March 12, 2014

Ms. Ashley Blauvelt, Senior Sanitary Engineer
Rhode Island Department of Environmental Management
Office of Waste Management – Site Remediation Program
235 Promenade Street
Providence, Rhode Island 02908

Re:  Response to Public Comments
     Blackstone Valley Preparatory School
     52 Broad Street, A.P. 2 Lot 26
     Cumberland, Rhode Island
     PARE Project No.: 13062.09

Dear Ms. Blauvelt:

On behalf of Civil Broad Street Corporation (Owner), Pare Corporation (PARE) is providing this response to the verbal and written public comments received during the public meeting and public comment period between February 24, 2014 and March 10, 2014 for the above-referenced site. This letter and the associated attachments are intended to fulfill the Rhode Island Department of Environmental Management (RI DEM) requirements set forth in Rule 7.07 of the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (Remediation Regulations). Provided below is a summary of the public meeting as well as a list of each public comment and PARE’s corresponding response.

PUBLIC MEETING

A public meeting with respect to the contamination discovered at the site was completed on February 24, 2014 at the Blackstone Valley Prep Elementary School, located at 291 Broad Street in Cumberland, RI. The purpose of the meeting was to gather information about potential environmental contamination at the site not previously identified as part of the environmental investigations performed at the site. A copy of the public meeting transcript is attached for your reference. PARE’s responses to public comments received during this public meeting are provided in the following section. The public meeting was advertised in the Providence Journal on February 11, 2014 (see attachment). The Notice of a Public Meeting was provided per RIGL Chapter 23-19.14 (The Industrial Property Remediation and Reuse Act) and more specifically Section 23-19.14-5 (Environmental Equity and Public Participation).

The record of the public meeting was open for ten (10) business days after the meeting for the receipt of public comment and closed at 4:00 PM on March 10, 2014. Public comments relative to the environmental investigation of the proposed project were submitted in writing to: Ms. Ashley Blauvelt, RI Department of Environmental Management - Office of Waste Management, 235 Promenade Street, Providence, RI 02908 or by telephone at (401) 222-2797 ext. 7026.

RESPONSE TO PUBLIC COMMENTS

COMMENT NO. 1: A representative of the public expressed concern at the public meeting and during the public comment period regarding the potential for petroleum from the former underground storage tanks (USTs) on the southern abutting parcel to have migrated toward the site via shallow groundwater flow or soil. Specifically, the following questions were asked:
a. Have soils also been tested as a possible medium for migration? If not, please explain why. Is it possible that potentially contaminated soils from the former gas station have either migrated or in some way impacted the school site?

b. Is it not possible that when the gas station was closed and demolished, fuel tanks and/or oil-changing waste containers may have remained buried on the property and subsequently corroded?

c. Has full removal of all tanks, barrels, etc. by the former owner been thoroughly documented? If not, how can this potential source of petroleum contamination be dismissed? If not, how can the parents of the future students at the school be assured that their children will in fact be safe there?

PARE RESPONSE:

a. A total of twenty-six (26) soil samples have been collected and analyzed from across the site at depths ranging from 2 feet to 11 feet in order to characterize the nature and extent of contaminants present at the site. Of the 26 six samples collected only one had elevated concentrations of petroleum (TPH) in excess of the RI DEM Residential Direct Exposure Criteria. The one sample that had elevated concentrations of petroleum was collected from the soil stockpile excavated from Area 1. It appears as though the elevated petroleum detected in Area 1 was isolated to that area and was not the result of migration from an adjacent parcel, as is evident by the relatively clean samples collected from the excavation sidewalls and bottom. In addition, a number of sidewall and bottom samples were also collected from Area 2, which also had petroleum concentrations below the Residential DEC. As such, it does not appear as though the contamination identified in Areas 1 and 2 is the result of petroleum migration from an adjacent parcel. In addition, there is no evidence that soil from any of the other test pits or borings has been significantly impacted by petroleum. At this time, there is no evidence that petroleum has migrated through soil from an off-site parcel, including the former gas station parcel to the south, and impacted the site.

