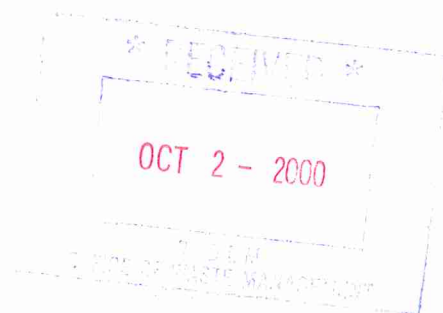


LAW OFFICES
BEVERIDGE & DIAMOND, P.C.
SUITE 700
1350 I STREET, N.W.
WASHINGTON, DC 20005-3311
(202) 789-6000
TELECOPIER (202) 789-6190

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

September 26, 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 our May 30 meeting, and my June 20 letter, 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. Enclosed is a report summarizing a new round of groundwater sampling at the site. The samples (both filtered and unfiltered) were collected August 24 -25 to satisfy your request for additional sampling. As you will see, the most recent results are consistent with the previous sampling and do not reveal a groundwater problem at the site.

We have prepared and enclosed a table setting forth the results from all three rounds of groundwater sampling that have been conducted and submitted to RIDEM. You now have samples collected over a period of almost two and a half years, reflecting both wet and dry seasons and both filtered and unfiltered samples. These samples do not suggest any adverse effects on groundwater at the site and appear to be well within an acceptable range given the site's location in an area of longstanding industrial use. Indeed, the great majority of the sample results are within RIDEM's GA groundwater objectives, even though the site is not classified as GA.

In light of these additional sample results, as well as those previously submitted, we respectfully renew our request that this matter be brought to a close with a discussion in the very

BEVERIDGE & DIAMOND, P. C.

Mr. Warren S. Angell II
Ms. Margaret Dein Bradley
September 26, 2000
Page 2

near future to resolve outstanding questions and issues regarding the terms of the Environmental Land Use Restriction (ELUR) for the site, and the issuance of a Letter of Compliance to Metech.

As you know, under the circumstances, and in light of the millions of dollars already spent on the Allens Avenue site, Metech is anxious to complete its discussions with RIDEM so that it can recover a portion of its substantial investment in the site's remediation through a sale of the property and its return to productive use. We look forward to hearing from you soon.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia A. Lewis".

Cynthia A. Lewis

Enclosures

September 26, 2000

Summary of Groundwater Sampling Results
Metech International, Inc.
Allens Avenue, Providence, RI

(All results in mg/L)

Monitoring Well 1

	March 1998 Unfiltered	December 1999 Filtered	August 2000 Unfiltered	August 2000 Filtered	GA Groundwater Objective
Arsenic	<0.005	N.D.	0.005	0.005	
Barium	0.57	0.62	0.635	0.601	2.0
Cadmium	0.005	N.D.	N.D.	N.D.	0.005
Chromium	<0.02	N.D.	N.D.	N.D.	0.1
Lead	0.006	N.D.	0.006	N.D.	0.015
Mercury	<0.0002	N.D.	N.D.	N.D.	0.002
Selenium	<0.005	N.D.	N.D.	0.03	0.05
Silver	<0.01	N.D.	N.D.	N.D.	

OCT 2 - 2000

Summary of Groundwater Sampling Results
Metech International, Inc.
Allens Avenue, Providence, RI

(All results in mg/L)

Monitoring Well 2

	March 1998 Unfiltered	December 1999 Filtered	August 2000 Unfiltered	August 2000 Filtered	GA Groundwater Objective
Arsenic	<0.005	N.D.	0.008	0.005	
Barium	0.15	0.50	0.576	0.607	2.0
Cadmium	<0.005	N.D.	N.D.	N.D.	0.005
Chromium	<0.02	N.D.	0.006	N.D.	0.1
Lead	0.009	N.D.	0.017	N.D.	0.015
Mercury	0.0005	N.D.	0.0004	N.D.	0.002
Selenium	<0.005	N.D.	N.D.	0.06	0.05
Silver	<0.01	N.D.	N.D.	N.D.	

