



February 20, 2023

Mr. Joseph T. Martella
Environmental Engineer III
Rhode Island Department of Environmental Management
Office of Land Revitalization and Sustainable Materials Management
235 Promenade Street
Providence, Rhode Island 02908
Sent via U.S. Mail and E-mail: joseph.martella@dem.ri.gov

**RE: Remedial Action Work Plan (RAWP)
Proposed Hope Mill Village
5 Main Street
Scituate, Rhode Island 02831
RIDEM File No. SR-30-0623A (Formerly Case No. 2007-010 & SR-30-0623)
SAGE Project No. R140**

Dear Mr. Martella:

SAGE Environmental Inc. (SAGE), on behalf of Paramount Apartments, LLC (Paramount), has prepared this Remedial Action Work Plan (RAWP) for the subject property (hereinafter, "Site"). The Site consists of the following five (5) parcels comprising approximately 28.9 acres of land:

PROPOSED HOPE MILL VILLAGE – PARCEL SUMMARY				
Town	Plat Map	Lot	Area (acres)	Key Features/Description
Scituate	5	1	12.3	Buildings 1, 2, 4, 6, 7 & 9 and proposed wastewater treatment system.
Scituate	5	114	2.8	Building 3 and proposed Buildings 14 & 15.
Scituate	5	117	1.0	Former railroad bridge abutment.
Scituate	8	3	5.5	Isolated from the remainder of the Site by the Pawtuxet River.
Coventry	101	5	7.3	Proposed pervious pavement area. Partially isolated from the remainder of the site by the Pawtuxet River.

No remediation is proposed for those portions of the Site (i.e., Lot 3 and portion of Lot 5) south and east of the Pawtuxet River. SAGE and Paramount understand that these areas are not eligible for a Letter of Compliance pursuant to the *Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases* (the Remediation Regulations).

A United States Geological Survey (USGS) Quadrangle Site Location Map showing the location of the Site relative to pertinent geographic features is included in **Figure 1**, and a plan depicting the Site boundaries and other relevant features is included in **Figure 2**. This RAWP is subject to the limitations presented in **Attachment 1**.

The completed Remedial Action Approval Application Fee Form is included in **Attachment B** and payment will be included with the hard copy of this report.

For the purposes of the RAWP it is useful to define the structures that are part of the proposed Hope Mill Village redevelopment project as indicated in the following table.

PROPOSED HOPE MILL VILLAGE – BUILDING SUMMARY	
Building 1	Existing 48,000 square foot, five-story granite block mill building slated for residential renovation.
Building 2	Existing 40,000 square foot, three-story granite block mill building slated for residential renovation.
Building 3	Existing 60,000 square foot, one-story brick mill building with “sawtooth” roof and basement slated for residential reconstruction with underground parking.
Building 4	Existing 2,890 square-foot, two-story brick structure slated for demolition.
Buildings 6 & 7	Existing 2,890 square foot, two-story brick boiler house building slated for renovation for use as resident common rooms.
Building 9	Existing 1,600 square-foot, one-story brick structure with basement slated for renovation for use as a museum.
Building 14	Proposed 10,000 square foot, 4-story residential building with ground level parking.
Building 15	Proposed 10,000 square foot, 4-story residential building with ground level parking.

Regulatory Status

Site Investigation (SI) activities were completed in multiple phases beginning in 2006 and continuing through 2022. Jacques Whitford Corporation, Inc. (JWC) performed an initial investigation on behalf of Hope Mill Village Associates LLC (a former owner), and the majority of SI was completed by ESS Group, Inc. (ESS) on behalf of Paramount and BMP, LLC (the current owner) beginning in 2016. Documents meeting the requirements of a Site Investigation Report (SIR) as described in Rule 1.8.8 of the Remediation Regulations were submitted to the Rhode Island Department of Environmental Management (RIDEM) on March 28, 2022. The public review and comment period for the proposed remedy ran from March 28 through April 11, 2022. No comments were received by RIDEM.

The table below summarizes available information concerning three underground storage tanks (USTs) previously located on the Site. This information is pertinent to the RAWP because remedial measures are required to address residual contamination associated with former UST No. 2.

PROPOSED HOPE MILL VILLAGE – UST SUMMARY					
UST ID	Volume (gallons)	Contents	Date Removed	Evidence of Release?	LUST Case No.
001	10,000	No. 2 Fuel Oil	March 5, 2010	No	N/A
002	20,000	No. 6 Fuel Oil	November 1, 2011	Yes	3024-ST
003	1,000	Gasoline	July 1, 2020	Yes	3024-LS

The Areas of Concern (AOCs) defined in the SIR and depicted on **Figure 2** are summarized in the following table:

PROPOSED HOPE MILL VILLAGE – AREAS OF CONCERN			
AOC No.	Description	Affected Lots	SIR Findings
AOC-1	Potential former liquid lagoons.	1	No evidence of contamination. NRP.
AOC-2	Former railroad bridge abutment.	117	PAHs above RDEC.
AOC-3	Annual fireworks display area.	1	Trace perchlorate in groundwater. NRP.
AOC-4	Pervious pavement/sub-drain area.	1, 114, 5	PAHs and metals above RDEC and GALC.
AOC-5	Proposed OWTS.	1	PAHs and pesticides above RDEC.
AOC-6	Former UST No. 002.	1	NAPL petroleum.
AOC-7	Fill area west of raceway.	1	PAHs and metals above RDEC.
AOC-8	West of Buildings 1 and 2.	1	PAHs and metals above RDEC.

Notes:

- GALC = GA Leachability Criteria.
- NAPL = Non-aqueous phase liquid.
- NRP = No remediation proposed.
- OWTS = On-site wastewater treatment system.
- PAHs = Polycyclic aromatic hydrocarbons.
- RDEC = Residential Direct Exposure Criteria.

Preferred Remedial Alternative

On May 4, 2022, the Rhode Island Department of Environmental Management (RIDEM) issued a Remedial Decision Letter (RDL) conditionally approving the following preferred remedial alternative (PRA) for the Site:

1. Targeted soil excavation (with dewatering, if needed) to address following areas of contamination:
 - a. Soil containing leachable lead at concentrations above the GA Leachability Criterion near the southwest corner of Building 3,
 - b. Soil containing chlordane at concentrations above the Residential Direct Exposure Criterion within the footprint of the proposed on-site wastewater treatment system (OWTS); and
 - c. Soil containing non-aqueous phase liquid (NAPL) petroleum and associated groundwater.
2. Removal of soil within the footprint proposed septic system leachfield where polycyclic aromatic hydrocarbons (PAHs) have been detected in soil at concentrations exceeding Residential Direct Exposure Criteria (RDEC).

3. Encapsulation of all remaining contaminated soils by construction of site-wide engineered controls. Final engineered controls are subject to RIDEM approval and will provide a level of protection consistent with two (2) feet of clean fill material or equivalent.
4. Certain freshwater wetlands areas subject to restoration activities or isolated from developed areas of the Site by physical access barriers (i.e., fencing and thorny brush) are not subject to the engineered control requirement (Item #3 above) provided they are maintained in a manner to keep them physically inaccessible. Wetland plans are subject to review and approval by the RIDEM Freshwater Wetlands Program.
5. Post-remediation monitoring of NAPL and volatile organic compounds (VOCs) in groundwater in the targeted NAPL removal area.
6. Collection and analysis of one (1) additional groundwater sample from MW-9 for total lead to demonstrate consistent total lead concentrations below the GA Groundwater Objective.
7. Evaluate potential for volatilization of VOCs into indoor air in current and proposed Site buildings based on the results of post-remediation confirmation compliance sampling, and if deemed necessary, soil gas and/or indoor air sampling and analysis.
8. Record an Environmental Land Usage Restriction (ELUR) restricting certain activities on the Site and establishing a maintenance program for capping surfaces and physical barriers. The ELUR will include a post-construction Soil Management Plan (SMP), which will outline the procedures for managing the regulated soils on Site should disturbances below the cap be required.

