

From:
The Hope Mill Concerned Citizens, and the residents of Scituate, Rhode Island

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

July 24, 2024

Petition to the Rhode Island Department of Environmental Management to cease approval and implementation of any and all remediation work and related permitting activities at the Hope Mill site in Historic Hope Village, Scituate, until a Public Involvement Plan is developed and approved.

Dear Mr. Martella:

Per State of Rhode Island's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, Regulation 1.8.7 C D E, the following required minimum of 25 signatures are attached to this petition to request Community Public Meetings via a Public Involvement Plan, on the remediation, removal of hazardous materials, all testing and results, and all construction processes through occupancy of the Hope Mill.

Prelude:

1. Hope Mill History

The Hope Mill site is located on 5 Main Street in Hope, RI and is known to have a long history from building cannons in 1766 for the Revolutionary War, to operation of the longest running Textile Mill and Village in the country up to 2007 which gained National status. Contamination from use and accumulation of hazardous materials on site was a constant practice. Located on a peninsula bordered by the Pawtuxet River, the site contains a mill race that channels through the mill and empties overflow into the river at the end of the peninsula. Hope Mill and Hope Village were designated as National Registered Historic Mill and District treasures. The site contains several buildings that were used for varied commercial purposes. They produced and stored hazardous materials and substances which were used in building construction and industrial processes. The site contains lead, metals, coal ash, oil and gasoline storage tanks, and numerous commercial waste and hazardous substances which are still presently located throughout the site.

2. Hope Dam History

The Hope Dam controls Scituate Reservoir water levels through the use of a sluice flood gate. Should the dam collapse during a heavy flood, there is high probability it may empty much of the reservoir which supplies drinking water to the city of Providence. Repairs and maintenance of the Hope Dam and dam gate are critical due to its structural Significant Hazard status and its potential to release hazardous substances onto the Mill property even after remediation processes are completed with approximately 176 apartments containing various types of contaminants. The dam needs to be reevaluated to reduce future floods particularly when the Hope Mill development is built on a flood plain. While the dam was investigated showing structural cracks, it was not inspected underwater. There is considerable concern that the dam might have become a High Hazard dam. Lack of an updated classification prevents an owner or the Town of Scituate from securing available funds to repair it. The millrace on the Mill site frequently floods the property due to an inoperable flood gate which evidently will continue to contaminate Hope Mill property and the towns along the Pawtuxet River due to heavy rain storms and floods.

3. Environmental Safety

DEM Violations were committed by owners/developers without immediate punitive enforcement to comply, yet permits were renewed with little action on the part of the current developer. Extremely high potential of

soil groundwater runoff from exposed crumbled buildings and soil disturbance still causes contamination of personal property, wells, indigenous vegetation, and wildlife.

Historically, mismanaged developer activities include: removal of indigenous plants and trees, overgrowth of site and dam vegetation, rear site grading to allow truck parking, inappropriate piling of disturbed soil, not putting hay bales around required perimeters, unbraced building walls and roofs were not performed all of which contributed to further contamination directly impacting the local population and the ecosystem. This neglect to maintain and secure the buildings and property caused the final blow and destruction of a National Historic Registered Mill, risking the health and safety of the residents of Hope Village and unsuspecting trespassers and visitors. The Hope Village community cannot suffer the expense and threat to their health, welfare, and safety including property when these requirements should have been remediated. Swimming in Hope Pond is prohibited until further notice due to high concentrations of bacteria; now an additional risk to everything downstream.



