



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT

235 Promenade Street, Providence, Rhode Island 02908

REMEDIAL DECISION LETTER

May 4, 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 Remedial Decision Letter (RDL) is a formal, written communication from the Department that approves a site investigation, identifies the preferred remedial alternative and authorizes the development of a Remedial Action Work Plan (RAWP) in order to achieve the objectives of the environmental clean-up.

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;
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; and

18. Notification To Abutters, Site Investigation, Hope Mill, 15 Main Street, Scituate, Rhode Island, 25 March, 2022, received by the Department on March 28, 2022, and prepared by Paramount Apartments, LLC.

Collectively, these documents define “Existing contamination” at the Site and fulfill the requirements of a Site Investigation Report (SIR) as described in Section 1.8.8 of the Remediation Regulations. In addition, according to our records, public notice was conducted to all abutting property owners, tenants, easement holders, and the municipality, regarding the substantive findings of the completed investigation in accordance with Sections 1.8.7(A)(2) and 1.8.9 of the Remediation Regulations. The opportunity for public review and comment on the technical feasibility of the proposed remedial alternatives commenced on March 28, 2022, and the period closed on April 11, 2022. No comments were received.

The preferred remedial alternative, as stated in the SIR, consists of the following conceptual measures:

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 hereby approves the SIR, with the above identified preferred remedial alternative, and requires a RAWP be submitted for review and approval, and implemented, to achieve the objectives of the environmental clean-up, in accordance with the following conditions:

1. In accordance with Sections 1.9 and 1.10 of the Remediation Regulations, a RAWP, ELUR, and SMP shall be submitted for Department review and approval within sixty (60) days from the date of this letter. The RAWP shall describe all of the technical details, engineer design elements, and schedules associated with the implementation of the proposed remedy. All of the subsections outlined in Section 1.10 of the Remediation Regulations must be included in order to facilitate the review and approval of the RAWP. If an item is not applicable to this Site, simply state that it is not applicable and provide an explanation in the RAWP.
2. Pursuant to Section 1.11.2 of the Remediation Regulations, an application fee for Remedial Action Approvals in the amount of one thousand (\$1,000.00) dollars shall be made payable to the State of Rhode Island General Treasurer and remitted to the Office of Management Services with the attached Remedial Action Approval Application Fee Form. Receipt of this Remedial Action Approval Application Fee is required prior to the Department's RAWP review.
3. Once the Department reviews the RAWP for consistency with Sections 1.9 and 1.10 of the Remediation Regulations, any written comments generated and forwarded as a result of the review(s) shall be incorporated forthwith into a RAWP Addendum, to be submitted for final approval.
4. Upon finalization of the RAWP, the Department will issue a Remedial Approval Letter (RAL), signifying Department approval. All remedial measures required by the Department shall be implemented, in accordance with the approved schedule, to ensure all applicable exposure pathways at the site are appropriately addressed.

Please be advised that the Department reserves the right to require additional actions under the aforementioned Remediation Regulations at the Property should any of the following occur:

- Conditions at the Site previously unknown to the Department are discovered;
- Information previously unknown to the Department becomes available;
- Policy and/or regulatory requirements change; and/or

- Failure by Paramount Apartments, LLC and/or BMP, LLC, or any future holder of any interest in the Property to adhere to the terms and conditions of the Department approved RAWP, schedule, RAL, ELUR and/or SMP for the Property.

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.

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
Nick Pisani, RIDEM/OWR/Stormwater Program
Mohamed J. Freij, RIDEM/OWR/OWTS
Christina A. Hoefsmit, Esq, RIDEM/Office of Legal Services
Susan Forcier, Esq, RIDEM/Office of Legal Services
James Bollinger, BMP, LLC
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

Attachment: Remedial Action Approval Application Fee Form



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT
235 Promenade Street, Providence, Rhode Island 02908

REMEDIAL ACTION APPROVAL APPLICATION FEE FORM

Rule 1.11.2 of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, requires an application fee for Remedial Action Approvals in the amount of one thousand (\$1,000) dollars. Please submit this form and check, made payable to the State of Rhode Island General Treasurer, directly to:

**R.I. Department of Environmental Management
Office of Management Services - Rm 340
235 Promenade Street
Providence, RI 02908**

Please complete this page and attach it to the check or money order. This information must be provided to coordinate your fee with the application submitted.

Site Name: Hope Mill

Address: 15 Main Street

Town/City: Scituate & Coventry

File Number: SR-30-0623

Contact Person: _____

Phone No: _____

RIDEM Project Manager: Joseph Martella

FOR RIDEM OFFICE USE ONLY:

Fee Amount Received: _____

Date Received: _____

Check#: _____

Receipt Account:

10.074.3765103.03.461043

cc:74:3481 Leg.17-18-841