b. While it is possible that when the gas station was closed and demolished that fuel tanks and/or oil-changing waste containers may have remained buried on the property and subsequently corroded, it is believed that groundwater in the vicinity of the site flows in a southerly and westerly direction, which would make the former gas station downgradient from the subject site. Nonetheless, given the proximity of the former gas station and the unknown disposition of the former USTs at the gas station, it was deemed prudent to perform an investigation of shallow groundwater beneath the southern edge of the site. The limited groundwater investigation included the advancement of three (3) geotechnical borings along the common property line between the site and the former gas station property. At each location, bedrock was encountered at a depth ranging from 6 feet to 14 feet. Groundwater was not encountered in any of the three boring locations, though water was recorded in one boring but appeared to be perched wash water introduced as part of the drilling process. The results of the limited groundwater investigation effectively eliminated the possibility that shallow groundwater beneath the site has been impacted by the adjacent former gas station facility. Moreover, with the exception of one (1) soil sample collected from the southern side of the property, none (0) of the twenty-six (26) soil samples collected from across the site at depths ranging from 2 feet to 11 feet had concentrations of total petroleum hydrocarbons (TPH) above the RI DEM Residential Direct Exposure Criteria. The one sample that had elevated concentrations of TPH was reported to be a mix of No. 2 heating oil and motor oil — no gasoline was reported in the sample. Therefore, it is the opinion of PARE that former USTs on the southern property have not had an impact on the site.
c. While the disposition of the former USTs on the southern abutting parcel is unknown, we do not believe that these USTs have impacted the school site (refer to response to Comment No. 1a). With regard to documentation of full removal of all tanks, barrels, etc. by the former owner, given that the tanks are (or were) not on the school site property, the owner of this project, Civic Builders, has no authority to remove or otherwise investigate the disposition of these tanks. It is the responsibility of the current property owner of the southern abutting parcel (AP 2 Lot 25) to investigate and potentially remove these tanks if they still exist. With respect to the safety of future students of the school, refer to response to Comment No. 5.

COMMENT NO. 2: A comment was received at the public meeting with respect to PARE’s experience with environmental investigations.

PARE RESPONSE: Pare Corporation has been in business for over 40 years, and during that time has performed environmental site assessments for hundreds of sites in New England. The environmental engineers of Pare Corporation provide environmental site assessments, from performing historical site review and investigations (Phase I); developing and implementing sampling and analysis programs (Phase II); to the development of plans for site remedial action and contaminant mitigation (Phase III). Our personnel have significant experience working with the RI Department of Environmental Management on the investigation and remediation of contaminated properties. Our engineers possess both the technical training and field experience to investigate contaminated sites and make informed and appropriate decisions about the nature and extent of contamination, as well as effective remedial strategies.

COMMENT NO. 3: A comment was received at the public meeting with respect to the environmental contaminants found at the site, particularly the frequency of this occurrence happening at a construction site and the significance of this particular release.

PARE RESPONSE: It is the opinion of PARE that these particular contaminants at the concentrations identified at the site are not uncommon in urban areas and that this release was isolated to two small areas of the site. We do not believe that this release represents a significant ongoing risk to human health or the environment.

COMMENT NO. 4: Several comments were received at the public meeting and in the public comment period with respect to the installation of a vapor barrier beneath the school building.

PARE RESPONSE: A vapor barrier and passive sub-slab ventilation system are proposed as part of the building construction; even though the risk for vapor intrusion at this site appears to be very low.

COMMENT NO. 5: A number of questions/comments were received during the public meeting regarding the owner and engineer’s consideration of the future safety of school children at the site as it would be impacted by the reported release.

PARE RESPONSE: PARE engineers evaluated the nature and extent of contaminants present at the site in accordance with the requirements of the RI DEM Remediation Regulations. Based on the results of the environmental investigation, which included a soil boring program, a test pit program, and soil chemical analytical testing, an appropriate remedial measure was developed for RI DEM review and approval. PARE utilized RI DEM’s Residential Direct Exposure Criteria (R DEC) published in the Remediation Regulations to evaluate soil data collected as part of the environmental investigation at the property. The R DEC is the RI DEM’s most stringent soil criteria for the protection of human health.
and the environment. That said, for areas outside of the proposed school footprint with reported contaminant concentrations above this regulatory threshold, PARE proposes the excavation of these contaminated soil “hot spots” until contaminant concentrations are no longer present at the site above this direct exposure criteria. It should be noted that soil observed to contain obvious signs of contamination (i.e., dark black color, strong petroleum odor) at the two release sites has been excavated and encapsulated in polyethylene sheeting on site and is scheduled for off-site removal and disposal at the Rhode Island Resource Recovery Corporation’s Central Landfill in Johnston, RI.

For exceedances of the direct exposure criteria located below the proposed school building footprint, PARE proposes capping soil in place utilizing the building foundation as an engineered control over the contaminated soil. This is a standard method of soil remediation and is effective for sites similar to the Blackstone Valley Preparatory School site. The cap will prevent contact with the contaminated soil and limit contaminant mobility. The contaminants reported in soil above their respective regulatory criteria located below the proposed school building footprint are all classified within a subset of semi-volatile organic compounds known as polycyclic aromatic hydrocarbons (PAHs). In total, five (5) PAHs - benzo(a)anthracene, benzo(b)fluoranthene, benzo(g,h,i)perylene, chrysene, and indeno(1,2,3-cd)pyrene - were reported below the proposed school building footprint at concentrations in excess of their respective R DEC. In addition, one (1) PAH - benzo(a)pyrene - was reported in this area at a concentration exceeding its RI DEM Industrial/Commercial Direct DEC. For additional information related to contaminant concentrations reported in soil at the site, refer to the attached Site Plan.

