



## RHODE ISLAND

### DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT

235 Promenade Street, Providence, Rhode Island 02908

#### PROGRAM LETTER

January 28, 2022

**File No. SR-30-0623**

(Formerly Case No. Case No. 2007-010)

Mr. Richard J. DeRosas  
Paramount Development Group  
165 Hunt Road  
Chelmsford, MA 01824

RE: Hope Mill  
15 Main Street  
Scituate, Rhode Island  
Plat Map 5 / Lots 1, 114 & 117  
Coventry, Rhode Island  
Plat Map 101 / Lot 5

Dear Mr. DeRosas:

Effective April 22, 2020, the Rhode Island Department of Environmental Management's (the Department) Office of Waste Management has changed the office name to the Office of Land Revitalization and Sustainable Materials Management (LRSMM), as reflected in the re-codified 250-RICR-140-30-1, Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations). The purpose of these regulations is to create an integrated program requiring reporting, investigation, and remediation of contaminated sites in order to eliminate and/or control threats to human health and the environment in a timely and cost-effective manner. A Program Letter is a document used by the Department to signify that a Site Investigation has been completed and that a Performing Party must conduct public notice in accordance with Sections 1.8.7(A)(2) and 1.8.9 of the Remediation Regulations concerning the findings of the investigation and the proposed remedial alternatives.

In the matter of the above-referenced property (the Site), the Department's Office of LRSMM is in receipt of the following documentation submitted pursuant to the Remediation Regulations in response to the reported release at the Site:

1. Phase II Environmental Site Assessment – Hope Mill, Scituate, RI, received by the Department on July 10, 2006, and prepared by Jacques Whitford (JWA);
2. Site Investigation Report – Hope Mill, Scituate, RI, received by the Department on August 23, 2007, and prepared by JWA;
3. UST Closure Assessment Report, Hope Mill Village, 1 Main Street, Scituate, Rhode Island, received by the Department on July 17, 2014, and prepared by Clean Environment Inc.

(CEI);

4. Site Investigation Work Plan, Former Hope Mill, Scituate, Rhode Island, received by the Department on August 1, 2016, and prepared by ESS Group (ESS);
5. ESS Group, Inc. Response to OWM Comments on SIWP (dated August 1, 2016), Former Hope Mill, Scituate, Rhode Island, received by the Department on August 31, 2016, and prepared by ESS;
6. Initial Findings, Site Investigations (Phase 1), Hope Mill Project, Mill Street, Scituate/Coventry, received by the Department on November 17, 2016, and prepared by ESS;
7. Interim Findings, Site Investigations (Phase 1), Hope Mill Project, Mill Street, Scituate/Coventry, received by the Department on December 2, 2016, and prepared by (HMA);
8. Site Investigations (SI) Chronology, Hope Mill Project, received by the Department on November 6, 2018, and prepared by ESS;
9. Town of Scituate Planning Board Decision Letter, dated November 28, 2018, received by the Department on December 21, 2018, and prepared by the Scituate Planning Board;
10. Email RE: Hope Mill Project - Proposed SI Activities, with attached Tables and Site Figures, received by the Department on January 9, 2019, and prepared by ESS;
11. Email RE: Hope Mill Project - Proposed SI Activities, received by the Department on January 18, 2019, and prepared by Partridge Snow & Hahn, LLP (PSH);
12. Email RE: Hope Mill Project - Proposed SI Activities, with attached Table and Site Figure, received by the Department on January 22, 2019, and prepared by ESS;
13. Email RE: Hope Mill Project - Proposed SI Activities, with attached Site Figure, received by the Department on January 30, 2019, and prepared by ESS;
14. Site Investigation Report, Hope Mill Project, 5 Main Street, Scituate-Coventry, Rhode Island, RIDEM No. SR-30-0623, received the Department on August 10, 2020, and prepared by ESS;
15. Email RE: SIR Review, Hope Mill, Scituate RI) - RIDEM No. SR-30-0623, with attached Site Figure Package, received by the Department on September 9, 2020, and prepared by ESS;
16. SIR Addendum - Response to RIDEM SIR Comments, Former Hope Mill (5 Main Street, Scituate, RI), received by the Department on November 30, 2020, and prepared by ESS;  
and

17. SIR Addendum 2 - Response to RIDEM SIR Addendum Comments, Former Hope Mill (5 Main Street, Scituate, RI), received by the Department on December 17, 2022, and prepared by ESS.

