

**Adelaide Avenue Environmental Justice Coalition
60 Crescent Street
Providence, Rhode Island 02907**

January 8, 2008

Terrence D. Grey, P.E.
Assistant Director RIDEM/AW&C
Rhode Island Department of Environmental Management
235 Promenade Street
Providence, Rhode Island 02908-5767

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Dear Mr. Grey:

An overarching principle to remember as Rhode Island and your Department proceeds to address the challenges posed by vapor intrusion is that the uncertainty associated with these challenges is an issue in itself. This uncertainty is a given, at least for the foreseeable future. In the face of such uncertainty, government must strive to take a precautionary and transparent approach.

A precautionary approach holds that where threats of harm to human health or the environment exist, lack of full scientific certainty about cause and effect should not be viewed as sufficient reason for government to postpone precautionary measures to protect public health and the environment. We must use the knowledge we have today to take a preventive approach to eliminating exposures from vapor intrusion.

The most common chemicals of concern at the vapor intrusion site located in our neighborhood are Trichloroethylene (TCE), tetrachloroethylene (PCE), and trichloroethylene (TCA). Each is highly volatile and associated with serious negative health impacts, such as cancer, organ damage, and/or birth defects.

We understand that policies to address vapor intrusion are still in the developmental stage. The United State Environmental Protection Agency (EPA) has issued draft guidance on the evaluation of vapor intrusion at contaminated sites, but none has been finalized. It appears that there may not be a final ruling on TCE until 2010. Our community can not wait, nor can our children who will continue to be placed on contaminated sites as the City of Providence gears up to rebuild their entire school system infrastructure.

Government must also provide citizens with complete and accurate information on the potential health and environmental impacts associated with different policy choices. The decision-making process at vapor intrusion sites should be open and transparent, and

provide citizens with opportunities for meaningful public participation. Decisions regarding investigation and mitigation must also be as fair and equitable as possible.

The special vulnerabilities of children and the high potential for exposure from multiple sources and pathways also warrant a cautious approach.

One-in-one million is the target cancer risk level for site remediation established by statute for the state of RI, and the required risk level for the development of soil and groundwater cleanup objectives is found under the same statute.

RIDEM's policy to establish their TCE guideline at a level that poses a higher risk, (10-4) or one-in-ten thousand raises concerns that the decision making process was driven by economic considerations rather than health protection. Decisions regarding acceptable risk should not be made on the basis of financial burden or the number of sites that would qualify for remediation. It should be based solely on public health protection.

Additionally, the groundwater and soil remediation concentrations for Trichloroethylene (TCE) are not in line with either the EPA or the Connecticut Department of Health's values. Since the state of Rhode Island utilizes Connecticut's protocol for soil gas vapor intrusion, we feel it is incumbent of you to at the very least adjust RIDEM's TCE thresholds for both groundwater, from 540ug/L to 27ug/L, and soil levels from 11,000 ug/Kg to 484 ug/Kg. This small step would rectify many of the discrepancies and inadequacies currently enveloping the issues at our "showcase Brownfield" site.

Once direct exposures have been mitigated, government agencies and responsible parties should act to cleanup the cause of vapor intrusion, i.e. underlying soil and groundwater contamination, as quickly and aggressively as possible. Aggressive cleanup is the only way to restore property values, ensure that mitigation systems will not have to be employed well into the future, and protect the economy of communities impacted by vapor intrusion. It is also the best way to protect ambient air from the impacts of contamination and operation of indoor air mitigation systems.

Sincerely,

Robert F. L. Dorr

Robert F. L. Dorr for:

Adelaide Avenue Environmental Justice Coalition

cc:

Richard Enander, PhD., RIDEM/OTCA/Risk Assessment
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John Lombardi, City Council
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