The RDL includes a requirement for completion of the permanent closure process for former UST Nos. 002 and 003 in accordance with the *Rules and Regulations for Underground Storage Facilities Used for Regulated Substances and Hazardous Materials*, and consistent with any requirements of the RIDEM UST Program. To meet this requirement, SAGE understands that the PRA must include the following elements specified by the RIDEM UST Program:

- Installation of one monitoring well in the grave of former UST No. 003, collection of soil samples for total petroleum hydrocarbons (TPH), VOCs, and metals, and collection of a groundwater sample for VOCs and metals.
- Submittal of an excavation and dewatering work plan for AOC-6 (i.e., former UST No. 002; refer to item 1.c., above) for approval by the UST project manager. The work plan must include:
 - An excavation depth of at least 20 feet below grade; and
 - A dewatering system able to treat at least 50 gallons per minute (gpm) permitted through the appropriate agency.
- Notification of the UST project manager at least 48 hours prior to commencement of work at AOC-6.
- Submittal of a summary report to the UST project manager documenting soil and groundwater testing results for AOC-6 and including plans for post-excavation installation and sampling of monitoring wells.

A copy of the RDL is provided in **Attachment 3**.

Remedial Action Work Plan

This RAWP has been prepared in accordance with Section 1.10 of the RIDEM *Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases* (the Remediation Regulations) to document the proposed Remedial Action implementation plan which addresses remedial objectives for all impacted media at the Site.

1.10.2 Remedial Objectives: *The Remedial Action Work Plan shall present a Remedial Action which addresses remedial objectives for all impacted media at the Contaminated-Site in a manner consistent with Section 1.9 of the Part (Risk Management), including, as appropriate, the following:*

- A. *Groundwater Objectives: The Performing Party shall propose a remedial objective for all Hazardous Substances found to have actual or potential impacts on groundwater.*

The proposed remedial objectives for groundwater are the RIDEM GA Groundwater Objectives. The underlying groundwater classification at the Site and surrounding area is "GA." GA areas are defined as "groundwater resources which are known or presumed to be suitable for drinking water use without treatment.

- B. *Surface Water and Sediment Objectives: The Performing Party shall propose a remedial objective for all Hazardous Substances found to have actual or potential impacts on surface water and/or sediments, that is consistent with the actual and potential uses of the surface water and/or sediment in the impacted area, and the policies and regulations of the Office of Water Resources;*

The Pawtuxet River flows through the southern and eastern portions of the Site. A raceway, also part of the Pawtuxet River, flows under Building 2 and along the western margin of the Site. The SIR concluded that surface water runoff from the majority of the Site is minimal and that the absence of detections of metals or PAHs above GA Groundwater Objectives suggests erosion has not likely impacted surface water quality in the Pawtucket River. Given that the Pawtuxet River is classified as a Class B Impaired Waterway by RIDEM with potential upstream and downstream sources of surface water and sediment contamination, no surface water or sediment remediation is proposed for the Site at this time.

- C. *Soil Objectives: The Performing Party shall propose a remedial objective for all Hazardous Substances and TPH found to have actual or potential impacts on soil that is consistent with the actual and potential uses of the land in the impacted area. The remedial objective for soil shall also take into account the potential for the Hazardous Substances to leach into groundwater and/or surface water from these impacted soils and, subsequently, should be consistent with the actual and potential uses of the ground water and/or surface water in the impacted area and the policies and regulations of the appropriate regulatory authority for that resource; and*

The proposed remedial objectives for soil are the RIDEM Residential Direct Exposure Criteria and GA Leachability Criteria.

The SIR documented the intermittent presence of metals and PAHs in shallow soils (generally 0 to 3 feet below ground surface [bgs]) throughout the Site. Other COCs, including chlordane and NAPL petroleum (and presumably petroleum hydrocarbons and petroleum-related VOCs) are present in limited volumes of deeper soils (i.e., approximately 3 to 10 feet bgs) within AOC-5 and AOC-6.

The remedial objective for soil at the Site is to eliminate potential human and environmental risk(s) of exposure to Site COCs through a combination of remedial actions including soil excavation, soil encapsulation, installation or placement of other physical controls and barriers and implementation of institutional controls.

- D. Air Objectives: The Performing Party shall propose a remedial objective for all Hazardous Substances found to have actual or potential impacts on air quality, whether the impact is from gaseous or particulate emissions and/or entrainment on soil. That air objective shall be consistent with the requirements of the Rhode Island Clean Air Act and the rules and regulations promulgated pursuant thereto.*

To date, RIDEM has not promulgated soil gas and/or indoor air standards. As such, the Massachusetts Department of Environmental Protection (MassDEP) Residential Sub-Slab Soil Gas Screening Values and Residential Indoor Air Threshold Values will be used to determine compliance with soil gas and indoor air standards.

Sub-slab depressurization systems (SSDs) will be installed in selected Site buildings to create a preferential pathway for soil vapors to the building exterior. Once sub-slab structures are installed, further testing will be conducted to determine whether the systems will be operated in an active or passive mode.

1.10.3 Proposed Remedy: *The Remedial Action Work Plan shall clearly explain the proposed remedy and justify the ability of the remedy to meet the remedial objectives. For remedies that include on-site treatment and/or containment of contaminated media, the Remedial Action Work Plan shall include the best management practices proposed to:*

1.) The PRA includes the following targeted soil excavations:

- a. Excavation and off-site disposal of soil containing leachable lead at concentrations above GALC near the southwest corner of Building 3 ("EX-1"). The anticipated dimensions of this excavation are approximately 65 feet by 65 feet, to a depth of 8 feet bgs. Dewatering will likely be required to achieve the target depth for this excavation.
- b. Excavation and on-site reuse or off-site disposal of soil containing PAHs above RDEC from two areas within the footprint of the proposed OWTS leachfield ("EX-2" and "EX-3"). The

anticipated dimensions of these excavations are approximately 15 feet by 15 feet, to a depth of 3 feet bgs. Dewatering is not anticipated.

- c. Excavation and off-site disposal of soil containing chlordane at concentrations above RDEC within the footprint of the proposed OWTS leachfield. The anticipated dimensions of this excavation are approximately 60 feet by 40 feet to a depth of 6 feet bgs (“EX-4”). Dewatering is not anticipated.
- d. Excavation and off-site disposal of soil containing NAPL and petroleum hydrocarbons at concentrations above RDEC and GALC in the vicinity of former UST No. 2 (“EX-5”). The anticipated dimensions of this excavation are approximately 60 feet by 40 feet to a depth of 20 feet bgs. Dewatering will likely be required to achieve the target depth for this excavation.

2.) If field conditions warrant (i.e., if evidence of historic fill is observed during construction), additional soil will be removed from the footprint of the proposed OWTS leachfield and; soil samples will be collected to confirm PAH concentrations meeting the corresponding RDEC.

3.) Physical barriers meeting the RIDEM requirements will be installed and/or maintained to prevent human exposure to and migration of impacted soil within AOCs 4, 6, 7, and 8.

The proposed capping surfaces are depicted on **Figure 3** and include the following categories:

Proposed Building Footprints

Existing Buildings 1, 2, 3, 6, 7, and 9 will be renovated for reuse as part of the proposed Hope Mill Village project; two 10,000 square foot 4-story buildings with ground level parking are proposed (Buildings 14 and 15). The final building footprints will serve as part of the engineered cap.

Asphalt/Concrete Pavements

During Site redevelopment, new asphalt/concrete pavements will be installed on the Site and a portion of the existing asphalt/concrete pavements will remain. Surface soil in the new asphalt/concrete pavement areas will either be (1) excavated and replaced with at least 4 inches of asphalt or concrete underlain by a minimum of 6-inches of clean fill or (2) the asphalt/concrete and clean fill will be placed directly on top of existing Site soil without excavation. Existing asphalt/concrete pavements will remain in their current configuration.

Landscaped Areas

During Site redevelopment, new landscaped areas will be installed on the Site and a portion of the existing landscaped areas will remain. Surface soil in the new landscaped areas will be removed to a depth of either one (1) or two (2) feet below the planned grade. In areas where no trees or shrubs will be planted, one (1) foot of clean fill will be placed over a geotextile barrier (a non-woven geotextile with a minimum puncture strength of 120 pounds and a burst strength of 400 pounds per square inch (psi)). For major planting areas where trees and/or shrubs are planned, two (2) feet of clean fill (which will include planting mix around the root balls) will be placed above Site soils. Based on grading

requirements, the one (1) or two (2) feet of clean fill may be placed directly on top of existing soil without excavation.

Fill material imported to the Site to construct the engineered cap will be sampled for VOCs, TPH, PAHs, metals (antimony, arsenic, barium, beryllium, cadmium, chromium, copper, lead, manganese, mercury, nickel, selenium silver, thallium, vanadium and zinc), and PCBs (via Soxhlet extraction) at a frequency of one sample per 500 cubic yards to confirm that these contaminants are not present in the imported fill at concentrations above their corresponding RDEC and/or GALC as established in the *Remediation Regulations*.