Summary of Groundwater Sampling Results
Metech International, Inc.
Allens Avenue, Providence, RI

(All results in mg/L)

Monitoring Well 3

	March 1998 Unfiltered	December 1999 Filtered	August 2000 Unfiltered	August 2000 Filtered	GA Groundwater Objective
Arsenic	<0.005	N.D.	0.016	0.016	
Barium	0.25	0.75	0.677	0.697	2.0
Cadmium	<0.005	N.D.	N.D.	N.D.	0.005
Chromium	<0.02	N.D.	N.D.	N.D.	0.1
Lead	0.006	N.D.	0.006	N.D.	0.015
Mercury	<0.0002	N.D.	N.D.	N.D.	0.002
Selenium	<0.005	N.D.	N.D.	0.04	0.05
Silver	<0.01	N.D.	N.D.	N.D.	

Summary of Groundwater Sampling Results
Metech International, Inc.
Allens Avenue, Providence, RI

(All results in mg/L)

Monitoring Well 4

	March 1998 Unfiltered	December 1999 Filtered	August 2000 Unfiltered	August 2000 Filtered	GA Groundwater Objective
Arsenic	<0.005	N.D.	0.012	0.015	
Barium	0.04	0.14	0.155	0.156	2.0
Cadmium	<0.005	N.D.	N.D.	N.D.	0.005
Chromium	<0.02	N.D.	0.012	0.005	0.1
Lead	0.002	N.D.	0.009	N.D.	0.015
Mercury	<0.0002	N.D.	N.D.	N.D.	0.002
Selenium	<0.005	N.D.	N.D.	N.D.	0.05
Silver	<0.01	N.D.	N.D.	N.D.	

Summary of Groundwater Sampling Results
Metech International, Inc.
Allens Avenue, Providence, RI

(All results in mg/L)

Monitoring Well 5

	March 1998 Unfiltered	December 1999 Filtered	August 2000 Unfiltered	August 2000 Filtered	GA Groundwater Objective
Arsenic	<0.005	N.D.	0.017	0.011	
Barium	0.07	0.10	0.162	0.181	2.0
Cadmium	<0.005	N.D.	N.D.	N.D.	0.005
Chromium	<0.02	N.D.	0.006	N.D.	0.1
Lead	0.002	N.D.	0.023	N.D.	0.015
Mercury	<0.0002	N.D.	N.D.	N.D.	0.002
Selenium	<0.005	N.D.	N.D.	N.D.	0.05
Silver	<0.01	N.D.	N.D.	N.D.	

Summary of Groundwater Sampling Results
Metech International, Inc.
Allens Avenue, Providence, RI

(All results in mg/L)

Monitoring Well 6

	March 1998 Unfiltered	December 1999 Filtered	August 2000 Unfiltered	August 2000 Filtered	GA Groundwater Objective
Arsenic	<0.005	N.D.	N.D.	0.005	
Barium	0.17	0.32	0.330	0.333	2.0
Cadmium	<0.005	N.D.	N.D.	N.D.	0.005
Chromium	<0.02	N.D.	N.D.	N.D.	0.1
Lead	0.141	N.D.	0.005	N.D.	0.015
Mercury	0.0004	N.D.	N.D.	N.D.	0.002
Selenium	<0.005	N.D.	N.D.	0.04	0.05
Silver	<0.01	N.D.	N.D.	N.D.	

Summary of Groundwater Sampling Results
Metech International, Inc.
Allens Avenue, Providence, RI

(All results in mg/L)

Monitoring Well 7

	March 1998 Unfiltered	December 1999 Filtered	August 2000 Unfiltered	August 2000 Filtered	GA Groundwater Objective
Arsenic	0.005	N.D.	N.D.	0.017	
Barium	0.15	0.11	0.186	0.198	2.0
Cadmium	<0.005	N.D.	N.D.	N.D.	0.005
Chromium	<0.02	N.D.	N.D.	N.D.	0.1
Lead	0.266	N.D.	0.024	N.D.	0.015
Mercury	<0.0002	N.D.	N.D.	N.D.	0.002
Selenium	<0.005	N.D.	N.D.	0.01	0.05
Silver	<0.01	N.D.	N.D.	N.D.	

