



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT

235 Promenade Street, Providence, Rhode Island 02908

Request for Response to Public Comments
File No. SR-09-1958

July 23, 2020

CERTIFIED MAIL

Mr. Tim Grenier
Grenier Properties, LLC
3 Cole Circle
East Greenwich, RI 02818

RE: Grenier Properties, LLC
33 Exchange Street
East Greenwich, Rhode Island
Plat Map 85/1 / Lot 382

Dear Mr. Grenier:

Effective April 22, 2020, the Rhode Island Department of Environmental Management's (the Department) Office of Waste Management has changed the office name to the Office of Land Revitalization and Sustainable Materials Management (LRSMM), as reflected in the re-codified 250-RICR-140-30-1, Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations). The purpose of these regulations is to create an integrated program requiring reporting, investigation, and remediation of contaminated sites in order to eliminate and/or control threats to human health and the environment.

In the matter of the above-referenced property (the Site), the Department's Office of LRSMM has received the attached four (4) public comments regarding the technical feasibility of the remedial actions proposed in the Site Investigation Report (SIR) and SIR Addendum. Some of the submitted comments address topics beyond the scope of the SIR and the Remediation Regulations, concerning the siting and property reuse. As such, a copy of this letter and attached comments is also being sent to the Town of East Greenwich.

Please review the attached comments and prepare written responses to each of them, as appropriate. A completed document, incorporating responses to all of the comments, must be submitted to the Department for review and approval. The Department will be conducting a review of comments specific to the Department and the Remediation Regulations, and will prepare responses to those comments, as applicable.

If you have any questions regarding this letter or would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 222-2797, ext. 7109, or by E-mail at joseph.martella@dem.ri.gov.

Sincerely,

A handwritten signature in cursive script that reads "Joseph T. Martella II".

Joseph T. Martella II
Environmental Engineer III
Office of Land Revitalization &
Sustainable Materials Management

cc: Kelly J. Owens, RIDEM/LRSMM
Susan Forcier, Esq., RIDEM/OLS
Nicholas Pisani, RIDEM/OWR
Greg Swift, RIDEM/OWR
Lisa Bourbonnais, East Greenwich Town Planner
Mark Schwager, President, East Greenwich Town Council
Gary S. Kaufman, REG



Mr. Joseph T. Martella II
Environmental Engineer III
R.I. Department of Environmental Management
Office of Land Revitalization & Sustainable Materials Management
235 Promenade Street
Providence, RI 02908-5767
(401)222-2797 Ext. 7109
joseph.martella@dem.ri.gov

Dear Mr. Joseph Martella II,

Greetings, Sir. I hope you are well. I am responding to a mail piece I received dated June 12, 2020.

Regarding the Notification to abutters, Future Residential Development, 32 & 33 Exchange Street, East Greenwich, RI, I am submitting what I hope will be regarded as "substantive written comments" prior to any approval of determinations by DEM.

In a preliminary summary, I am listing my concerns initially and then describing them more fully below.

1. Please do not approve of this project until there is identified: an authoritative body who will supervise/police the activity for which you give approval.
2. Concern about the cavalier attitudes toward improper handling of soil.
3. Concern that the Town of EG and RIDEM deny responsibility for the execution of the project.
4. We request a 10' barrier to surround the project and another across the street in order to keep the hazardous soil from migrating.
5. This is also a minority issue. Many of the children and adults affected by this project are minorities.
6. We need a phase 2 soil test. Any testing done was done on soil previously dug with a backhoe and would not accurately reflect what is in the soil.
7. A broader array of toxicants present in the soil would expose residents to a broader array of illnesses. It is unconscionable to not help us understand what they are.
8. Approval should not be given to Mr. Kaufman specifically.
9. Imploring you to help keep us safe. Signatures requesting a complete phase 2 soil study.

1. Please do not allow this project consideration until there is some understanding of authority (a policing agent/response team) to provide immediate help to residents should there be concern over the actual work on the ground. We need a phone number and reassurance that there will be someone answering and responding to assist our concerns in a direct and immediate way.

