RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
235 Promenade Street, Providence, RI 02908-5767 TDD 401-222-4462

Trestle Trail Bike Path
Trestle Trail Right-Of-Way
Coventry, Rhode Island
RIDEM Case No. 2010-019

September 20, 2011

Dear Abutters:

The Rhode Island Department of Environmental Management's (RIDEM) Office of Waste Management (OWM) has received multiple concerns, comments and questions about the technical feasibility of the proposed remedy for the above referenced property that were brought up at a public meeting held on July 12, 2011. One comment was also received by RIDEM in e-mail form. Based on the comments provided, the environmental consultant retained by the owners of the property (Trestle Trail Right-Of-Way), Vanasse Hangen Brustlin, Inc. (VHB) and the RIDEM, have prepared the attached responses. All questions and concerns are shown below in bold and the responses are in italics. Thank you for presenting your concerns associated with this project. If you have any questions regarding this letter, please contact me by telephone at (401) 222-2797 ext. 7147 or by e-mail at tim.fleury@dem.ri.gov.

Sincerely,

Timothy M. Fleury
Senior Engineer
Office of Waste Management

Cc: Kelly J. Owens, RIDEM / Office of Waste Management
Jeffrey P. Crawford, RIDEM / Office of Waste Management
Robert Bailey, RIDEM / Division of Planning and Development
Anita Marshall, Rhode Island Department of Transportation
Claude Masse, Vanasse Hangen Brustlin, Inc.
Hugh Neenan, Prime Engineering, Inc.

A member of the public at the public meeting requested that the documents be made available on the internet.

RIDEM response: RIDEM is in the process of gathering electronic documents and milestone letters to generate an Internet document repository for the Trestle Trail Bike Path site. The internet repository can be found at the following website:

http://www.dem.ri.gov/programs/benviron/waste/trest.htm

Additional documents will be added to this online repository once these documents become available. Please note that hard copies of all of the documents are available at RIDEM and can be reviewed by scheduling a file review with the Department. File reviews can be arranged by contacting Timothy Fleury of the Office of Waste Management by telephone at (401) 222-2797 x7147 or by E-mail at tim.fleury@dem.ri.gov.

How wide is the proposed cap and what percentage of the trail will be capped?

VHB response: The width of the cap will depend on the width of the right-of-way and how much area is cleared for the trail. It is anticipated that, where a cap is needed, all cleared areas will be capped. It is impossible to determine what percentage of the trail will be capped until all soil investigations are completed and the occurrence of soil impacts is better defined.

RIDEM response: More specific information will be available following the additional assessment activities and will be included as part of the post-site investigation public notice requirement that is mailed directly to each property abutter. Furthermore, a copy of the final Site Investigation Report (SIR), which will include results of the additional assessment activities, will be available at the public library (or a similar location) when the document becomes available. The availability and the exact location of this SIR will be provided in the post-site investigation public notice requirement that was mentioned above. In addition, all documents will still be available electronically at the abovementioned website.

There is a concern regarding the documented groundwater impacts identified in the former railroad right-of-way and potential impacts on abutting private wells.

VHB response: Due to concerns associated with leaving a direct conduit to the groundwater in an unsecured, remote area, standard, permanent groundwater monitoring wells were not installed. Instead, temporary wells consisting of polyvinyl chloride (PVC) well screen and riser pipe were placed in the borehole and backfilled with inert sand to approximately one foot above the well screen. Samples were then collected directly from the temporary wells with limited time to allow for the settling of suspended soil particles in the groundwater. Following groundwater sampling, the PVC well was pulled from the borehole and the boring was filled to grade with bentonite clay and native backfill. As such, the groundwater samples collected from these temporary wells were turbid and the laboratory detection of metals in the groundwater sample was most likely the result of the detection of metals absorbed to suspended soil particles.

It should also be noted that the substances detected within the right of way (polycyclic aromatic

hydrocarbons (PAHs) and metals) are not especially mobile in water, which is why these substances are still detected in the soil 40+ years after the railroad operations ceased.

*If residents have concerns regarding the quality of their private drinking water wells, there is guidance available for having their wells tested. The University of Rhode Island (URI) Cooperative Extension Home*A*Syst Program recommends that homeowners have their private wells tested for coliform bacteria, nutrients, and turbidity every year; target metals and pH every 3 to 5 years; and volatile organic compounds every 5 to 10 years. A link to the URI Home*A*Syst webpage is provided below:*

http://www.uri.edu/ce/wq/has/Private%20Wells/WHYTEST.html

Is soil removal an option and why can't you excavate all the soil on the project?

