

**Adelaide Avenue Environmental Justice Coalition  
60 Crescent Street  
Providence, Rhode Island 02970**

August 21, 2007

Mr. Joseph T. Martella II  
Senior Engineer, Office of Waste Management  
Rhode Island Department of Environmental Management  
235 Promenade Street  
Providence, Rhode Island 02908-5767

**Re: Textron's Site Responsibilities-Parcel A  
Responsible Party Activities prior to RIDEM  
Remediation Work plan Approval-2001**

Dear Mr. Martella:

As you are aware, our community group continues to struggle with objectively and systematically helping both regulatory as well as Primary Responsible Parties (PRP) revisit and clarify historical data and information concerning the Textron/Gorham Manufacturing Hazardous Waste Site located at 333 Adelaide Avenue, in Providence, Rhode Island.

Over the course of the last six months we have written; and reached out to both Textron Inc., and their environmental consultants, Mactec Inc. about our community's concerns and the apparent abuses, inconsistencies, and lack of compliance concerning the management of this section (12.1 Acres) of the hazardous waste site known as "Parcel A". The location of the now abandoned Super Stop & Shop, the detention basin located to the north and behind the abandoned retail complex, and the entrance to the entire four-parcel subdivision occupy this parcel.

We have repeatedly invited Textron's environmental consultants to physically review the site with us and document our issues concerning the integrity of their work, the City of Providence's work, and the work of the City's and Textron's handpicked developer for the project; Richard Baccari of Churchill and Banks Ltd. The problems that continue to haunt this site today were implemented as early as 1995, when the Providence Redevelopment Agency, for the City, and Textron embarked on their "mutual indemnification program", without any input from the community or any other stakeholder of consequence, including the RIDEM or the EPA.

After meeting with you and the senior staff from the Rhode Island Department of Health (RIDOH) at the site today (again, we have repeatedly requested that Textron join us at the site, to no avail), I would like to highlight and itemize the most disturbing and immediate issues which must be addressed if the community is to accept that the High School installed on Parcel B earns even a marginally passing grade for risk-based safety

standards. The lapses, the blatant disregard, and the unresolved contamination issues identified on Parcel A and Parcel D continue to highlight the miserable record Textron and the City has compiled to date on this site.

Dave McCabe, of Harding Lawson & Associates (Mactec) referenced the use and placement of clean fill repeatedly in his Remediation Work Plan and Human Health risk Assessment he crafted for the Textron/Gorham Site. In specific reference to Parcel A, he stated, *"The developed parcel will be regarded and clean fill will be imported onto the site prior to redevelopment. Therefore the location and number of industrial/commercial direct contact exceedences may be different than shown."* (Whatever that means...). As the photos which were revealed at today's site visit indicate, very little of the anticipated fill brought onto the site appears to be "clean", and according to David Heislein of Mactec Engineering, none of the fill introduced to the site was documented as such by any party involved, including Textron.

Extrapolating the volume of material indicated in the aerial photos taken in 1998-99, and evaluating the present site grades and elevations today, we estimate that approximately twenty-five thousand (25,000) cubic yards of contaminated material was brought from various offsite locations by Textron's developer, Richard Baccari. Research, and interviews with workers who were on site at the time indicate the majority of the material was delivered here because there appeared to be no oversight (by Textron's designated environmental contractor, Mactec; and the cost of disposing of the contaminated soils legally was cost prohibitive. Again, the project manager during this time period for Mactec was Dave MaCabe. There appears to have been a nominal dumping fee charged to those who wanted to participate in this illegal dumping of hazardous waste at our school site.

The community is requesting that the RIDEM initiate the Responsible Parties to implement an immediate testing regime on the entire eastern property line of Parcel A, which appears to be comprised of illegally deposited hazardous material. The process of establishing what material was inappropriately installed in our backyards would simply involve installing a series of sampling bores running the length and width of this particular site feature. This most recent revelation continues to add insult to injury to this Environmental Justice community saga; we all know this would not happen on the East Side of Providence!

This situation must be addressed immediately, and if the RIDEM feels this is not within the scope of your mandate, then we anticipate that you will help the community prepare a report and request for assistance from the EPA or the U. S Attorneys Office, located here in Providence.

Sincerely,

**Adelaide Avenue Environmental Justice Coalition**

Cc: Terrence Gray, Assistant Director, RIDEM  
Leo Hellested, P.E. Chief, RIDEM/OWM  
Robert Vanderslice, Phd, RIDOH  
Frank Battaglia, EPA-Region 1  
Tammie A. McRae, ATSDR  
John Langlois, Esq. RIDEM/OLS  
Gregory L. Simpson, Textron