



July 30, 2020

Project 201942

Mr. Joseph Martella II
Rhode Island Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, RI 02908

RE: Public Comment Response Letter
32 & 33 Exchange Street
Plat 85/1, Lots 87 & 382
East Greenwich, Rhode Island 02818
File No. SR-09-1958

Dear Mr. Martella II:

Redwood Environmental Group, LLC (Redwood), on behalf of Grenier Properties, Inc., has prepared this Public Comment Response Letter as requested in your Request for Response to Public Comments letter dated July 23, 2020. As you know, the property is being re-developed and is considered a 1/3rd low/moderate income project.

If you have any questions regarding this submittal, please call me at (401) 270-7000.

Sincerely,

REDWOOD ENVIRONMENTAL GROUP, LLC

A handwritten signature in black ink that reads "Gary S. Kaufman". The signature is written in a cursive style.

Gary S. Kaufman
Principal

Cc: Grenier Properties
John Kupa, Esq.

Letter #1- Aimee Heru

1. With respect to a governing body to supervise/police the activities, this is not within the scope of this Site Investigation Report (SIR).
2. Redwood has and will continue to provide and use generally accepted environmental consulting best practices using the Rhode Island Department of Environmental Management (RI DEM) rules and regulations as promulgated in the Remediation Regulations as a guide.
3. Redwood's recollection is that a discussion about tire washing was conducted and Grenier had no problem providing a wash station for truck tires.
4. Grenier will erect a standard 6-foot temporary construction chain-link fence around the property during construction. Grenier can attached either green or black fence fabric to prevent fugitive dust from leaving the Site. This along with watering of the soil should prevent most of the dust from leaving the Site. However, no size of fencing can all dust emissions from being transported off the Site, as the encapsulation of the Site is not technically feasible. Grenier will use generally accepted engineering best practices to mitigate the fugitive dust.
5. This is not within the scope of the SIR.
6. The locations of the borings and monitoring wells were randomly selected to provide a characterization of the Site. If the Site, as suggested, was "So" contaminated by the previous owner, Redwood would have found regulated constituents above regulatory standards applicable to the Site through the Site Investigation (SI). No petroleum related constituents were identified above regulatory standards applicable to the Site other than poly-nuclear aromatic hydrocarbons (PAHs) and Lead. The SIR and SIR Addendum provide the Preferred Remedial Alternatives for the Site which were approved by RI DEM in a Program Letter dated June 8, 2020. Furthermore, ground water was sampled and did not identify Volatile Organic Compounds (VOCs) which would have been an indicator of historical releases at the Site.
7. The SIR is available for the public to review at RI DEM. This document provides tables and discussions on constituents identified and not identified at the Site. The constituents identified were compared to current RI DEM standards applicable to the Site. Constituent identified above standards have been addressed in SIR and SIR Addendum Preferred Remedial Alternatives as approved by RI DEM in a Program Letter dated June 8, 2020.
8. Approval of the environmental remediation is provided by RI DEM to Grenier.
9. A SI (Phase 2 study) has been performed and documented in the SIR.

As a side note, the hand-written note at the bottom of the letter seems to not have a problem with the investigation nor the proposed remediation (capping) if the land were to be developed as a park. A common theme in several comment letters.

As for Ms. Heru's email of July 5, 2020, Redwood believes that the Site has been characterized satisfactorily as described in the SIR. Should additional contamination be uncovered during the remedial activities and construction at the Site, RI DEM will be notified and the area of contamination characterized. Redwood will prepare a remediation plan for RI DEM for approval should it be found necessary.

Letter #2- John Wayne Ucci

Fugitive dust can be a consequence of construction projects. Grenier has stated that regular watering of the construction related soils will be performed. However, it is feasibly impossible to stop all dust from migrating off-Site. Grenier will use all generally acceptable engineering practices to limit fugitive dust emission into the neighborhood. By these practices, costly monitoring would not be necessary. Many projects similar to this one have used water to mitigate dust emissions successfully.

Redwood acknowledges Mr. Ucci statement regarding "Charley's" dumping. However, based on soil and ground water sampling, only PAHs and Lead in soil were identified above regulatory standards. No VOCs were identified in ground water above standards. Based on the SI, whatever historical activities performed at the Site is not currently affecting the soil or ground water with the exception of the aforementioned PAHs and Lead in soil.

Email-James Patrick Gorham

Mr. Gorham has many of the same comments as previous letters. Redwood's response to these comments are unchanged. With respect to the impermeable barrier, plastic can be used in loading areas as needed. As the entire Site will be stripped of 2-feet of soil and clean soil brought in, residual soil from the loading to trucks will be captured and removed from the Site.

With respect to the encapsulating the entire Site and creating a negative pressure enclosure, this is not technically feasible nor cost feasible at this time. Many projects like this have been completed using water as a dust control measure.

With respect to the railroad property, this is not part of the Site and therefore, was not part of the SIR.

The comment of other contaminants of concern besides Lead, as the Site is being stripped of 2-feet of soil, any other contaminants which Mr. Gorham is concerned with will necessarily be removed as part of the remediation activity.