

Community Relations Plan Former Uniroyal US Rubber Plant

475, 485, and 495 Valley Street
Providence, Rhode Island

WaterFire Providence

May 2015



317 Iron Horse Way
Suite 204
Providence, RI, 02908





FUSS & O'NEILL

May 18, 2015

Ms. Jessica Dominguez
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code OSRR07-3
Boston, MA 02109-3912

RE: Community Relations Plan
Former Uniroyal US Rubber Plant
475/485/495 Valley Street
Providence, Rhode Island

Dear Ms. Dominguez:

On behalf of the WaterFire Providence, we are pleased to present the enclosed Community Relations Plan for the above-referenced site. The Community Relations Plan documented herein has been developed to present a framework to notify the public and solicit public involvement during the cleanup of the former Uniroyal US Rubber Plant site.

Please contact us if you require additional information, or if you have any questions.

Sincerely,

Brian E. Kortz, CPG, CNU-A
Project Manager

Attachment: Community Relations Plan

C: Mr. Peter Mello, WaterFire Providence
Mr. Barnaby Evans, WaterFire Providence

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1 Introduction

In May 2013, WaterFire Providence (WaterFire) was selected for a \$600,000 Brownfields Cleanup Grant by the United States Environmental Protection Agency (USEPA) for the cleanup of the former Uniroyal US Rubber Plant site in the City of Providence, Rhode Island (the City). In accordance with the Cooperative Agreement between WaterFire and USEPA, WaterFire is required to prepare a *Community Relations Plan (CRP)* that outlines WaterFire's plan for involving the public during the cleanup process.

The purpose of this *CRP* is to identify the communication strategies that will address the needs and concerns of the citizens of Providence, particularly residents who live in close proximity to the site. This *CRP* describes how WaterFire has involved and will continue to involve City officials, residents, nearby business owners, and local organizations in the decision-making process regarding the environmental remediation efforts at the site.

Active residents and institutions in the community are essential resources for the success of the *CRP*. WaterFire perceives these citizens and organizations as key stakeholders and points of contact and communication. One measure of success of the environmental remediation will be the involvement of well-informed citizens in the remediation process.

2 Spokesperson and Information Repository

The spokesperson for this project is Mr. Peter A. Mello of WaterFire, who may be contacted at:

Peter A. Mello
Managing Director
WaterFire Providence
101 Regent Avenue
Providence, Rhode Island 02908
401-273-1155 ext. 130
peter@waterfire.org

Select documents prepared as part of this project will be available in the Information Repositories. An Information Repository will be located in WaterFire's office located at the above address. To conduct a review of the Information Repository, Mr. Mello should be contacted to make an appointment during normal WaterFire business hours.

A second Information Repository has also been established at the Mt. Pleasant Library at 315 Academy Avenue in Providence, Rhode Island.

3 Site Description

3.1 Site Location

The site, the former Uniroyal US Rubber Plant, is an approximately 1.3-acre collection of three parcels located on the southern side of Valley Street in a commercial area of Providence, Rhode Island. The site is identified by the Providence Tax Assessor as Plat 27, Lot 289 (475 Valley Street – 0.42 acre), Lot 290 (485 Valley Street – 0.64 acre), and Lot 291 (495 Valley Street – 0.25 acre) (referred to hereafter as Parcels A, B, and C, respectively). Structures located on the subject site include a 27,333-square foot one-story warehouse building on Parcel B. Parcel A generally consists of paved areas and a loading dock that is attached to the site building on Parcel B. Parcel C generally consists of paved areas.

3.2 History of Site Use and Ownership

The site was part of the American Locomotive Works (ALCO) complex from the late 1800s to 1918. The site was owned by the U.S. Rubber Company from approximately 1918 until about 1967. No structures were located on-site until approximately 1929 when, according to a U.S. Rubber Company underground piping plan dated January 1930, the current site building was constructed on Parcel B. The piping plan listed the building as the “Roll Covering” building. However, the building was also used as a maintenance shop for the testing and repairing of equipment. The site was owned by Uniroyal Inc. from 1967 through 1976, Jopelo Realty, Inc. from 1976 to 1985, and by Zavota Brothers Rigging from 1985 to 1999. From approximately 1973 to 1999, the site building was rented by C.O. Hoffacker, who used the site for rebuilding heavy machinery and machine tools. From 1999 through 2012, the site was owned by Capital Records Management, Inc., who used the site building primarily for storage purposes. WaterFire acquired the site in November 2012 and plans to redevelop the site as its headquarters and as a community arts center.

3.3 Nature of Threat to Public Health and the Environment

The following environmental investigations have been conducted at the site or abutting parcels at the former ALCO property:

- Garofalo and Associates, Inc. (Garofalo) May 1994 *Site Characterization Report* – Documented the advancement of six soil borings near the loading dock and near an existing 3,000-gallon underground storage tank (UST) containing No. 2 heating oil on Parcel A. Laboratory results revealed no detectable levels of volatile organic compounds (VOC), total petroleum hydrocarbons (TPH), or polychlorinated biphenyls (PCBs) in the soil samples.
- Fuss & O’Neill, March 2006 *Site Investigation Report* for adjacent ALCO property – Documented the presence of urban-fill related contaminants (metals, semi-volatile organic compounds [SVOC]) in soil at the ALCO complex abutting the site to the south.

