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October 28, 2006

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

Re: MACTEC Files-Extron UST closure reports: January '81 thru January '99

Dear Mr. Heislein:

I am writing this request as a spokesperson for the *Concerned Citizens of the Reservoir Triangle and South Providence*. The most recent postings, dated October 19, 2006, at the RIDEM website for the Extron/Gorham Hazardous Waste Site includes an email sent to the RIDEM from the City of Providence's engineers, E. A. Engineering. In it Peter Grivers, P.E., LSP, project manager for the City's ongoing remediation and investigation of Parcel B, the High School; states that Underground Storage Tanks thought to still be onsite, have been removed. In his email to RIDEM Mr. Grivers, P.E. says, "*these tanks were investigated and removed in accordance with RIDEM UST regulations in 1995*". This is terrific news and we are relieved to finally learn this information. The community had been extremely concerned about the disposition of two 15,000-gallon solvent tanks located under Building N adjacent to Parcel B, the High School. We are grateful for both the removal and the State RIDEM mandated follow-up investigation always performed at such events. This may also explain why Extron and MACTEC neglected to accurately represent the status of USTs in your Site Investigation Report (SIR) Checklist for the Park Parcel, dated July 31, 2006. Specifically Section 7-7.03.H; *UIC Systems, septic tanks, underground storage tanks (UST), piping and, other underground structures*. You simply had removed the tanks at some previous time prior to the completion of the now abandoned Stop & Shop. The tanks would have been in the northwest corner of "Parcel A", under the rear fire lane and delivery access paving which was installed in April of 2001. This **Heavy Duty Asphalt** paving has acted as a capping device for all of Extron's remediation responsibilities on "Parcel A". These heavy duty parking areas were installed by the City of Providence at great expense, with funds from the federal government, at no cost to Extron.

Unfortunately, to date we have been unable to locate either the closure report for the removal work attending to the naphthalene solvent tanks or any Limited Remediation Work Plan that would have been implemented per the regulations to address any residual contamination found under or near the solvent tanks. As our research progressed, we were in fact unable to locate any real data on the removal of **any Underground Fuel and Solvent Tanks on site**.

The one file located referenced the removal of two 30,000-gallon underground storage tanks (USTs). These tanks were excavated and removed by Terraco Precision Testing under contract to the City. This event occurred November 11, 1998, with HLA (MACTEC) personnel present to document the closure and investigation of these fuel tanks. The two fuel tanks removed, under the direction of HLA (MACTEC), were the most recent tanks installed by Textron on this site in 1974.

The lack of information on the other nine identified underground storage tanks is confusing. Textron has stated that Textron personnel removed all tanks on site with RIDEM observers standing by. The UST Program at the RIDEM has been operational for some time, yet we cannot locate any of the reports or investigations, which Textron, by law, would have filed. We are confident that this information is readily available from Textron's own files, and that you would forward these closure reports to the community for review and bring closure to our concerns.

Again we are delighted to learn that all solvent and underground fuel tanks have now been removed from the site. It has been a long time coming. One last point of concern is the evidence that the City contracted to remove the abovementioned 30,000-gallon fuel tanks. The community as a Stakeholder and participant in this process was led to believe that Textron was responsible for all underground contamination, including but not limited to groundwater, pond and cove surface water, surface soil, subsurface soil, sediments, and any other contamination discovered after the demolition of the Textron manufacturing facility. This would have certainly included any contamination discovered under the footprints of the existing structures or tanks. If the underground tanks were not included in this agreement, please clarify who was responsible for, and what entity ultimately paid for the work performed. Also which engineering firm signed off on the program once it was completed?

Respectfully,

Robert L. Don Jr.

Concerned Citizens of the Reservoir Triangle and South Providence

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