This project should not proceed, because to date, there will be no oversight/monitoring/supervising (i.e. a town or governmental policing agent) of this project. Both DEM and the Town of East Greenwich refuse to supply any official or official group to supervise/police this project. There will be no one who will take responsibility for any concern from the residents, especially any concern that would require immediate attention (threat/concern of exposure to hazardous soil to neighboring residents).

If the measures and goals to keep residents safe and hazardous soils contained are circumvented by an inability to be accountable, then the relationship between DEM and the town of EG is a sham. It might as well not exist. It renders the purpose and efforts of DEM a toothless sham. It is a matter of extreme indifference to the health and welfare of neighborhood residents to allow this project to proceed without oversight. Providing a trail of tidy paperwork regarding this project could not possibly replace real oversight regarding the work that is actually done. I believe that no project should be allowed to move forward where the process is unclear. It would be sanctioning a disaster. It would be conceding to the eventual harm of residents by conscious neglect. For either the town of E.G. or DEM to sanction this project understanding that no one will take responsibility for it, is for both to be guilty of not taking responsibility. It's a distinction without a difference.

2. Especial concern would be containment of hazardous soil from migrating to the streets, neighboring properties and prevailing in the air for years in the neighborhood. The example I gave to the EG Planning Board at a meeting earlier this year was hazardous soil that would be dragged through the neighborhood in the ~~wheels of exiting trucks~~. **Mr. Kaufman responded to the EG Planning Board that he didn't have to remove soil from the wheels of exiting trucks because "DEM won't make me."** This statement represents to my mind a derelict attitude towards his profession, this project, and the residents of our neighborhood. Mr. Kaufman was admitted as expert witness to the EG Planning Board for environmental concerns, and [despite the conflict of interest] he also conducted all relevant site tests and also intends to continue his employ to remediate this property. Mr. Kaufman further described that, though it may be policy in other states, RIDEM would not require him to take any measures to ensure containment of the soil from the surrounding residential properties. This is a densely settled residential family neighborhood. There are many small children who could be affected by exposures, not just by lead, but also by the relatively high toxicants that are identified as present in the soil.

3. Mr. Joseph Martella stated that **DEM is not a policing agency. The monitoring of all activities (excavation and transport of hazardous soil from the site) would be conducted by the town of E.G.. Mr. Teitz, lawyer present to the E.G.**

Planning Board during meetings held earlier this year, stated unequivocally that EG has “no jurisdiction” once DEM is involved, and conversely stated that that DEM is entirely responsible as a policing agent. Mr. Tietz, and the Planning Board members listened to my concerns that there would be no direct and immediate supervision of the activity during the proposed excavation of the property. I asked how the town would fulfill this important role of supervision and who would I call if there would be a concern that needed immediate action? Again, unequivocally, **Mr. Tietz advised the E.G. Planning Board that the town had “no jurisdiction” or responsibility to the welfare of the residents in the neighborhood who may become harmed through exposure to the hazardous soil and reiterated that the town would not provide any group or person who would address problems arising from any concerns other than DEM.**

It is a shame that it is a resident who points out that there is no one scheduled to oversee the project and respond to emergency concerns. It is a broken system that should not be allowed to proceed until it is fixed. This is a hazardous site. It represents a hazard to the neighborhood.

4. We request that a 10' impermeable barrier surround the property enclosing and containing all activities prior to any excavation. In addition, I request a similar barrier be placed across the very narrow street to prevent drift to a family yard in which numerous small children play.

The barrier proposed by the developer is porous. It would allow drift of particles from excavation. Mr. Marcella proposed wetting the ground sometimes but only when the digging equipment caused particulate to become visible as dust, thus preventing hazardous soil from becoming airborne. I am hoping this measure is intended **in addition to a physical barrier. A physical barrier is the only measure that would prevent drift.** The particles that are most hazardous are too small to see. These small dust particles from hazardous soil, wet or dry, are pushed upward and stay airborne through a process of thermo dynamics. Once inhaled into the lungs, they can be carried through the blood stream and attach to organs causing damage and triggering cancers. “These dust particles [2.5 microns in diameter consisting of a mixture of extremely small particles and liquid droplets suspended in air], called PM2.5 for short easily deposit deep in the lungs,” according to Harvard Health Review, 2009. When they are composed of toxicants like lead, they are particularly dangerous and can remain a factor in a neighborhood for years where excavation occurs. Much has been written about PM2.5. Urban pollution is offered as curriculum concentrations in colleges and universities. We have an opportunity to minimize exposure by enclosing the project with physical barriers. There is no other way to do this. There is no other way to keep residents, visitors, workers, boaters, and pets safe from hazard that can only be blocked by a physical barrier.