Site investigations performed at the Mill site identified multiple hazardous substances exceeding DEM allowed Residential Direct Exposure Criteria (RDEC) amounts. This information was obtained from the 2006 Jacques Whitford Environmental Site Assessment Report, the 2014 Clean Environment Inc. UST Closure Assessment Report, and the 2023 Sage RAWP, all which you already have in your possession, and more. The Hope Mill site hazardous substances include, but are not limited to: complex mixtures of polycyclic aromatic hydrocarbons (PAHs) and metals, total petroleum hydrocarbons (TPHs), Volatile organic compounds (VOCs), pesticides, coal ash, asbestos, arsenic, beryllium, benzene, lead from paint and metal construction materials, polychlorinated biphenyls (PCBs), dye compounds, fuel oil, gasoline, and compromised plastic barrels of unknown chemicals due to the collapse of buildings, roofs and floors and due to the lack of proper protection measures. Increased extreme weather events have and will intensify the release of more hazardous contaminants into the Pawtuxet River.

It is evident that Hope village was intentionally built with densely compacted homes designed for workforce housing and enticing longevity by creating a sense of community with amenities. Their families grew and built homes close-by further expanding the village. This high density means that exposure to hazardous substances will also affect areas outside and downstream of abutter distances, as many village homes may only be separated by a stone's throw, a rock wall, driveway or street. Severe weather events will not prevent the release hazardous substances into a much larger radius with devastating effects.

4. Community Engagement And Mental Health

The constant looming danger and the loss of a National treasured Mill severely affected Village life and residents in numerous ways. Starting with depression due to memories held dear when family members worked there, having to see a crumbled Mill every-single-day replacing village pride, and waiting 20 years for Main Street to be paved, lighted, and a culvert repaired until a mill development plan was approved. This newly paved road accelerated increased traffic, noise, and speeding. It is difficult to safely cross the road. Having to deal with a poorly designed street plan that removed parking spaces, forgot curbing for handicapped access in appropriate locations, disrupting the flow of pedestrian traffic on sidewalks used for exercise and walking on both sides of the street, and adding a multitude of street signs that destroyed village aesthetics and community continuity. This resulted in a tradition of summer concerts for years at the Village Green to be moved to another location which further deteriorated resident engagement and typical village life. It is a no-brainer that has apathy and defeatism has set in from the lack of oversight, protection, and expedient action when serious unheard concerns were raised to local municipal and state authorities. The village residents further experienced

removal of a police station, having taxes raised due to town court litigations with developers, complaints requiring site visit responses by town inspectors, firemen, police, and delays in concerns and actions to their safety concern and continued lack of transparency. This shameful lack of accountability and indifference to basic human needs falls on many.

5. Municipal Government Inaction For Public Welfare And Safety

The inability of Scituate Town Councils to establish ownership or assume responsibility to repair Hope Dam, failure to retrieve full taxes owed by developers, not ensuring expedient security of the Hope Mill from wild fires, graffiti and unauthorized building access has been ongoing for decades. The 2023 town order to condemn Hope Mill buildings further exemplifies the lack of prudent action. Ineffective security measures allowed people to enter Mill property and buildings, endangering the community by causing fires, painting graffiti, breaking glass, allowing children to play in buildings as well as curious unknown trespassers. The town has had to impose fencing on the property which proved inadequate in preventing further access onto the site. The installed fencing does not enclose the full perimeter of the property. It is low enough to provide easy scaling and crawling underneath, unpruned bush and tree overgrowth over and along fence sections further obstructs vision of the property when trespassing occurs. Graffiti was painted on buildings, on every story, in 2023 which took a long time to remediate, and the solution was to paint it black, leaving a huge eyesore on the mill, and a badge that security is absent. A recent defacement occurred on July, 2024, where evidence shows that trespassers gained entry inside the mill sections absent of safe roofs or floors, by painting on the inside of windows several feet away from the ladders. The metal ladders leaning against crumbling roofs were addressed by concerned residents to their Town Council, yet were not removed, again allowing free access to open windows and traverse roofs reaching heights that could have resulted in serious harm. There continues to be compromisable access points that are easily breached on the site.

