



August 18, 2011

Vanasse Hangen Brustlin, Inc.

Ref: 72016.10

Mr. Timothy Fleury
Senior Engineer
Rhode Island Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, Rhode Island 02908

Re: Trestle Trail, Coventry Rhode Island
Response to Public Comments

Dear Mr. Fleury:

Vanasse Hangen Brustlin Inc. (VHB), on behalf of our client, Prime Engineering, Inc. (PEI), submits this letter to summarize the results of the public meeting held at the Coventry Community Center on July 12, 2011. As you are aware, approximately 20 to 30 people attended the meeting. The public comment period ended on July 26, 2011 at 4:00 P.M. You had indicated that you waited an extra seven days beyond the official close of the comment period before forwarding one public comment received by your office.

Below are responses to comments that were generated at the public meeting and during the comment period regarding the findings of the initial Site assessment and the proposed additional Site Investigation activities. Since many of the comments consisted of central themes, VHB has attempted to incorporate many of these themes into one comment. For the sake of clarity, VHB has re-stated the question/comment in italics and has provided a response below it.

1. *How wide is the proposed cap and what percentage of the trail will be capped?*

The width of the cap will depend on the width of the right-of way and how much area is cleared for the trail. It is anticipated that, where a cap is needed, all cleared areas will be capped. It is impossible to determine what percentage of the trail will be capped until all soil investigations are completed and the occurrence of soil impacts is better defined.

2. *There is a concern regarding the documented groundwater impacts identified in the former railroad right-of-way and potential impacts on abutting private wells.*

Due to concerns associated with leaving a direct conduit to the groundwater in an unsecured, remote area, standard, permanent groundwater monitor wells were not installed. Instead, temporary wells consisting of polyvinyl chloride (PVC) well screen and riser pipe were placed in

RECEIVED
D.E.M. / O.W.M.
2011 AUG 19 P 12:58

Mr. Timothy Fleury
R.I.D.E.M.
Ref.: 72016.10
August 18, 2011
Page 2

the borehole and backfilled with inert sand to approximately one foot above the well screen. Samples were then collected directly from the temporary wells with limited time to allow for the settling of suspended soil particles in the groundwater. Following groundwater sampling, the PVC well was pulled from the borehole and the boring was filled to grade with bentonite clay and native backfill. As such, the groundwater samples collected from these temporary wells were turbid and the laboratory detection of metals in the groundwater sample was most likely the result of the detection of metals absorbed to suspended soil particles.

It should also be noted that the substances detected within the right of way (polycyclic aromatic hydrocarbons (PAHs) and metals) are not especially mobile in water, which is why these substances are still detected in the soil 40+ years after railroad operations ceased.

If residents have concerns regarding the quality of their private drinking water wells, there is guidance available for having their wells tested. The University of Rhode Island (URI) Cooperative Extension Home*A*Syst Program recommends that homeowners have their private wells tested for coliform bacteria, nutrients, and turbidity every year; target metals and pH every 3 to 5 years; and volatile organic compounds every 5 to 10 years. A link to the URI Home*A*Syst webpage is provided below:

<http://www.uri.edu/ce/wq/has/Private%20Wells/WHYTEST.html>

3. *Is soil removal an option and why can't you excavate all the soil on the project?*

Some soil removal may be conducted in association with cap construction to meet design grades. Complete soil removal for the entire 5 to 10 mile segments, however, is not possible due to the excessive costs associated with soil disposal.

4. *There was a railroad stop at Camp Westwood Road that reportedly had off-loading of coal and fueling stations for the railroad.*

VHB has reviewed several historic publications including the following documents:

Coventry Celebration: A Pictorial History, by Donald A. D'Amato, Coventry, Rhode Island, 1991;

A History of Greene and Vicinity 1845-1929, by Squire G. Wood, privately printed in Providence, Rhode Island, 1936;

Reflections of Coventry's Yesterdays (1741-1900), published by Coventry Public Library, 1976; and

Historical and Architectural Resources of Coventry, Rhode Island: A Preliminary Report, Rhode Island Historical Preservation Commission, February 1968.



While each of these documents discusses a depot in Greene where wood, coal, acid and fuel was stored, there is no mention of any facilities at Camp Westwood Road. Regardless, a boring will be advanced on each side of Camp Westwood Road to investigate the surface soil quality.

5. *There was a large railroad depot in Greene. Are there any plans to investigate there?*

As indicated above, the Greene depot was mentioned in each of the references cited above and there were several references to storage of oil and/or hazardous materials. As such, several samples will be collected on either side of Hopkins Hollow Road at approximately 50 foot intervals.

6. *Do the results of this investigation change any plans for the construction of the trail?*

No, the detection of the substances found along the former railroad were anticipated based on the former Site use and from experience on similar projects conducted by the Rhode Island Department of Environmental Management (RIDEM) and the Rhode Island Department of Transportation (RIDOT).

7. *There is a concern about beryllium impacts.*

Beryllium is a naturally occurring metal and it is common to detect it in soil samples in Rhode Island. The RIDEM Residential Direct Exposure Criteria (RDEC) for beryllium is set at 0.4 mg/kg (or parts per million (ppm)) and is based on a background study, not on any risk-based criteria. The background beryllium concentration was determined from 42 soil samples collected throughout the state. It should be noted that RIDEM, in their draft changes to the *Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (Remediation Regulations)* dated December 2010, have proposed a new beryllium RDEC based on the statistical 95 percent upper confidence limit of natural background data across the state. This would result in a beryllium RDEC of 1.5 ppm.

The actual risk-based screening level utilized by the United States Environmental Protection Agency (USEPA) is 160 ppm. Similarly, the Commonwealth of Massachusetts uses a beryllium criterion of 100 ppm for their most sensitive soil resources.

Although there were several soil samples that exceeded the RIDEM RDEC of 0.4 ppm, none of the sample results came close to the risk-based criteria. In fact, the highest beryllium concentration detected throughout the project was 0.54 ppm.

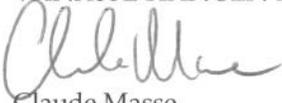


Mr. Timothy Fleury
R.I.D.E.M.
Ref.: 72016.10
August 18, 2011
Page 4

If you have any questions or comments regarding these responses, please feel free to contact me at (401) 272-8100.

Very truly yours,

VANASSE HANGEN BRUSTLIN, INC.



Claude Masse
Senior Environmental Scientist

Cc: A. Marshall, RIDOT
R. Bailey, RIDEM
H. Neenan, Prime Engineering, Inc.

RECEIVED
D.E.M. / O.W.M.
2011 AUG 19 P 12: 58