5. Directly adjacent and nearby properties to this project site there are residents who are white, brown, black (Hispanic, Asian, Indian, African American, and mixed) and small children under the age of 5 and older. The older adults living on adjacent properties include one 98 and several over 70. There is at least one person living on an adjacent property using a nasal cannula with oxygen. We are vulnerable. I am hoping that current national sentiment will encourage greater protection and much needed public service to this collection of vulnerable people through your government agency as well.

6. We need a phase 2 soil sample of this project site in order to understand the actual scope of the problems. As it was explained to me at DEM, the phase 2 study was expensive, and so it was permitted that a different sampling be done in order to save the developer associated costs. I believe a phase 2 soil sample is the only way to understand the extent of the toxicants in the soil since the developer disturbed the area with a backhoe. In my first written concern to the EG Planning Department in 2018, I expressed concern that the Grenier group sent a team in to dig the soil in this hazardous junkyard to "test the water table." They dug successive holes down the entire length of the property. I stated in writing that the areas that were dug would be too diluted to provide valid soil sampling. I submitted this written concern to DEM for their records. Yet, as if by instruction, Mr. Kaufman took his first soil samples from those exact spots where the soil had been disturbed by digging. I complained to the town and DEM. I felt ignored because even more concerningly, his second soil samples were taken from the same disturbed spots. I complained again, yet both times, the soil samples were accepted by both the town and DEM. After the second sampling, the stand-in chair for the Planning Board asked Mr. Kaufman directly if he had dug in the same spots. He replied, "No." Yet, those samples were within feet of the first samples and one was within inches. All samples were taken in the diluted soils; the sandy, gravelly areas that had been recently turned over by the backhoe in 2018. It is not too late to do a proper phase 2 soil sample of the entire site. Doing so would more likely describe the extent to which the land has been polluted throughout its many decades a junkyard.

7. With soil testing done on only the diluted soil, it is remarkable that any toxicant was discovered at all. It was explained to me that effective soil remediation was the same for lead as it would be for lead, cadmium and chromium combined and any other heavy metals. Since lead was found on the property, I could feel reassured that all soil would be remediated thus removing all toxicants identified / not identified on the property. That may be so, but if remediation on the property involves dragging the hazardous soil through the streets and disbursing it into the air, the concerns are compounded. Poisoning from toxicants may be very different. People know that lead causes brain damage/organ failure/blindness. Cadmium causes kidney damage/cancers. Chromium causes skin diseases/dementia /psychosis/schizophrenia, for example. A larger array of exposure to toxicants can cause a wider range of problems. With no supervision over this project, with no impermeable barriers, and with the concerns of improper handling of materials that

could result in dispersal of hazardous materials throughout the neighborhood, these illnesses would become very real to many residents. It makes sense to understand the problem through testing before considering proceeding.

