Adelaide Avenue Environmental Justice Coalition
60 Crescent Street
Providence, Rhode Island 02907

April 3, 2008

Mr. Michael Murphy
Mactec Engineering and Consulting, Inc.
Senior Principal Scientist
107 Audubon Road, Bldg. 2, Suite 301
Wakefield, MA. 01880

Re: Soil Vapor Investigation-Parcel A
Abandoned Stop & Shop Retail Complex
Proposed Active Soil Depressurization System Design

Dear Mr. Murphy:

We are in receipt of Mactec's recent Active Soil Depressurization System Design Plan (ADS) for the abandoned Stop & Shop retail complex submitted to the Rhode Island Department of Environmental Management **(RIDEM)** on March 31, 2008. The stated objective of this investigation and design plan is to mitigate soil vapor concentrations beneath and in the immediate vicinity of the retail complex at the former Textron/Gorham Manufacturing Site **(Site).** This Super Stop & Shop facility located on "Parcel A", a twelve (12) acre part of the abovementioned thirty-eight (38) acre Site at 333 Adelaide Ave in South Providence, Rhode Island; has been abandoned since October of 2006. Since neither the City of Providence, the landlord, nor Kimco Realty Trust, the present lease holder, or Stop & Shop Corporation, the previous tenant have made any effort to inform the community and the public as to the disposition of the property, we will assume the indoor air conditions at the facility have been a health risk since its opening in 2002, and continue to be an issue of major concern since the store has not reopened, having been hastily abandoned by Stop & Shop in late 2006 without warning. Apparently the building cannot be used (even for commercial purposes) until remediation of the property has been implemented and completed. Remediation which Mactec and Textron Inc. aggressively insisted was unnecessary and unwarranted three short years ago.

As the community understands it, vapor intrusion is defined as vapor phase migration of volatile organic and/or inorganic compounds into occupied (or, in this instance, abandoned) buildings from underlying contaminated ground water and /or soil. It is also clear to everyone, including the regulatory, scientific, and health communities that contaminant exposure via vapor intrusion can pose a very real, serious, and significant risk to the public, especially children and compromised risk groups and individuals, including pregnant women within our community.

Based on your investigation results, Mactec and Textron are proposing the installation of an ADS system for Parcel A's retail complex. Listed below are issues and concerns the community has with the belated and ongoing resolutions proposed by you and your client:

- Since verification of high concentrations of Trichloroethylene (TCE), Tetrachloroethylene (PCE), and 1,1,1-Triccloroethylane (TCA), as well as other carcinogenic Volatile Organic Compounds (VOCs) in both the groundwater and soil beneath the retail complex in 2007, no investigation of soil contamination concentrations has occurred. Your focus continues to be the groundwater only, the same groundwater Dave McCabe (working for Mactec at the time, but now actually working directly for Textron) emphatically stated would have no impact on the health of the public in this area of "Parcel A". Clearly Textron's own reluctant follow-up investigations have dispelled any myth as to the magnitude and extent of contamination issues at the abandoned Stop & Shop in our neighborhood. We are distressed that the submission of a depressurization system design without a complete understanding of the contamination sources below and in proximity to the facility in question will continue to perpetuate the same long-term disregard for the health and well-being of our community now and in the future.

- We have been requesting actual soil bore analyte laboratory testing since 2006, when the RIDEM compelled Textron to install additional compliance wells (MW-216 couplet and MW-217 couplet) along the property lines of Parcel A with Parcel B; when an ill-advised school was designed and constructed on Parcel B. These well couplets are now clogging with oil and solvents located at and below the water table. In fact, engineers have been unable to collect samples at the location of compliance well CW-216s because of the magnitude of product which has quickly rebounded into the well construction area. Not unlike the VOC vapor rebound which has already begun below the foundation of the new Adelaide Avenue High School. These developments are harbingers of issues the community will continue to confront well into the future. These concentrations could have been avoided had Dave McCabe as project manager for Mactec, 1994-2000, developed an honest, transparent, and remotely accurate Conceptual Site Model (CSM) for Textron's Hazardous Waste Site.

- The community again requested Textron to laboratory test soil from monitoring wells MW-220 and MW-221 which were installed in March of 2007, at the behest

of us at a February 4, 2007 community meeting, to determine the likelihood of groundwater contamination significant enough to generate an indoor air hazard within the retail complex. The groundwater results were inconclusive for vapor intrusion unto themselves, but the crude site analysis of the soil cuttings from the well constructions were extremely elevated by Photo Ionization Detection (PID) analysis; upwards of three hundred parts per million (300ppm). It is now clear VOC vapor intrusion has always existed at the Stop & Shop, and much of it is being generated by contaminated soil in the vadose zone below the building and above the water table. Soil which easily could have been removed from the site had your investigation for the site been transparent and comprehensive from the outset. Secondly, the community has repeatedly requested from David Heislein, project manager for the site, all documentation and testing results for the huge volume of fill which was brought onto the site under your guidance and authorization. The response's have been less than inspirational, patronizing, and have never included any actual data or testing results. The community's own research and information gathered since the development of the site indicate chronic and blatant violations of all regulations concerning the placement of "foreign fill" at any site under either federal (EPA) or state (RIDEM) oversight. There are also clear indications that much of the surface contamination present on Parcel A was delivered and commingled with the extensive existing soil contamination generated by Textron's manufacturing facility originally. If Mactec and Textron could show us how this is not the case concerning the fill below the abandoned Stop & Shop, that would be an encouraging first step to re-establishing confidence in Textron's professed commitment to "making this right", stated repeatedly by you personally in public..

- By your own investigation it has been noted that the fill material directly below the foundation of the retail complex is much too dense to utilize the installation of a conventional depressurization system. Your initial solution seems to be the extraction of soil gas from depths below the foundation. This method would facilitate extraction wells located thru-out the floor area of the complex. The series of soil vapor extraction wells will direct the soil gas to the roofline of the building and then discharge the effluent into the atmosphere. Since no indication and or effort has been made to establish the possibility that the fill material directly below the building floor area is also a source of the VOC indoor air contamination, how is it possible to gauge the potential long term effectiveness of the planned mitigation system?

Since every consultant and regulatory authority we have solicited (including the EPA and the RIDEM) has indicated that a vapor intrusion mitigation system is a "temporary solution" until the actual contamination has been resolved, please indicate to the community in writing what additional remediation efforts are being implemented in conjunction with your ADS system to resolve the issues of soil contamination generating VOC vapor intrusion on Parcel A. Please address both those contaminants which are homogenous to the site as well as those which were

introduced in large volumes by others during Dave McCabe's oversight of Textron' hazardous waste site from 1996 thru 2001.

It should not be the worry or concern of the community that the process of investigating the VOC vapor issues at your site is being done after the fact, and consequently costing all parties involved an unnecessary and huge additional expense burden. Why the City was allowed to build a twelve million dollar complex over poorly remediated land is still a question the community would like answered, amongst many others relating to Textron's site and your fifteen year investigation.

Sincerely,

Adelaide Avenue Environmental Justice Coalition
Concerned Citizens of the Reservoir Triangle and South Providence

cc:
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