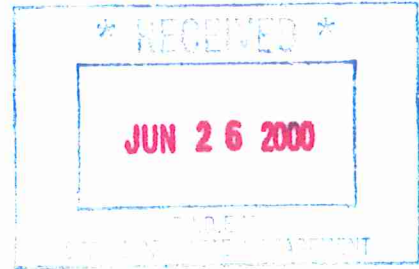


LAW OFFICES  
**BEVERIDGE & DIAMOND, P.C.**  
SUITE 700  
1350 I STREET, N.W.  
WASHINGTON, DC 20005-3311  
(202) 789-6000

CYNTHIA A. LEWIS  
(202) 789-6018  
clewis@bdlaw.com

TELECOPIER (202) 789-6190



June 20, 2000

Mr. Warren S. Angell II  
Ms. Margaret Dein Bradley  
Office of Waste Management  
Rhode Island Department of Environmental  
Management  
235 Promenade Street  
Providence, RI 02908-5767

Re: Metech International, Inc. Allen's Avenue Site, Case # 99-060

Dear Mr. Angell and Ms. Bradley:

This letter follows up Ms. Bradley's May 26, 2000 letter to Alexandra Callam and our May 30 meeting with you regarding the remaining steps necessary for Metech International, Inc. to obtain a Letter of Compliance from RIDEM for the company's Allen's Avenue property in Providence. As you know, Metech is anxious to complete any necessary work so obstacles to sale of the property can be minimized and the company can recoup a portion of the substantial investment it has made in the site's remediation.

The following summary reflects our understanding of where matters stand, based on the various correspondence and discussions to date between Metech and its representatives and your office.

1. In light of the prior excavation of a substantial portion of the site to remove PCB-containing soil and the covering of all unpaved portions of the site with clean fill, RIDEM does not require further sampling or analysis of the soil at the site.
2. With respect to groundwater sampling for metals, you indicated that RIDEM would like three sets of samples, with at least one sample each from wet and dry seasons, to ensure that there are no adverse trends with respect to groundwater quality. As you know, one set of groundwater samples, taken in December 1999, was submitted with Ms. Callam's January 18 letter following Metech representatives' November 10, 1999 meeting with Mr.

Mr. Warren S. Angell II  
Ms. Margaret Dein Bradley  
June 20, 2000  
Page 2

Strakaluse and Mr. Beck. An analytical report on an additional set of (unfiltered) samples, collected in March 1998, is enclosed with this letter.<sup>1/</sup> None of the samples suggests that metals at the site have adversely affected the groundwater. In fact, even though the Allens Avenue site is not located within a GA-classified area, the great majority of the sample results are within RIDEM's GA groundwater objectives. As we have discussed, given the nature and history of the surrounding area, it would be surprising if there were not some contaminants detectable in the groundwater. To satisfy your request for additional sampling, Metech proposes to collect and analyze one additional set of samples from the monitoring wells in July so that you will have the desired three sets of sample results.

3. Metech will agree to enter into an Environmental Land Use Restriction (ELUR) with respect to the site to ensure that the clean fill is maintained and that use of the property is restricted to industrial and commercial activity. There are some differences between the terms of the ELUR submitted with Alexandra Callam's January 18 letter to Mr. Angell and the draft accompanying Ms. Bradley's May 26 letter. We assume that questions regarding the differences between the two draft ELURs can be resolved through further discussions between the parties, once any remaining site work has been completed.
4. Ms. Bradley's letter asked why the December 1999 samples were filtered. As discussed at our meeting, the use of filtered samples was discussed with and approved by Mr. Strakaluse. The filtering of the samples was intended to ensure that any substances detected in the samples were actually in the groundwater rather than adhering to soil particles. We continue to believe that filtered samples provide the most accurate indication of whether there is migration into the groundwater. However, in light of your request for unfiltered samples, we propose to test both filtered and unfiltered samples from the next round of sampling. (We also note that the 1998 samples provided with this letter were unfiltered.)

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<sup>1/</sup> These samples were collected and analyzed for Metech's own informational purposes, rather than as part of the PCB remediation pursuant to the EPA consent decree. They were therefore not a part of the submission to EPA, nor do we believe they have previously been submitted to RIDEM.

Mr. Warren S. Angell II  
Ms. Margaret Dein Bradley  
June 20, 2000  
Page 3

5. We believe that the inquiry in Ms. Bradley's letter regarding whether Metech's property is a downgradient recipient of VOC migration<sup>2/</sup> was adequately resolved by our discussion of the November 1999 meeting. At that meeting, Metech representatives were informed by Mr. Strakaluse and Mr. Beck that there was no need for Metech to address the issue of VOC contamination because the Metech property is a downgradient receptor.
6. Finally, as discussed, under the circumstances of this matter and in light of the millions of dollars already spent on remediation of the Allens Avenue site, we believe that little purpose would be served by extensive review of remedial alternatives other than the ELUR approach that has already been discussed on several occasions with RIDEM.