8. The cavalier attitude of Mr. Kaufman was evident from when he extracted the first soil samples. I witnessed him dig these first soil samples on the project site. I explained to him that he was taking the samples from the previously dug soil, and that, since the soil was diluted of concentrated contaminates, his sample would not accurately reflect what was in the soil. At first it seemed he wasn't hearing me. But eventually, he flailed his arms out and yelled, "I don't have to talk to you!.....talk to the owner." At the E.G. Planning Board meeting where he was admitted as the expert witness for environmental concerns, he launched his talk to the E.G. Planning Board by again flailing his arms out and saying, "Lead isn't a toxin. I don't know why people say lead is a toxin. It's not!" When I expressed concern about the large equipment dragging contaminated soil into the streets in the wheels and that the dirt needed to be cleaned off first, his response to the board was, "I don't have to that. DEM won't make me....." When I stated my concerns to the E.G. Planning Board about his professionalism, he wanted to clarify his position by stating, "I am here to represent the owner's interest." There is no one who needs supervision more than someone who, to my mind, is sorely lacking in professional integrity. Even then, it's an operational crisis when the people who do the work are so lacking in integrity that the results are always questionable, and because of that, people are placed in danger. I believe Mr. Kaufman's work presents a danger. I believe Mr. Kaufman's work is a threat to our community. A phase 2 soil test is needed to be done by an unbiased professional scientist who possesses basic integrity. If soil remediation is to take place, Mr. Kaufman has indicated that dragging the contaminated dirt through the neighborhood is something he would do. I believe approval should not be given to Mr. Kaufman to work on this project no matter how expansive and tidy his paperwork is. I believe his work to date and his intentions moving forward present a real danger to residents, workers and visitors to our community.

9. We are grief-struck, that a government agency designed to keep us safe would possibly consent permission to put us and our children under threat of exposure to the toxicants dug up from "Charley's old junkyard" located at 32 and 33 Exchange Street. Please do not permit this project to move forward until our concerns are addressed. I could have easily presented this letter to you as a very full petition with signers that include residents (mostly renters who have not received this document to which to respond), workers, visitors, boaters and even paw signatures; any one, any mammal that could possibly inhale these toxicants or drag them into our homes, boats, businesses and vehicles from our collective feet/paws. The concern of spreading covid 19 has prevented me from currently engaging in petition gathering. However, last year, I spent just a couple afternoons gathering signatures to request a phase 2 soil test be done of the 32/33 Exchange Street property. These include people as described above (minus the pets), who are concerned about exposure to all the toxicants in the soil. I understand a complete phase 2 soil test was not done because of an effort to help save the developer the expense. In this case, because of

the compromise of testing [due to previously dug and therefore diluted soil] that could only reveal what I feel are false and misleading results, I believe a phase 2 soil test is necessary to protect the lives and well-being of so many people. Please see signatures attached (4 pages).

Thank you for your concern for us in the work you do.

Sincerely,


Aimee Heru

Mr. Martella,

I can only add that my "preferred remedial alternative" would be to cap the soil and leave the land for use as a park. That would be great! And the best, safest remedy considering all angles here. Please keep us safe!

Thank you
Aimee

Name	Address
THURGOOD Cormack	[REDACTED]
John Christine	[REDACTED]
John Capra	[REDACTED]
Britany SUMM	[REDACTED]
Jessie HOE AL.	[REDACTED]
Juan Gomez	[REDACTED]
Marcia Hutchings	[REDACTED]
Jay Buss	[REDACTED]
R. White	[REDACTED]
Lawrence West	[REDACTED] Warwick RI
[REDACTED]	[REDACTED] EGR1
Newman	[REDACTED] EC RT
Chris Martin	[REDACTED]
Kevin Dillon	[REDACTED]

meeting w/ children
Scott

STEVE MORLEY

[Handwritten signature]

Michael Moore

LINDA CHANSKY Boat Owner East Greenwich Marina

Chad Cook

Zach Casuso

SHIRLEY H. JOHNSON

Robert Black

Julie Daylor

Sabrina Ferro

Sydney Brennan

Wayne Fisher

John Lee

Joshua Darling

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Pembroke Ct

West Warwick RI

EG RI

EG RI 02918

EG RI

Westerly RI

Wagwich RI - Vis.

EG RI

Richard Milner
[redacted] east greenwich R.I.