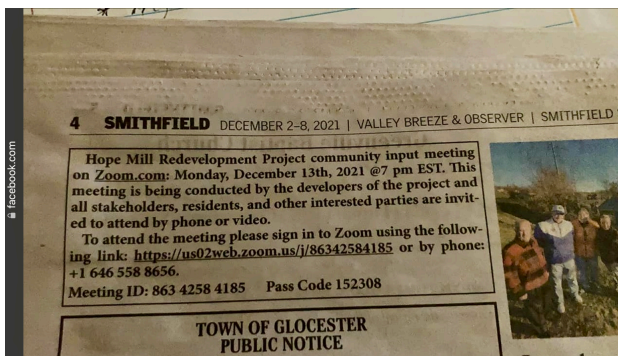
6. Hazardous Substance Management, Unprecedented Weather Events And Climate Change

The release of site hazardous and toxic substances are inextricably connected to materials mismanagement; soil disturbances, unsafe transport, extreme weather events and continued climate change, pose an imminent threat of hazardous substance release. The 2010 Pawtuxet River Flood was widespread in Rhode Island, causing significant damage to homes, businesses, roads, transportation of emergency vehicles, and the spread of hazardous substances and waste which included E.coli. Climate change cannot be ignored.

Whereas Hope Village, and concerned citizens of Scituate, Rhode Island, are requesting this petition for a Public Involvement Plan be approved due to their imminent health, welfare, safety and environmental impacts and concerns:

- Public Involvement Plans: The performing party shall develop and submit to DEM for review and approval in both hard copy and electronic format (as specified by the Department), a site-specific public involvement plan for any Contaminated-Site for which the Department has received a Notification of Release and for which a minimum of twenty-five (25) residents, local officials or other interested parties have requested, in writing and in form of a petition, that a formal process be set up for their participation in cleanup planning. The Public Involvement Plan shall address all relevant and applicable requirements of Rule 7.07 A, B, C and D.
- As noted in the prelude above, the residents of Hope Village District in particular, are extremely concerned about what has, and is still happening to the Hope Mill from lack of management, communication and oversight. Not only are they concerned about the Hope Dam currently designated as a Significant Hazard Dam, they believe that Hope Dam responsibility lies with Paramount/BMP, LLC. to manage, repair and maintain. The intention to subrogate responsibility back to the Town of Scituate, is against resident and town expectations that would overburden town infrastructure costs, and cause delays to the safety of its citizens.
- Numerous hazardous substances imminently posing a risk to public health, safety, and the environment were recorded at the site which will get worse should the dam collapse with the flood gate not operational. With the looming climate changes, we can expect more severe weather to come, and if the sluice gate is not repaired, there is high probability that a heavy rain storm will cause flooding during the remediation process.

- Hope Mill and Hope Village, have been exposed to decades of mismanagement of unknown hazardous materials that could have a direct impact on the health and welfare of the village and downstream towns. Hope residents fault both Paramount Development Group and BMP LLC for contributing to additional years of continued risk to our health, welfare, destruction of our historic national buildings further contaminating our environment by delaying maintenance, designing a project that will overcome an already sense population, violating conformance to DEM permits and the inability to pay taxes or fund their own progress.
- Compounding the alarming presence of contaminants, several rain storms from years 2010 up through 2024 have significantly washed away the road at the end of Mill Street which needed to be repaired three times - but not before flooding waters traversed through the Mill site carrying hazardous substances into the Pawtuxet River, as well as homeowner properties, cesspools, and wells along the way. Regardless that some identified hazardous substances did not exceed RDEC levels, it does not mean that it will not have a future effect on the natural environment. Residents have a right to be concerned. Who will be monitoring the aggregation of hazardous deposited substances levels obstructed in the river that could raise substances above RDEC levels? The river is riddled with soil runoff, silt, downed trees, stagnant pools, overgrown vegetation, rocks, boulders and grasses along its course. Low river level will also trap substances and allow them to sink into the river's floor.
- Lack of communication and inconsistent information to the public require a dire need for a Public Involvement Plan. Some examples include:
 - On December 13, 2021, at 7 PM, Paramount held a public meeting via Zoom, however, their public notification had limited subject details, was published in the December 2nd-8th Smithfield Section of the Valley Breeze Observer, where most Scituate residents would not have expected a Scituate notice to be located, and was missed. Only a few residents were able to attend in person, after finding out about the notice via a Facebook page comment at 7:00 on the evening of this meeting. This prevented Hope Village residents from opportunity to provide comments or ask questions. Unfortunately, since the meeting had already started, other residents who tried to call in or join online were not given access. It was later discovered DEM determined that because there were no public comments at this meeting, that the UST hybrid system was approved. Hope residents have no knowledge of the potential risks posed by this new system.



