



SAGE
ENVIRONMENTAL

March 1, 2012

Mr. Joseph Martella
RI Dept. of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, Rhode Island 02903

RE: *Response to Meeting Summary Comments*
Queen Anne Square
Newport, Rhode Island
SAGE Project No. S2244

Dear Mr. Martella:

The following has been developed in response to the Rhode Island Department of Environmental Management's (RIDEM's) recent request for clarification of information provided in *SAGE Environmental, Inc.'s (SAGE's) February 24, 2012 Meeting Summary* submittal. Those items identified by RIDEM have been excerpted (in italics) ahead of each *SAGE* response for ease of reference.

- 1. The Department requested that a hard copy of the Meeting Summary document be submitted for the project site file. Mr. Clark indicated that a hard copy had been sent via conventional mail and that the Department should receive it soon.*

Response: A hard copy of the document was mailed to your attention on February 28, 2012.

- 2. The Department clarified the Public Involvement requirements under Rhode Island General Laws (R.I.G.L.), Title 23, Health and Safety, Chapter 23-19.14, Industrial Property Remediation and Reuse Act, Section 23-19.14-5, Environmental Equity and Public Participation, as well as under Section 7.00, Rule 7.07.A.iii of the Remediation Regulations, which according to an opinion from our Office of Legal Services, are both applicable to this site.*

(4) Whenever a site that is known to be contaminated or is suspected of being contaminated based upon its past use is considered for possible reuse as the location of a school, child-care facility, or as a recreational facility for public use, the person proposing such reuse shall, prior to the establishment of a final scope of investigation for the site and after the completion of all appropriate inquiries, hold a public meeting for the purposes of obtaining information about conditions at the site and the environmental history at the site that may be useful

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in establishing the scope of the investigation of the site and/or establishing the objectives for the environmental clean-up of the site. The public meeting shall be held in a city or town in which the site is located; public notice shall be given of the meeting at least ten (10) business days prior to the meeting; and following the meeting, the record of the meeting shall be open for a period of not less than ten (10) and not more than twenty (20) business days for the receipt of public comment. The results of all appropriate inquiries, analysis and the public meeting, including the comment period, shall be documented in a written report submitted to the department.

(ii) No work (remediation or construction) shall be permitted at the property until the public meeting and comment period regarding the site's proposed reuse has closed except where the director determines that such work is necessary to mitigate or prevent:

- (A) an imminent threat to human health, public safety or the environment; or*
- (B) off-site migration of known or suspected contamination.*

In summary, the Responsible Party (City of Newport as owner) or Performing Party (the Doris Duke Monument Foundation (DDMF) c/o the Newport Restoration Foundation [NRF]), prior to finalizing the scope of work for the investigation of the site, must schedule and hold a Public Meeting. Public notice of the meeting must be given at least ten (10) business days prior to the meeting. The public meeting shall be conducted in a manner consistent with the requirements in Rule 7.07(C) regarding Community Meetings. This subject was mentioned in the Department's November 16, 2011, letter to the City of Newport, where we indicated that these requirements may be applicable to this property.

Response: SAGE reviewed the above Public Notice requirements with both the City of Newport and DDMF representatives during a recent meeting. Public meeting preparations, including notice schedule and location, are in progress and will be communicated when complete.

3. *Anecdotal evidence regarding the nature of historic cleaning activities and solvent usage at the former site laundry business was presented at the February 22, 2012, meeting. The Department requested clarification regarding the identity of the source of the historic information.*

Response: Anecdotal information indicating that the petroleum distillate naphtha was utilized as the dry cleaning solvent at the former Egan's Laundry & Cleaners was furnished by Mr. Pieter Roos during our February 24, 2012 meeting.

- 4. The Department questioned why 15 of the boring logs indicated that samples had been submitted for total petroleum hydrocarbon (TPH) and volatile organic compound (VOC) analysis, but the text of the submittal only indicated that two (2) TPH and four (4) VOC samples were actually submitted for laboratory analysis.*

Response: As indicated in the boring logs, samples were collected in analyte-specific containers for possible laboratory analysis for TPH and VOCs. Given the lack of PID headspace response as well as lack of any visual (e.g., staining) and/or olfactory (e.g., petroleum or solvent-like odors) evidence of contamination, laboratory analysis was not performed as the additional expense did not appear justified based on the soil conditions encountered.

- 5. The Department requested copies of the laboratory analytical data sheets, which were submitted by Sage via electronic mail later that day.*

Response: As indicated in the comment letter, your request has been satisfied.