It is important to note that while a number of PAHs were identified below the proposed school building footprint, no PAHs are included on the EPA’s list of Chemicals of Potential Concern for Vapor Intrusion. PAHs are not readily volatile and therefore represent an insignificant risk of volatilization at the site. Even though vapor intrusion from these chemicals is considered to be an insignificant issue, a vapor barrier and passive sub-slab ventilation system will be installed beneath the building, as originally proposed. An environmental land use restriction will also be implemented with the property deed restricting future soil disturbance below the school building. To conclude, PARE’s recommended remedial measure for the site, which includes selective soil removal and disposal, supplemented with engineered and institutional controls in the proposed school building footprint, will fulfill the requirements of the RI DEM Remediation Regulations.

**COMMENT NO. 6:** PARE obtained an email correspondence between the Office of the Governor and the RI DEM with respect to a photograph of the former gas station abutting the site to the south, which was circulated by Representative James N. McLaughlin, state representative for District 57 in Cumberland and Central Falls. Representative McLaughlin expressed concern regarding the former gas station and the unknown disposition and removal of the former USTs at the gas station on the southern abutting parcel. The email suggests that the former gas station and the school site are one and the same. A copy of the email correspondence and photograph are attached for your review.

**PARE RESPONSE:** We would like to clarify first and foremost that the gas station photo circulated in the above-referenced email is not a photo of the school site, but a photo of the southern abutting parcel (AP 2 Lot 25). While the disposition of the former USTs on the southern abutting parcel is unknown, we do not believe that these USTs have impacted the school site (refer to response to Comment No. 1b, above). With regard to the specific question about whether or not these tanks will be removed as part of this project, given that the tanks are not (and never were) on the school site property, the owner of this project, Civic Builders, has no authority to remove or otherwise investigate the disposition of these tanks. It is the responsibility of the current property owner to investigate and potentially remove these tanks if they still exist.
COMMENT NO. 7: A public comment was received requesting further study and investigation of:

d. soil samples around the foundation and areas around the Blackstone Valley Prep School which is under construction;

e. contamination near the building, specifically underground gas and home heating oil tanks which may not have been remediated or removed, as well as resultant hazardous chemicals that may persist in the soil; and

f. core drilling to assess subsidence in several locations to the depth of 200 feet as suggested in a report by U.S. Department of Interior pertaining to this same area.

PARE RESPONSE:

a. A total of twenty-six (26) soil samples have been collected and analyzed from across the site at depths ranging from 2 feet to 11 feet in order to properly characterize the nature and extent of contaminants present at the site. These 26 locations included areas around and beneath the proposed school foundation.

b. At this time, the excavation has occurred beneath the entire proposed building foundation and under the building footprint to a depth of 6 to 11 feet below the grade of the former park. No underground storage tanks were discovered during the excavation of the building foundation or footprint. In addition, a number of additional test pits were performed around the site and samples collected to identify if contamination exists near the building. At this time, we believe the site has been adequately characterized and no additional investigation is warranted. Following RI DEM approval of the Site Investigation Report (SIR) for the proposed school, the SIR will be available for public review. In addition, the RI DEM will be including a link titled "Blackstone Valley Prep School" on their site remediation webpage (http://www.dem.ri.gov/programs/benviron/ waste/topicrem.htm) underneath the section called "Information on Specific Remediation and Brownfield Sites." This link will contain all of the documents associated with this project. A copy of the SIR will also be available for review at the Cumberland Town Hall.

c. This comment does not pertain to the environmental conditions at the site or provide any additional information on the reported release at the site, and therefore shall not be addressed in this Response to Public Comments letter. Concerns regarding the geotechnical studies and ground stability should be brought to the Town of Cumberland's Building Department at 45 Broad Street, Cumberland, RI 02864 or by telephone at (401) 728-2400 ext. 141.

COMMENT NO. 8: A public comment was received with respect to the following safety concerns:

a. I am concerned that environmental investigations have been limit[sic] to the soil samples from a small area and not from the whole site. Therefore I ask if more soil samples shouldn't be necessary?

b. I am concerned with the ground stability. Based on historical and factual events of cave-ins, why not follow the recommendations that more core drilling be done?

PARE RESPONSE:

a. Refer to response to Comment No. 7a.

b. Refer to response to Comment No. 7c.
COMMENT NO. 9: A public comment was received with respect to the impact of the proposed school site on local parking.

PARE RESPONSE: This comment does not pertain to the environmental conditions at the site and therefore shall not be addressed in this Response to Public Comments letter. Concerns regarding parking and traffic impacts should be brought to the Town of Cumberland's Planning Department at 45 Broad Street, Cumberland, RI 02864 or by telephone at (401) 728-2400 ext. 140.

If you have any questions or concerns, please do not hesitate to contact me at your earliest convenience at (401) 334-4100, thank you.

