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March 2, 2012

BY ELECTRONIC MAIL

Mr. Jeffrey Crawford
R.I. Department of Environmental Management
235 Promenade Street
Providence, RI 02908-5767

RE: Comments on Draft Five Year Review, Springfield Street Schools

Dear Mr. Crawford:

On behalf of the plaintiffs in the *Hartford Park Residents Association et al. v. R.I. Department of Environmental Management et al.* case I am submitting the within comments on the Draft Five Year Review prepared for the Springfield Street Schools Site. These comments are in addition to the comments made at the public hearing on February 27, 2012.

Again, I want to thank the Department for changing the timing of the public meeting and public hearings, to allow our technical assistance provider, Skeo Solutions (Skeo), to have sufficient time to review the various site assessment and monitoring documents that underlay the Draft Five Year Review. Skeo submitted a thorough review of the Department's Draft Five Year Review, which included several recommendations. The Department has acknowledged receipt of Skeo's report, placed it on the Internet document repository for the Springfield Street Schools site, and agreed to respond to the recommendations made by Skeo. The plaintiffs thank the Department for doing all of these things.

For the record, plaintiffs endorse all of the recommendations made by Skeo on pages 24 through 26 of their report, including Skeo's endorsement of recommendations made in the Draft Five Year Review. While all of the recommendations would improve the effectiveness of the remedial actions at the schools, plaintiffs want to highlight some of the more important recommendations:

- Confirming the presence of a measurable vacuum beneath the school buildings at all times to demonstrate the effectiveness of the sub-slab ventilation systems;
- Increasing the frequency of inspection of the soil cap to two week intervals;

- Evaluating whether landfill gases might be migrating into nearby residences;
- Lowering the action level for hydrogen sulfide to 2ppm;
- Adding the substances recommended by Skeo to the list of substances in soil gas samples currently analyzed by the laboratory;
- Making changes to the blower in the front section of the middle school building to avoid the frequent shutdowns of that blower;
- Taking additional soil samples and a grab sample of standing water in the area between the elementary and middle school (adjacent to where raised beds were installed several years ago) to alleviate community concerns about potential contamination in that area.

There are two additional comments I wish to offer. First, I have had further discussions with Skeo about their report, and on their behalf want to forward an additional recommendation contained in an email I received yesterday from Terrie Boguski of Skeo which reads as follows:

Steve,

To followup on our phone conversation from earlier today, it would be good to ask DEM to consider collecting soil gas samples from the ventilation systems for laboratory analysis. This would identify the actual constituents of the soil gas that is removed from the subsurface and provide additional information about the potential risk of vapor intrusion into the school buildings if the ventilation systems are not operating properly.

Please let me know if you have additional questions.
Terrie

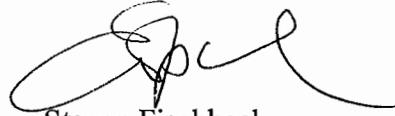
Skeo Solutions
913-568-7550

Although this communication does not indicate where the sample should be taken, Ms. Bouguski suggested to me verbally that the sample be taken off the port before the carbon filters.

Second, the plaintiffs request that DEM follow up on information in the Draft Five Year Review that the orange snow fencing was observed by Mr. Conti in the rear of the middle school building (page 20 of the Review). This is the first report of any kind that the snow fencing was observed. At the public meeting on February 15, 2012, DEM noted that the agency never received a report from the City that the snow fencing was visible. Plaintiffs ask that DEM determine the precise location where the snow fencing was visible and the approximate date that the snow fencing was covered. Moreover, this incident underscores the importance of the maintenance staff receiving training about reporting requirements.

Should you or others at DEM have any questions about these comments do not hesitate to contact me.

Respectfully Submitted:

A handwritten signature in black ink, appearing to read 'S. Fischbach', with a large loop at the end.

Steven Fischbach
Community Lawyer / Unit Head

Cc: Susan Forcier, Esq.
Terrie Boguski & Kirby Webster, Skeo Solutions
James Murphy, USEPA Region 1