4.) Physical barriers (i.e., fencing and thorny vegetation) will be installed to isolate wetland areas on Lots 1, 117 and 5 (north of the Pawtuxet River) from the developed portion of the Site.

5.) The existing Site buildings (i.e., Buildings 1, 2, 6, 7, and 9) will be retrofitted with SSDS piping. SAGE understands that the ground-level or sub-grade parking in Buildings 3, 14, and 15 will be “open-air”, and as such, will not require sub-slab ventilation. The need for active or passive sub-slab ventilation for Buildings 1, 2, 6, 7, and 9 will be determined based on the results of the Limited Design Investigation (LDI) described in Section 1.10.5 of this RAWP.

6.) An ELUR with post-construction SMP will be implemented. A draft ELUR and SMP, prepared in accordance with Section 1.9.9 of the *Remediation Regulations*, will be provided to the RIDEM for review and approval prior to submission of the Remedial Action Closure Report (RACR).

A. *Prevent the infiltration/migration of Hazardous Substances at levels harmful to human health or the environment;*

Following excavation of the areas described above, an engineered barrier will be placed over impacted areas and will prevent the migration of hazardous substances and/or petroleum via wind and erosion. Additionally, the ELUR and SMP will prevent disturbance of Site soils that could lead to migration of hazardous materials.

B. *Prevent direct contact with Hazardous Substances at levels harmful to human health and the environment;*

As described above, the proposed engineered barrier will prevent direct contact to hazardous substances and/or petroleum and mitigate the risk to human health and the environment. The proposed ELUR and SMP will mandate future users of the Site to maintain the cap and manage soil appropriately. As noted above, a draft ELUR and SMP, prepared in accordance with Section 1.9.9 of the *Remediation Regulations*, will be provided to the RIDEM for review and approval prior to submission of the RACR.

C. Eliminate volatilization and entrainment of Hazardous Substances

A SSDS will be installed in selected Site buildings to create a preferential pathway for soil vapor to release outside the buildings. Once sub-slab structures are installed, further testing of soil vapor will determine whether the system will be passive or require additional vacuum.

D. Minimize and manage surface runoff from the area including during and after the Remedial Action. The plan shall identify all locations of existing and/or proposed infiltration systems.

Erosion controls have been erected surrounding the Site boundary adjacent to exposed soil areas as part of redevelopment activities. SAGE anticipates that appropriate dust and erosion control measures will be implemented throughout redevelopment and the proposed remedial activities.

Following redevelopment, the Site will consist of building footprints, asphalt/concrete pavement, and landscaped areas. Stormwater will be expected to infiltrate on-Site in the landscaped areas, flow off-Site to the east/southeast in the rear half of the Site, and flow south to off-Site catch basins in the front of the Site. The proposed engineered barrier surfaces will prevent the migration of hazardous substances and/or petroleum via wind and erosion.

1.10.4 Remediation of Impacted Groundwater: *The Remedial Action Work Plan shall clearly explain how impacted groundwater will be remediated. Remediation of groundwater shall meet the requirements of Section 16 of the Groundwater Quality Rules, as well as the requirements of Section 1.9 (RISK MANAGEMENT) of the Remediation Regulations. Any Remedial Action Work Plan which includes the proposal of a discharge zone and/or a residual zone shall submit the required proposals and meet the required demonstrations of Rules 13.2 and 13.3 of the Groundwater Quality Rules, respectively.*

Groundwater at the Site has generally been shown to meet RIDEM GA Groundwater Objectives for Site COCs. However, benzene was detected at a concentration of 9.6 microgram per liter ($\mu\text{g/l}$) in a sample collected from monitoring well MW-5 by JWC in 2006; this concentration exceeds the corresponding GA Groundwater Objective for benzene and may be related to the identified release of No. 6 fuel oil from UST No. 002. Post-remedial monitoring will be required to confirm groundwater conditions consistent with GA Groundwater Objectives within AOC-6 and within the grave of former UST No. 003.

1.10.5 Limited Design Investigation: *The Director may require the Performing Party to include a proposed Limited Design Investigation in the Remedial Action Work Plan in order to gather information necessary for the design and construction of a specific remedy. The Performing Party may also propose to include a Limited Design Investigation in the Remedial Action Work Plan in order to gather information necessary for the design and construction of a specific remedy. Activities proposed as part of this Limited Design Investigation shall meet the requirements of Section 1.8 (SITE INVESTIGATION) of these regulations.*

The PRA includes the following LDI components:

- Collection of one groundwater sample from monitoring well MW-9 to confirm to lead concentrations consistent with RIDEM GA Groundwater Objectives;
- Installation of one soil boring in the grave of former UST No. 003 and the collection of soil and groundwater samples in conformance with RIDEM UST program request; and
- Post-construction soil gas sampling below Buildings 1, 2, 6, 7, and 9.

1.10.6 Points of Compliance: *The Remedial Action Work Plan shall clearly indicate the locations, for each impacted medium where Hazardous Substances will be measured in order to determine if the remedial objectives have been met. These points will be designated Points of Compliance. Remedial Actions will be initially focused on meeting remedial objectives set for the Contaminated Site, and compliance shall be measured throughout that Contaminated Site. The Points of Compliance shall be managed in a manner consistent with Rule 1.9.8 (Points of Compliance). Rule 1.13.0 specifies requirements unique to arsenic in soil.*

Based on the information collected during the Site Investigation, the following proposed remedial actions will achieve the Points of Compliance for soil and meet the requirements of Section 1.9 of the *Remediation Regulations*:

1. Residual leachable lead concentrations below GALC at the limits of EX-1. Residual PAH concentrations below RDEC at the limits of EX-2 and EX-3. Residual chlordane concentrations below RDEC at the limits of EX-4, and elimination of NAPL petroleum at EX-5.
2. Excavation of impacted soil to meet the planned grading requirements of the redevelopment and off-site recycling/disposal of excavated soil and/or on-site reuse of excavated soil under the proposed engineered barrier;
3. The placement and/or maintenance of a RIDEM-approved engineered cap to prevent human exposure to and migration of impacted soil;
4. SDS installation in selected Site buildings; and,
5. The implementation of an ELUR and SMP.

No further actions are warranted with respect to groundwater, surface water, and/or sediment, as no remedial objectives have been proposed for these media.

1.10.7 Proposed Schedule for Remediation: *The Remedial Action Work Plan shall include a proposed schedule for implementing the proposed Remedial Action.*

Implementation of the Proposed Remedy is anticipated to commence in the second quarter of 2023.

As required by the RIDEM UST program, an excavation and dewatering work plan for will be submitted in support of proposed excavation EX-5, and the UST project manager will be notified at least 48 hours prior to commencement of this work. A summary report will be submitted to the UST project manager within 30 days of completion of the EX-5 excavation.

SAGE anticipates that a LDI Summary Report will be submitted following the groundwater sampling at MW-9 and the required soil and groundwater sampling at former UST No. 003.

Once approved by the RIDEM, the final ELUR and SMP will be recorded with the Town of Scituate Land Evidence Records upon completion of the proposed engineered barrier. A copy of the recorded ELUR and SMP will be submitted to the RIDEM within fifteen (15) days. ELUR inspections will be conducted annually, and a copy of the inspection report will be submitted to the RIDEM.

1.10.8 Contractors and/or Consultants: *The Performing Party shall include the names, addresses and telephone numbers of the contact Persons of any contractors or consultants hired to implement or operate the remedy proposed in the Remedial Action Work Plan. The responsibilities of each consultant and/or contractor shall be clearly explained. If the actual consultant or contractor has not been determined at the time of application, the expected duties of each company shall be explained and the Department shall be notified as soon as the specific companies are selected.*

A remediation contractor has not been selected as of the date of submittal of this RAWP. Contact information for the selected contractor will be provided to the RIDEM via E-mail prior to the start of work.

Environmental Consultant

SAGE Environmental, Inc.
301 Friendship Street
Providence, Rhode Island 02903
Contact: Barrett L. Smith, CPG, LEP
Telephone: 401-723-9900 x111
E-mail: bsmith@sage-enviro-com

1.10.9 Site Plan: *The Remedial Action Work Plan shall include a site plan. The site plan submitted as part of the Site Investigation, conducted pursuant to Rule 1.8.3.F, shall be amended to include any further information available to the Performing Party, and the locations of all proposed remedial units and monitoring points. The Points of Compliance shall also be clearly marked on the site plan.*

A USGS Quadrangle Site Location Map and a Site Plan are attached as **Figures 1 and 2**, respectively. A Proposed Remedy Plan illustrating the configuration of the proposed engineered cap to be in place at the time of recording of the ELUR is included as **Figure 3**.