Sincerely,

Timothy P. Thies, P.E.
Managing Engineer

Attachments: Site Plan
Public Notice
Public Meeting Transcript
Public Comment Email Correspondence and Photograph
Public Comment Period Letters

cc: Ms. Janelle Bosek – Civic Broad Street Corporation
Mr. Andrew Chagnon, P.E. – Pare Corporation
Mr. George G. Palmisciano, P.E. – Pare Corporation
Mr. Sean Coffey – Burns and Levinson

TPT/SPD/abv

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Ad Order Confirmation

**Customer:** CIVIC BUILDERS, INC.  
**Customer Account:** 100226887  
**Agency:** CIVIC BUILDERS, INC.  
**Agency/Parent Account:** 100226887  
**Ordered By:** Ellen McBurney  
**PO Number:** 0001221135  
**Ad Order #:** 0001221135

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**Order Taker:** Amy Kelly  
**Payment Method:** Credit Card  
**Payment Amount:** $0.00  
**Ad Number:** 0001221135-01

**Run Dates:** 2/11  
**Product:** Providence Journal  
**Placement/Classification - Position:** PJ CIs Legals - PJ LG Legal Notices  
**Sort Text:** PJ Projo.com

**PUBLIC NOTICE**
Civic Builders is hereby providing Notice of a Public Meeting per RI General Law Chapter 23-19.14 (The Industrial Property Remediation and Reuse Act) and more specifically Section 23-19.14-5 (Environmental Equity and Public Participation).

The purpose of this meeting is to discuss the environmental investigations associated with the reuse of 52 Broad Street, Cumberland, RI as a public charter school.

The record for the public meeting shall be open for ten (10) business days after the meeting and will close at 4:30 PM on March 10, 2014. Public comments relative to the environmental investigation of the proposed project must be submitted in writing to: Ms. Ashley Blauvelt, RI Department of Environmental Management - Office of Waste Management, 235 Promenade Street, Providence, RI 02908.

For more information regarding this notice, please contact Ashley Blauvelt by telephone at (401) 222-2797 ext. 7026.

**Date:** February 24, 2014  
**Place:** Blackstone Valley Prep Elementary School 1, 291 Broad Street, Cumberland, RI 02864  
**Time:** 5:30 to 7:30 pm
STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PROVIDENCE, SC.

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IN RE: DEM ENVIRONMENTAL PUBLIC MEETING
WITH REGARD TO SITE LOCATED AT
52 BROAD STREET WHICH WILL BE USED AS
A PUBLIC K-8 ELEMENTARY CHARTER SCHOOL
FOR 400 STUDENTS ATTENDING
BLACKSTONE VALLEY PREP ES 2.

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HEARD at the Blackstone Valley Prep School
Multi-Purpose Room, 291 Broad Street, Cumberland,
Rhode Island, on February 24, 2014 at 5:30 p.m.

TEAM ATTENDEES

Sean Coffey, Esquire (Burns & Levinson)

Civic Builders Team: Mr. David Umansky, CEO
Ms. Janelle Bosek

Pare Engineering Team: Mr. Tim Thies,
Technical Environmental Expert
MR. UMANSKY: All right. If it's okay with everybody, we're going to get started. Am I okay
without a microphone? Can everybody hear me? Yeah, okay, good.

My name is David Umansky, and I am CEO of Civic Builders, which is the developer, the builder of the project at 52 Broad Street. I'm going to read through some sort of legal-ish information just to set the agenda for the evening, and then we'll end up turning the meeting over to our engineers, Pare Engineering, to go over some technical information. We're having this public meeting per RIGL, Chapter 23-19.14, the Industrial Property Remediation and Reuse Act, and, more specifically, Section 23-19.14-5.

The purpose of the meeting is to report on the environmental investigations associated with the reuse of 52 Broad Street and to gather information from the public, any information that the public may have on this topic. We've conducted extensive site investigations. The point here, though, is to say what else does anybody know with regard to issues that Pare is going to discuss? And, just as -- we've had some public meetings on this project before, and just to say that this is -- it's a venue to gather information. It's not a venue to answer questions. We are happy to answer questions. We've provided index cards which are in the back; and, if you would just write down a question, in the appropriate forum we're happy to respond; but this is not the forum for that. This is for us to gather information.
As well, I know that over time there are folks who are very excited about the project. We certainly are. There are others who are less excited about the project; and, just particularly in the interest of time, we're focused on the facts with regard to environmental contaminants. We're not here to talk sort of about the politics of doing or the excitement of doing the project or not doing the project.

And, as well, by the way, with regard to discussions of mines, this is not the forum to discuss mines.

The record shall be open for business -- shall be open for 10 business days after the meeting, which is to say that, after this meeting, if you have initial information, you can send that information either to Civic Builders, to Pare Engineering, or directly to the Department of Environmental Management for 10 business days.

MS. BOSEK: David, only to the DEM, not to us.

MR. UMANSKY: I apologize. You'll send it directly to DEM, and that ends on March 10th, 2014, I believe, 4:00 p.m. I have the information as to where you would send that. I guess I'll say that now, and I'll also say it at the end of the meeting. It's to Ashley Blauvelt at the Rhode Island Department of Environmental Management, the Office of Waste Management, 235 Promenade Street, in Providence, 02908.

