

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

DEC 26 2000

December 18, 2000

**Via Facsimile and Mail**

Margaret Dein Bradley  
Senior Environmental Scientist  
Rhode Island Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, RI 02908-5767

Re: Metech International, Inc. – Discussion of Remedial Alternatives for Allens  
Avenue Property

Dear Margaret:

In our most recent conversations regarding the steps necessary for Metech International, Inc. to obtain a Letter of Compliance from DEM for Metech's Allens Avenue property in Providence, you asked us to provide you with a discussion of remedial alternatives for the site and to designate Metech's preferred remedial alternative. This letter is intended to respond to that request.

***Background***

As you know, the site is located in an area of longstanding industrial use and has already been subject to extensive remediation for polychlorinated biphenyls (PCBs) pursuant to a 1991 Consent Decree entered by the federal district court for the District of Rhode Island in settlement of litigation between the U.S. EPA and Metech. In general, pursuant to the Consent Decree, the company undertook extensive grid sampling of the property for PCBs. Where PCBs were determined to be present in excess of the specified cleanup level of 10 ppm the contaminated soil was excavated, disposed of offsite, and replaced with clean fill. Overall, more than 60% of the site was excavated and covered with clean fill; the portions of the site that were not excavated are primarily those covered with paved surfaces. Metech also constructed a shoreline structure and established ground cover to eliminate potential transport pathways. More detail regarding the



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cleanup can be found in Metech's April 24, 1998 final report on the remediation, which was submitted to both EPA and DEM. The cost to Metech of performing the required remediation was approximately \$6 million. EPA issued its Certificate of Completion to Metech on August 2, 1999, confirming that the company had satisfied its obligations under the Consent Decree.

In addition to the PCB-related work, Metech has also conducted and submitted to you three sets of groundwater sample analyses, conducted over a two and a half-year time span in both wet and dry seasons and reflecting both filtered and unfiltered samples. As discussed in my September 26, 2000 letter to you, the samples do not suggest any groundwater problems or any leaching of any metals that may remain in the soil. Indeed, the great majority of the results are within DEM's GA groundwater objectives even though the site is not classified as GA.

### ***Remedial Alternatives***

In light of the above background, Metech believes that the three remedial alternatives that warrant discussion are as follows.

No Action. As noted, the site is located in an industrial area where nearby properties are likely contaminated to some degree; extensive remediation has already been conducted by Metech at the site; and there is no evidence of any current environmental problem at the site. We therefore believe that DEM would be justified in requiring no further action at the site in order to issue a Letter of Compliance to Metech.

Institutional Controls: Environmental Land Usage Restriction. In order to ensure that the benefits of the previous remediation continue, a second option would be for Metech to implement institutional controls by executing an Environmental Land Usage Restriction (ELUR). The ELUR would require appropriate maintenance of the clean fill applied to the site during the previous remediation and would limit the property to non-residential uses.

Excavation and Offsite Disposal. A third alternative would be to again excavate the site, dispose of the soil by sending it offsite for use as landfill cover, and capping the entire site with clean soil determined to contain no metals contamination.

### ***Review of Alternatives and Selection of Preferred Alternative***

Risk Management. In view of the work already done at the site and the results of the groundwater sampling submitted to DEM, Metech believes that the site poses little, if any, risk and that all three alternatives are adequately protective. Although the excavation alternative could, ultimately, further reduce the potential for exposure to any contaminants that may remain onsite, it also poses the risk of increased short-term exposure during the excavation process,



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which would disturb the clean fill applied to the site during the PCB remediation. Accordingly, we believe the most protective suitable alternative is the ELUR option.

Technical Feasibility and Legal Compliance. All three alternatives are technically feasible and in compliance with applicable legal and regulatory standards.

Cost and Ability to Perform. All three alternatives are theoretically capable of being performed at the site. However, the excavation alternative is estimated to involve costs of over \$1 million and would impose a severe financial burden on Metech, particularly in light of the millions of dollars already spent on remediation of the site.

Preferred Alternative. Metech believes that the excavation alternative is unjustified in view of its high cost, the absence of significant risks posed by the site, and the possibility that, by disturbing the existing clean fill, the excavation might actually increase short-term exposure to any contaminants that may be present at the site underneath the fill. While, as noted above, we believe that the no action alternative is justified by the work previously done and the absence of evidence of a current health or environmental risk from the site, Metech is willing to take a more conservative approach in light of the site's proximity to the Providence River. Accordingly, Metech's preferred alternative is the institutional controls/ELUR approach.

### ***Details of Proposed Remedy***

Metech will promptly seek to reach agreement with you on the terms of an appropriate ELUR that maintains appropriate protections while permitting the site to be returned to beneficial use. Once such agreement is reached, Metech will execute the ELUR to ensure that its provisions are implemented. We note that we have received from you previously draft language for an ELUR and we will provide our comments on that draft shortly.

\* \* \*

I will be in touch with you shortly regarding the above discussion. We look forward to working with you to bring this matter to a prompt conclusion.

Sincerely,



Cynthia A. Lewis