1.10.10 Design Standards and Technical Specification: *The Remedial Action Work Plan shall include all design standards and technical specifications necessary for the design of the proposed remedy. Design standards and technical specifications will include, where appropriate:*

As noted previously, the use of RIDEM-approved engineered barriers are proposed. Standard asphalt/concrete paving equipment will be utilized. A non-woven geotextile with a minimum puncture strength of 120 pounds and a burst strength of 400 psi will be utilized. No laboratory or pilot scale tests are necessary to determine the effectiveness of the proposed Remedial Action.

A. *Identification of the materials of construction of all portions of the remedy;*

The materials of construction of all portions of the remedy are discussed above under **Section 1.10.3 Proposed Remedy**.

B. *The type of equipment to be used, including unit capacity and dimensions;*

Typical construction equipment will be utilized to implement the Proposed Remedy.

C. *The results of any laboratory or pilot-scale tests conducted to determine the effectiveness of the proposed Remedial Action; and*

The following laboratory testing results are necessary to determine the effectiveness of the Proposed Remedy:

1. Results of LDI sampling of monitoring well MW-9;
2. Results of LDI sampling at former UST No. 003;
3. End-point samples for targeted soil excavations;
4. Post-remedial monitoring to confirm absence of NAPL at AOC-6; and
5. Confirmation of vapor control in selected Site buildings.

D. *Any manufacturer's literature and/or technical guidance documents on the construction, implementation and/or operation of proposed units.*

As the proposed remedy includes Site-wide capping, manufacturer's literature and/or technical guidance documents on the construction, implementation and/or operation of proposed units are not required as part of the approach.

These portions of the Remedial Action Work Plan shall be prepared under the supervision of a Registered Professional Engineer in the State of Rhode Island, and stamped by that engineer prior to submittal.

1.10.11 Set-up Plans: *The Remedial Action Work Plan shall explain any pre-operational staging or construction requirements which shall be completed prior to the installation and operation of the proposed Remedial Actions. These pre-operational staging or construction activities may include the installation of pads, liners, or berms; any intrusive activities; or any Contaminated-Site contouring or grading which may be necessary. The Set-Up Plan shall show how any construction or staging activities will be done in a manner in compliance with any applicable laws, rules and regulations.*

Prior to conducting excavation work at the Site, DigSafe will be notified to provide markings of utilities in the area and a site-specific health and safety plan (HASp) will be prepared for use by SAGE employees during our on-Site operations.

As noted previously, temporary stormwater and erosion controls are currently installed at the Site. Temporary fencing will be installed along the boundaries of the work area. As appropriate, 6-mil

polyethylene sheeting, for the temporary stockpiling of excavated soil, will be staged on-Site prior to commencing construction.

1.10.12 Effluent Disposal: *The Remedial Action Work Plan shall include specific plans for the management and disposal of any products or by-products from the proposed Remedial Action. This section shall also identify what regulations shall be complied with during, and what permits or approvals shall be obtained prior to, any planned effluent disposal actions.*

Implementation of the PRA will generate soil requiring off-Site disposal and/or on-Site reuse. SAGE anticipates that the excavated soil will either be placed on/covered by 6-mil polyethylene sheeting or will be live-loaded for off-Site reuse/disposal following the completion of in-situ and/or stockpile waste characterization and approval by an appropriate receiving facility. If soil will be stockpiled, the sheeting will be a minimum of 6 mil in thickness and of sufficient width to encompass the width of the stockpile with an additional apron of at least four (4) feet on all sides. Sheeting with the same characteristics will be used to fully cover the stockpile. The stockpiles will be maintained in a covered condition to alleviate the potential for erosion of the stockpile.

Waste characterization samples of in-situ or stockpiled soil will be collected and analyzed to develop an appropriate waste profile(s) prior to transport and disposal. The waste characterization data will be used to identify an appropriate receiving facility and to transport the soil in accordance with local, state, and federal regulations. Depending on the results of the waste characterization, if necessary, excavated soils are anticipated to be shipped to an approved licensed disposal and/or asphalt recycling facility.

SAGE assumes that representatives will be present to certify the waste profile shipping and documentation as required. Based on the depth to groundwater measured during the Site Investigations, dewatering will be required during the proposed targeted soil excavation at EX-5. Treatment and discharge of recovered groundwater is expected to be permitted in accordance with the 2019 Rhode Island Pollutant Discharge Elimination System (RIPDES) Remediation General Permit (RGP).

1.10.13 Contingency Plan: *The Remedial Action Work Plan shall include a Contingency Plan which clearly explains the procedures to be followed and the Persons to be notified in the event of an unexpected incident involving Hazardous Materials at the Contaminated-Site. The Contingency Plan shall include, at a minimum, the following information:*

A Site-specific HASP will be available on-site during implementation of the remedial action. The HASP will identify safe work practices, emergency coordinators, and emergency response procedures. A summary of the procedures that will be followed and notifications that will be made in the event that an unexpected incident involving hazardous materials and/or petroleum occurs at the Site during implementation of the remedial action are as follows.

A. *The names and telephone numbers of all emergency coordinators;*

Anthony M. Rossato
SAGE Environmental, Inc.
Telephone: (401) 723-9900 x133
E-mail: arossato@sage-enviro.com

Barrett L. Smith, CPG, LEP
SAGE Environmental, Inc.
Telephone: (401) 723-9900 x111
E-mail: bsmith@sage-enviro.com

Jacob H. Butterworth, MS, LSP
SAGE Environmental, Inc.
Telephone: (401) 723-9900 x123
E-mail: jbutterworth@sage-enviro.com

B. *All emergency response procedures and arrangements;*

Spills of oil or hazardous materials: The spill will be controlled and cleaned-up to the extent that it is safe to do so with available tools, containers, and personal protective equipment available on-Site. If necessary, additional spill response equipment and or personnel will be mobilized to the Site.

Ignition of flammable material: Dry chemical fire extinguishers will be available on-Site. Ignited flammable materials will be extinguished to the extent that it is safe to do so with the available fire extinguishers. If necessary, additional fire response equipment and or personnel will be mobilized to the Site.

Notifications

Notification of spills or unexpected releases of hazardous materials and/or petroleum will be reported as follows:

- RIDEM Office of Emergency Response: During normal business hours (Mon-Fri 0800-1600) = (401) 222-1360; Anytime, any emergency = (401) 222-3070
- Town of Scituate Fire Department: 911. Non-emergency number: (401) 828-6460
- SAGE Emergency Coordinators: (401) 723-9900

Notification of incidents involving fire or explosion:

- Town of Scituate/Town of Coventry Fire Department: 911
- SAGE Emergency Coordinators: Barrett Smith, Anthony Rossato, Jacob Butterworth = (401) 723-9900

- C. *A description of the procedures necessary for the prevention of ignition and/or reaction of any flammable material or reactive materials, where appropriate.*

No reactive materials are known to exist or are planned to be stored on-Site during the remedial and/or redevelopment activities. Flammable materials will be limited to fuels contained in on-Site vehicles and equipment used to implement the remedial action. An adequate number of fire extinguishers will be maintained on-Site to address incipient fire conditions.

1.10.14 Operating Log: *The Remedial Action Work Plan shall include a proposed Operating Log which clearly and completely records activities on-site and shows how the implementation and operation of the Remedial Action is progressing. This Operating Log shall include, at a minimum, the following information:*

An Operating Log will be maintained to record remedial activities during the implementation of this RAWP. Copies of the Operating Logs will be provided in the RACR to be submitted to the RIDEM.

- A. *Time periods of operation of the remedial unit and approximate flow rates;*

Documentation of Site-wide capping will be provided in the RACR. Sampling and testing of the proposed dewatering treatment system, with an anticipated flow rate of 50 gpm, will be completed in conformance with the NPDES RGP.

- B. *Records of any analyses conducted as part of the Remedial Action;*

All analytical testing data collected as part of the Remedial Action will be provided in the RACR and summary report required by the UST project manager.

- C. *Instances of implementation of the Contingency Plan; and*

Any instances of the implementation of the Contingency Plan will be provided in the RACR.