If you find any of the above summary to be inconsistent with your understanding of our discussions, please let us know promptly. We look forward to working with you to bring this matter to a close, and to return the Allens Avenue site to productive use, in the near future.

Sincerely,



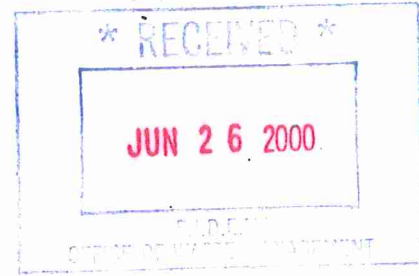
Cynthia A. Lewis

Enclosures

O:\CL\03\45\4784\LTR\0600 ltr to ridem re meeting follow up.wpd

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<sup>2/</sup> We believe this inquiry was initially triggered by Metech's January 1998 report to RIDEM of the detection of trace amounts of spent gasoline in one monitoring well. A copy of Mr. Koskinas's fax confirming this report and noting the presence of potential sources of the material is enclosed.



**REPORT OF ANALYTICAL RESULTS**

**Case Number: I0305-01**

Prepared for:

Metech International  
120 Mapleville Main St.  
Mapleville, RI 02839  
Attn: Mike McGrane

Report Date: MARCH 11, 1998

Reviewed by:

*Mark H. Bishop LS*

Mark H. Bishop  
Laboratory Director

**NEW ENGLAND TESTING LABORATORY, INC.**

1254 Douglas Avenue, North Providence, Rhode Island 02904-5392  
PROVIDENCE (401) 353-3420 TOLL FREE: 1-888-863-8522

## ANALYSIS PERFORMED:

The following table details the analyses performed on the samples at the request of the client:

<u>Sample</u>	<u>Analysis</u>	<u>Method</u>
I0305-01: Samples 1-8	Arsenic	7060A
	Barium	6010B
	Cadmium	6010B
	Chromium	6010B
	Lead	7421
	Mercury	7470A
	Selenium	7740
	Silver	6010B

Note: These methods are documented in:

*Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, USEPA/OSW.*

## QUALITY ASSURANCE/CONTROL STATEMENTS

All samples were found to be properly preserved/cooled upon receipt. All analyses were performed within EPA designated holding-times. Procedure/calibration checks required by the designated protocols were within control limits.

## **ANALYTICAL RESULTS**

Case No. I0305-01

MW1-GW02

<u>Parameter</u>	<u>Result, mg/L</u>
Arsenic	<0.005
Barium	0.57
Cadmium	0.005
Chromium	<0.02
Lead	0.006
Mercury	<0.0002
Selenium	<0.005
Silver	<0.01

Case No. 10305-01

**MW2-GW02**

<u>Parameter</u>	<u>Result, mg/L</u>
Arsenic	<0.005
Barium	0.15
Cadmium	<0.005
Chromium	<0.02
Lead	0.009
Mercury	0.0005
Selenium	<0.005
Silver	<0.01



Case No. I0305-01

**MW3-GW02**

<u>Parameter</u>	<u>Result, mg/L</u>
Arsenic	<0.005
Barium	0.25
Cadmium	<0.005
Chromium	<0.02
Lead	0.006
Mercury	<0.0002
Selenium	<0.005
Silver	<0.01

Case No. 10305-01

**MW4-GW02**

<u>Parameter</u>	<u>Result, mg/L</u>
Arsenic	<0.005
Barium	0.04
Cadmium	<0.005
Chromium	<0.02
Lead	0.002
Mercury	<0.0002
Selenium	<0.005
Silver	<0.01

Case No. I0305-01

**MW5-GW02**

<u>Parameter</u>	<u>Result, mg/L</u>
Arsenic	<0.005
Barium	0.07
Cadmium	<0.005
Chromium	<0.02
Lead	0.002
Mercury	<0.0002
Selenium	<0.005
Silver	<0.01

Case No. I0305-01

**MW6-GW02**

<u>Parameter</u>	<u>Result, mg/L</u>
Arsenic	<0.005
Barium	0.17
Cadmium	<0.005
Chromium	<0.02
Lead	0.141
Mercury	0.0004
Selenium	<0.005
Silver	<0.01