- Fuss & O'Neill, August/October 2006 *Remedial Action Work Plans* for adjacent ALCO property – Documented the planned remediation activities to be conducted on the ALCO properties, including soil capping in the vicinity of the subject site to address direct exposure risks related to SVOC and metals in soil. Soil capping activities at the ALCO property were implemented in 2006 and completed in 2012.
- Fuss & O'Neill, September 2011 and November 2012 *Phase I ESA Report* – Documented site conditions and Recognized Environmental Conditions (RECs) in accordance with the Federal *All Appropriate Inquiry (AAI) Standard*, on behalf of the Rhode Island Department of Environmental Management (RIDEM) as part of a Targeted Brownfields Assessment (TBA).
- Fuss & O'Neill November 2012 *Site Investigation Report* (equivalent to a Phase II ESA in the State of Rhode Island) – Documented soil, soil vapor, and groundwater conditions based on field activities completed at all three parcels comprising the site in October 2012 by Fuss & O'Neill on behalf of RIDEM as a TBA.
- Fuss & O'Neill, November 2012 *Hazardous Building Materials Assessment Report* – Documented the presence of asbestos and lead-based paint in building materials at the site building on Parcel B.

The November 2012 *Site Investigation Report* by Fuss & O'Neill identified the following environmental conditions at the site:

- Metals and SVOC were identified in soil samples at levels above the RIDEM Method 1 Industrial/Commercial Direct Exposure Criteria (I/C-DEC) collected from all three parcels comprising the site. This was attributed to the presence of fill materials comprised of brick, concrete, asphalt, coal, and ash deposited site-wide at depths of up to eight feet below grade.
- PCBs were identified in surface soil at levels above the RIDEM I/C-DEC and GB Leachability Criteria (GB-LC) located adjacent to a concrete pad that formerly supported electrical transformers on Parcel C. The release of PCBs was attributed to a former electrical transformer owned by National Grid. Therefore, National Grid was identified as the responsible party for this release, and separate response actions will be conducted by National Grid to address this release.

The preferred remedial approach proposed in the November 2012 *SIR/TBA* included the construction of a remediation soil cap over the entire site with limited excavation and hazardous material abatement. The cap would mitigate the potential for direct exposure to soil containing metals and SVOC under normal daily site operations.

Fuss & O'Neill, on behalf of WaterFire Providence, will coordinate, design, and oversee implementation of the selected remedial alternative. The remedial response action will be implemented using funding awarded to WaterFire Providence by the USEPA Brownfields Program.

4 Community Background

4.1 Community Profile

In 2010, the U.S. Census indicated that the City population was 178,042. According to the 2010 U.S. Census, Providence is an increasingly diverse city: 38% Hispanic, 16% African American, and 6% Asian. In 2009, 22% of Providence families were living below the poverty level, 2.2 times greater than the national average. At Paul Cuffee School, a neighboring school, 67% of the students are eligible for free lunches from the National School Lunch Program, indicating their family's income is below 130% of the poverty level. The site is located in a now-disused industrial corridor adjacent to the poorest zip codes in the City, including the densely populated urban neighborhoods of Smith Hill and Olneyville, the latter having the highest percentage of households in Providence above 1.5 times the poverty line in 2000 (Provplan.org).

WaterFire intends to take advantage of its brownfields revitalization opportunity to develop a much-needed City-wide community arts center and a consolidated production and support center for WaterFire's events.

4.2 Chronology of Community Involvement

To date, efforts to involve the community in the cleanup planning for the site have consisted of the following:

- In accordance with Section 7.07 of the *Remediation Regulations*, Fuss & O'Neill mailed letters to owners and tenants of abutting properties notifying them of the pending commencement of Site Investigation Report/Targeted Brownfield Assessment (SIR/TBA) activities on December 1, 2011.
- In accordance with RIDEM's *Policy for Considering Environmental Justice in the Review of Investigation and Remediation of Contaminated Properties*, Fuss & O'Neill conducted the following public involvement activities in addition to the above referenced letter:
 - Fuss & O'Neill mailed a site-specific fact sheet, two fact sheets regarding RIDEM and the Office of Waste Management State Site Remediation and Brownfields Program, and a "*Brownfields: Turning Bad Spaces into Good Ones*" booklet to abutting property owners and tenants, project stakeholders, and local and state elected officials on December 1, 2011. These documents were sent in both Spanish and English.
 - A sign was also posted on the fence at the northwestern corner of the site in both English and Spanish informing the public that an environmental assessment was in progress. Contact information was also listed on this sign. Environmental justice materials were submitted to RIDEM for approval prior to posting or mailing.

- A preliminary draft *Analysis of Brownfields Cleanup Alternatives (ABCA)* was prepared by Fuss & O'Neill on November 7, 2012 as part of the Brownfields Cleanup Grant application process by WaterFire. The Preliminary ABCA was also discussed at a public meeting on November 7, 2012.