We have a stenographer here to document your
comments, and we'll be making the transcript available to the DEM. Please, if you have comments, we're going to ask that you come sort of here in the middle of the room so the stenographer as well as others can hear you. You'll state your name and make sure that your comments are recorded properly. As well, if you have comments a number of times, if you have to come back and comment, please state your name again for the stenographer.

Just a bit of history, as a reminder, the site was formerly a single-family residential property with a garage until it was conveyed to the Town in 1968; and the residential structures were demolished sometime between 1968 and 1977; and, in the late 70's, the parcel was converted to a park.

This site is -- we've started construction on the site to convert it into a K-8 Elementary Charter School for 400 students attending Blackstone Valley Prep ES 2. Construction on the site has been stopped temporarily at the direction of DEM, as we conduct additional environmental investigations and gather this public information that we're seeking today.

The civil and environmental engineering company for the project is Pare Corporation based out of Lincoln, and they will present their technical findings of the environmental investigations that have been completed to date. So, I'm in a moment going to turn the floor over to Pare.

I just -- as a reminder again, we're here to
gather public comment. That’s the purpose. If you have questions, we have a separate way to ask questions; and, as well, this is particularly related to any information about the environmental contaminants that were found on the site that Pare is going to present. So, with that, we will turn the meeting over to Pare.

MR. THIES: Thank you. My name is Tim Thies.

I’m an engineer with Pare Corporation. I’m an environmental engineer, and we’ve been working with Civic Builders on the environmental investigation that Dave mentioned.

I’ll give you a little bit of history about the environmental process for a site like this. Almost a year ago, a little over a year ago, we began what’s called the environmental due diligence process for the property, and the industry standard for environmental due diligence for a property like this is to conduct what’s called a Phase 1 Environmental Site Assessment or a Phase 1 ESA. A Phase 1 ESA is primarily a records review of a property with interviews of the owner, local officials, and a review of historical information about the property, the purpose of which is to identify the past use of the site which suggests an environmental issue at the property or to identify if there are any records of known environmental issues at the site.

So, we performed a Phase 1 ESA; and, not surprisingly, based on the site’s history, we didn’t
find any records of environmental concerns on the property. There were no -- there is no evidence of a buried underground storage tank. There was no evidence that the site had ever been used for industrial activity. So, there were no red flags that would suggest this property had been impacted in any significant way.

Like Dave mentioned, this property was a park going back to the late 1970’s, and before that it was a single-family home going back to I think the 1850’s. So, this property has a history of residential and open space use. So, there’s nothing in this property’s history that would suggest an environmental concern.

So, the result of the Phase I didn’t suggest that any more investigation was required. However, we were out there doing a geotechnical investigation as part of the structural design for the building, and our geotechnical engineers are trained to look for, you know, potential environmental concerns as they’re doing their geotechnical program, which is essentially geotechnical borings that they did all over the site. So, they did about 13 or 14 geotechnical borings across the site; and, during that program, they did not identify any specific issues, specific environmental concerns at the site.

So, we went through the Phase I process, and we went through the geotechnical process for the site, and we didn’t identify any significant environmental
issues. So, we proceeded through construction, and we actually began excavation for some of the foundations; and, during that excavation process, we found a very minor amount of what appeared to be petroleum-impacted soil. So, we found some soil that was discolored and had a strong petroleum odor. So, at the time, we stopped construction. We went out there, and we did a little bit of investigation to see how extensive this impacted soil was; and what we found was that it was not particularly extensive. It was actually limited to a very small spot on the site, this dashed line on this site plan (indicating). This is the property here. This is the old home that used to be on the site. And what we wound up doing as part of the investigation, you know, we were digging out there with a backhoe. We wound up digging up most of this contaminated soil as part of the investigation. We stockpiled it on plastic. We covered it on plastic, all good practices for an investigation of this nature; and, like I said, we stopped construction at the time. We had the material analyzed, the soil analyzed. As soon as we got the lab data back which confirmed our suspicions that it was petroleum-impacted soil, we notified the Department of Environmental Management that we suspected we had a release at this site.
We met with them and agreed that more investigation was warranted at the property.

So, we went out there, and we supplemented our geotechnical program with additional test pits. We went around the site and did additional environmental investigation through the advancement of test pits. We found one other minor spot even smaller than the first, same sort of material. It was a petroleum-impacted soil. It had strong petroleum odor. We excavated that as well. We put it on the same stockpile with the plastic. We covered it with plastic, and in the rest of the site we didn't find anything else. We did a number of test pits throughout the site, and we didn't find any other petroleum that exceeded any residential criteria.

We had some metals in our first one, the contaminants that we found in this first release area. It included petroleum, metals, and what we call semi-volatile organics which are related to petroleum. We didn't find any other metals of significant concern around the site. We found some naturally-occurring metals in the soils but nothing that exceeded the residential criteria outside of these two release areas.