Harold Northrop

Alan B. [redacted] EG

Karon Talavaco [redacted] EG

Ruth Friselle [redacted] EG et

Jan Zuzolinski [redacted] EG

John A. [redacted] EG
(Pantazza)

John Wilcox War. RT

[redacted signature]

Robert Taylor

<u>Name</u>	<u>EG address</u>
Quincey Kern	[REDACTED], EG
Ed. Weaver	[REDACTED]
Joseph Hart	[REDACTED]
[REDACTED]	[REDACTED]
Lynette King	[REDACTED]
Virginia Stephen	[REDACTED]
Mr. P. Gordon (James P. Gorham)	[REDACTED] EG
Dante W.	[REDACTED]
Norma L. Powers	[REDACTED]
Ann [REDACTED]	[REDACTED]
Angela Durrin	[REDACTED]
Kimberly Green	[REDACTED]
Mackenzie Green	[REDACTED]
Brandon Jones	[REDACTED]

From: [Aimee Heru](#)
To: [Martella, Joseph \(DEM\)](#)
Subject: [EXTERNAL] : 32/33 Exchange Street, EG - Requesting additional soil samples
Date: Sunday, July 5, 2020 2:02:53 PM

Dear Mr. Joseph T. Martella II,

I would like to request that additional soil samples be examined from 32/33 Exchange Street in East Greenwich. I am hoping it would be possible to have tests done from sample areas undisturbed by recent digging.

In the attached map, I have identified, in yellow, the area that has been disturbed by recent digging by the Hoffman Environmental group. You can see that is also where Mr. Kaufman obtained his samples. This is the area where Charley conducted much of his work in his junkyard. While this area would have been most likely representative of the toxins found in the soil, it no longer is. The concentrations have been diluted. Mr. Hoffman's group mixed the topsoil with the soft sands beneath. They dug down to the water table (about 5'). This land which once filled up like a lake during a rainstorm now drains like a bathtub. It has been draining now for almost 2 years.

I have identified numerically in pink, areas where I would appreciate soil test samples be taken. There are 8 listed. If 8 is too many, I would appreciate that numbers 2, 4, 5 and 7 be given priority for the following reasons:

#2 is near my house. I remember Charley pouring Gasoline here.

#4 is inside a shed with mostly a dirt floor. I feel a sample here would reveal a number of chemicals and heavy metals Charley was handling.

#5 was an area that used to be heaped high with metal, mostly rims. But there were chemical barrels, too.

#7, as with the entire back, is where Charley dumped larger quantities of fluids [according to my neighbors who observed Charley over many decades].

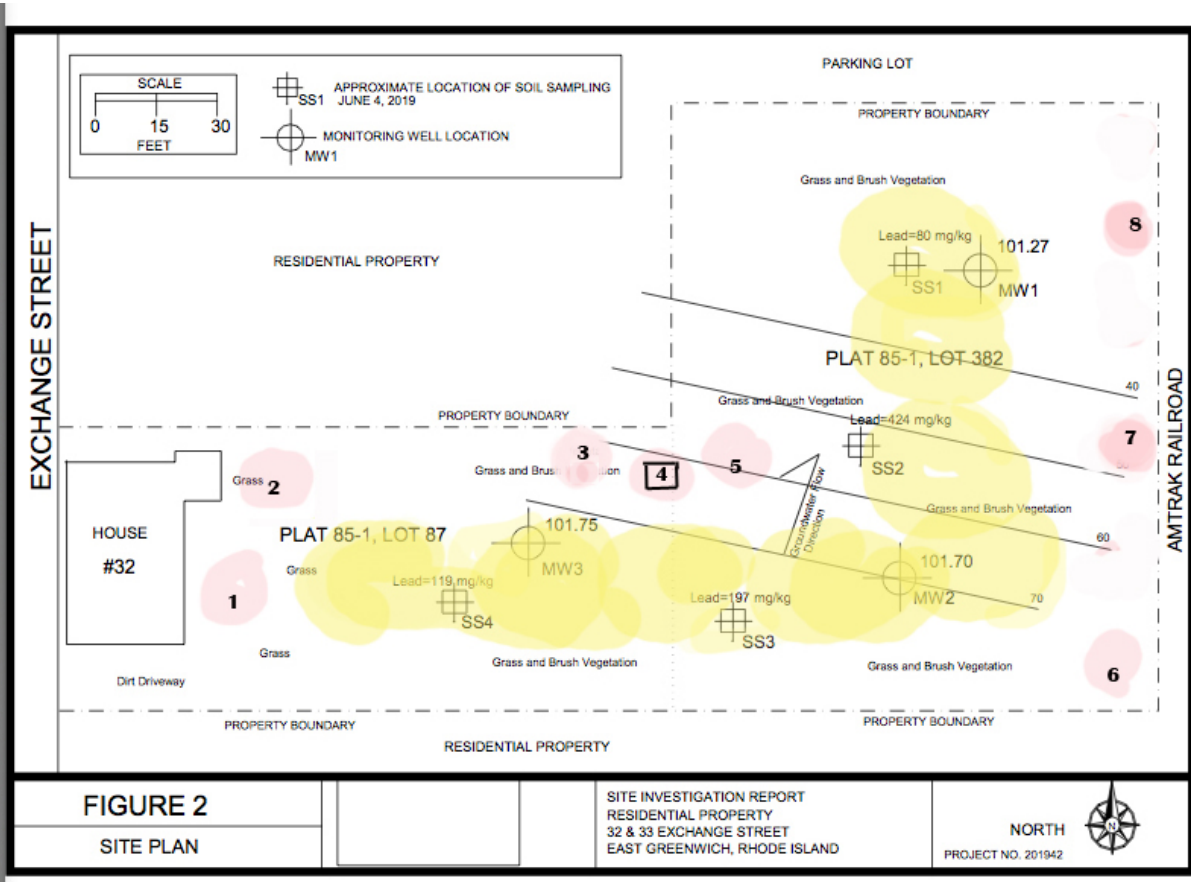
I am very hopeful this can be done. I really appreciate your help and consideration.

