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July 20, 2018

Ms. Rachel T. Simpson
RI Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, RI 02908

Subject: Response to Remedial Action Work Plan Comment Letter
390-392 Pine Street, Pawtucket, RI
File No. SR-26-0073

Dear Ms. Simpson:

On behalf of Tallman Enterprises, and in accordance with Section 9.00 of the Rhode Island Department of Environmental Management (RIDEM) Rules and Regulations for the Investigation and Remediation of Hazardous Materials Releases, dated March 31, 1996; as amended August 1996, February 2004, and November 2001 (Remediation Regulations), Environmental Strategies & Management, Inc. (ES&M) has prepared the enclosed Remedial Action Work Plan (RAWP) Addendum for the property located at 390-392 Pine Street in Pawtucket, Rhode Island (the Site). The RAWP Addendum has been prepared to address the RIDEM's RAWP Comment Letter dated July 12, 2018.

The RIDEM comments concerning the RAWP are numbered and italicized below, followed by ES&M's response.

RAWP Comments:

1. *Section 5.0: Please note that a copy of the recorded ELUR is required to be submitted to the RIDEM within 15 days of recording, not within 30 days.*

Section 5.0 has been revised to confirm that a copy of the recorded ELUR will be submitted to the RIDEM within 15 days of recording.

ELUR/SMP Comments:

2. *Please include all exhibits for review by the Department*

Exhibit A (legal property description) and Exhibit B (Soil Management Plan) have been included within the RAWP Addendum for review by the Department.

3. *Section A of ELUR: Please keep stipulation "i. No residential use of the Property shall be permitted that is contrary to Department approvals and restrictions contained herein."*

Section A of the ELUR has been revised to include stipulation i.

4. **Section A of ELUR:** Remove stipulation “vi. No subsurface structures... Groundwater Objectives set forth in the Remediation Regulations.” This stipulation is not applicable.

Section A of the ELUR has been revised to remove stipulation vi.

5. **Background of the SMP:** The background should note the other PAHs present in Site soils above the Residential Direct Exposure Criteria (RDEC), in addition to the benzo(a)pyrene listed.

The Background section of the SMP has been revised to include the following PAH compounds which exceed the RDEC: benzo(a)anthracene, benzo(b)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, and indeno(1,2,3-cd)pyrene.

6. **Applicable Area of SMP:** It is not necessary to restrict the future Site use to Industrial/Commercial only since the remedial alternative involves the placement of a physical barrier to eliminate direct contact with the jurisdictional material; however, if residential use is to be an option, then the SMP needs to acknowledge all constituents in Site soils present above the RDEC.

This section of the SMP has been revised to read “This SMP and affiliated ELUR pertains to the entire Property. See attached site figure.”

7. Edit the date of the SMP accordingly when the documents are recorded with the Land Evidence Records.

The date of the SMP will be edited to accurately reflect the recording date.

8. Please submit a RAWP Addendum that addressed the abovementioned comments on or before August 13, 2018.

Please see RAWP Addendum enclosed.

We appreciate your timely review of these materials. If you require additional information, please do not hesitate to contact the undersigned at (401) 728-6860.

Sincerely,
Environmental Strategies & Management, Inc.



Evan B. Cucé
Environmental Scientist & Project Manager



Mark J. House
Vice President & Senior Scientist