- D. *An inspection plan designed to insure the proper operation of the proposed remedial unit. Operating treatment units shall be inspected at least weekly unless an alternative inspection frequency is approved by the Director.*

SAGE will be present intermittently throughout the proposed remedial actions. Inspections of the proposed dewatering treatment system will be conducted at least twice monthly as required by the RGP. Post-remedial groundwater monitoring will be conducted at least quarterly for the first year following remediation, and the frequency will be adjusted as needed

based on the first year results. Annual ELUR inspections to document the preservation and maintenance of the proposed engineering controls and will include a SMP to ensure the proper handling of impacted soil in the event of future disturbance. Annual inspection reports will be submitted to the RIDEM.

1.10.15 Security Procedures: *The Remedial Action Work Plan shall include a description of the security procedures proposed to prevent unknowing access to the Contaminated-Site or key features identified at the Contaminated-Site. This section shall include descriptions of any natural boundaries or any existing or proposed walls or fences surrounding the Contaminated-Site. Means to control entry to the Contaminated-Site or key features identified at the Contaminated-Site shall also be clearly explained.*

Appropriate Occupational Safety and Health Administration (OSHA) safe work practices shall be employed during the construction of the engineered cap. Security fencing with monitored entry and exit areas will be employed during the remedial activities. No additional security procedures are required for the proposed remedial approach.

1.10.16 Shut-Down, Closure and Post-Closure Requirements: *The Remedial Action Work Plan shall contain a section outlining the procedures required to shut-down and close the remedial units. This section shall also outline any proposed post-closure activities, including monitoring and/or institutional controls restricting future land usage at the Contaminated Site. All post-closure groundwater monitoring shall be done in accordance with a program meeting the requirements of Section 12 of the Groundwater Quality Rules.*

During the placement of, and following the installation of, the engineered barrier, inspections will be conducted to document that the proper thickness of barrier is installed. As necessary, copies of the geotextile specification sheet, laboratory data for clean fill, soil disposal documentation, and the operating logs will be submitted to the RIDEM as part of the RACR.

Post-closure activities will include the implementation of the ELUR and SMP which will manage risks associated with direct contact with Site soil, ensure the proper handling of exposed soil in the event of future disturbance activities on the Site, and ensure the preservation and maintenance of the engineered cap. Following filing of the RIDEM-approved ELUR and SMP, ELUR inspections will be conducted annually to ensure continued compliance and a copy of the inspection report will be submitted to the RIDEM.

1.10.17 Institutional Controls and Notices: *The Remedial Action Work Plan shall indicate a methodology for providing notice to the general community, and contain specific plans and implementation procedures for land usage restrictions, restrictions on the use of groundwater on the Contaminated-Site, and institutional controls in accordance with Rule 1.9.9 (Institutional Controls) for all Remedial Actions that are not determined by the Director to provide a permanent solution.*

The Proposed Remedy includes the implementation of an ELUR and SMP which will manage risks associated with direct contact with Site soil, ensure the proper handling of exposed soil in the event of future disturbance activities on-Site, and ensure the preservation and maintenance of the engineered

barrier. A draft ELUR and SMP, prepared in accordance with Section 1.9.9 of the *Remediation Regulations*, will be provided to the RIDEM for review and approval prior to submission of the RACR. Upon approval by the RIDEM and implementation of the approved remedy (including construction of the RIDEM-approved engineered barrier), the ELUR and SMP will be recorded with the Town of Scituate Land Evidence.

1.10.18 Compliance Determination: *The Remedial Action Work Plan shall include a section outlining the procedures to be employed in order to demonstrate that the remedial objectives for the Contaminated-Site have been met. Such compliance determination shall be proposed in a manner consistent with Rule 1.9.10 (Compliance Sampling)*

Following RIDEM approval and implementation of the approved remedy (including construction of the RIDEM-approved engineered barrier), the ELUR and SMP will be recorded with the Town of Scituate Land Evidence. A copy of the recorded ELUR and SMP will be submitted to the RIDEM with a letter requesting the issuance of a Letter of Compliance. ELUR inspections will be conducted annually to document continued compliance and a copy of the inspection report will be submitted to the RIDEM.

1.10.19 Certification Requirements: *The Remedial Action Work Plan and all associated progress reports shall include the following statements signed by an authorized representative of the party specified:*

CERTIFICATIONS

I certify that the RAWP is a complete and accurate representation of the contaminated Site and the Release and contains all known facts surrounding the Release to the best of my knowledge.

Richard Derosas 3/2/23
Richard J. Derosas, Manager Date
Paramount Apartments, LLC

We certify that information contained within this RAWP is complete and accurate to the best of our knowledge. This report has been prepared and reviewed by the undersigned staff in accordance with SAGE's standard Quality Control Procedures.

 3/3/23
Barrett L. Smith, Senior Project Manager Date
SAGE Environmental, Inc.

 3/3/2023
Richard J. Mandile, Principal Date
SAGE Environmental, Inc.

 02/21/23
Jason R. Proulx, PE Date
Rhode Island Professional Engineer No. 9829



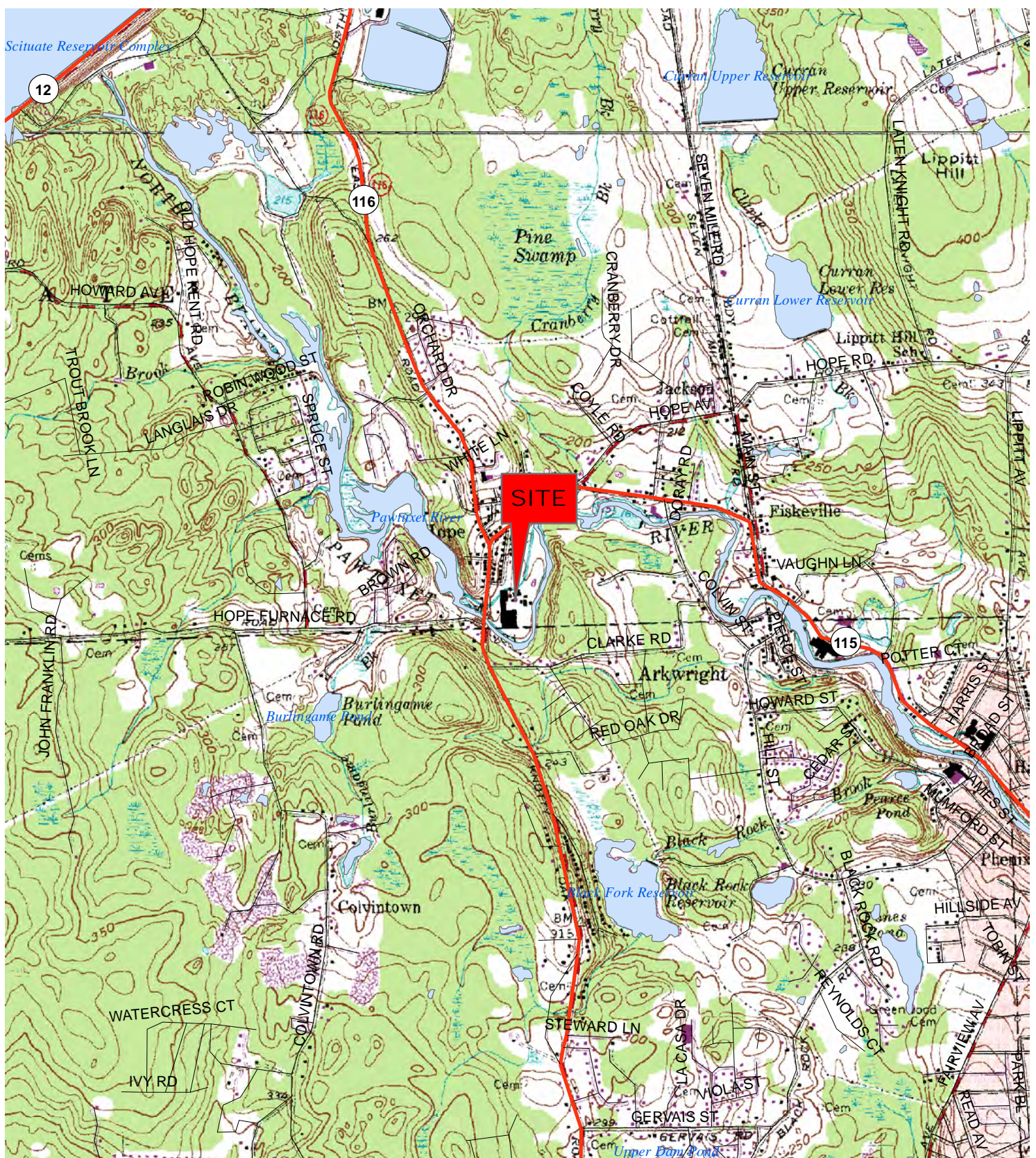
FIGURES

- Figure 1:** USGS Quadrangle Site Location Map
Figure 2: Site Plan
Figure 3: Proposed Remedy Plan

