



December 17, 2021

Joseph T. Martella II
Environmental Engineer III
Rhode Island Department of Environmental Management
Office of Land Revitalization & Sustainable Materials Management
235 Promenade Street
Providence, Rhode Island 02908

**Re: *SIR Addendum 2 - Response to RIDEM SIR Addendum Comments
Former Hope Mill (5 Main Street, Scituate, RI)
RIDEM No. SR-30-0623A (Formerly Case No. 2007-010 and Part of SR-30-0623)
ESS Project No. P312-010***

Dear Mr. Martella,

On behalf of Paramount Apartments, LLC and BMP, LLC (the “Operator” and “Site Owner”, respectively), ESS Group, Inc. (ESS) is providing the Rhode Island Department of Environmental Management’s (RIDEM) Office of Land Revitalization and Sustainable Materials Management (LRSMM) with this Site Investigation Report (SIR) Addendum 2 for the Hope Mill Project in Scituate-Coventry, Rhode Island. This SIR Addendum 2, as requested by the RIDEM, provides the appropriate information required in the RIDEM’s SIR Comment Letter 2, dated November 4, 2021, which required a response to seven (7) separate comments, questions, or concerns about the SIR Addendum (ESS, November 30, 2020) in order to receive a Program Letter. *ESS assumes and respectfully requests confirmation from the RIDEM that the RIDEM is accepting of all ESS’ Responses presented in the SIR Addendum for which an additional response, as presented in the SIR Comment Letter 2, has not been requested by the RIDEM.*

Below are ESS’s responses to the seven items presented in the RIDEMs SIR Comment Letter 2:

1. Based upon ESS’s responses, it is the Department’s understanding that the Site is comprised of seven (7) individual lots, including Scituate Plat 3, Lot 8, Plat 5, Lots 1, 58, 69, 114 and 117, and Coventry Plat 101, Lot 5. Two (2) of those lots, Scituate Plat 5, Lots 58 and 69, have never been investigated and are not part of Phase I of the proposed redevelopment of the Site.
 - a. The Department acknowledges that BMP, LLC (BMP) recently (July 15, 2020) purchased the Site from the former court appointed receiver, Mr. Peter J. Furness, and Paramount Apartments LLC (Paramount) has a legal agreement with BMP to develop the Site for residential reuse.

ESS Response: *Correct.*

- b. Regarding the establishment of eventual Site-Wide compliance, are there any future plans (Phase II?) and/or a proposed schedule for completing investigation, potential remediation, and/or redevelopment of Lots 58 and 69, beyond the planned wetlands restoration activities?

ESS Response: *BMP has granted the Pawtuxet River Authority (PRA) conservation easements for both Lots 58 and 69 for the intended use as a park. At the appropriate time, BMP and other involved*



parties will take into account what actions are warranted for performing investigations on Lots 58 and 69.

- c. It is understood by the Department that Scituate Plat 5, Lot 107 is owned by another party not involved in this project, has not been investigated or shown to be jurisdictional to the Remediation Regulations at this time, and is not included in this Site or current proposed redevelopment plans.

ESS Response: *Correct.*

2. The Department acknowledges and concurs with ESS' response to Comment 14, indicating a commitment to collecting one additional groundwater sample from MW-9 for total lead to show consistent total lead concentrations below the Department's GA Groundwater Objective (GAGO) for lead. Please be advised that additional groundwater monitoring at MW-9 for total lead may be required should analytical sampling results indicate an exceedance of the GAGO for lead.

ESS Response: *Accepted.*

3. The Department acknowledges ESS' response to Comment 16 that there is not currently a GAGO for total petroleum hydrocarbons (TPH) in the Department's Remediation Regulations. The Department is in the process of revising the Remediation Regulations, which will likely include the addition of GAGOs for TPH and various Aromatic and Aliphatic Hydrocarbon Fractions. Depending upon the timing and status of the GAGO changes in the Remediation Regulations at the time the final Remedial Action Work Plan (RAWP) is approved, the Department may require applicable petroleum hydrocarbon post-remediation groundwater monitoring in the NAPL remediation area.

ESS Response: *Understood.*

4. Regarding ESS' response to Comment 20, and subsequent questioning of "why hazardous building materials, such as asbestos, lead paint and/or PCBs, are the subject of the RIDEM's comment/response to ESS' SIR." It has been the Department's experience that not all parties are familiar with the requirements regarding hazardous building materials abatement prior to demolition activities, which can inadvertently lead to jurisdictional releases (e.g. lead or PCBs) to soil. The Department acknowledges ESS' response that a Hazardous Building Material (HBM) survey was completed in 2016 of the subject buildings which identified asbestos containing building materials (ACBMs), lead-based paint, PCB-containing building materials, and that these materials will be the subject of future abatement/ removal/disposal, pursuant to applicable regulations and guidelines, prior to renovation and construction activities.