Summary of Groundwater Sampling Results
Metech International, Inc.
Allens Avenue, Providence, RI

(All results in mg/L)

Monitoring Well 8

	March 1998 Unfiltered	December 1999 Filtered	August 2000 Unfiltered	August 2000 Filtered	GA Groundwater Objective
Arsenic	<0.005	N.D.	0.014	0.020	
Barium	0.03	N.D.	0.063	0.058	2.0
Cadmium	<0.005	N.D.	N.D.	N.D.	0.005
Chromium	<0.02	N.D.	0.022	0.009	0.1
Lead	<0.002	N.D.	N.D.	N.D.	0.015
Mercury	<0.0002	N.D.	N.D.	N.D.	0.002
Selenium	<0.005	N.D.	N.D.	N.D.	0.05
Silver	<0.01	N.D.	N.D.	N.D.	



REPORT OF ANALYTICAL RESULTS

NETLAB Case Number K0828-09

Prepared for:

Attn: Andrew McManus
Metech International
120 Mapleville Main St.
Mapleville, RI 02839

Report Date: September 6, 2000

Reviewed by:

Mark H. Bishop

Mark H. Bishop
Laboratory Director

Lab # RI010
of pages: 14

NEW ENGLAND TESTING LABORATORY, INC.
1254 Douglas Avenue, North Providence, Rhode Island 02904-5392
PROVIDENCE (401) 353-3420 TOLL FREE: 1-888-883-8522

These methods are documented in:

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

CASE NARRATIVE

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.

Case No. K0828-09

MW-1

Parameter	Result, mg/L	Reporting Limit	Date Analyzed
Total Metals			
Arsenic	0.005	0.005	8/29/00
Barium	0.635	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	N.D.	0.005	8/29/00
Lead	0.006	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	N.D.	0.01	8/29/00
Silver	N.D.	0.005	8/29/00
Dissolved Metals			
Arsenic	0.005	0.005	8/29/00
Barium	0.601	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	N.D.	0.005	8/29/00
Lead	N.D.	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	0.03	0.01	8/29/00
Silver	N.D.	0.005	8/29/00

N.D. = Not Detected

Case No. K0828-09

MW-2

Parameter	Result, mg/L	Reporting Limit	Date Analyzed
Total Metals			
Arsenic	0.008	0.005	8/29/00
Barium	0.576	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	0.006	0.005	8/29/00
Lead	0.017	0.005	8/29/00
Mercury	0.0004	0.0002	9/6/00
Selenium	N.D.	0.01	8/29/00
Silver	N.D.	0.005	8/29/00
Dissolved Metals			
Arsenic	0.005	0.005	8/29/00
Barium	0.607	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	N.D.	0.005	8/29/00
Lead	N.D.	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	0.06	0.01	8/29/00
Silver	N.D.	0.005	8/29/00

N.D. = Not Detected

Case No. K0828-09

MW-3

Parameter	Result, mg/L	Reporting Limit	Date Analyzed
Total Metals			
Arsenic	0.016	0.005	8/29/00
Barium	0.677	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	N.D.	0.005	8/29/00
Lead	0.006	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	N.D.	0.01	8/29/00
Silver	N.D.	0.005	8/29/00
Dissolved Metals			
Arsenic	0.016	0.005	8/29/00
Barium	0.697	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	N.D.	0.005	8/29/00
Lead	N.D.	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	0.04	0.01	8/29/00
Silver	N.D.	0.005	8/29/00

N.D. = Not Detected

Case No. K0828-09

MW-4

Parameter	Result, mg/L	Reporting Limit	Date Analyzed
Total Metals			
Arsenic	0.012	0.005	8/29/00
Barium	0.155	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	0.012	0.005	8/29/00
Lead	0.009	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	N.D.	0.01	8/29/00
Silver	N.D.	0.005	8/29/00
Dissolved Metals			
Arsenic	0.015	0.005	8/29/00
Barium	0.156	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	0.005	0.005	8/29/00
Lead	N.D.	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	N.D.	0.01	8/29/00
Silver	N.D.	0.005	8/29/00

