



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

April 5, 1999

Alan Sepe, Director  
Division of City Property  
City Hall  
25 Dorrance Street  
Providence, R.I. 02903

RE: Site Investigation Report for Elementary and Middle Schools on Springfield Street in Providence by ATC Associates, Inc. (Case #99-018)

Dear Mr. Sepe:

The Office of Waste Management (OWM) has received and reviewed the abovementioned Site Investigation Report dated March 25, 1999 concerning property along Springfield Street and Hartford Avenue in Providence proposed for new schools by the City of Providence. Based upon the review, the Office has listed below the following comments:

1. **Introduction-** Please explain the Performing Party's (the City of Providence) capability to comply with Rule 7.04 Development of Remedial Alternatives, Item D.
2. The OWM requests that ATC collect groundwater samples from some of the wells located within the proposed schools footprints for laboratory analysis for VOC's. The results will assist the Office in reassuring the general public that no groundwater contamination is present beneath the proposed school sites which may be a threat to human health. (ATC groundwater collection is scheduled for April 1, 1999)
3. **Page 12, Background Determination** – For clarity, this section does not comply with the requirements in the Remediation Regulations for determining background concentrations at a site. In order to address existing site contaminants as potential background concentrations, ATC would have to collect twenty (20) additional soil samples from unimpacted areas of the whole site, conduct laboratory analysis and then determine what the average concentration is in relation to the applicable exposure criteria.
4. **Page 19, Alternative 3** – Please indicate the fate of the fill material surrounding the elementary school footprint and whether this material would require a gas collection

system, gas monitoring wells along the perimeter of the site or at a minimum, sensor alarms beneath the floor to detect methane concentrations which may be migrating from the surroundings.

5. **Page 19, Alternative 3** – The Department will require a comprehensive description in the Remedial Action Work Plan for the design of the gas collection system under the middle schools, the location of the gas collection monitoring wells network and the proposed location of all sensor alarms in the school buildings. Also required will be the frequency of testing these wells to indicate any gas exceedance of the acceptable limit (i.e. at the beginning methane readings must be taken weekly at these wells) after establishing sufficient data these wells may be monitored on a quarterly basis.
6. **Page 19, Alternative 3** – The City of Providence is reminded that the proposed cover for those areas of the site which will not be located beneath the building footprints will require a minimum cover of two (2) feet of clean soil and/or a combination geotextile layer with a minimum of one (1) foot of clean soil. Either scenario will require a final cover of 2-2inch perpendicular lifts for asphalt areas or loam & seed in the proposed grass areas and an ELUR.

Please forward the Remedial Action Work Plan to this Office as soon as possible. Should you have any questions, please call me at (401) 222-2797 x 7102.

Sincerely,



Jeffrey Crawford  
Principal Environmental Scientist  
Office of Waste Management

cc: Terrence Gray, Chief OWM  
Greg Fine, Supervising Engineer OWM  
Leo Hellested, Supervising Engineer OWM Solid Waste  
Walid Ali, Senior Engineer, OWM Solid Waste  
ATC Associates, Inc.

Springfield Street SI letter /jc