



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT

235 Promenade Street, Providence, Rhode Island 02908

LETTER OF RESPONSIBILITY

File No. SR-10-2243

June 18, 2025

CERTIFIED MAIL

Paul Pisano
Metacomet Property LLC
950 Warren Avenue, Suite 401
East Providence, RI 02914

RE: Metacomet Redevelopment Project
500 Veterans Memorial Parkway
East Providence, Rhode Island
Map 107 / Plat 15 / Lot 01

Dear Mr. Pisano:

On April 22, 2020, the Rhode Island Department of Environmental Management's (the Department) Office of Land Revitalization and Sustainable Materials Management (LRSMM) enacted the codified 250-RICR-140-30-1, Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations). Following periodic refiling, the active Rule became effective on January 4, 2022. The purpose of these regulations is to create an integrated program requiring reporting, investigation, and remediation of contaminated sites in order to eliminate and/or control threats to human health and the environment in a timely and cost-effective manner. A Letter of Responsibility (LOR) is a preliminary document used by the Department to codify and define the relationship between the Department and a Performing Party.

Please be advised of the following facts:

1. The above referenced property is located at 500 Veterans Memorial Parkway, East Providence, Rhode Island (the Site). The Site is further identified by the City of East Providence Tax Assessor's Office as a 56-acre portion of Map 107 / Plat 15 / Lot 01.
2. The Department is in receipt of the following documents:
 - a. Limited Subsurface Investigation (LSI), received by the Department on April 14, 2025, and prepared by SAGE Environmental Inc. (SAGE);
 - b. Release Notification Form (RNF), received by the Department on April 14, 2025, and prepared by SAGE;
 - c. Release Notification (Re-Submittal), Metacomet Redevelopment Project, 500

Veterans Memorial Parkway (Portion of Map 107, Plat 15, Lot 1), East Providence, Rhode Island, received by the Department on June 16, 2025, and prepared by SAGE; and

- d. Electronic mail - Subject: RE: L5247468 – Metacomet Redevelopment Project, received by the Department on June 17, 2025, and prepared by SAGE.
3. The above referenced documents identify concentrations of arsenic in Site soils that exceed the Department’s Method 1 Direct Exposure Criteria, as referenced in the Remediation Regulations.
4. Based on the presence and nature of the Hazardous Substance the Department concurs that a Release of Hazardous Materials has occurred as defined by Sections 1.4(A)(33), 1.4(A)(34), and 1.4(A)(63) of the Remediation Regulations.
5. Metacomet Property LLC is identified as the current owner of the Site by the City of East Providence Tax Assessor’s office and as such is a Responsible Party as defined by Section 1.4(A)(70) of the Remediation Regulations.

As a result of the information known and the conditions observed at the site, the Department requests that Metacomet Property LLC comply with the following:

1. If necessary, prior to the implementation of any additional site investigation field activities and in accordance with Section 1.8.7(A)(1) of the Remediation Regulations, Metacomet Property LLC must notify all abutting property owners, tenants, easement holders, and the municipality that an investigation is about to occur. The notice should briefly indicate the purpose of the investigation, the work to be performed, and the approximate scheduled dates of activities. Please submit a draft notification to the Department via E-mail for review and approval prior to distribution. A boilerplate notification to be distributed can be found online under “**Public Notice Reference Documents**” at: <https://dem.ri.gov/environmental-protection-bureau/land-revitalization-and-sustainable-materials-management/site-remediation-program>. You can also navigate to this notice from the Department's main web page (www.dem.ri.gov) by clicking on *Environmental Protection Bureau > Land Revitalization and Sustainable Materials Management > State Site Cleanup > Site Remediation Program > Public Notice Reference Documents*.

The Department will require a copy of the public notice letter and a list of all recipients. Failure to comply with the aforementioned items may result in enforcement actions as specified in Rhode Island General Laws 23-19.1-17 and 23-19.1-18.

2. Conduct further investigation of the Site soil and groundwater, if warranted, in accordance with Section 1.8 of the Remediation Regulations.
3. Upon completion of the additional site investigation, submit a Site Investigation Report (SIR) in accordance with Section 1.8 of the Remediation Regulations within ninety (90) days from the date of this letter. Given that some limited environmental investigation has already been

performed at the Site, you may incorporate portions of the information already gathered and work already performed to address the items covered in Section 1.8. The SIR should include at least two remedial alternatives other than no action/natural attenuation and include future plans for the re-use or redevelopment (if applicable) of the property.

4. Submit an SIR checklist in accordance with Section 1.8.8 of the Remediation Regulations. The SIR checklist was created as a supplemental tool to expedite the review and approval process by cross-referencing the specific sections and pages within the SIR that provide the detailed information that addresses each stated requirement within Section 1.20 of the Remediation Regulations.
5. Upon approval by the Department of the SIR, be prepared to bring the Site into compliance with the Remediation Regulations.

Please be advised that Metacomet Property LLC, as the Responsible Party, is responsible for the proper investigation and remediation of hazardous substances at this site. Also be advised that any remedial alternative that proposes to leave contaminated media on-site at levels which exceed the Department's Residential Direct Exposure Criteria, applicable Leachability Criteria, or applicable Groundwater Criteria will, at a minimum, necessitate the recording of an institutional control in the form of an Environmental Land Usage Restriction (ELUR) on the deed for the site, and will likely require implementation of additional engineered controls to restrict human exposure.

Please notify this office within seven days of the receipt of this letter of your plans to address these items. All correspondences should be sent to the attention of:

Hannah Mitchell
RIDEM / Office of Land Revitalization and Sustainable Materials Management
235 Promenade Street
Providence, RI 02908

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) 537-4342, or by E-mail at hannah.mitchell@dem.ri.gov.

Sincerely,

Hannah Mitchell

Hannah Mitchell
Environmental Scientist I
Office of Land Revitalization &
Sustainable Materials Management

cc: Kelly Owens, RIDEM/LRSMM
Ashley Blauvelt, RIDEM/LRSMM
Joseph Martella, RIDEM/LRSMM

Ron Gagnon, RIDEM/OCTA
Richard Lucia, Rhode Island Coastal Resources Management Council
Rick Mandile, SAGE
Becky Raymond, SAGE
Keith A. Brynes, Director, East Providence Planning & Economic Development