Sincerely,

Aimée Heru

[REDACTED]

[REDACTED]





Mr. Joseph T. Martella II
Environmental Engineer III
R.I. Department of Environmental Management
Office of Land Revitalization & Sustainable Materials Management
235 Promenade Street
Providence, RI 02908-5767
(401) 222-2797 Ext. 7109
joseph.martella@dem.ri.gov

Mr. John Wayne Ucci
[REDACTED]
East Greenwich, RI 02818
[REDACTED]

RE: 32 and 33 Exchange Street, Remediation Proposal, July 3, 2020

Dear Mr. Martella,

I am an abutter to this project site. Having worked my life in construction, I am hoping to convince you that our concerns are great and warrant special consideration from your office. I am in my 70's and have severe pulmonary difficulties. I rely on supplemental oxygen to get through the day. My son who also lives with me has asthma, and my aunt who is 98 is fragile but still with us.

I hope that to whatever degree the land gets disturbed on 32 and 33 Exchange Street, you will insist on measuring the particulate that emanates from the property throughout the period of digging and construction. I believe there are machines that can measure that. I spoke to a neighbor on Duke Street, and we came to the same conclusion. I hope you will install numbers of these devices on and near the construction site.

Ideally, I believe the land should be capped and rendered a park. I believe that this would be the safest solution for land remediation considering how densely populated the area is and how many small children are around. I'm not sure how much sway you have in presenting this solution on our behalf, but I'd like to impress on you how relieved and appreciative neighborhood residents would be.

I have lived next to the old junkyard most all my life. Even in my earliest recollections I remember Charley's activities, stripping and crushing vehicles and dumping fluids on the property. As a small boy, I loved watching Charley work. I want you to know that sometimes he'd dump barrels of fluid. The soil gets pretty sandy here once you dig down a couple feet, so I imagine much of his discards have been carried out to sea in the strong underground current that comes down from the hill. But still, there are a couple feet of superficial dirt that are of grave concern to us. Charley dumped a lot of stuff on his property. He only got rid of stuff he could sell.

Thank you for your consideration to our community.

Sincerely,

John Wayne Ucci

From: [James Gorham](#)
To: [Martella, Joseph \(DEM\)](#)
Cc: [Aimee Heru](#); [Aimee Heru](#)
Subject: [EXTERNAL] : 32/33 Exchange St. East Greenwich
Date: Wednesday, July 15, 2020 11:00:10 AM

Dear Mr. Martella,

I wanted to take a moment to underscore concerns presented by my neighbor Aimee Heru, regarding impending construction at 32/33 Exchange St. In addition, I would like to make a few additional points.

