

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

July 2, 2007

Mr. David Heislein
Project Manager
Mactec Engineering and Consulting
107 Audubon Road, Bldg. 2, Suite 301
Wakefield, Massachusetts 01880

Re: Remedial Action Closure Report-Parcel A
Omitted Confirmatory Testing – Incomplete Files
Community Response – Mactec Letter dated June 19,2007

Dear Mr. Heislein:

Previously the community presented Mactec and others with a brief synopsis of the incomplete remediation work done to date on a portion of your client's (**Textron**) and the City of Providence's; specifically the Providence Redevelopment Agency's (**Owner**), property located at 333 Adelaide Avenue (**Site**). The primary focus of that letter is the six hundred (600)-car parking lot and perimeter grading and landscaping comprising over nine acres of the proposed remediation cap for Parcel A. Additionally; the scope of our focus includes the detention basin and the area north of the abandoned Stop & Shop, which is all part of the Parcel A property. This parking area, and the contaminated materials in the soil beneath are directly adjacent to the new high school recently built on Parcel B. The only engineered access to the school for both pedestrian and vehicular traffic is through the abovementioned parking lot. Specifically, over the central source area of the Tetrachloroethylene (**PCE**) solvent contamination and resultant spreading groundwater plume identified on Parcel A, the abandoned Super Stop & Shop. It should also be noted that additional contaminants exceeding the Industrial/Commercial direct exposure criteria (**I/CDEC**) are distributed throughout the regions not directly covered by asphalt, yet still are considered a part of Parcel A. These additional areas are also considered to be within the scope of the proposed Remediation Action Work Plan (**RAWP**) submitted by Textron and Mactec in April of 2001 for this site.

Since our receipt of your correspondence dated June 19, 2007 additional information has come to light, highlighting additional unacceptable and incomplete remedial actions implemented by Textron and Mactec at the site to date. Included in this new data are the

results of a series of soil tests performed throughout the so-called “remediation cap” installed on Parcel A. Also, listed below is some, but not all of the information actually missing from the file at the Rhode Island Department of Environmental Management reinforcing these concerns as well as others.

The preparation and submission of a **Remedial Action Closure Report** documenting the work performed and including at a minimum the following items, was never submitted, as is required, by Textron or it’s agents:

- A post remediation survey of the entire site with as-built plans demarcating the exact location (e.g. vertical and horizontal extent and type) of the installed engineered controls, including: geotextile fabric, clean fill, basins, swales, the storm water detention basin and actual thickness of asphalt and concrete.
- All compliance and confirmatory sampling, and clean fill sampling as applicable.
- A statement from the facility or environmental consultant (Mactec) attesting to the origin of the clean fill and/or loam, and its suitability consistent with the RAWP and your **Order of Approval** issued by the RIDEM in October of 2001.
- Verify that all fill material brought onto the Site and all soil utilized for the engineered control cap must be compliant with the RIDEM’s Method 1 Residential Direct Exposure Criteria pursuant to the Remediation Regulations. All clean fill; including sub-grade material and loam, imported to the site must be sampled in accordance with the **RAWP** and the Order of Approval, prior to delivery and placement. Laboratory analytical results must be submitted to the RIDEM office of Waste Management via fax. Written approval (via e-mail, fax, or letter) to use the fill must be received from the RIDEM prior to use.
- Identify and implement a long-term maintenance plan of the engineered controls and portions of the property (the site in its entirety) subject to your **Order of Approval**, including annual inspection and certification by an engineering professional (Mactec).

Mactec’s response letter dated June 19, 2007 simply reiterated some aspects of my original request for state mandated supporting data to verify the legitimacy of the remediation work on Parcel A. In particular you focused on the soil treatment of contaminated soils exceeding upper contaminant levels (UCLs). We emphasized Textron’s work in this area and during this time frame only to verify that contractors were on site and present during the preparation of the questionable remediation cap (parking lot and grading) not because we believe the TPH soil remediation was completed satisfactorily. As with most aspects of this project, there is evidence to indicate otherwise. It is perplexing that one aspect of the project would be so well documented (TPH soil batching), yet the major and most important component of the remediation work plan (the parking lot) implemented simultaneously would be completely ignored and or unsupervised. These inconsistencies are very troubling to the community, and continue to erode confidence in the entire site’s compliance status.

My concern about the integrity of the pavement surface was not about the neglected and uninspected condition of the parking area over the last five years, (though that is a valid concern), but about the integrity of the entire process and those who contributed to that process. We need accurate and verifiable information to support Mactec's summary of events, and those who were responsible for implementing these tasks. The community and the RIDEM do not need a summation of what is already common knowledge.

As was mentioned above, we are in receipt of additional information and evidence concerning the legitimacy of Textron's work on Parcel A, as well as the entire Textron /Gorham Site. Before arrangements can be made to accommodate and facilitate your expedited remediation plan for the Park Parcel, the community is requesting a more thorough and informative response to the community's very real issues, which persist in this protracted process. I suggest we make arrangements to meet at the Site, and the community can make representatives available for a physical review of all our concerns. You can reach me, Robert Dorr, at 401-749-7048 to expedite this scheduling. We are thanking Mactec in advance for their cooperation and guidance relevant to this most important and complex project.

Sincerely,

Robert F. L. Dorr for the community

Adelaide Avenue Environmental Justice Coalition

cc:

Terrence D. Gray, P.E., Assistant Director, RIDEM/AW&C
John Langlois, Esq., RIDEM/LEGAL
Joseph T. Martella II, RIDEM/OWM
Richard Enander, PhD, RIDEM/OTCA/Risk Assessment
Karen Leslie, CEO, YMCA
Senator Juan Pichardo, District 2
Representative Thomas Slater
John J. Lombardi, City of Providence
Thomas Deller, City of Providence
John Simmons, City of Providence
Sara Rapport, Esq., City of Providence
Glenn Wilson, Kimco Realty
Tammie A. McRae, ATSDR
Richard A. Sullivan, ATSDR
Greg Simpson, Textron Inc.
Peter M. Grivers, EA Engineering
James Ryan, Partridge, Snow, & Hahn
Knight Memorial Library Repository