



## RHODE ISLAND

### DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT

235 Promenade Street, Providence, Rhode Island 02908

#### **SIR COMMENT LETTER**

**File No. SR-28-2076**

May 15, 2023

Mr. Joseph Paolino  
1144 Eddy Street LLC  
100 Westminster Street  
Providence, Rhode Island 02903

RE: Former Federal Products Corp.  
1144 Eddy Street  
Providence, Rhode Island  
Plat Map 57 / Lot 291

Dear Mr. Paolino:

The Rhode Island Department of Environmental Management's (the Department) Office of Land Revitalization and Sustainable Materials Management (LRSMM) has reviewed the Site Investigation Report (SIR) for the above referenced property (the Site), which was submitted on May 3, 2023, by SAGE Environmental, Inc. (Sage) in accordance with 250-RICR-140-30-1, Section 1.8 of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations).

After careful review of the SIR, the Department requires a response to the attached comments, questions, and concerns about the submittal, which must be fully addressed in writing to receive a Program Letter.

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. 2777142, or by E-mail at [patricia.burke@dem.ri.gov](mailto:patricia.burke@dem.ri.gov).

Sincerely,

Patricia Burke  
Environmental Scientist I  
Office of Land Revitalization &  
Sustainable Materials Management

cc: Terry Gray, RIDEM/OLRSMM  
Susan Forcier, RIDEM/OLRSMM

Leo Hellested, RIDEM/OLRSMM  
Matthew Destefano, RIDEM/OLRSMM  
Kelly Owens, RIDEM/OLRSMM  
Ashley Blauvelt, RIDEM/OLRSMM  
Jacob Butterworth, SAGE  
Amy Mulhern, SAGE

## DEPARTMENT COMMENTS

May 15, 2023

Site Investigation Report, dated May 3, 2023  
Former Federal Products Corp.  
Providence, Rhode Island

1. It had been the Department's understanding that the Responsible and Performing Party is requesting to bifurcate the environmental approach to this Site by addressing the volatile organic compound (VOC) impacts to the indoor air quality in the immediate term. However, it is not clear to the Department if that is still the case nor exactly how a bifurcated process at this Site is envisioned. Please outline the process and timeline that is being proposed to investigate and remediate this Site moving forward. Additionally, please provide a detailed update as to the proposed reuse of the Site building.
2. Please submit a copy of the full Phase I Environmental Site Assessment (ASTM E1527-13) Report. As stated in an email dated May 1, 2023, to Sage, the Department is particularly interested in the interior and exterior inspection that would have been documented in the Phase I Report, noting areas of staining, sumps, floor drains, locations in the building where certain chemicals were used as part of historical operations, remaining machinery, stored/leftover chemicals, etc. The Phase I Report should summarize the recognized environmental conditions (RECs) that were identified.
3. The site figure labeled as "Figure 2" in Attachment C notes the locations of several features in and around the building such as a "sump-like structure," "subgrade tank vault," former and current locations of "OHM storage areas," "oil-water separator and satellite drum," area labeled "not accessible," and "acid line." However, the SIR does not indicate that any were investigated or discuss the possibility of any to be contributing to the indoor air quality issues in the building. Please investigate all potential sources of VOCs to determine if they are either serving as a preferential pathway for vapor intrusion into the building or are contributing VOC sources themselves.
4. The indoor air sampling conducted April 25, 2023, did not include the basement. The only indoor air sampling data for the basement level of the building that has been provided to the Department is now 18 months old, collected on December 20, 2021. Please conduct indoor sampling in the basement level of the building, particularly in the eastern side. Indoor air sampling of the basement shall be conducted via 24-hour Summa Canister collection and laboratory analyzed for VOCs via EPA Method TO-15.
5. If there is an HVAC system, please provide information pertaining to it. Is it operational? Can it be equipped with air purifying units? Are there any plans to turn it on?
6. Based on the PID screening in the boring logs, it appears unlikely that the low-level detections of VOCs in the groundwater are the source of the VOCs present in the indoor air and soil gas. The PID screening is reported to have only measured detection in the upper 0 – 4 feet below ground surface (bgs) range while screening closer to the groundwater table were non-detect.

7. To date, the Site assessment, including the PID screening detections and the sub-slab soil gas data, has **not identified a clear or distinct source to explain the VOCs detected in the indoor air**. Please provide a detailed explanation as to the source of VOCs in indoor air and soil gas or what steps will be taken to determine the source. It is possible that a soil source not yet discovered may be present and/or the source could be a combination of chemical spills to the floor over the decades of manufacturing operations that have been absorbed into the building slab. Both scenarios can result in the sub-slab soil gas and indoor air impacts that exist now. Due to the reluctance to evaluate building materials as a potential contributing source of VOCs in the indoor air and the lack of information provided to the Department regarding the interior of the building, the Department does not have enough information to evaluate if the proposed remedial alternative of a sub-slab depressurization system (SSDS) will be adequate to keep VOC concentrations in the indoor air below residential thresholds.
8. Please elaborate on Remedial Alternative 2. This alternative does not address the VOC contamination in the sub-slab soil gas or indoor air. Given that the building covers nearly the entire lot and those soils containing jurisdictional concentrations of VOCs has not been discovered, excavation of soils as a remedial alternative is not a complete remedy to list for consideration.
9. Please submit a SIR Addendum that addresses the abovementioned comments on or before June 15, 2023.