Throughout this process, I have been consistently appalled by the nonchalant attitudes expressed by associates of Mr. Grenier, including Mr. Kaufman, who has revealed a clear bias in favor of his client's interests. Not only have our concerns about potential environmental impacts of this project been dismissed, but in fact we have been given false and/or misleading information, such as Mr. Kaufman's claim, given under oath, that "lead is not a toxin".

When we have insisted that the developers construct an impermeable enclosure around the construction site, in order to contain dust from soil containing lead and cadmium (and asbestos dust from the demolition of the existing structure), our concerns have been largely scoffed at.

Best practices suggest that plastic should be laid around the perimeter of the property to prevent spread to other properties. They also suggest that a negative pressure enclosure be constructed to contain the site, with a HEPA vacuum installed to capture any small toxic particles that may become airborne. They suggest that equipment (truck tires, protective gear, etc.) used on site should be cleaned so that toxic dust is not spread to the surrounding neighborhood. I have thus far received little assurance that these safety measures will be taken during the demolition and construction process, and in fact, the prevailing attitude has seemingly been that the developers intend to do the bare minimum required to meet state guidelines, and no more. This is unacceptable.

Below is a link to a very helpful page posted by the EPA that highlights best practices for soil remediation, practices which should all be followed by the developer should they choose to proceed with this project:

https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/availability_session_9-24-16.pdf [19january2017snapshot.epa.gov]

One issue that has not been adequately addressed in the proceedings is that the site should receive special consideration, due to its proximity to the railway which has bounded the property for well over a century and a half. Not only was the site used as an informal junkyard for decades, but also there is a high possibility that heavy metals from the railway may have impacted the soil quality over the years. It is important to note that no soil samples were taken directly adjacent to the railway embankment, and were rather taken from the center of the property (it is my understanding that junk cars, trucks, and buses were stored at the periphery of the property, with barrels of toxic chemicals poured at the outskirts by its previous owner).

Recent studies have shown that concentrations of heavy metals and other toxic substances is higher than average in soil that is close to a railway. For your convenience, I will include a link below to a study that highlights this fact:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3096763/#Abs1title> [ncbi.nlm.nih.gov]

Because of this legitimate concern, and because of the clear bias demonstrated by Mr. Kaufman in favor of his client's interests, I would request that additional independent soil testing be completed on site. This testing should investigate soil quality at the periphery of the property, and particularly the railway embankment, rather than the center of the property, which is of least concern.

Another concern which I feel very strongly about which was summarily dismissed in the proceedings is that it has been claimed that lead is the only contaminant of concern on the property. I disagree with this claim. In fact, soil testing showed that in one of the locations, cadmium concentrations were shown to exist at 1.99 ppm. At that concentration, it is reasonable to expect that there are likely adjacent areas where cadmium concentration exceeds 2 ppm. While 2 ppm is below the state mandates for acceptable levels of cadmium in the soil, that does not change the fact that soil with levels as low as 2 ppm can nonetheless pose a hazard to human health, especially if soil is used for agricultural purposes. In fact, according to the University of Georgia, cadmium concentrations anywhere from 2 to 39 ppm are considered a "potential risk":

https://secure.caes.uga.edu/extension/publications/files/pdf/C%201075_2.PDF
[secure.caes.uga.edu]

It is extremely important to note that there is a large garden on the property directly adjacent to 32/33 Exchange. Were dust from demolition and construction to escape the site, it is very possible that it could impact the soil next door, thus placing anyone who consumed produce from that garden at risk.

Primarily, it has appeared that the goal of the developer has been to push the project through over the objections of neighbors at every stage of the process. There has been a consistent effort to downplay and minimize our concerns while bulldozing an unacceptable project down our throats, a project which could very well pose real health risks to neighbors in our very high-density neighborhood. This is not ok. It is my hope that RI DEM can take every measure at its disposal to ensure the health and safety of residents in the face of this unwanted construction project.

Thanks for your time and consideration,

James Patrick Gorham



East Greenwich, RI 02818

Sent from my iPhone