VHB response: Some soil removal may be conducted in association with cap construction to meet design grades. Complete soil removal for the entire 5 to 10 mile segments, however, is not possible due to the excessive costs associated with soil disposal.

RIDEM response: Partial soil excavation in conjunction with capping of these impacted soils is a viable and acceptable remedy under the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations). The remedy proposed by the Responsible Party is similar to the remedies proposed, and implemented, for the Coventry Greenway Bike Path, the Blackstone Valley Bike Path, and the East Bay Bike Path.

There was a railroad stop at Camp Westwood Road that reportedly had off-loading of coal and fueling stations for the railroad.

VHB response: VHB has reviewed several historic publications including the following documents:

> *Coventry Celebration: A Pictorial History, by Donald A. D'Amato, Coventry, Rhode Island, 1991;*
>
> *A History of Greene and Vicinity 1845-1929, by Squire G. Wood, privately printed in Providence, Rhode Island, 1936;*
>
> *Reflections of Coventry's Yesterdays (1741-1900), published by Coventry Public Library, Rhode Island Historical Preservation Commission, February 1968.*

While each of these documents discusses a depot in Greene where wood, coal, acid and fuel was stored, there is no mention of any facilities at Camp Westwood Road. Regardless, a boring will be advanced on each side of Camp Westwood Road to investigate the surface soil quality.

There was a large railroad depot in Greene. Are there any plans to investigate there?

VHB response: As indicated above, the Greene depot was mentioned in each of the references cited above and there were several references to storage of oil and / or hazardous materials. As such, several samples will be collected on either side of Hopkins Hollow Road at approximately 50 foot intervals.

Do the results of this investigation change any plans for the construction of the trail?

VHB response: No, the detection of the substances found along the former railroad were anticipated based on the former use and from experience on similar projects conducted by the Rhode Island Department of Environmental Management (RIDEM) and the Rhode Island Department of Transportation (RIDOT).

RIDEM response: As noted above, the remedy proposed by the Responsible Party is similar to the remedies proposed, and implemented, for the Coventry Greenway Bike Path, the Blackstone Valley Bike Path, and the East Bay Bike Path.

There is a concern about beryllium impacts.

VHB response: Beryllium is a naturally occurring metal and it is common to detect it in soil samples in Rhode Island. The RIDEM Residential Direct Exposure Criteria (RDEC) for beryllium is set at 0.4 mg/kg (or parts per million (ppm)) and is based on a background study, not on any risk-based criteria. The background beryllium concentration was determined from 42 soil samples collected throughout the state. It should be noted that RIDEM, in their draft changes to the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (Remediation Regulations) dated December 2010, have proposed a new beryllium RDEC based on the statistical 95 percent upper confidence limit of natural background data across the state. This would result in a beryllium RDEC of 1.5 ppm.

The actual risk-based screening level utilized by the United States Environmental Protection Agency (USEPA) is 160 ppm. Similarly, the Commonwealth of Massachusetts uses a beryllium criterion of 100 ppm for their most sensitive soil resources.

Although there were several soil samples that exceeded the RIDEM RDEC of 0.4 ppm, none of the sample results came close to the risk-based criteria. In fact, the highest beryllium concentration detected throughout the project was 0.54 ppm.

RIDEM response: A water truck shall be utilized as a dust suppression technique during construction to prevent the spread of fugitive dust from the site that may contain Beryllium and / or any other potential contaminants. Any complaints regarding dust in the atmosphere that is being generated during construction activities may be made by calling the RIDEM's Office of Compliance and Inspection (OC&I) at (401) 222-1360.

Furthermore, it is the responsibility of the property owner (RIDEM – Division of Planning and Development) to submit to the Office of Waste Management an annual compliance inspection

report detailing the current status of the engineered cap on the entire property. It is the obligation of the property owner to also notify the Office of Waste Management prior to any excavation or site work to ensure that the proper methods and techniques are utilized during future construction. The purpose of this annual compliance inspection report and this notification of excavation is required to ensure that the proposed engineered cap is maintained in such a way to prevent exposure and access to contaminated soils that may not be excavated.

The path is so close to our house that we are concerned about noise, privacy, safety, and truancy on a path that is not policed.

RIDEM response: The RIDEM – Division of Planning and Development is responsible for the maintenance of the bike path and for the submittal of the annual compliance inspection reports explained above but is not responsible for policing the property. Any noise, privacy, and trespassing issues on your property should be taken up with the Coventry Police Department. Each individual that chooses to utilize the bike path is responsible for their own safety as the bike path will be operating with the same principles as the other bike paths throughout the State of Rhode Island.