

July 10, 2008
File No. 32795.12



Ms. Joan Taylor
Rhode Island Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, Rhode Island 02908

Re: Bedrock Aquifer Investigation Work Plan Comment Responses
Former Charbert Facility
Richmond, Rhode Island

530 Broadway
Providence
Rhode Island
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FAX 401-751-8613
www.gza.net

Dear Ms. Taylor:

GZA GeoEnvironmental, Inc. (GZA) is pleased to provide responses to the comments dated May 13, 2008 provided by the Rhode Island Department of Environmental Management (RIDEM) related to the Proposed Bedrock Aquifer Investigation. These comments were related to Charbert's March 28 responses to RIDEM's February 26 comments to our January 29, 2008 Phase II Bedrock Aquifer Evaluation Work Plan. To support your review, this letter has been formatted to present RIDEM's comment, followed by the corresponding page number/Section/paragraph of the report text which contains the modification/ response. RIDEM's comments are presented in plain text and GZA's responses are in italics.

RIDEM Office of Waste Management Comments:

Response to comments is acceptable except for the following:

Comments Pertaining to the October 2007 RAWP:

GENERAL COMMENTS:

The 28 March 2008 response to comments indicated that the additional detail on the Closure of Lagoon 5 would be submitted to RIDEM by 11 April 2008. This has not been received to date. If task completion dates cannot be met, RIDEM requests that Charbert notify the Department via email in advance of those deadlines and provide the Department with the expected date(s) of completion.

GZA Response: *So noted. A detailed Supplemental Remedial Action Work Plan addressing the details of the Lagoon 5 closure was provided to the Department on May 16, 2008.*

Specific Comment 4, Page 24, Section 4.13, Environmental Monitoring:

In accordance with discussions during the conference call on 23 April 2008 between RIDEM and Charbert, it was agreed that, as part of the environmental monitoring, additional groundwater samples would be collected from perimeter wells between the Charbert facility and nearby private wells and analyzed for VOCs. Perimeter monitoring wells included RIZ-1, GP-22, RIZ-21, GZ-1 and RIZ-14. Sample results from these wells were received on 1 May 2008. Based on these results and the results of the Piezometric Monitoring Report dated 2 May 2008, RIDEM concurs with Charbert's recommendation (received via email 5/9/08) to resample those wells on 1 July 2008 and determine the future monitoring frequency at that time.

In addition, your response indicates that the residential water treatment performance monitoring will include **yearly** VOC analysis of raw water; however, the 29 January 2008 Phase II Bedrock Aquifer Evaluation Work Plan indicates that raw water sampling of these wells will take place **every six months**. Please clarify and provide justification for the raw water sampling frequency of the residential water treatment systems.

GZA's Response: *Item #1: As agreed, GZA will resample the above mentioned perimeter monitoring wells during the next Interim Compliance Monitoring (ICM) quarterly sampling event scheduled for July 2008. The results and a recommendation for future monitoring frequency will be discussed in the July 2008 ICM Report.*

Item #2: The raw well water from the three residential water treatment systems will be analyzed on a yearly basis. This frequency was selected for the initial monitoring because we expect that it will take six to 12 months for the positive effect of evaluating the use of the on-site wastewater disposal lagoons to be evident along River Street. Following the first 2 annual raw water sampling rounds Charbert may elect to increase the frequency depending on the observed changes in Site conditions.

Specific Comment #6, Page 26, Section 8.00, Compliance Determination:

As discussed during the 23 April 2008 conference call, Charbert has provided the Department with a revised Section 8.00, Compliance Determination section of the RAWP on 9 May 2008. Upon review the Department finds this revision acceptable.

Response: *So Noted*



Comments Pertaining to the Phase II Bedrock Aquifer Evaluation Work Plan/Phase IV Subsurface Investigation Program:

Comment C: Page 3, Task 1-Data Collection and Evaluation



Charbert's 28 March 2008 response indicated that RIDEM would receive a Piezometric Monitoring Technical Memorandum the week of April 7, 2008. That report was not received until 1 May 2008. As stated in Comment 1, if task completion dates cannot be met, RIDEM requests that Charbert notify the Department via email in advance of those deadlines and provide the Department with the expected date(s) of completion.

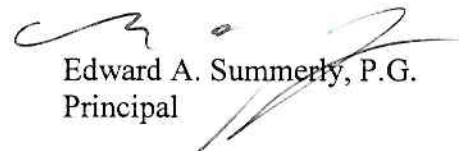
Response: *So Noted*

We hope this response summary satisfies your present needs. If you need any additional information, please feel free to contact Edward Summerly at (401) 421-4140 or via E-mail at edward.summerly@gza.com.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.


Steve Andrus, EIT
Assistant Project Manager


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