ATTACHMENTS

- Attachment 1:** Limitations
Attachment 2: Remedial Action Approval Application Fee Form
Attachment 3: Remedial Decision Letter
Attachment 4: Example Operating Log

FIGURES



USGS QUADRANGLE
CROMPTON, RHODE ISLAND



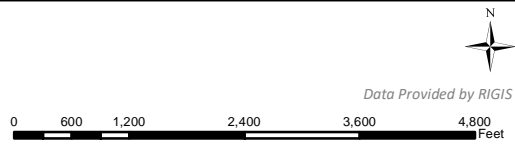
★ Site Location

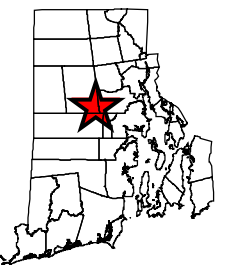
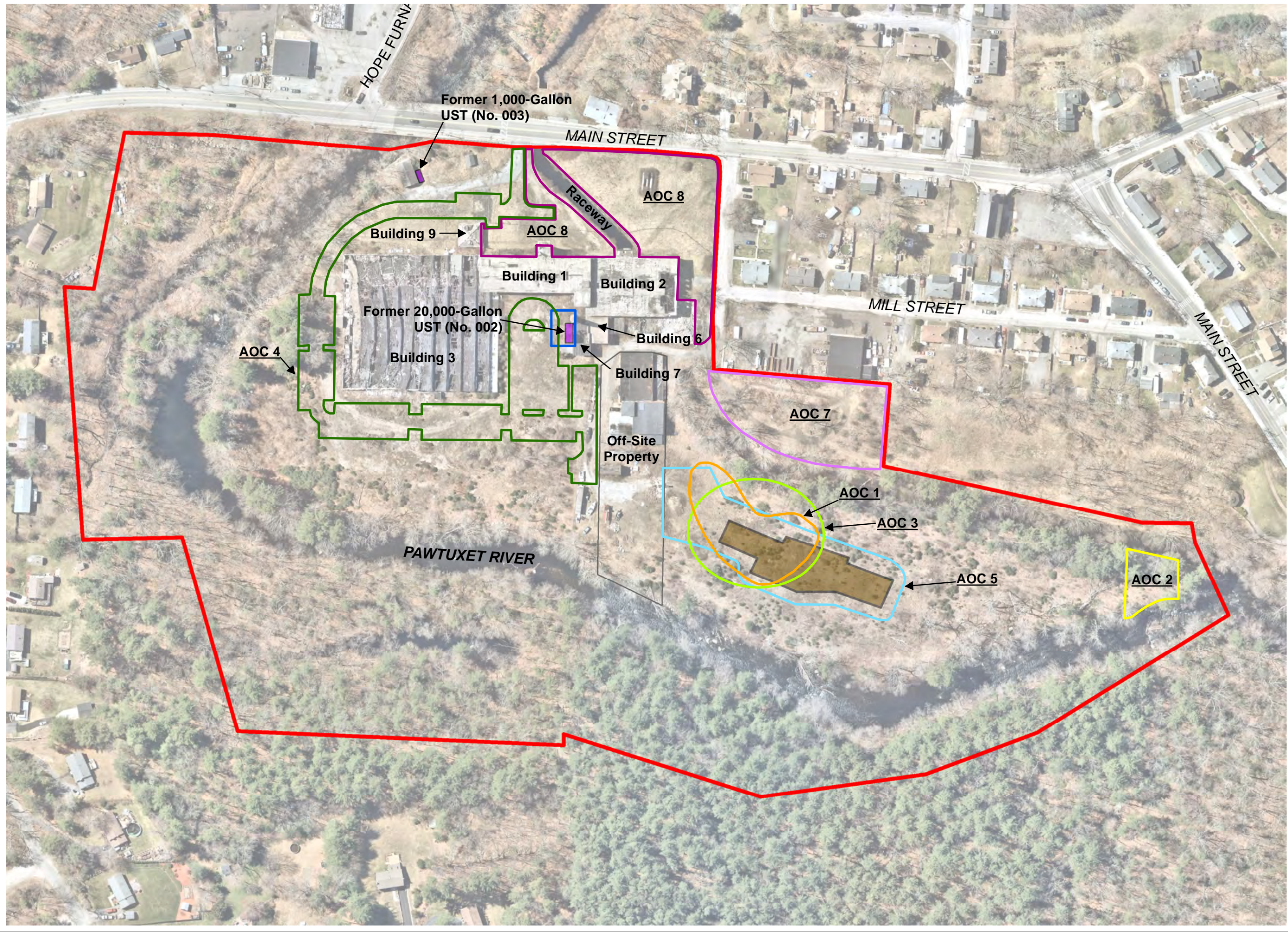
USGS Quadrangle Site Location Map

5 Main Street
Scituate, Rhode Island

DATE: 02/13/2023
JOB #: R140
CREATED BY: JPL

Figure 1





★ Site Location

Legend

- ▭ Approximate Site Boundary
- ▭ AOC 1 = Potential Former Liquid Lagoons
- ▭ AOC 2 = Former Railroad Bridge Abutments
- ▭ AOC 3 = Annual Fireworks Display Area
- ▭ AOC 4 = Pervious Pavement/Sub-Drain Area
- ▭ AOC 5 = On-Site Wastewater Treatment System (OWTS)
- ▭ AOC 6 = Former UST No. 002
- ▭ AOC 7 = Fill Area
- ▭ AOC 8 = West of Building 2
- ▭ Approximate Location of Former USTs
- ▭ Approximate Limits of OWTS Leachfield