We did find a number of low levels -- excuse me, low level contamination in a couple of other spots which we're going to eventually excavate and take off the site; but, in essence, what we found is that this release that we identified was really limited to
these two very small spots on the site; and so, at this point, we have prepared a site investigation report which we are getting ready to submit to the environmental -- the Department of Environmental Management; but, as part of that process, like David mentioned, we're doing a public hearing to gather more information about the site, to find out if there's other concerns at the site that haven't been addressed as part of our site investigation activity; and that's really the purpose of this. Once we complete this public hearing process, we will submit our findings to the Department of Environmental Management, and then we will proceed with the development of a remedial action work plan, which is essentially a means to clean up what small areas we did find on site.

Once we develop the remedial action work plan, it will be submitted to the Department of Environmental Management for approval; and, once we get approval, we'll actually implement the plan, and we'll file a closure report once that plan is implemented. So, we're in this process right now of investigating; and, eventually, we're going to clean up what minor contamination we did find; but, as part of that, we'd like to gather more information about the site, if anybody has more information about the site as it pertains to any environmental concerns, if you have anything. Anything you'd like to add?

MR. UMANSKY: No. So, with that, we'd like to
invite public comment again. We'd ask that -- ma'am, you're welcome to --

MS. CLEMENTE: This is not a comment. It's a question. So, maybe if you answer it, I will know if I have a comment.

THE COURT REPORTER: Can I have your name, please.

MS. CLEMENTE: Alice Clemente. When you say petroleum, is that heating oil or something that could come from a gas station?

MR. THIES: What we found is that the petroleum out there is about a fifty-fifty part mix between heating oil and old motor oil.

MS. CLEMENTE: Okay. Okay, when I was a child -- let's see, this is Broad Street, right?

MR. THIES: Yes.

MS. CLEMENTE: There was a gas station right here, right (indicating on the map)?

MR. THIES: That's right.

MS. CLEMENTE: Right. Is it possible that maybe there's something under there, like say a gas tank -- I mean an oil, whatever, that might be leaching over there?

MR. THIES: When we did the Phase 1 ESA, we did identify this former gas station here. We believe that groundwater is flowing in a southerly direction, so --

MS. CLEMENTE: It wouldn't go up? It couldn't leach that way?
MR. THIES: Well, we don't believe that it would have.

MS. CLEMENTE: Have you tested this side?

MR. THIES: Well, what we did as part of the geotechnical program is, because we had the gas station here, even though we don't think it was going to come backward to our site, we put a couple of borings along the common property line to test groundwater; and what we had found is that in our borings here, we didn't hit groundwater at all. We went right down to ledge, and there was no
groundwater. So, the possibility that this would have migrated through groundwater to our site --

MR. THIES: It could.

MS. CLEMENTE: I know. It could still from the soil. It could do that. You really should check that.

MR. UMANSKY: Great. Can we invite anybody else up who has any other information to share on this issue? Sure, do you want to state your name and --

MR. McLAUGHLIN: State Representative Jim McLaughlin. In reference to the -- if you look at 2307, DEM, for anybody that had some questions, I have the original copies from DEM, their official report. I brought them with me as information for you people, you know, who have children going to this. I will leave them -- the original copy of DEM, their report and findings, okay.
What I'm concerned about is the -- if you look at the requirements from DEM, they state, like Woonsocket, they put in a pad and a vapor barrier, okay. As to the extent there was a gas station on the side, okay, of this building, and it operated in the early 1950's. You know, it went through several owners. You know, I obtained this information.

Someone sent me an email. They didn't want to be, you know -- but I have that documentation.

What I am concerned about is if this thing is to be built, okay, that a vapor barrier be put in between this area. That -- I was told I couldn't mention the structural integrity of the building. I also have reports from the Department of Land and Mines, Safety and Management. If anybody would care to see those, I have over 60 to 70 copies, okay. I've done extensive research on this from September, and their final report is in here; and, if you want to make an informed decision, you can read it and make up your own minds. I know it's not easy for you, not easy for me. I'm not the most popular guy; but, if 400 kids are going there, they're going to be safe. That's my job as a state representative. We are going to form a committee at a State level because we have three active mines in the State -- inactive mines, I should say, all right, which is Portsmouth, Cranston and Blackstone Mining Company. There was Dexter and Roger Williams mines, all active during the period from 1807 up to the 1900's. So,
with that said, you know, I'll leave the information for you. If you'd care to read it, you're more than welcome. My concerned parents, I want to thank you, but that's all I have.

MR. UMANSKY: Sir, with regard to the information that you have on the gas station, can you please forward that to the DEM.

MR. McLAUGHLIN: I plan on meeting with Director Coit, March 3rd.

MR. UMANSKY: Very good.

