

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

December 30, 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: Adelaide Avenue School
Quarterly O&M Summary Report No. 1
Community Stakeholder Issues & Concerns

Dear Mr. Martella:

On behalf of the City of Providence (City) EA Engineering Inc. has provided the Rhode Island Department of Environmental Management (RIDEM) a copy of the first Quarterly Operations and Maintenance (O&M) Summary Report in accordance with Provision 6(f) of the Order of Approval and amendments (Amended OA) for the referenced Adelaide Avenue High School site. (Site). The O&M Report summarizes recently completed Site activities related to compliance sub-slab vapor and indoor air sampling for the period between September and November 2007.

This three-month period spans the duration from the submittal of the Remedial Action Closure Report [RACR] in September through the first quarterly reporting period ending in November. The community has been evaluating and developing comments in response to the RACR and hopes to submit them to the RIDEM sometime in January 2008. The City's RACR for the Adelaide Avenue School will not be a finalized document until approved in its entirety by the RIDEM. The RACR is a final step in completing an approved (yet limited) remediation program.

We are encouraged the final closure report approval will incorporate the legitimate and science based concerns the community and it's advisers will submit to the RIDEM for their review and consideration

. Fortunately the Adelaide Avenue School final review is still before the honorable Justice Daniel A. Procaccini, who sits on the Rhode Island Superior Court bench. The court will offer the final disposition on the completeness of the City's responsibilities and obligations to all stakeholders involved, as was stipulated in a court order issued on March 29, 2006. Attorney Steven Fischbach has been dismissed from this case by the community, and when the time is appropriate, the community will assign new counsel to represent it's interest in these matters and proceedings.

Itemized below are comments and observations concerning the City's O&M Report dated December 20 2007. A number of issues reviewed here will also be incorporated into the Community Stakeholder response to the City's Remedial Action Closure Report for the School, which will be submitted at a later date.

. To simplify the review process, we will identify each referenced issue from the O&M Report by sub-heading in bold and the relevant text in italics (*where applicable*), and below that, the community's response, suggestions, and/or requests:

2.3 Ambient Outdoor and Indoor Air Sampling

One outdoor ambient air sample and eight indoor air samples within the school at RIDEM-approved sampling locations were collected and analyzed for VOCs via Method TO-15 SIM (Selective Ion Monitoring) on 20 September, 9 October, and 7 November 2007.

- According to the sample receipt and container information included at the end of each monthly analytical laboratory report provided by EA Engineering in the quarterly O&M Report (data which was not made available in the previous eight monthly reports); the City is using 2.7 Liter canisters for the collection of both indoor and ambient outdoor air samples. The community insists that the City utilize 6-Liter stainless steel summa canisters to retrieve these samples. Every state testing program that we researched, including but not limited to Colorado, Kansas, California, Washington, New Hampshire, Massachusetts, New Jersey, Michigan, Connecticut, and New York (the city's engineers have historically had a particular proclivity for the NYDEC protocol), have all determined indoor and ambient air sampling will be done with **6-Liter canisters only**.
- The City has been setting the flow regulators for the school's indoor air sampling at thirty minutes. This is also unacceptable and the community is requesting that all **school building indoor air sampling and accompanying ambient outdoor samples should occur over an eight (8) hour period**. Thirty minute indoor air sampling is

considered unorthodox by all State health departments and environmental management divisions we contacted and interviewed.

- The flow controller flow rate for each type of sampling canister (*1-liter, 2.7-liter, 3.2-liter, and 6-liter stainless steel summa canister*) is dependent on the sampling location. It shall be the City's responsibility to direct the laboratory to preset the flow regulators for the sample collection periods specified by sampling location.

2.4 Sub-Slab Vapor Sampling and Evaluation of Potential "VOC Rebound" Effect

The sub-slab data is summarized in Appendix C along with copies of the laboratory data reports associated with these three sampling events. In accordance with the Amended OA, the sub-slab data has been evaluated and there is no evidence of increasing VOCs (i.e., VOC rebound) beneath the school.

