

# Lake Shore Environmental, Inc.

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April 30, 2004

Mr. Richard B. Hodgson  
General Counsel  
Mapleville Main, Inc.  
C/O Trelleborg North American Group Law Department  
8677 Batesville Road  
Afton, VA 22920

RE: Annual Inspection of Property at 434 Allens Avenue  
Providence, Rhode Island

Dear Mr. Hodgson:

In accordance with your request, Lake Shore Environmental, Inc. (LSE) has completed an annual inspection of the referenced property and the associated clean-fill soil cap. The Soil Management Plan (SMP) for the property describes the requirements for an annual inspection in accordance with provisions outlined in the Environmental Land Use Restriction (ELUR) which was recorded in the City of Providence Land Evidence Records by Mapleville Main, Inc. (MMI) on February 3, 2003. The Property is located at 434 Allens Avenue and is identified as Plat 47, Lot 601 and Plat 55, Lot 10.

The objective of the annual inspection was to assess the current condition of the soil cap and verify that:

1. No residential use of the Property has occurred,
2. No groundwater at the Property is used as a potable water supply,
3. Soil at the site is not disturbed without written permission from the Rhode Island Department of Environmental Management's (RIDEM), and
4. Soils at the property are properly maintained in accordance with the Department-Approved SMP in order to prevent human exposure to soils containing hazardous substances at concentrations exceeding the applicable Direct Exposure Criteria pursuant to the Remediation Regulations.

## **Brief Summary**

Based on LSE's inspection of the property, we have confirmed that no residential use of the property has occurred, no potable use of groundwater at the property has occurred, the engineered controls at the property have served to isolate underlying soils containing hazardous substances from direct human contact, and no erosion of the soil caps has occurred.

## Site Inspection

Due to inclement winter weather earlier in the year, as well as scheduling issues, a satisfactory site inspection could not be conducted until the latter part of March 2004. On March 23, 2004, Mr. David Hazebrouck of LSE visited the six-acre site with Mr. Frank Jacques of Commercial Real Estate Services of Rhode Island, Inc., the broker for the property. The site is predominantly open space with tall grass covering most of this relatively level parcel. Several non-contiguous areas in the western half of the Property are either paved with bituminous asphalt or concrete. The entire eastern half of the Property is unpaved. The only structures remaining on the Property include a steel building frame and associated concrete floor slab, a reinforced concrete building shell and a brick garage. Remnants of an inactive railroad spur extend from Allens Avenue into the southwest corner of the Property. The entire property is enclosed within a chain link fence and entry to the property was gained through a locked gate bordering Allens Avenue in the southwest corner of the site. Entry gates are also present at the northwestern side of the property (adjoining Allens Avenue) and along the northeast site boundary. It did not appear as though entry through these alternate gates had been made in the recent past.

The inspection of the Property followed several transects across the Property as well as the entire perimeter of the Property. The fence surrounding the Property is generally in good condition except for several areas where trespassers have made small cuts in the chain-link fence to gain access to the Property. As noted below, a fence contractor has been retained to make repairs to the fence where needed. In general, unpaved portions of the Property consist of sandy well-drained soil that is well graded and has established vegetation. The site fence and hay bales surrounding the Property are still present and functional. Areas along the Providence River appear to be stable due to protection offered from the large boulders and rip-rap along the River bank. Although a few small isolated areas at various locations on the Property show no signs of soil disturbance or erosion, they are nearly devoid of vegetation. These areas appear to be comprised of clean sandy soil that may not contain a sufficient thickness of organic loam to sustain a healthy vegetative growth.

In the central portion of the Property, vehicle tracks were observed forming an oval-shaped pattern with sharp radius U-turns at either end suggesting that ATVs had used this area for racing/recreation. These tire marks were only about three to four feet apart suggesting they were made by an all-terrain vehicle (ATV) rather than by a large truck. The vehicle tracks had formed ruts that were no more than six inches deep. A few other small areas had also sustained minor damage from the ATVs. An examination of the fence in the northeast corner of the Property revealed a four-foot section of damaged fence adjacent to the Providence River that appears to be the access point for unauthorized ATV-sized vehicles. Closer inspection of areas near this access point revealed that the silt fence and hay-bales that were set up as erosion controls were trampled flat by a vehicle entering the site through this area.

Although the shallow ruts created by the unauthorized ATVs caused minor disturbance of the topsoil and vegetation on the soil cap, the ruts were not deep enough to penetrate the clean soil cap. Consequently, in order to smooth the shallow soil disturbances and re-establish vegetation in these areas, a landscaping contractor has been retained and is scheduled to make the surficial

cap repairs during the last week in April 2004. Further, in response to the above-referenced observed breaches in the fence, a fence contractor has been retained and is scheduled to make the necessary fence repairs during the first week in May 2004.

### **Recommendations**

In general, the soil cap and paved areas of the site appear to be achieving the ELUR goals of precluding direct contact with PCB impacted soils. However, several sections of the chain link fence had been damaged by trespassers who apparently used the Property intermittently for recreational purposes. Some of these activities have caused minor damage to the soil cap and should be prohibited.

Consequently, a qualified fence contractor has been retained to repair all damaged sections of the fence, thereby eliminating unauthorized access to the property. Where the soil cap has been disturbed by recreational ATVs, the top soil will be regraded by a reputable landscaping contractor to remove the ruts, cover the areas with loam and reseeded to promote healthy vegetative cover. In areas with sparse or missing vegetation, additional loam will be spread and seeded such that health vegetative growth can be established. No further recommendations are offered at this time.

If you have any questions regarding this correspondence or this site, please feel free to contact the undersigned.

Sincerely,



David J. Hazebrouck, P.G., LSP, LEP  
Principal

Attachments:            Site Photographs

## **SITE PHOTOGRAPHS**