MR. McLAUGHLIN: Because I've had discussions with DEM. Unfortunately, DEM tells me, and I don't want to reiterate the mines again, they have no professional knowledge in this State, nor statute, professional opinion that could actually deal with these mines; and this is what I've been told. I referred to the Federal Government. These are the people in 2005; they came down. They abated the problem at the Lusitania parking lot. This problem can be abated at no cost, you know, to the taxpayers. So I'm told. They have a reclamation form that needs to be filled out. I don't have a problem. Let's get it resolved. There is an existing problem. I'm looking to the future, and I will not be responsible for 400 kids that are going there, you know, unless it's safe. That's all I have to say.

MR. UMANSKY: Sir, I'm just going to say again that please forward -- I understand you have a
meeting with the Director, but please forward anything within the comment period to the Director.

MR. McLAUGHLIN: Yes, sir.

MR. UMANSKY: Okay. Does anybody else have any other information pertaining to the environmental contaminants that were identified at the site?

MR. FIGUEIREDO: Nuno Figueiredo. Would you say that your company in Lincoln is a company that's been doing this for a while?

MR. THIES: Uh-huh.

MR. FIGUEIREDO: Is this a common incident that would be found in a construction being built? Is this a common problem that would be found anywhere else, or is this something that's distinct to this particular situation where we're building?

MR. UMANSKY: I just want to tell you, we're really not here to answer questions. We are happy to answer questions, if you'd write them down; but I don't want to take part in a situation where they're responding to some questions and not others. We're not responding to --

MR. FIGUEIREDO: I understand that; but, basically, my concern is how -- can you basically elaborate on how significant of a problem this is maybe, if it is significant at all?

MR. UMANSKY: I think Pare said that they view this as a minor problem. I think that was the word
that was used earlier. So, just to reiterate what they said earlier --

MR. THIES: Yes, I don't believe this to be a significant occurrence.

MR. FIGUEIREDO: And in regards to the construction of a vapor barrier, would you say that that would be not needed, considering you said that it's highly unlikely that it would flow upstream?

MR. UMANSKY: So, with regard to -- with regard to the way we're going to be -- the means with which we're going to respond to the contaminants that were found, we're going to work with this process and then with DEM. We'll come up with the solutions which will also be publicly made available. So, I think it's premature to say exactly what's a good idea or not a good idea. We have to make that decision with DEM.

MR. FIGUEIREDO: Okay, one more question, last one. Would it be safe to say that, along with both your companies and the assistance of the State, you're doing everything possible to build a safe school for my children?

MR. UMANSKY: That's safe to say.

MR. FIGUEIREDO: Thank you.

MR. UMANSKY: Thank you. Does anybody else have comments or information with regard to the contaminants that were identified? Sir?

MR. DaCOSTA: Yes, Manny DaCosta, reigning Town Council for District 1. I don't have any
information. I applaud Representative McLaughlin's efforts. He's been tirelessly working with this, but I have a few concerns, though. You explained that the geotechnical and the soil samples were performed, and basically nothing turned up. Now we find that something was there after the fact. Is it possible that we still overlooking or not considering all the dangers that may be there concerning soil stability and further contaminants in the ground? That's question one.

And, in addition to that, just to follow up on Mr. Figueiredo's question about the safety of the children, are we doing everything we can to ensure when the building is complete and the kids attend classes there that we'll have a safe structure, first of all, and environmentally protected and clean areas for them to play on the playground as well? So, just concerns.

Like the rep. said, it's not a popular issue.

It's a very sensitive subject, but we need to tackle this with objectivity and look under every rock and any possibility that we're not overlooking any minor details, as it's obvious that this may have been done on the preliminary findings of the soil and the geotechnical condition of the site. Okay, thank you for the attention.

MR. UMANSKY: Does anybody else have anything to share, any other information? (Pause and no response from anyone.) Okay, as nobody else has anything to
I would say that we're going to close this meeting, and thank you all -- sorry, do you?

MR. DaCOSTA: No, I'm done.

MR. UMANSKY: Okay. So, with that, then we'll close this meeting and thank everybody for coming and -- oh, yes, yes, yes. And, just as a reminder, the comment period is open for I think 10 business days, until March 10th, and that comment should be sent to -- I apologize. So, the comment period is open until March 10th at 4:00 p.m., and that the comments should be sent to Ashley Blauvelt at the DEM. Yes, sir?

MR. McLoughlin: Just one other thing. After the meeting, ladies and gentlemen, if you care to get the reports, I have the reports here. It's informational reports from the Department of Land and Mines Interior and DEM, their actual findings. So, I would be more than happy to share it with you.

MR. UMANSKY: Okay. So, thank you all. The meeting is now adjourned.

(MEETING ADJOURNED AT 6:00 P.M.)

* * * * * * * *
CERTIFICATION

I do hereby certify the foregoing pages to be a complete, true and accurate transcript, according to my stenographic notes, of the DEM Environmental Public Hearing held at the Blackstone Valley Prep School, 291 Broad Street, Cumberland, Rhode Island, on February 24, 2014 at 5:30 p.m.