0 30 60 120 180 240 Feet

Data Provided by RIGIS
Orthoimagery provided by nearmap.com

Site Plan

5 Main Street
Scituate, Rhode Island

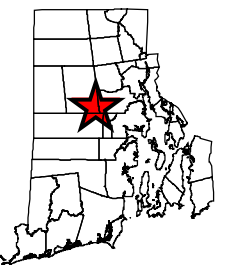
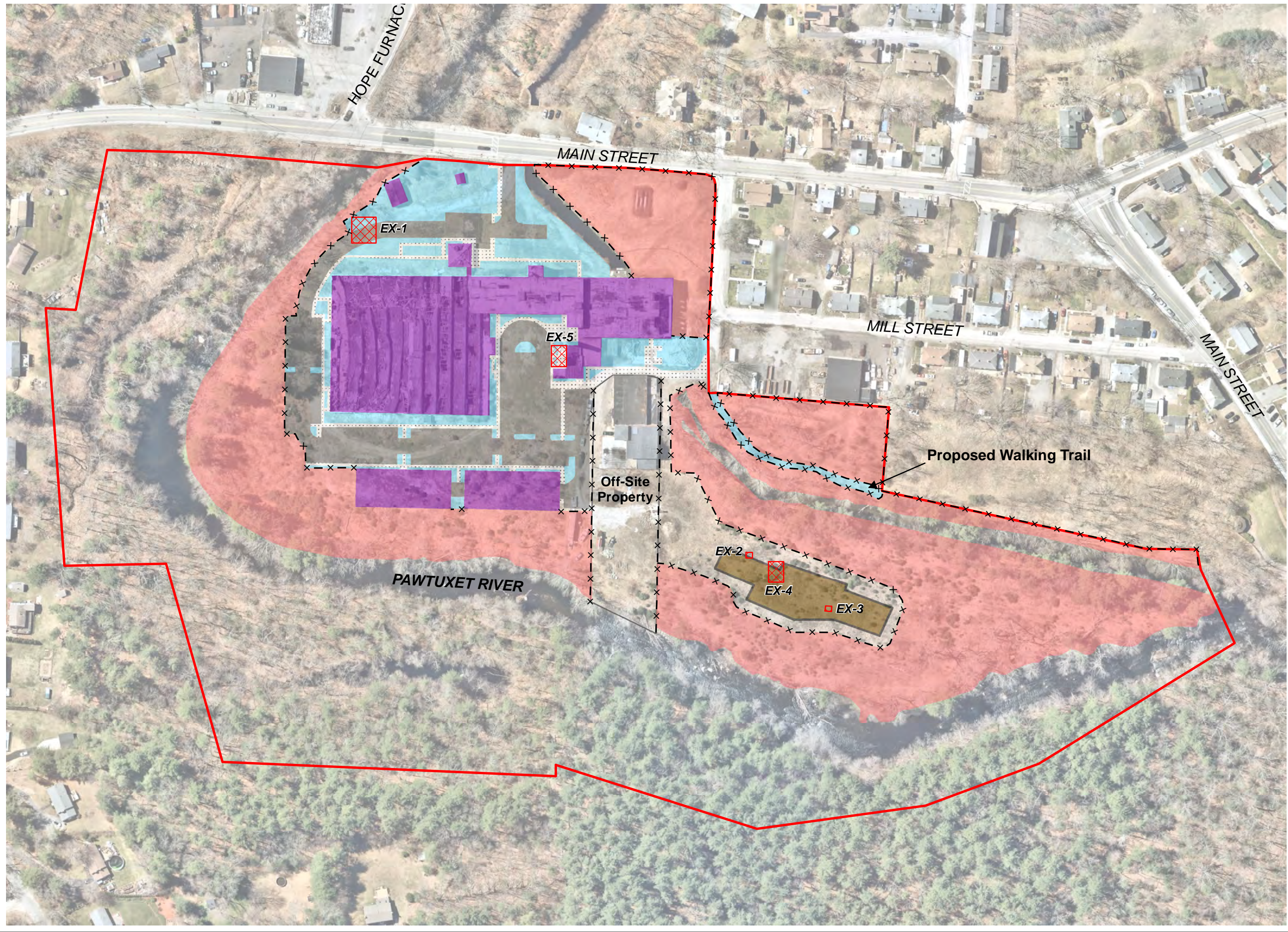
Date: 02/14/2023

Job#: R140

Created By: JPL

Figure 2

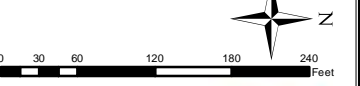




★ Site Location

Legend

- Approximate Site Boundary
- Approximate Location of Focused Excavation Areas
- Proposed Concrete Sidewalks (Concrete Pavement Cap)
- Proposed Clean Fill Cap (Underlain by Geofabric)
- Proposed Pervious Pavement (Asphalt Cap)
- Existing and/or Proposed Buildings (Hardscape Cap)
- Area to be Restricted by Fencing and Thorny Vegetation. Includes Wetland Restoration Area
- Approximate Limits of OWTS Leachfield
- Proposed Fence



Data Provided by RIGIS
 Orthoimagery provided by nearmap.com

Proposed Remedy Plan

5 Main Street
 Scituate, Rhode Island

Date: 02/14/2023

Job#: R140

Created By: JPL

Figure 3



ATTACHMENT 1

LIMITATIONS

1. This report was prepared for the exclusive use of Paramount Apartments LLC (“Client”). This report and any findings and conclusions contained therein shall not, in whole or in part, be provided to, used, or relied upon by any other person, firm, entity or governmental agency in whole or in part, without the prior written approval of SAGE. Reliance by any other person, firm, entity, or governmental agency in whole or in part, for any use, without SAGE’s prior written approval, shall be at that party’s sole risk and without any liability to SAGE.
2. This report, and the findings and conclusions contained therein, are based on services provided to Client under the conditions stated herein, pursuant to the agreement between SAGE and Client. Use of this report, in whole or in part, at other locations or for other purposes, without SAGE’s prior written approval, will be at Client’s sole risk and without any liability to SAGE.
3. This report has been prepared in accordance with generally accepted practices. SAGE’s services were performed using the degree of skill and care ordinarily exercised by qualified professionals performing the same type of services, at the same time, under similar conditions, at the same or a similar property.
4. In preparing this report, SAGE may have relied upon certain information made available by governmental agencies, Client, and/or other persons, firms, or entities. SAGE cannot verify the accuracy or completeness of that information and cannot guarantee or warrant the information provided by non-SAGE sources.
5. SAGE does not and cannot represent that a site contains no hazardous material, oil, or other condition beyond that observed by SAGE during its study. Additionally, SAGE does not assume responsibility for limited sampling and explorations, fluctuations in water levels, or the presence of chemical constituents that are not the subject of this investigation and which are not included in the of analyzed parameters for a study.
6. The findings and conclusions presented in this report are based solely on the information contained or referenced in this report. If additional environmental or other relevant information that was not made available to SAGE at the time of this report is developed at a later date, Client agrees to promptly bring such information to the attention of SAGE. Upon evaluation of such information, SAGE reserves the right to recommend modification of this report and its findings and conclusions.
7. No warranty, express or implied, is made by way of SAGE’s performance of services or providing a work product, including but not limited to any warranty with the contents of a report or with any and all work product.

ATTACHMENT 2



**Rhode Island Department of Environmental Management
Office of Land Revitalization & Sustainable Materials Management**

REMEDIAL ACTION APPROVAL APPLICATION FEE FORM

Rule 10.02 of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Materials Releases, requires an application fee for Remedial Action Approvals in the amount of one thousand (\$1,000) dollars. Please submit this form and check, made payable to the State of Rhode Island General Treasurer, directly to:

**R.I. Department of Environmental Management
Office of Management Services- Rm 340
235 Promenade Street
Providence, RI 02908**

Please complete this page and attach it to the check or money order. This information must be provided to coordinate your fee with the application submitted.

Site Name: Proposed Hope Mill Village

Address: 5 Main Street

Town/City: Scituate

File Number: SR-30-0623A

Contact Person: Richard Derosas

Phone No: (978) 256-2515

RIDEM Project Manager: Joseph Martella

FOR RIDEM OFFICE USE ONLY:

Fee Amount Received: _____

Date Received: _____

Check #: _____

Receipt Account:

10.074.3765103.03.461043

cc:74:3481 Leg.17-18-841

ATTACHMENT 3



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

REMEDIAL DECISION LETTER

May 4, 2022

File No. SR-30-0623

(Formerly Case No. Case No. 2007-010)

Mr. Richard J. DeRosas
Paramount Development Group
165 Hunt Road
Chelmsford, MA 01824

RE: Hope Mill
15 Main Street
Scituate, Rhode Island
Plat Map 5 / Lots 1, 114 & 117
Coventry, Rhode Island
Plat Map 101 / Lot 5

Dear Mr. DeRosas:

Effective April 22, 2020, the Rhode Island Department of Environmental Management's (the Department) Office of Waste Management has changed the office name to the Office of Land Revitalization and Sustainable Materials Management (LRSMM), as reflected in the re-codified 250-RICR-140-30-1, Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations). The purpose of these regulations is to create an integrated program requiring reporting, investigation, and remediation of contaminated sites in order to eliminate and/or control threats to human health and the environment in a timely and cost-effective manner. A Remedial Decision Letter (RDL) is a formal, written communication from the Department that approves a site investigation, identifies the preferred remedial alternative and authorizes the development of a Remedial Action Work Plan (RAWP) in order to achieve the objectives of the environmental clean-up.

In the matter of the above-referenced property (the Site), the Department's Office of LRSMM is in receipt of the following documentation submitted pursuant to the Remediation Regulations in response to the reported release at the Site:

1. Phase II Environmental Site Assessment – Hope Mill, Scituate, RI, received by the Department on July 10, 2006, and prepared by Jacques Whitford (JWA);
2. Site Investigation Report – Hope Mill, Scituate, RI, received by the Department on August 23, 2007, and prepared by JWA;
3. UST Closure Assessment Report, Hope Mill Village, 1 Main Street, Scituate, Rhode Island, received by the Department on July 17, 2014, and prepared by Clean Environment Inc.

