

Adelaide Avenue Environmental Justice Coalition

April 22, 2007

Gregory L. Simpson
Site Project Manager
Textron
40 Westminster Street
Providence, R. I. 02903

Re: Slag Pile Removal Action Work Plan – Community Comments

Dear Mr. Simpson:

After reviewing Textron's "Response to RIDEM comments", dated February 02, 2007 relevant to the ongoing Slag Pile removal, the community would like to share these observations:

- Textron has acknowledged the need to examine further those locations within the slag pile that exceed the industrial/commercial direct exposure criteria (I/C DEC) for total Lead. The locations identified with exceedences were the result of a series of sampling events performed July 12 thru July 16 2007 by your contractor, Mactec Inc. These samples were retrieved after Mactec had already begun to backfill the central portion of the Slag Pile without clearance or authorization from the RIDEM. As you have proposed in your response, Textron intends to temporarily remove and relocate the backfilled material until all conditions stipulated by the RIDEM have been achieved. Thus affording the opportunity to take confirmatory test samples in an area not previously sampled (below the backfill). The community wants to be sure that the area of the slag pile covered by the premature backfilling will also be excavated and sampled. The resulting exceedences, if any, will then be incorporated with the data already collected at the locations under scrutiny for further analysis. The backfilled area comprises a significant portion of the property line between the high school and the remaining slag pile.
- According to your correspondence the work will include the removal of soil at two locations in the excavation area. Additionally, test pits will be dug at the remaining locations where lead concentrations exceed the industrial/commercial direct exposure criteria (I/CDEC) of 500 mg/kg. Confirmatory testing will then be performed for total lead concentrations, as well as the SPLP leaching test. Assuming that Textron can identify the precise coordinates for each sample with GPS mapping, shouldn't you first retrieve soil from these locations for the SPLP testing? The exceedence of at least lead is already established at these points. It seems practical and within the scope of your proposed work plan to take grab samples at these locations and then proceed to excavate test pits for further sampling as has been suggested. Why is lead the only metal or contaminate being tested for?

- The community as an important stakeholder in this process appreciates the effort that Textron is now making to facilitate a closure plan for the Slag Pile. What has not been made clear is the final disposition of any material, which may pass/flunk the SPLP testing. Can it be assumed that any hazardous waste identified through leach testing will be removed? The potential for lead and other metals in the slag pile to leach is one of the many unanswered questions at your site, and the soil has already failed all the leach testing done by Mactec to date. Once you have identified a hazardous waste material you must remove it.
- During the site investigation performed by ABB (Mactec) in 1995, a large test pit was excavated on the bluff, adjacent to monitoring well GZA-3. This test pit was identified as EX-002 and was one of a series of five sampling locations completed by ABB (Mactec). The data from this exploratory pit has never been incorporated into any of Textron's or Mactec's reports or models developed for this site. Excavation was completed to a depth of at least eighteen feet (18') according to field site logs. Since this excavation was done just east of the historical slag pile it would be an ideal representation of the north bank, as it is referred to. Please include it with your final work plan for the completion of the Slag Pile removal. If the results cannot be incorporated into the data, please explain why.

The community, as a valued and essential component of this process, would like to commend Textron for their efforts and contributions to date. We are aware of the complexities and difficulties in making accurate assessments concerning the scope of issues on this site. As a Stakeholder, the people of South Providence, and all communities impacted, look forward to the progress that can be made when Textron, the City of Providence, and the Providence Redevelopments Authority include us in all ongoing developments.

Sincerely,



Robert F. L. Dorr, as spokesperson for the community

cc:

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