- Residents have unsuccessfully tried to get information from their town council by emails and meetings. Many emails were not answered; meeting questions were frustratingly responded with “We can’t answer due to litigation”, “We’ll look into that”, “No comment”, or were tabled and delegated to others who never answered the questions. This lack of transparency, trust and concern for community safety of their constituents is alarming.
- Hope Village deserves to know what kind and type of restrictions will be imposed on the Mill property. Without public inclusion, there will be suspicion that the remediation plan was created solely for convenience to this developer and not address public concerns. While recognizing other business owners and tenants played a part in mill property mismanagement, it’s now at a point where significant buildings which should have been saved, have degraded past saving under the current developer’s watch. They didn’t attempt any protective measures to prevent building deterioration and river contamination while in their custody. Hope Village and concerned Scituate citizens are in dire need of open and transparent communication, and are facing a dangerous and unknown future. A Public

Involvement Plan should serve to keep everyone on the same page to promote transparency and open inclusion between all parties.

- The historical treatment of the Hope Mill site as promised by the developer and their legal representatives stated “they would be honored to rehabilitate a National Historic icon”. Had that been a true outcome, there wouldn’t be a need for a petition. Contamination would have remained more localized, less leaching would have found its way into the river, and the Hope Mill would have served a proud and useful service for the town instead of facing condemnation. Whatever state the Hope Mill is in, the responsibility still remains with the owner to keep their promise. Residents expect that any plans, excavation and remediation and construction should closely align with the Planning Board (acting as the Local Board of Review) Master Plan approval letter dated 11/28/2018, page 2, item 4) “That the proposed rehabilitation of buildings 1, 2, 3, 4, 6, 7 & 9 was reviewed and issued a conditional approval by the Rhode Island Historic Preservation Commission (RIHPC) and the National Park Service (NPS) in accordance with the Secretary of the Interior Standards for Rehabilitation (36 CFR 67)”¹. Therefore, residents expect that all historical elements should be used where possible, incorporated in new construction, and if not used, should be appropriately stored and permanently stay on the property. Guidelines from The code of Federal regulations² and The Secretary of the Interior's Standards for the Treatment of Historic Properties regulations, with the understanding that “Standards For Restoration & Guidelines For Restoring Historic Buildings³ need to be adhered as applicable during the remediation, removal, and reconstruction process. In light of the Mill’s current condition, residents have no faith or belief that there will be any transparency or adherence to Town, DEM, State, or Federal regulations without a Public Involvement Plan.

1 Planning Board Decision Letter recorded in Town of Scituate, DOC Num# 2018000241, Book 708, Page 55

2 See Federal Code of Regulations, Secretary of the Interior Standards for Rehabilitation <https://www.ecfr.gov/current/title-36/chapter-I/part-67/section-67.7>

3 As stated in the regulations (36 CFR Part 68.7) promulgating the Standards, “one set of standards ...will apply to a property’s undergoing treatment, depending upon the property’s significance, existing physical condition, the extent of documentation available, and interpretive goals, when applicable. The Standards will be applied taking into consideration the economic and technical feasibility of each project.” These Standards apply not only to historic buildings but also to a wide variety of historic resource types eligible to be listed in the National Register of Historic Places. This includes buildings, sites, structures, objects, and districts. (<https://www.ecfr.gov/current/title-36>) and U.S. Department of the Interior, National Parks Service, Technical Services Guidelines (<https://www.nps.gov/orgs/1739/upload/treatment-guidelines-2017-part2-reconstruction-restoration.pdf>)