Case No. I0305-01

**MW7-GW02**

<u>Parameter</u>	<u>Result, mg/L</u>
Arsenic	0.005
Barium	0.15
Cadmium	<0.005
Chromium	<0.02
Lead	0.266
Mercury	<0.0002
Selenium	<0.005
Silver	<0.01

Case No. 10305-01

**MW8-GW02**

<u>Parameter</u>	<u>Result, mg/L</u>
Arsenic	<0.005
Barium	0.03
Cadmium	<0.005
Chromium	<0.02
Lead	<0.002
Mercury	<0.0002
Selenium	<0.005
Silver	<0.01

**CUSTODY RECORD**

10305-01

LABORATORY: NE Testing Lab

# EST INC.

Environmental Sampling Technology  
368 Hillside Avenue  
Needham, MA 02194  
Tel: (781) 455-0003 Fax: (781) 455-8336

# CHAIN OF CUSTODY RECORD

CLIENT: New England Testing Labs  
ADDRESS: 1254 Douglas Ave.  
North Providence, RI 02904  
PHONE #: (401) 353-3420  
P.O. # \_\_\_\_\_  
CLIENT CONTACT: Joe Foley  
DESCRIPTION: Customer ID # 434

### ANALYSES

- CONTAINER TYPE  
 P — Plastic  
 G — Glass  
 V — VOA  
 B — Bacteria
- SAMPLE TYPE  
 1. Wastewater  
 2. Groundwater  
 3. Drinking Water  
 4. Soil  
 5. Surface Water  
 6. Other \_\_\_\_\_

Total PCA & Metals

SPECIAL INSTRUCTIONS

RUSH  
 \_\_\_\_\_ DAY TURNAROUND

ROUTINE

LOCATION (SAMPLE IDENTIFICATION)	SAMPLE TYPE	CONTAINER		SAMPLING		PRESERVATIVE	COMMENTS
		SIZE	TYPE #	DATE	TIME		
MW2-GW02	2	500	P 1	3/4	1000	HNO3	
MW1-GW02	2	"	"	"	1120	"	
MW3-GW02	2	"	"	"	1225	"	
MW6-GW02	2	"	"	"	1330	"	
MW5-GW02	2	"	"	"	1430	"	
MW8-GW02	2	"	"	"	1525	"	
MW4-GW02	2	"	"	"	1605	"	
MW7-GW02	2	"	"	"	1700	"	

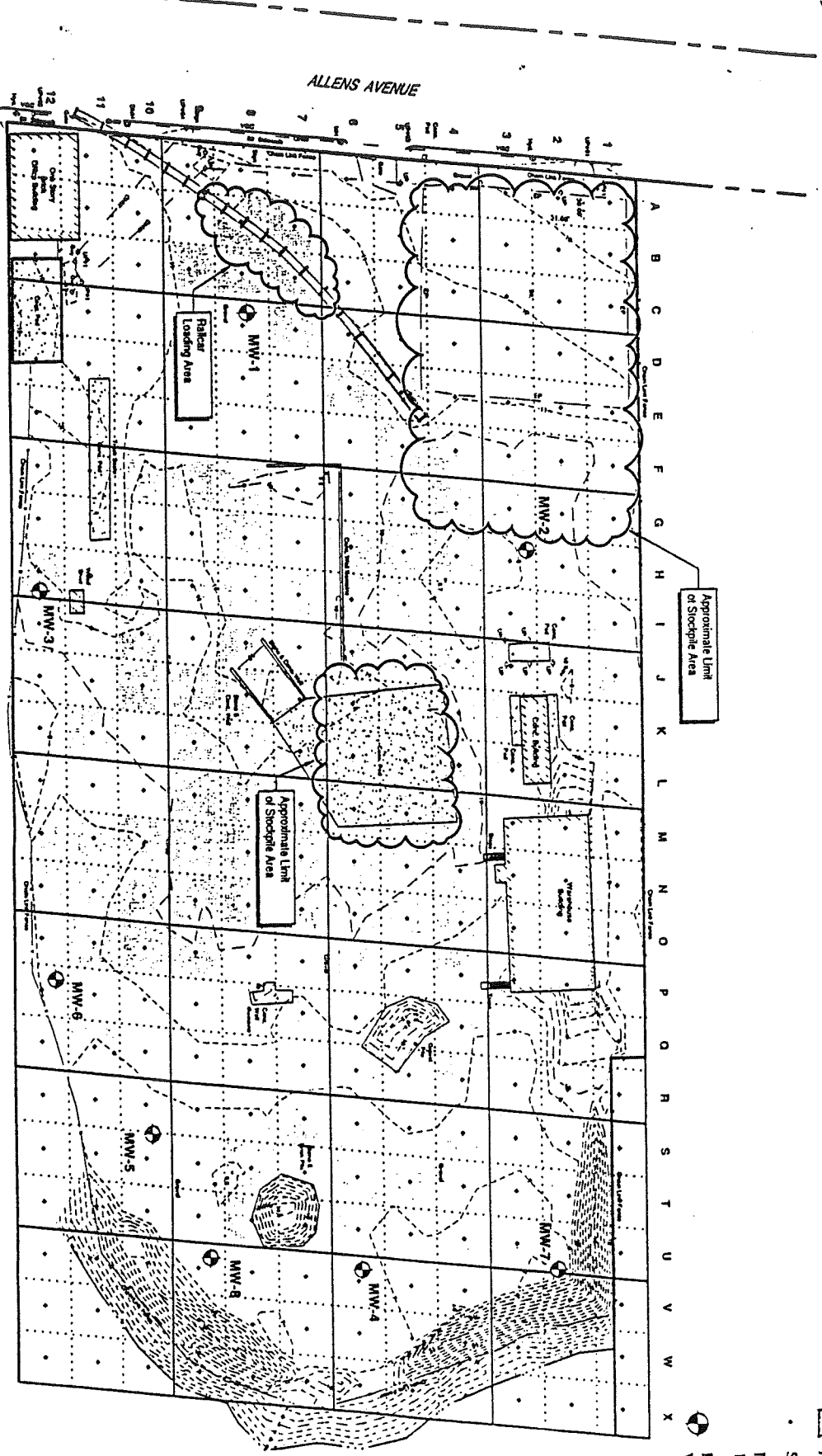
Sampler's Signature	Date	NUMBER	TRANSFERS RELINQUISHED BY	TRANSFERS ACCEPTED BY	DATE	TIME
<u>Joe Foley</u>	<u>3/4/98</u>	1	<u>Joe Foley</u>	<u>Lynn M. Smith</u>	<u>3/4/98</u>	<u>5:50</u>
		2				
		3				
		4				