- a. Were there any PCB detections greater than 50 parts per million (ppm) and therefore requiring US Environmental Protection Agency (EPA) Toxic Substances Control Act (TSCA) notification?

ESS Response: *A total of 14 building materials (i.e., caulking, glazing, and paints) were identified as potentially containing PCBs. A total of 28 building material samples were collected for analysis of PCBs by EPA Method 3540/8082A. PCBs were detected in 11 samples at concentrations ranging from 0.20 through 34.2 milligrams per kilogram (mg/kg). No PCBs were detected above*

the U.S. EPA Regulated PCB Concentration of 50 mg/kg. Based upon analytical results, Site historical information, and a visual assessment of representative building materials, it is ESS' opinion that all materials containing measured concentrations of PCBs are considered "excluded PCB products" in accordance with the definitions provided in §761.3.

- b. What type of PCB-containing building materials were identified, and what are the ranges of PCB detections?

ESS Response: Refer to response for Comment 4(a).

5. The Department acknowledges ESS's response to Comment 24 that "The Applicant (Paramount and BMP) can accept an NFA" at the successful conclusion of all required and approved remedial actions and wetland restoration activities.

ESS Response: No response necessary.

6. The Underground Storage Tank (UST) Program has reviewed the SIR Addendum - Response to RIDEM SIR Comments, and has provided the following comments to the Site Remediation Program for inclusion in this Comment Letter:

- a. Regarding ESS' response to Comment 25 (a) 1000 gallon Gasoline UST:

- i. The assessment around the UST 003 area is not sufficient. This office is requiring installation of one well in the actual UST location. Soil samples are to be analyzed for TPH, EPA 8260, and metals. This well may be installed after the excavation around AOC 6. Groundwater samples are to be analyzed for EPA 8260 and metals. Subsequent actions will be determined after the well is completed, after monitoring.

ESS Response: Paramount and BMP are accepting of the RIDEMs requirements.

- b. Regarding ESS' response to Comment 25 (b) 20,000 gallon No. 6 Fuel Oil UST:

- i. Project Management:

1. The RIDEM UST division approves the request to manage contaminated soils at AOC 6 within the RAWP, under the following conditions:

- a. The excavation and dewatering work plan must be reviewed and approved by the UST project manager.
- b. The UST project manager is to be notified at least 48 hours prior to work commencing on AOC 6.
- c. Following site work all soil and groundwater testing results are sent to the UST project manager in a summarizing report.

ESS Response: Paramount and BMP are accepting of the RIDEMs requirements for Comment 6(b)(i)(1)(a), (b), and (c).

ii. Excavation Work Plan:

1. The excavation and dewatering work plan must meet the following requirements:
 - a. The excavation depth must reach at least 20 feet below grade.
 - b. The dewatering system must operate at 50 gallons per minute or more.
 - i. Alternatively, the flow rate may be calculated using on-site aquifer testing for a water table drawdown to 20 feet below grade.
 - c. Groundwater pumped through the dewatering system must be permitted through the appropriate agency and treated prior to discharge.
 - d. Plans for post-excavation installation and sampling of monitoring wells should be included in the post-excavation report.

ESS Response: Paramount and BMP are accepting of the RIDEMs requirements for Comments 6(b)(ii)(1)(a), (b), (c), and (d).

2. The RIDEM UST project manager also reserves the right to require further site investigation work for the No. 6 fuel oil release.

ESS Response: Accepted.

iii. Gauging and Product Removal:

1. The requirement to gauge and remove separate-phase product from the well is deferred for a period of three (3) months following the approval of the RAWP. If after this point excavation activities have not begun the well must be gauged monthly and all free product must be removed until excavation begins.

ESS Response: Paramount and BMP are accepting of the RIDEMs requirements for Comment 6(b)(iii)(1).

7. Please submit an SIR Addendum 2 that addresses the abovementioned comments on or before December 31, 2021.

ESS Response: This letter serves as SIR Addendum 2 and is being submitted to the RIDEM prior to December 31, 2021.



If the RIDEM reviewers of this SIR Addendum 2 should have any questions, please contact either of the undersigned at 781-419-7705 (William Chapman) or 781-419-7714 (Craig Paradis).

Sincerely,

ESS GROUP, INC.

A handwritten signature in blue ink that reads "William M. Chapman".

William M. Chapman
Project Director

A handwritten signature in blue ink that reads "Craig C. Paradis".

Craig Paradis
Assistant Project Manager

C: Richard J. DeRosas, Paramount Apartments, LLC

