this case and the process that was used in the Springfield Street School case. Even before the Springfield Street School case went to trial, the Department had internally decided that it would no longer expedite school or other residential projects on contaminated sites. Immediately following the trial, and well before the Judge's decision was issued, the Department significantly overhauled the public participation process associated with site remediation projects in environmental equity areas to provide more timely opportunities to educate and receive input from the public. The specific requirements are outlined in the Department's LOR issued to the City. Admittedly, there still have been several complaints about the City's performance during the process, including neglecting to provide a Spanish language translator at one of the public meetings, not always providing notice prior to initiating work at the site, and being generally unresponsive to telephone calls and written requests for information about the project.

Unfortunately, one of the biggest controversies in this case, site selection, is one in which the Department has had no role because the site was chosen by the City before it began the site investigation work that initiated the Department's involvement. As I believe you are aware, the DEM does not get involved in the siting of public or private projects (i.e. a public school or a YMCA). The DEM's role is limited to evaluating site investigation data to determine if the proposed remedy is appropriate and safe for the specific use proposed within the boundaries of the portion of the contaminated site for which it is designed, and to verify that the remedy is consistent with DEM's Remediation Regulations.

In the case of the City's proposed high school on Parcel B, the DEM was put in the position of considering the project specifically because the City, which owns the entire Gorham/Textron site including Mashapaug cove, chose this site to build a school. In fact, the City chose the site even after Thomas Deller of the City informally called Kelly Owens, the supervisor of the Site Remediation Section at DEM, to ask what she thought about using the former Gorham manufacturing site as a school site, and he was strongly urged by Ms. Owens not to consider such a use on that site. Ultimately, however, the final decision on the selection of the site was made by City officials, local politicians, the School Board, the Public Properties Department, the Providence Redevelopment Agency and, hopefully, interested members of the community. As part of this site selection process these local entities should have considered public concerns regarding: the wisdom and/or necessity of siting a public high school on a contaminated, former industrial site; whether the school parcel would be remediated up to or beyond state/federal requirements; how much time to allot for investigating the site, constructing the building and opening the school; the impact of abutting, unremediated portions of the site; cleanup of the surrounding parcels of the site. In the case of any municipally sponsored redevelopment of a contaminated property, concerned residents and other interested members of the community should work through their local government and representatives to ensure that the overall project addresses local public concerns and "should" proceed before a remedial plan is submitted to DEM to determine whether the project is capable of meeting applicable regulatory requirements. This is clearly illustrated by the example cited in your letter, of the previously proposed location for the school, also on a contaminated site, which was subsequently rejected by its neighbors and local political officials, resulting in the selection of the present subject site.

It should be further noted that the City not only made the final call on the selection of the site, but that the City has continued to aggressively pursue its goal of developing Parcel B as a public school even after the public expressed its concerns. The attorneys representing the City and the Providence Redevelopment Agency have made it *abundantly* clear during the course of the Superior Court litigation that they will vigorously oppose any attempt to delay or deny the construction of the school on the former Gorham site. Accordingly, once the City satisfies the Court that it has met DEM's minimum regulatory requirements, the Court will likely require DEM to approve the proposed remedy and allow construction of the school to begin. Accordingly, in the event that DEM winds up approving the City's remedial plans, such an approval should not be construed to mean that DEM in any way endorses the idea of building schools on sites such as the former Gorham site.

Implementation of the City's proposed remedy for Parcel B (i.e. placement of a two foot or equivalent cap over exposed portions of the parcel, operation of an active venting system to remove volatile vapors from under buildings, installation of perimeter fences and posting of warning signs), may technically bring the parcel into compliance with the letter of the Remediation Regulations, but it may not adequately take into account the potential risks from exposure to contamination on adjacent parcels. Analytical data sampling results submitted by a concerned party during the public comment period for the school project have indicated the presence of very elevated levels of contamination in the sediments of Mashapaug Pond. The DEM is currently planning to take samples to verify this information. Once DEM has obtained this data, it will attempt to evaluate the exposure risks presented by the Pond and what kind of remedial measures might be necessary to protect users of the school on Parcel B.

Unfortunately, even under ideal circumstances, with complete cooperation from all parties involved, it is not likely that the extent of the contamination in Mashapaug Pond can be completely assessed and a remedy implemented before construction of the school is completed. In addition, even with best efforts by the City to educate and inform the users of the school about the possible risks from exposure to potentially contaminated surface water, sediments, and fish tissues, as well as installation of well designed physical barriers (i.e. fences, locked gates, etc.) to prevent access to unremediated areas around a site, it is not possible to guarantee that trespassers will heed these warnings or be deterred if their goal is to reach the shore of Mashapaug Pond.

