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August 1, 2011

BY ELECTRONIC AND  
REGULAR MAIL

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

RE: Notice of Commencement of Five-Year Environmental Review, Anthony  
Carnevale Elementary School and Del Sesto Middle School dated June 20, 2011

Dear Mr. Crawford:

On behalf of the Plaintiffs in Hartford Park Tenants Association v. R.I. Department of Environmental Management, CA 99-3048 (hereafter, "Plaintiffs"), I am responding to the above referenced notice to provide information regarding the remedial actions at the Springfield Street Schools Site and concerns about environmental conditions at said Site. Below is a list of items that the Plaintiffs want the Department of Environmental Management (DEM) to address in the Five Year Environmental Review (Review).

As you know, DEM rejected Plaintiffs' request for a sixty day extension of the comment period set out in the above referenced notice to allow a technical assistance provider from the U.S. Environmental Protection Agency to provide recommendations on issues that should be addressed in the Review. Thus, the information herein is submitted under protest. Plaintiffs are still working with EPA to secure that technical assistance, and Plaintiffs request that DEM consider any recommendations that the consultant may make after the close of this comment period. Moreover, Plaintiffs expressly reserve their rights to seek judicial redress for the manner in which DEM is conducting this Review. Plaintiffs also request that a copy of this letter be posted on the Internet document repository maintained by DEM for the Springfield Street Schools Site.

1. Environmental Conditions of Concern

- Persistent flooding of grounds: Plaintiffs want the Review to explain the reasons for persistent flooding, to investigate those areas for possible contamination (especially TPH and Arsenic) and insure that the soil cap in those areas is still 2 feet deep. The areas of persistent flooding include the area to the left of the Middle School building (as you face the building)

along Springfield Street, the area adjacent to the transformer unit behind the Middle School, and the ball field behind the Middle School.

- Dead trees throughout the site: A number of trees that were planted in the soil cap have died. Plaintiffs want the Review to assess whether the trees died due to contaminants in the ground. The areas where trees have died include the ball field behind Middle School, the area to the left of the Middle School building (as you face the building) along Springfield Street, and in the median strip in the Elementary School Parking Lot (between the parking lot and Springfield Street).
- Odors: During one of the recent monitoring events I received a complaint from staff about an odor in former music room in Middle School building. I did observe an odor at the time. I have also received odor complaints regarding the Elementary School gymnasium. Plaintiffs want the Review to include interviews of staff regarding odors and to have the source of any odors investigated and explained.

## 2. Concerns related to the Remedial Actions

- Frequent breakdown of sub-slab vapor extraction system in Middle School: There have been several times where the extraction unit in the front of the Middle School has been shut down, allegedly because it fills up with water during rain events. **Today I observed that this unit was not on.** The Review should examine whether any measures to prevent the repeated shut down of this unit can be implemented.
- Disrepair of groundwater and soil gas monitoring wells: While 3 broken groundwater wells were recently repaired there are two soil gas wells that were destroyed (WB 5 and WB 7). Also, **today I observed that the cover to MPL-7 was broken.** The Review should determine why so many soil gas and groundwater wells have become non-functional and steps that should be implemented to prevent other wells from becoming destroyed.
- VOCs in Soil Gas: Only two samples from soil gas wells (WB-2 and MPL 6) and no samples from the sub-slab vapor extraction system are sent to a laboratory for analysis. These locations are on opposite sides of the site (WB-2 is behind the Elementary School and MPL-6 is along Hartford Avenue by the Middle School Parking Lot). The most recent monitoring event (June 2011) showed exceedences of the CT Residential Indoor Air standards for Methylene Chloride, Tetrachloroethylene, Trichloroethylene and 1,2,4-Trimethylbenzene in both wells. Since May 2010, there have been exceedences of Methylene Chloride and Trichloroethylene in virtually every sample analyzed. At the same time the readings for Organic Vapors reported for these wells in all events was 0.0 ppm. The Review should address several issues raised by these numbers: a.) whether more than 2 soil gas samples should be sent off to a lab for analysis; b.) whether samples taken off the sub-slab ventilation system should sent off to a lab for analysis; c.) whether indoor samples taken with summa canisters

should be made part of the quarterly monitoring regimen (as is the case with Alvarez High School); and d.) what is the source of these VOCs and whether any further remedial actions are necessary to address them.

- Groundwater flow: there is no information about the direction of groundwater flow across the site. The presence of VOCs in soil gas samples taken at wells WB-2 and MPL 6 points to the need for the Review to include an evaluation of whether groundwater could be transporting those VOCs towards the school buildings.
- Methane in MPL 6: Methane has been detected in this well. The Review should ascertain the source of the methane and whether it could be related to former gas station located on the corner of Hartford Avenue and Springfield Street.
- Carbon Dioxide in soil gas monitoring wells and sub-slab system: At almost every monitoring event there are exceedences of Carbon Dioxide in soil gas wells and in the vapor extraction system. The Review should examine whether CO<sub>2</sub> or VOCs are getting into school building. The possible effect of settlement cracks in the walls of both buildings (visible on the first floor) should be factored into this examination.
- Former Sinkhole areas (near transformer behind Middle School, Middle School courtyard adjacent to cafetorium, near transformer in schoolyard behind Elementary School): The Review should assess whether the soil cap in areas adjoining sinkhole areas that have been repaired is still 2 feet deep and whether the soil cap in those areas has become contaminated (especially TPH and Arsenic). The Review should also explain the reasons why the sinkholes developed in the first instance. **Today I observed a small tree growing in a crack of a repaired sinkhole in the fenced in transformer unit behind the elementary school.**
- Erosion of slope behind elementary school and by the cemetery: The Review should examine whether the soil cap in these areas is still 2 feet deep.
- School Nurse Reports: The plaintiffs receive periodic reports from the School Nurse which document the reasons why students visit the nurse. The Plaintiffs are concerned about headaches and stomach aches reported to the School Nurse. Plaintiffs ask that the School Nurse be queried about this issue during the Review.

For the record, Plaintiffs express their concern about the lack of comments received as a result of the June 20, 2011 Notice. This notice was distributed at the very end of the school year, and many parents do not focus on school related issues over the summer break. As part of the Review and after the new school year begins, another notice should be sent out to parents explaining that the Review is underway, and that any parents who want to speak with the Reviewers about concerns can contact DEM for that purpose.

Very truly yours,

A handwritten signature in black ink, appearing to read 'S. Fischbach', written in a cursive style.

Steven Fischbach  
Community Lawyer / Unit Head

CC: Curt Spaulding, Regional Administrator EPA Region 1  
James Murphy, EPA Region 1  
Susan Forcier, Esq.