The Department regards the information provided in these reports as meeting the requirements pursuant to Section 1.8.8 of the Remediation Regulations. The preferred remedial alternative proposes the following remedy:

Focused soil excavation and dewatering in areas with elevated concentrations of Synthetic Precipitation Leaching Procedure (SPLP) lead impacted soil, areas with chlordane impacted soil, and areas with non-aqueous phase liquids (NAPL) and petroleum impacted soil and groundwater. Removal of soil within the proposed Onsite Wastewater Treatment Systems (OWTS) leach field footprint where contaminants have been detected in soil at concentrations exceeding the Department's Residential Direct Exposure Criteria (RDEC). Encapsulation of all remaining contaminated soils by construction of sitewide engineered controls. All final engineered controls shall be subject to Department approval and provide a minimum level of protection consistent with two (2) feet of clean fill material or equivalent. Certain freshwater wetlands areas which are subject to restoration activities or will be isolated from developed areas of the Site by physical access barriers (i.e. fencing and thorny brush to restrict or prevent access), are not subject to the constructed engineered control requirement provided they are maintained in a manner to keep them physically inaccessible. All wetland plans shall be subject to review and approval by the Freshwater Wetlands Program.

Completion of the permanent closure process for the two (2) identified Underground Storage Tanks (USTs) in accordance with the Rules and Regulations for Underground Storage Facilities Used for Regulated Substances and Hazardous Materials, and consistent with any requirements of the UST Program. A plan shall be developed for post-remediation groundwater gauging of NAPL and monitoring for volatile organic compounds (VOCs) in the targeted NAPL removal area. Collection and analysis of one (1) additional groundwater sample from MW-9 for total lead to demonstrate consistent total lead concentrations below the Department's GA Groundwater Objective. The potential for volatilization of VOCs into the indoor air of any current or proposed Site buildings shall be evaluated based upon the results of post-remediation confirmation compliance sampling, and if deemed necessary, soil gas and/or indoor air sampling and analysis. An institutional control in the form of an Environmental Land Usage Restriction (ELUR) shall be recorded for the property. The ELUR will restrict certain activities on the entire site and will also ensure that the final engineered cap is not disturbed, and the wetland physical access barriers are properly maintained. The ELUR will include a post-construction Soil Management Plan (SMP), which will outline the procedures for managing the regulated soils on site should disturbances below the cap be required.

The Department acknowledges that the site investigation activities are complete. The Department is not yet able to formally approve the SIR, however, due to the necessity to first allow the public to comment on the technical feasibility of the preferred remedial alternative. Outlined in Section 1.8.7(A)(2) and 1.8.9 of the Remediation Regulations are the requirements for public notice after the SIR is deemed complete to all abutting property owners, tenants, easement holders, and the

municipality regarding the substantive findings of the completed investigation and the opportunity for public review and comment on the technical feasibility of the preferred remedial alternative. Please submit a draft notification to the Department via E-mail for review and approval prior to distribution. A boilerplate notification to be distributed can be found online at <http://www.dem.ri.gov/programs/wastemanagement/site-remediation/index.php>. The Department will require a copy of the approved public notice letter and a list of all recipients upon issuance.

The Department will formally approve the SIR in the form of a Remedial Decision Letter (RDL) once Public Notice is completed and upon Department approval of all final responses to relevant public comments. At that point, the Department will require submission of the Remedial Action Work Plan (RAWP) and draft versions of the ELUR and SMP for review and approval in accordance with Sections 1.9 and 1.10 of the Remediation Regulations. Upon receipt of the RDL, be prepared to submit the Remedial Action Approval Application Fee of one thousand dollars (\$1,000.00) in check form made payable to General Treasurer -State of Rhode Island directly to the Office of Management Services.

If you have any questions regarding this letter or would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 222-2797, ext. 2777109, or by E-mail at [joseph.martella@dem.ri.gov](mailto:joseph.martella@dem.ri.gov).

Sincerely,



Joseph T. Martella II  
Environmental Engineer III  
Office of Land Revitalization &  
Sustainable Materials Management

cc: Kelly J. Owens, RIDEM/OLRSMM  
Ashley Blauvelt, RIDEM/OLRSMM  
Eric Beck, RIDEM/OWR  
Michael Cote, RIDEM/OLRSMM/UST Program  
David Chopy, RIDEM/OC&I  
Martin Wencek, RIDEM/OWR/Freshwater Wetlands Program  
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Christian Capizzo, Esq., Partridge Snow & Hahn, LLP  
William Chapman, ESS Group  
Seth D. Sokoloff, Barbara Sokoloff Associates  
Jeffrey C. Hanson, Chairman Scituate Planning Board  
Russell Crossman, Coventry Director of Planning and Development  
Peter D. Ruggiero, Esq., Scituate Town Solicitor, Ruggiero, Brochu & Petrarca