- 6. The Department inquired about the protocol utilized for the collection of soil samples that were to be submitted for VOC analysis, and in particular whether they were grab or composite soil samples.*

Response: Samples were obtained as grab samples along the depth interval indicated in the boring logs. For example, sample B-21/S2B represents a sample from the second macrocore sleeve advanced from four to eight feet below grade level (bgl). The sleeve was further subdivided into three subcategories (A, B & C) based on the results of field screening. The sample was obtained from the middle of the sleeve (i.e., the "B" interval) along the 34-inch interval where the highest (635 parts per million (ppm)) headspace response was detected. Samples were collected in both methanol-preserved vials and non-preserved vials equipped with stir bars. Preserved samples were placed on ice and refrigerated prior to transportation to the laboratory; non-preserved samples were placed on ice then frozen prior to transporting to the laboratory for analysis.

- 7. The Department asked for clarification regarding the groundwater sampling conducted at the site, since the boring logs for all but one (1) of the soil borings that were later converted into groundwater monitoring wells, indicated specifically that groundwater was not encountered and soils were described as dry at the point of refusal.*

Response: As discussed during our telephone conversation, soil samples from borings appeared dry. Moisture content determined via laboratory analysis of soil samples indicates soil samples contained approximately 20% moisture. Only a single sample obtained from approximately 11 feet bgl in boring B-28 was observed to be wet. Borings were left open after drilling and inspected in an effort to identify borings intercepting the groundwater surface. Only boring B-28 (MW-3) exhibited

recharge. Given the elevated headspace in boring B-6 (MW-1) and B-21 (MW-2), wells were installed at these two locations. Given site topography, a decision was made to install wells at locations B-35 (MW-4) and B-34 (MW-5) believed to be in locations likely hydraulically downgradient of remaining portions of the property should groundwater recharge to elevations above the bottom of the screened interval. Monitor wells were gauged and sampled on January 31, 2012. Groundwater was encountered in all wells except MW-2 which was dry. Monitor wells MW-1 and MW-5 went dry during purging. Field data obtained during sampling is summarized in the attached Water Level Measurement/Groundwater Sampling Log.

As a point information, the RNF that was previously forwarded to RIDEM was developed based on a preliminary review of analytical data. As indicated in *SAGE's* February 24, 2012 meeting summary, however, in addition to lead, the heavy metals beryllium and arsenic and five additional polynuclear aromatic hydrocarbons (PAHs) were identified above applicable RIDEM Method 1 Residential Direct Exposure Criteria. The five additional PAH compounds are chrysene, indeno(1,2,3-cd)pyrene, benzo(g,h,i)perylene, benzo(k)fluoranthene and pyrene.

Should you have any additional questions or comment, please do not hesitate to contact me.

In furtherance to my February 29, 2012 voicemail, could you please advise as to when you expect RIDEM will issue a Notice of Responsibility (NOR) for the site and whether or not the public meeting can be scheduled prior to receipt of the NOR.

Thank you for your continued assistance.

Sincerely,
SAGE Environmental, Inc.



Bruce W. Clark
Principal

BWC/car

Attachment

c: Kelly Owens, RIDEM
Pieter Roos, Newport Restoration Foundation
William Riccio, Director, Newport Department of Public Services
Scott Wheeler, Newport Department of Public Services
Jane Howington, Newport City Manager
Jim Farrar, Farrar Associates

WATER LEVEL MEASUREMENTS/GROUNDWATER SAMPLING LOG
 QUEENE ANNE SQUARE
 NEWPORT, RHODE ISLAND

Instrument	ORS Interface Probe	SAGE Job #	S2244	Temperature:	40					
Checked By	car	Date:	1/31/12	Weather	Cloudy					
Gauged By	JD									
Well #	Well Dia. (in)	Depth To Product (ft)	Depth to Water (ft)	Length of Water Column	Amount to Bail	Amount Bailed	Did well go dry?	Color	Odors	Comment
MW-1	2	---	10.29	1.31	0.65	0.5	Yes	Silty	No	Limited recharge; VOC sample collected
MW-2	2	---	Dry	Dry						Not sampled
MW-3	2	---	8.60	2.80	1.40	5	No	Silty	No	VOC and PPI3 samples obtained
MW-4	2	---	8.24	1.31	0.65	4	No	Silty	No	VOC and PPI3 samples obtained
MW-5	2	---	6.45	0.85	0.40	0.5	Yes	Silty	No	Limited recharge; VOC sample collected

Comments:

— = No separate-phase petroleum identified
 NS = Not Surveyed