- This proclamation is erroneous and misleading, nor does it appear to be based on any type of empirical data or actual site observations.
- Firstly, the City's sub-slab testing protocol has been grossly flawed since its inception (as has been documented in previous reports). Not until interior monitoring probes were installed within the floor of the building (at the insistence of the community) was the City capable of retrieving somewhat representative samples of the soil gas vapors beneath the school building. Because these interior probes were not installed until September, fewer than three sampling events have occurred; hardly enough data to establish that "VOC rebound" is not, or will not occur
- Secondly, all three interior monitoring probes show significantly greater concentrations of the contaminants of concern than the eight perimeter monitoring probes designed and installed by EA Engineering on behalf of the City (the community has no confidence in the performance of these eight probes). The fact that EA Engineering continues to define them as RIDEM-approved does not legitimize their functionality. In fact the RIDEM got it wrong, and will need to ultimately have the City install additional interior monitoring probes (replacing the eight perimeter probes) to accurately assess the soil vapor conditions beneath the Adelaide Avenue High School.
- Thirdly, there is clear evidence that many of the sub-slab soil vapor samples have been compromised by ambient air. All of the interior sub-slab monitoring probe samples to date appear to have been diluted and tainted by indoor air. Until the City's engineers incorporate a standard tracer compound into their testing protocol to determine if the soil gas collection system at the probe level is free of leaks, none of the analytical testing results should be allowed as evidence of proper performance by the City. Neither the RIDEM nor EA Engineering appears to be aware of this failsafe

mechanism used universally by environmental engineers during soil gas sampling. The community is extremely disappointed that yet again we are the ones identifying and determining the obvious shortcomings of the City's compliance testing program for our school. We will include more discussion about tracer compounds for soil gas sampling in our response to the City's Remedial Action Closure Report submitted to the RIDEM by EA Engineering.

- Lastly, EA Engineering performed a soil gas-sampling event in October of 2005. There was a protracted discussion concerning the results of those tests, and Tim Regan of EA Engineering insisted that they would be representative of the site's soil gas concentrations over time. The City's own analytical test results since the October '05 sampling event indicate a ten to one-hundred fold increase in many of the contaminants of concern. The community would like the City to explain how this is not a "VOC rebound"? Additionally, the soil gas vapors found beneath the abandoned Stop & Shop are tens of thousands times greater than predicted by the Providence Redevelopment Agency, and the City's developer, Churchill & Banks, (*they implied there would be none*). The scope of the soil gas vapor intrusion within the Stop & Shop is a harbinger of what is to come at the school.

Tragically no one was consulted or informed (*i.e., RIDEM, school committee, city council, community, parents, students, teachers, etc.*) concerning the dangers and severity of the conditions at this hazardous waste site. Tom Deller, executive director of the PRA, is singularly responsible for the decision to install a six hundred-student high school on top of this catastrophe unfolding in slow motion before us. The characterization of the contamination at this site by both Textron, and the City of Providence was so inadequate as to appear intentional. The school should never have been constructed at this location, regardless of what limited remediation has been initiated. At this juncture the community can only rely on the regulatory oversight of the Rhode Island Department of Environmental Management to be assured that the actual conditions at this site are uncovered and rectified. We have been stripped of all other mechanisms and protocol to protect our children, now and in the future.

Sincerely,

Adelaide Avenue Environmental Justice Coalition

cc:

Terrence D. Gray, P.E., Assistant Director, RIDEM/AW&C
John Langlois, Esq., RIDEM/LEGAL
Leo Hellested, RIDEM/OWM chief
Richard Enander, PhD, RIDEM/OTCA/Risk Assessment
Barbara Morin, RIDEM/OAR
Karen Leslie, CEO, YMCA
Greg Simpson, Textron

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Principal Torchon, Adelaide Avenue School
Senator Juan Pichardo, District 2
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