4.3 Benefit to Targeted Community

The intended reuse of the site includes development of a City-wide community arts center and headquarters for WaterFire. The site will act as a hub for public engagement in the arts and events promoted by WaterFire.

Site cleanup will directly benefit the community by reducing threats to the quality of human and environmental health in the immediate area. In its current state, contaminants at the site are present in uncontained soil, and, therefore, site users and biota present at the site may be exposed to the contaminants. In addition, the contaminants may migrate via stormwater or air entrainment. Site cleanup will aim to mitigate these potential risks to public health and the environment. The remediation of contaminants will allow for the safe use of the land by future occupants.

5 Continued Community Involvement

In order to solicit public comments on the approach to remediation, a clear understanding of the site background, the existing health and environmental risks, and need for response actions will be provided. Summaries of data and applicable RIDEM regulations were presented in the November 2012 *SIR/TBA*. A preliminary draft *ABCA* was developed in November 2012 to evaluate remedial approaches to environmental conditions at the site with respect to cost and public benefit, among other criteria. These materials are available in the Information Repository. A final draft *ABCA* document will be prepared for public comment, in accordance with USEPA's cleanup grant requirements.

WaterFire shall notify the public of the following by placing a display advertisement on WaterFire's website and sending notifications through WaterFire's social media platforms and newsletters. In accordance with RIDEM regulations, notifications will also be directly mailed to property owners and tenants of properties directly abutting the site.

- A public meeting about the project will be held on Thursday, May 28, 2015 at 4 PM at the offices of Fuss & O'Neill at the ALCO complex in Providence that is adjacent to the site.
- The availability of documents regarding the evaluation of cleanup alternatives.
- The availability of the Information Repositories for this project, including this *CRP* and environmental assessments, at the WaterFire office and Mt. Pleasant Library in Providence, for viewing during normal business hours.
- The availability of the Information Repository online, via <http://www.waterfire.org/>.

The advertisement will provide instructions for those requiring interpreting services for non-English speakers. Please note that WaterFire does not intend to publish an advertisement in the local newspaper, as the notification methods proposed above will reach a wide audience as well as the neighborhood residents that work and reside in close proximity to the site. WaterFire believes that these methods of notification are better and more appropriate for project stakeholders than a newspaper notice.

The advertisement will announce the start of a 30-day comment period on the final draft *ABCA* document and selected cleanup plan. WaterFire will accept comments on the cleanup plan during the comment period and, if warranted, will provide written responses that will become a part of the administrative record. Anyone wishing to comment is strongly urged to submit written comments. However, WaterFire will consider all comments it receives. Comments may be submitted at the meeting or in writing, to the following addresses:

Mail: Mr. Peter A. Mello
WaterFire Providence
101 Regent Avenue
Providence, RI 02908

Electronically: peter@waterfire.org

The Information Repositories will be updated with the inclusion of meeting minutes, progress reports, and other communications as they are generated. Information will be specific as it relates to meeting both State and Federal requirements. Upon completion of the 30-day comment period, WaterFire shall prepare a final *ABCA* that will respond to comments received during the comment period and provide the final analysis of cleanup alternatives. The report will be completed within 60 days of the end of the comment period and will be available in the Information Repositories.

When applicable, WaterFire Providence will communicate project progress status updates to the community and RIDEM through the distribution of progress summaries that will be e-mailed to appropriate personnel and available in the Information Repositories. As the consultant selected by WaterFire to provide technical oversight of the cleanup activities, Fuss & O'Neill will work with WaterFire to disseminate complete and accurate information through public meetings or through press releases to the local media.

Upon completion of the cleanup actions, WaterFire shall prepare a *Remedial Action Closure Report (RACR)* for submission to RIDEM describing the activities conducted to clean up the site and the final outcome, or additional activities required at the site and a proposed schedule for completion of those activities.

6 Proposed Project Schedule

After the completion of project steps with deliverables, the Information Repositories will be updated. The tentative project schedule includes the following steps:

- May 2015 – Prepare and submit *CRP* to USEPA for review and approval.

- May 28, 2015 – WaterFire to conduct public meeting to present final draft *ABCA* and solicit comments. Display advertisement is published, marking the beginning of a 30-day public comment period.
- June 2015 – 30-day public comment period ends. Respond to public comments on remediation strategy and finalize *ABCA*.
- 2015 to 2016
 - Prepare site development and permitting documents, including a *Remedial Action Work Plan (RAWP)* for RIDEM approval of the cleanup plan.
 - Upon receiving *Remedial Approval Letter* from RIDEM, complete remediation specifications and bid documents. Issue notification of public invitation to bid.
 - Pre-bid meeting, contractor bids submitted, and bid award. Prepare *Quality Assurance Project Plan (QAPP)* for USEPA comment and approval, if necessary.
 - Commence site cleanup and construction activities
 - Complete site cleanup and construction activities
- Fall 2016 – Submit *RACR* to RIDEM
- Following *RACR* submission – Closeout grant