GZA
GeoEnvironmental, Inc.

Engineers and Scientists

May 4, 2006
File No. 32795.17-C

Ms. Joan Taylor
Rhode Island Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, Rhode Island 02908-5767

Re: Solid Waste Areas Remediation and Wetland Restoration
Charbert, Division of NFA Corp.
Alton, Rhode Island

140 Broadway
Providence
Rhode Island
02903
401-421-4140
Fax: 401-751-8613
www.gza.com

Dear Ms. Taylor:

On behalf of our client, Charbert, Division of NFA Corp., GZA GeoEnvironmental, Inc. (GZA) has prepared this letter as a follow-up to the April 27, 2006 conference call with representatives from Charbert, RIDEM and GZA. During that call, Charbert representative Mike Healey expressed that as a proactive step, Charbert would remove the solid waste from the four areas delineated in our June 2, 2005 *Site Investigation Report* (SIR) and as shown on Figure 1, attached.

Three of these areas are partially located within the 200-foot riverbank wetland buffer. Charbert will also be closing a portion of the old lagoon access road that passes through the 200-foot riverbank wetland buffer, also shown on Figure 1. The restoration work in the wetland buffer will be performed in accordance with the July 2005 Consent Agreement. The areas outside the 200-foot riverbank wetland buffer will be restored to the match existing adjacent area. Sediment controls and wetland restoration details are provided on Figure 2, attached.

The sections below describe the subject areas and the work to be performed:

Solid Waste Areas 1 and 2

The waste removal from Areas 1 and 2, which are located to the west and to the east of the lagoons, respectively, involves the removal of refuse from the "old community dump" that appears to have operated from the early-1900s to approximately 1970. The refuse appears to have been placed on top of the existing ground surface with no evidence of buried waste. The depth of refuse varies from surficial at the perimeters to 1 to 1.5 feet in the centers. Area 2 contains piles of soil mixed with refuse that appear to be the surface soil removed to construct the holding pond east of the lagoons.

The waste in both of these areas will be removed from the surface with a small skid steer loader and a small backhoe. Care will be taken to not disturb the existing trees. The waste will be stockpiled on 10-mil polyethylene sheeting and sorted for off-site disposal at a licensed facility. See Figure 1 for the proposed stockpile area.

During the removal of refuse, the field screening will consist of visual, olfactory and total volatile organics utilizing a photoionization device with a 10.6 eV lamp. Any soils that appear to be impacted by contaminants will be removed and segregated during the refuse removal. Prior to

any restoration activities, discrete samples will be collected from 4 to 5 locations within the excavations. The soil sample analysis will consist of the following target analyte groups:

- Total Petroleum Hydrocarbons (EPA Method 8100M)
- Volatile Organic Compounds (EPA Method 8260B)
- Semi-volatile Organic Compounds (EPA Method 8270C),
- Total Metals (EPA Method 6010B/7471A)

The metals analysis will consist of the 18 regulated metals in the RIDEM's Remediation Regulations. In addition 1 to 2 samples from each area will be selected for polychlorinated biphenyls (PCBs) analysis (EPA 8082).

Restoration in these areas will be performed as specified in the July 2005 Consent Agreement. Care will be taken to minimize the amount of trees and shrubs removed during the cleanup operations. Trees that are removed will be replaced, and ground surfaces that are stripped will be restored with clean soils, planted with shrubs and grass seed, and mulched with straw, as specified on Figure 2. The areas outside the wetland buffer will be graded to match the surrounding area, seeded and mulched. Erosion controls will be placed throughout the wetland buffer work area and down slope of the areas outside the buffer.

Solid Waste Area 3

Solid Waste Area 3 is located at the end of Myrtle Street and consists of household items and discarded building material brought on-Site by non-Charbert personnel. Visible waste includes tires, furniture, wood, roof shingles and various other materials. The waste will be removed, the area will be screened for evidence of contamination as described above, and two (2) soil samples will be collected and analyzed for the same suite described for Areas 1 and 2. No PCB analysis is planned for this area, but if any evidence of PCB containing refuse is discovered, this analysis will be performed. This area is not located within the 200-foot riverbank wetland buffer and will be restored to match the surrounding area. The areas to be stripped of vegetation are minimal and sediment controls will not be necessary.

Solid Waste Area 4

Solid Waste Area 4 is located in the gravel borrow area located to the northeast of the lagoons, adjacent to the Pawcatuck River. The area is a depression and contains refuse similar in character to Area 3. The surficial waste will be removed, the area will be screened for evidence of contamination as described above, and two (2) soil samples will be collected and analyzed for the same suite described for Areas 1 and 2. No PCB analysis is planned for this area, but if any evidence of PCB containing refuse is discovered, this analysis will be performed. [This area will be restored as part of the wetland restoration described in the 2005 Consent Agreement and no restoration will be conducted during the solid waste removal.] As this area is fully contained in a depression with no danger of erosion or sediment impacting the wetland buffer, sediment controls will not be necessary.

Old Lagoon Access Road

Charbert has voluntarily chosen to restore a portion of the "old lagoon access road" that is located within the 200-foot riverbank wetland buffer. A new roadway was constructed outside the wetland buffer in 2004. The area to be restored extends from the rear yard of the facility

approximately 400 feet south toward the lagoons. The area will be surrounded by sediment controls before receiving soil and grading work, and the vegetation will be restored. Because the facility production wells are located within this area, the plantings will be placed as to allow access for well pump maintenance and repairs. No solid waste or contaminants have been identified in this area, thus no samples will be collected for analysis.

The work is currently scheduled to begin the week of May 22, 2006. If you have any questions or comments or wish to arrange for a site visit, please call Stephen or Ed at (401)-421-4140.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

Stephen Andrus
Project Engineer

John P. Hartley
Principal/Reviewer

Edward A. Summerly, P.G.
Associate Principal

EAS:clz

Attachments: Figures 1 and 2

cc: Bruce Ahern, RIDEM-OCI
Cynthia Gianfrancesco, RIDEM-OWM
David Chopy, RIDEM-OCI
Mary Morgan, Richmond Town Hall
Clark Memorial Library - Charbert Repository