



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT
235 Promenade Street, Providence, Rhode Island 02908

PFAS Groundwater Sampling Plan Comment Letter
File No. SR-13-0454

November 21, 2023

Ms. Janine Pitocco
FM Global
743 Reynolds Rd
West Glocester, RI 02814

RE: Former Landfill at FM Global Test Center
743 Reynolds Rd
West Glocester, Rhode Island
Plat Map 002 / Lot 004

Dear Ms. Janine Pitocco

The Rhode Island Department of Environmental Management's (the Department) Office of Land Revitalization and Sustainable Materials Management (LRSMM) has reviewed the PFAS Groundwater Sampling Plan for the above referenced property (the Site), which was submitted on November 8, 2023, by Geosphere Environmental Management, Inc. in accordance with 250-RICR-140-05-2, Section 2.1.8, Part F, Section 1(h) of the Department's Solid Waste Regulations No.2 Solid Waste Landfills.

After careful review of the PFAS Groundwater Sampling Plan, the Department requires a response to the attached comments, questions, and concerns about the submittal, which must be fully addressed in writing to receive approval.

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) 222-2797, ext. 2777138, or by E-mail at trevor.moulton@dem.ri.gov.

Sincerely,

Trevor Moulton

Trevor Moulton
Environmental Scientist
Office of Land Revitalization &
Sustainable Materials Management

cc: Matt Destefano, RIDEM
Ray Talkington, GEOSPHERE

DEPARTMENT COMMENTS

November 21, 2023

PFAS Groundwater Sampling Plan, dated November 8, 2023
Former Landfill at FM Global Test Center
West Glocester, Rhode Island

1. The Department is in question regarding Geosphere's concern that the initial PFAS sampling results have the potential not to be associated with sampled groundwater, but rather, due to the possible detection of PFAS in the Teflon constructed low-flow bladder pumps, installed in 1999. The report states that prior to sampling of monitoring wells MW-1, MW-3, and MW-6 as part of the PFAS monitoring, the sampling devices of concern will be removed. Therefore, in addition to purging the well three times before sampling, it is hard to determine whether the contamination primarily emerges from the bladder pumps. Please confirm if the pumping system will be kept out of the monitoring well completely between both sampling events within 180 days of each other. If the pump is the primary concern for contamination, leaving the pump out between sampling events and comparing both sampling event results may be of value for this concern.
2. Please submit a written reply that addresses the abovementioned comments on or before December 8, 2023.