ADDITIONAL COMMENTS:





THURBERGERS CHANNEL



PROVIDENCE RIVER

Vanessa Hansen Dravish, Inc.  
 Site Plan  
 Bolden Metcalf, Inc.  
 434 Allens Avenue  
 Providence, Rhode Island

Figure 1

# metech

INTERNATIONAL INC.

**TO:** RIDEM Office of Waste Management  
Attention: Mr. Gregory Fine  
Supervising Engineer

**Fax:** 401-222-3812

**FROM:** John D. Koskinas

**DATE:** January 23, 1998

**No. of Pages:** 1

**SUBJECT:** Report of Possible Contamination

Mr. Fine:

I have been referred to you by Ms. Margaret Bradley of the Office of Waste Management. I spoke to Ms. Bradley following a phone switch from the Division of Site Remediation where I was trying to contact Ms. Angela Shulman. Ms. Shulman was referred to me by Tom Angelone. Mr. Angelone and I had a discussion on Friday at 3:40 p.m. regarding the ground water contamination question.

Metech International in Mapleville, Rhode Island, has been conducting a PCB remediation under a Consent Decree with Region I of the EPA on our site at 433 Allens Avenue in Providence, Rhode Island.

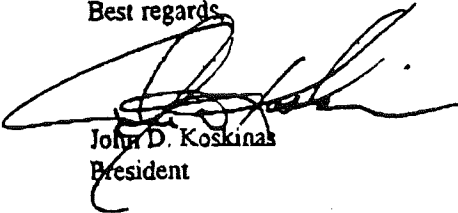
The last phase of the work on this site included installation of eight ground water monitoring wells. During the drilling of the well located in the furthest northeastern corner of the property, our Engineering Group detected a slight odor which was not apparent in the other wells. Following tests, we have trace indications of trimethylbenzene (8ppm) and zylene (0.8ppm). Mr. Angelone, from your Ground Water Protection Department, characterizes these findings as "spent gasoline".

We recognize we do not have reportable release quantities; however, we feel it is our responsibility to report these findings. Hence our effort this afternoon. The property immediately adjacent to ours is a cable crossing bounded on its far side by a property owned by Cumberland Farms (and prior to that, Gulf Oil). It appears to include old gasoline pumps, concrete, etc.

Along with the report to your office, we are advising EPA Region I of these findings. We are pleased to be finalizing this PCB remediation and want to be certain that the proper authorities duly note these trace indications.

If you have any questions or require further information, please contact our Chief Engineer, Mr. Christian Jedson by phone at 568-0711 or fax at 568-6003.

Best regards,

  
John D. Koskinas  
President

JDK:kb