(CEI);

4. Site Investigation Work Plan, Former Hope Mill, Scituate, Rhode Island, received by the Department on August 1, 2016, and prepared by ESS Group (ESS);
5. ESS Group, Inc. Response to OWM Comments on SIWP (dated August 1, 2016), Former Hope Mill, Scituate, Rhode Island, received by the Department on August 31, 2016, and prepared by ESS;
6. Initial Findings, Site Investigations (Phase 1), Hope Mill Project, Mill Street, Scituate/Coventry, received by the Department on November 17, 2016, and prepared by ESS;
7. Interim Findings, Site Investigations (Phase 1), Hope Mill Project, Mill Street, Scituate/Coventry, received by the Department on December 2, 2016, and prepared by (HMA);
8. Site Investigations (SI) Chronology, Hope Mill Project, received by the Department on November 6, 2018, and prepared by ESS;
9. Town of Scituate Planning Board Decision Letter, dated November 28, 2018, received by the Department on December 21, 2018, and prepared by the Scituate Planning Board;
10. Email RE: Hope Mill Project - Proposed SI Activities, with attached Tables and Site Figures, received by the Department on January 9, 2019, and prepared by ESS;
11. Email RE: Hope Mill Project - Proposed SI Activities, received by the Department on January 18, 2019, and prepared by Partridge Snow & Hahn, LLP (PSH);
12. Email RE: Hope Mill Project - Proposed SI Activities, with attached Table and Site Figure, received by the Department on January 22, 2019, and prepared by ESS;
13. Email RE: Hope Mill Project - Proposed SI Activities, with attached Site Figure, received by the Department on January 30, 2019, and prepared by ESS;
14. Site Investigation Report, Hope Mill Project, 5 Main Street, Scituate-Coventry, Rhode Island, RIDEM No. SR-30-0623, received the Department on August 10, 2020, and prepared by ESS;
15. Email RE: SIR Review, Hope Mill, Scituate RI - RIDEM No. SR-30-0623, with attached Site Figure Package, received by the Department on September 9, 2020, and prepared by ESS;
16. SIR Addendum - Response to RIDEM SIR Comments, Former Hope Mill (5 Main Street, Scituate, RI), received by the Department on November 30, 2020, and prepared by ESS;
17. SIR Addendum 2 - Response to RIDEM SIR Addendum Comments, Former Hope Mill (5

Main Street, Scituate, RI), received by the Department on December 17, 2022, and prepared by ESS; and

18. Notification To Abutters, Site Investigation, Hope Mill, 15 Main Street, Scituate, Rhode Island, 25 March, 2022, received by the Department on March 28, 2022, and prepared by Paramount Apartments, LLC.

Collectively, these documents define “Existing contamination” at the Site and fulfill the requirements of a Site Investigation Report (SIR) as described in Section 1.8.8 of the Remediation Regulations. In addition, according to our records, public notice was conducted to all abutting property owners, tenants, easement holders, and the municipality, regarding the substantive findings of the completed investigation in accordance with Sections 1.8.7(A)(2) and 1.8.9 of the Remediation Regulations. The opportunity for public review and comment on the technical feasibility of the proposed remedial alternatives commenced on March 28, 2022, and the period closed on April 11, 2022. No comments were received.

The preferred remedial alternative, as stated in the SIR, consists of the following conceptual measures:

Focused soil excavation and dewatering in areas with elevated concentrations of Synthetic Precipitation Leaching Procedure (SPLP) lead impacted soil, areas with chlordane impacted soil, and areas with non-aqueous phase liquids (NAPL) and petroleum impacted soil and groundwater. Removal of soil within the proposed Onsite Wastewater Treatment Systems (OWTS) leach field footprint where contaminants have been detected in soil at concentrations exceeding the Department’s Residential Direct Exposure Criteria (RDEC). Encapsulation of all remaining contaminated soils by construction of sitewide engineered controls. All final engineered controls shall be subject to Department approval and provide a minimum level of protection consistent with two (2) feet of clean fill material or equivalent. Certain freshwater wetlands areas which are subject to restoration activities or will be isolated from developed areas of the Site by physical access barriers (i.e. fencing and thorny brush to restrict or prevent access), are not subject to the constructed engineered control requirement provided they are maintained in a manner to keep them physically inaccessible. All wetland plans shall be subject to review and approval by the Freshwater Wetlands Program.

Completion of the permanent closure process for the two (2) identified Underground Storage Tanks (USTs) in accordance with the Rules and Regulations for Underground Storage Facilities Used for Regulated Substances and Hazardous Materials, and consistent with any requirements of the UST Program. A plan shall be developed for post-remediation groundwater gauging of NAPL and monitoring for volatile organic compounds (VOCs) in the targeted NAPL removal area. Collection and analysis of one (1) additional groundwater sample from MW-9 for total lead to demonstrate consistent total lead concentrations below the Department’s GA Groundwater Objective. The potential for volatilization of VOCs into the indoor air of any current or proposed Site buildings shall be evaluated based upon the results of post-remediation confirmation compliance sampling, and if deemed necessary, soil gas and/or indoor air sampling and analysis. An institutional control in the form of an Environmental Land Usage Restriction (ELUR) shall be recorded for the property. The ELUR will restrict certain activities on the entire site and will also ensure that the

final engineered cap is not disturbed, and the wetland physical access barriers are properly maintained. The ELUR will include a post-construction Soil Management Plan (SMP), which will outline the procedures for managing the regulated soils on site should disturbances below the cap be required.

The Department hereby approves the SIR, with the above identified preferred remedial alternative, and requires a RAWP be submitted for review and approval, and implemented, to achieve the objectives of the environmental clean-up, in accordance with the following conditions:

1. In accordance with Sections 1.9 and 1.10 of the Remediation Regulations, a RAWP, ELUR, and SMP shall be submitted for Department review and approval within sixty (60) days from the date of this letter. The RAWP shall describe all of the technical details, engineer design elements, and schedules associated with the implementation of the proposed remedy. All of the subsections outlined in Section 1.10 of the Remediation Regulations must be included in order to facilitate the review and approval of the RAWP. If an item is not applicable to this Site, simply state that it is not applicable and provide an explanation in the RAWP.
2. Pursuant to Section 1.11.2 of the Remediation Regulations, an application fee for Remedial Action Approvals in the amount of one thousand (\$1,000.00) dollars shall be made payable to the State of Rhode Island General Treasurer and remitted to the Office of Management Services with the attached Remedial Action Approval Application Fee Form. Receipt of this Remedial Action Approval Application Fee is required prior to the Department's RAWP review.
3. Once the Department reviews the RAWP for consistency with Sections 1.9 and 1.10 of the Remediation Regulations, any written comments generated and forwarded as a result of the review(s) shall be incorporated forthwith into a RAWP Addendum, to be submitted for final approval.
4. Upon finalization of the RAWP, the Department will issue a Remedial Approval Letter (RAL), signifying Department approval. All remedial measures required by the Department shall be implemented, in accordance with the approved schedule, to ensure all applicable exposure pathways at the site are appropriately addressed.

Please be advised that the Department reserves the right to require additional actions under the aforementioned Remediation Regulations at the Property should any of the following occur:

- Conditions at the Site previously unknown to the Department are discovered;
- Information previously unknown to the Department becomes available;
- Policy and/or regulatory requirements change; and/or

- Failure by Paramount Apartments, LLC and/or BMP, LLC, or any future holder of any interest in the Property to adhere to the terms and conditions of the Department approved RAWP, schedule, RAL, ELUR and/or SMP for the Property.

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. 2777109, or by E-mail at joseph.martella@dem.ri.gov.

Sincerely,



Joseph T. Martella II
Environmental Engineer III
Office of Land Revitalization &
Sustainable Materials Management

cc: Kelly J. Owens, RIDEM/OLRSMM
Ashley Blauvelt, RIDEM/OLRSMM
Eric Beck, RIDEM/OWR
Michael Cote, RIDEM/OLRSMM/UST Program
David Chopy, RIDEM/OC&I
Martin Wencek, RIDEM/OWR/Freshwater Wetlands Program
Nick Pisani, RIDEM/OWR/Stormwater Program
Mohamed J. Freij, RIDEM/OWR/OWTS
Christina A. Hoefsmit, Esq, RIDEM/Office of Legal Services
Susan Forcier, Esq, RIDEM/Office of Legal Services
James Bollinger, BMP, LLC
Christian Capizzo, Esq., Partridge Snow & Hahn, LLP
William Chapman, ESS Group
Seth D. Sokoloff, Barbara Sokoloff Associates
Jeffrey C. Hanson, Chairman Scituate Planning Board
Russell Crossman, Coventry Director of Planning and Development
Peter D. Ruggiero, Esq., Scituate Town Solicitor, Ruggiero, Brochu & Petrarca

Attachment: Remedial Action Approval Application Fee Form

ATTACHMENT 4