N.D. = Not Detected

Case No. K0828-09

MW-5

Parameter	Result, mg/L	Reporting Limit	Date Analyzed
Total Metals			
Arsenic	0.017	0.005	8/29/00
Barium	0.162	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	0.006	0.005	8/29/00
Lead	0.023	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	N.D.	0.01	8/29/00
Silver	N.D.	0.005	8/29/00
Dissolved Metals			
Arsenic	0.011	0.005	8/29/00
Barium	0.181	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	N.D.	0.005	8/29/00
Lead	N.D.	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	N.D.	0.01	8/29/00
Silver	N.D.	0.005	8/29/00

N.D. = Not Detected

Case No. K0828-09

MW-6

Parameter	Result, mg/L	Reporting Limit	Date Analyzed
Total Metals			
Arsenic	N.D.	0.005	8/29/00
Barium	0.330	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	N.D.	0.005	8/29/00
Lead	0.005	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	N.D.	0.01	8/29/00
Silver	N.D.	0.005	8/29/00
Dissolved Metals			
Arsenic	0.005	0.005	8/29/00
Barium	0.333	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	N.D.	0.005	8/29/00
Lead	N.D.	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	0.04	0.01	8/29/00
Silver	N.D.	0.005	8/29/00

N.D. = Not Detected

Case No. K0828-09

MW-7

Parameter	Result, mg/L	Reporting Limit	Date Analyzed
Total Metals			
Arsenic	N.D.	0.005	8/29/00
Barium	0.186	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	N.D.	0.005	8/29/00
Lead	0.024	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	N.D.	0.01	8/29/00
Silver	N.D.	0.005	8/29/00
Dissolved Metals			
Arsenic	0.017	0.005	8/29/00
Barium	0.198	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	N.D.	0.005	8/29/00
Lead	N.D.	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	0.01	0.01	8/29/00
Silver	N.D.	0.005	8/29/00

N.D. = Not Detected

Case No. K0828-09

MW-8

Parameter	Result, mg/L	Reporting Limit	Date Analyzed
Total Metals			
Arsenic	0.014	0.005	8/29/00
Barium	0.063	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	0.022	0.005	8/29/00
Lead	N.D.	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	N.D.	0.01	8/29/00
Silver	N.D.	0.005	8/29/00
Dissolved Metals			
Arsenic	0.020	0.005	8/29/00
Barium	0.058	0.005	8/29/00
Cadmium	N.D.	0.005	8/29/00
Chromium	0.009	0.005	8/29/00
Lead	N.D.	0.005	8/29/00
Mercury	N.D.	0.0002	9/6/00
Selenium	N.D.	0.01	8/29/00
Silver	N.D.	0.005	8/29/00

N.D. = Not Detected



Environmental Sampling Technology
 85 Franklin Street
 Needham, MA 02494
 Phone (781) 455-0003
 Fax (781) 455-8336

Chain of Custody Record

KU020 V1

Laboratory:

NET Lab
 (401) 353-342x

- Container Type Sample Type
- P - Plastic
 - G - Glass
 - V - VOA
 - B - Bacteria
- 1. Wastewater
 - 2. Groundwater
 - 3. Soil
 - 4. Drinking Water
 - 5. Surface Water
 - 6. Other

NET Lab
 Rush
 Day Turna
 Routh
 Reference
 962- xx

Client: Metech International, Inc.
 Address: Mapleville Main Street
 Mapleville RI

Contact Name: Andrew McManus
 Phone Number: (401) 568-0711
 Description: Low Flow Groundwater Sampling, Allens Ave Providence, RI

LOCATION (Sample Identification)	Sample Type	Container Size	Type	#	Sampling		Preservative	Analysis	Comments
					Date	Time			
MW-1	2	500 ml	P	2	9/25	11:20			8 Recra pc Jocelyn
MW-2					9/25	11:30			
MW-3					9/24	11:36			
MW-4					9/24	13:55			
MW-5					9/25	9:40			
MW-6					9/24	10:40			
MW-7					9/24	12:53			
MW-8									

SAMPLER'S SIGNATURE
[Signature]

DATE: 9/25/00
 TIME: 15:00

NUMBER: 1

TRANSFERS RELINQUISHED BY
[Signature]

TRANSFERS ACCEPTED BY
[Signature]

DATE: 9/28/00

Additional Comments:
 Dissolved Metals Samples to be field filtered to 0.45 Micron

* All samples chilled to 4 degrees Celsius.