Finally, in regards to your request that the entire 37-acre site be cleaned up all at once, the DEM has often recognized the need to subdivide a large property for remediation purposes, or to adopt a phased approach to remediation of a property. It has been the DEM's experience that allowing a phased cleanup of a large property by multiple performing parties with different development schedules, often results in a faster, more efficient and more effective overall site cleanup than would result from waiting for every conceivable aspect of the remedy to be addressed before allowing cleanup and redevelopment to begin. Complex remedies of very large sites often present economic and logistical barriers that appear insurmountable to an individual performing party. Waiting for a single party to take on such a site could result in the contamination not being addressed in a timely manner, not being addressed in an adequate manner, or not being addressed at all. However, the prospect of voluntarily taking on the cleanup and redevelopment of a contaminated site can often be simplified and made more affordable and attractive to developers if a large complicated site is broken into manageable pieces with different performing

parties addressing their piece according to its environmental issues and that party's reuse plans. Such a phased approach can be safely accomplished with the ultimate goal of a complete and compliant site-wide remedy that is protective of both human health and the environment.

I realize that this is a very complicated site, and that the issues are compounded by the proposed reuses, proximity to the neighborhood, incomplete characterization of Mashapaug Pond and cove, and variations in the individual project remediation/redevelopment schedules. I hope this letter addresses some of your concerns regarding items that are within the control of the DEM.

If you have any further questions, please feel free to contact my office at 222-2771.

Sincerely,



W. Michael Sullivan, Ph.D.
Director

cc: Terrence D. Gray, P.E., Assistant Director, RIDEM/AW&C
Leo Hellested, P.E., Chief, DEM/OWM
Kelly J. Owens, RIDEM/OWM
Brian Wagner, Esq., DEM/OLS
Hon. David N. Cicilline, Mayor, City of Providence
Hon. James R. Langevin, US House of Representatives
Hon. Jack Reed, US Senate
Rep. Thomas Slater, District 10
Hon. Ronald Allen, Rep Ward 8 – Providence City Council
John J. Lombardi, City of Providence
Thomas Deller, City of Providence
Sarah Rapport, Esq., City of Providence
John M. Boehnert, Esq, PS&H
Dr. Robert Vanderslice, PHD, RIDOH

SERVICE TRANSPORT GROUP, INC.

31

58 PYLES LANE, NEW CASTLE, DE 19720

PHONE: (877) 999-9559

No 192707

Abatement Plan No: None

WASTE SHIPMENT RECORD

Shipment I of I

S.T.G. # 01722

GENERATOR	1. Material Origin Site Former Gorham Manufacturing Property - Parcel B 333 Adelaide Avenue Providence, RI 02907		Generator: Name/Address City of Providence / Dept of Public Properties 25 Dorrance Street Providence, RI 02903 ATT: ALAN SEPE		Generator: Phone # 401-421-7740	
	2. Removal Contractor: Name/Address Pasquazzi Bros., Inc. 464 Dyer Avenue Cranston, RI 02920		License LAC 179-000 Contact: Henry Pasquazzi, Jr.		Contractor: Phone # 401-942-2250	
	3. Responsible Agency: Name/Address U.S. EPA Region I One Congress Street, Ste. 1100 Boston, MA 02114-2023		4. US DOT Class - FRIABLE ASBESTOS ONLY RQ ASBESTOS, 9, NA.2212, PG.III			
	5. Description of Materials Specify Friable or Non-Friable Non Friable		Containers No. 34 Dumpster Bags Type TSI/VAT		Total Quantity 1	
	IF Friable (enter required information)					
	IF Non-Friable (check one): <input type="checkbox"/> Category I <input type="checkbox"/> Category II					
	6. Special Handling Instructions 24-hour emergency spill response no. 800-424-9300					
7. Generator Certification: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transport by highway according to the applicable regulations of the Department of Transportation, USE.P.A., and any other state government agency. I certify that the foregoing is true and correct to the best of my knowledge. If the waste shipment is not as I stated, I accept the RETURN of the COMPLETE LOAD to the generator's service location at the generator's expense.						
Printed/Typed Name & Title Henry Pasquazzi, Jr. / Vice President			Signature 		Date September 7th 2005	
TRANSPORTER	8. Transporter 1 (Acknowledgement of Receipt of Materials) If blank, Transporter 2 serves as sole transporter.					
	Company Name & Address Pasquazzi Bros. Inc. 464 Dyer Avenue Cranston, RI 02920		Signature 		Telephone No. 401-942-2250 Date: September 7th 2005	
	Printed Name: Henry Pasquazzi, Jr. Title: Vice President					
DISPOSAL SITE	9. Transporter 2 (Acknowledgement of Receipt of Materials) Company Name & Address Service Transport Group, Inc. 58 Pyles Lane New Castle, DE 19720		Signature 		Telephone No. 877-999-9559 Date: 9-25	
	10. Discrepancy Indication Space:					
11. Waste Disposal/Recycling Site Owner or Operator's Certification (Receipt of above Waste Except as Noted in 10)						
Company Name & Address A & L Salvage, Inc. 11225 S. R. 45 P.O. Box 333 Lisbon, OH 44432 Permit No: OH EPA 139120		Signature 		Telephone No. 330-424-3739 Date 9-13-05		
Printed Name: Katherine Nash Weighmaster A&L Salvage, LLC P.O. Box 333 Lisbon, OH 44432		Title: _____				