Andrew J. D'Angelo
Court Reporter

Page 19
From: Blauvelt, Ashley (DEM) [mailto:ashley.blauvelt@dem.ri.gov]
Sent: Wednesday, February 26, 2014 10:54 AM
To: Tim Thies
Subject: FW: McLaughlin, Public Comment

Hi Tim,

Public Comment that needs to be address at the end of the comment period.

-Ashley

Ashley L. Blauvelt, Sanitary Engineer
RI Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, RI 02908
(401) 222-2797 ext. 7026
ashley.blauvelt@dem.ri.gov

From: Owens, Kelly (DEM)
Sent: Wednesday, February 26, 2014 10:46 AM
To: Blauvelt, Ashley (DEM)
Subject: FW: McLaughlin

Ashley,

Please forward to Pare Engineering and have them respond in writing to the question below as part of their response to public comments.

Thank you,
Kelly

From: Pollock, Nicole (DEM)
Sent: Tuesday, February 25, 2014 5:33 PM
To: Owens, Kelly (DEM)
Subject: Fw: McLaughlin

From: Brock, Kate (GOV)
To: Pollock, Nicole (DEM)
Sent: Tue Feb 25 17:11:36 2014
Subject: FW: McLaughlin
Rep McLaughlin is circulating the attached image (which apparently is where the school is being built) and is wondering whether we are removing the gas tanks or are making sure they are removed. I assume the answer is yes?

Kate Brock
Policy Analyst and Legislative Liaison
Office of Governor Lincoln D. Chafee
State House, Room 128
Providence, RI 02902
401-450-5427 (Cell)
401-222-8137 (Office)
Kate.Brock@governor.ri.gov

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From: Canon Rm 128 [mailto:canonrm128@governor.ri.gov]
Sent: Tuesday, February 25, 2014 4:55 PM
To: Brock, Kate (GOV)
Subject: Attached Image
March 2, 2014

Ms. Ashley Blauvelt  
RI Department of Environmental Management  
Office of Waste Management  
235 Promenade St.  
Providence, RI 02908

Re: Proposed school at 52 Broad Street, Cumberland, RI

Dear Ms. Blauvelt:

As a full or part-time abutter for the last 70 years to the site under construction, I am writing to repeat the question that I raised at the public meeting on February 24, 2014 re the source of petroleum contamination that has been found at the site. In response to my question about whether the petroleum might have migrated from the remains of the gas station that once occupied a portion of the space now serving as a parking lot for the Lusitania Club, I was assured by those conducting the meeting that groundwater has been ruled out as a pathway for contamination from the remains of that gas station. When I asked whether soils have also been tested as a possible medium for migration, the answer was that, no, the proponents had not considered that possibility, nor did they give any reason for such an omission. My question thus remains unanswered.

Is it not possible that when the gas station was closed and demolished, fuel tanks and/or oil-changing waste containers may have remained buried on the property and subsequently corroded? Has full removal of all tanks, barrels, etc. by the former owner been thoroughly documented? If not, how can this potential source of petroleum contamination be dismissed? If not, how can the parents of the future students at the school be assured that their children will in fact be safe there? Such an investigation is clearly in order at this time.

In any structure that will house young children for a significant amount of time, health and safety must be of the highest priority.

Sincerely yours,
Dear Ms. Blauvelt:

With regard to items referenced in your Letter of Responsibility File No. SR-08-1723, I am requesting further study and investigation of:

- Soil samples around the foundation and areas around the Blackstone Valley Prep School which is under construction.

- Contamination near the building, specifically underground gas and home heating oil tanks which may not have been remediated or removed, as well as resultant hazardous chemicals that may persist in the soil.

- Core drilling to assess subsidence in several locations to the depth of 200 feet as suggested in a report by U.S. Dept. of Interior pertaining to this same area.

As Civic Builders continues with construction, I am also requesting assurance and verification that a vapor barrier and corresponding ventilation system will be installed throughout the school building.

I would appreciate any information you have available regarding ongoing assessment of this property.

Sincerely,
March 10, 2014

Dear Mrs. Blauvelt;

I am writing to you to express my safety concerns regarding 52 Broad St, Cumberland RI.

I am concerned that environmental investigations have been limited to the soil samples from a small area and not from the whole site. Therefore I ask if more soil samples shouldn't be necessary?

Additionally, I am concerned with the ground stability. Based on historical and factual events of cave-ins, why not follow the recommendations that more core drilling be done?

Thank you for your attentions and assistance on this issue.

Best regards
To whom it may concern,

The object of this letter is to point out that I'm not against the school. I'm not for the school on Broad St.

The parking plan is not going to work out also. We'll have cars parked all over. I can't even get out of my driveway at times. I take my grandchildren to school every day and pick them up in the afternoon. There is always a lot of traffic on Broad St.

Also I understand they have discovered the soil being contaminated. That isn't good.