Hope Village, Scituate residents strongly and respectfully request that all permits be put on hold until a thorough site inspection is performed due the *current condition of the entire site*, in order to verify that all newly exposed hazardous contamination will be identified and remediated according to Board of Health, Federal and State DEM regulations. With recent changes of flooding, groundwater runoffs, further collapsed and crumbling buildings that occurred since the proposed Sage 2023 remediation plan now necessitates a new site investigation. Legitimate concerns exist with how management, remediation and removal of hazardous materials will be procedurally handled by BMP LLC/Paramount, or their contracted companies without DEM investigators present during the entire process. Assurance that all access points, signing, adequate fencing, maintenance of vegetation and property, will be strictly enforced to prevent any hazardous exposure to residents, trespassers, workers, indigenous vegetation and wildlife.

Recognizing that precedence exists of DEM-approved requests for a Public Involvement Plan were granted to other locations in Rhode Island, the undersigned residents respectfully request you approve this petition to ensure the safety, health and welfare of the citizens of the National Historic Hope Village District, with a Public Involvement Plan for Hope Mill to remedy concerns which have been severely neglected.

Thank you for your time and consideration of this petition.

Sincerely,

The undersigned residents of Hope Village, Scituate, Rhode Island.

Signatures Enclosed

Petition Signatures to Rhode Island DEM to approve a Public Information Plan regarding BMP LLC/Paramount remediation work and related permitting activities at the National Historic Hope Mill site in the National Historic Hope Village of Scituate, RI.

	PRINTED NAME	SIGNATURE	ADDRESS	Email	Phone	DATE
1	Matt Sanders	<i>Matt Sanders</i>	11 Mill St			7/22/24
2	Cheryl Palmeri	<i>Cheryl Palmeri</i>	18 Mill St			7/22/24
3	Cory Menard	<i>Cory Menard</i>	17 Mill St			7/22/24
4	Kathleen Rogers	<i>Kathleen Rogers</i>	17 Mill St			7/22/24
5	RACHEL WAVERLY	<i>Rachel Waverly</i>	19 Mill St			7/22/24
6	JOSH Batista	<i>J. Batista</i>	25 Mill St.			7/22/24
7	Nichelle Lagasse	<i>Nichelle Lagasse</i>	39 Mill St			7/22/24
8	Tabitha Conr	<i>Tabitha Conr</i>	39 Mill Street			7/24/24
9	Susan Anderson	<i>Susan Anderson</i>	43 Main St			7-22-24
10	DIANA HOPKINS	<i>Diana Hopkins</i>	8 High St			7/22/24
11	Kirk Loisele	<i>Kirk Loisele</i>	1 High St			7-23-24
12	JULIE WINWARD	<i>Julie Winward</i>	7 Harrington Ave			7-23-24
13	Dalton Fromant	<i>Dalton Fromant</i>	80 Main St Apt B			7/23/24
14	CATERINA RAINERI	<i>Caterina Raineri</i>	80 Main St Apt A			7-23-24
15	Lucy Barros	<i>Lucy Barros</i>	76 Main St			7-23-24
16	Kenny Barros	<i>Kenny Barros</i>	76 Main St			7-23-24
17	Jose Barros	<i>Jose Barros</i>	76 Main St			7-23-24

	PRINTED NAME	SIGNATURE	ADDRESS	Email	Phone	DATE
18	Pat Jennings	Pat Jennings	68 Main St Hope			7/23/24
19	TACK JENNINGS	TACK JENNINGS	68 Main St Hope			7/23/24
20	Courtney Griffith	Courtney Griffith	29 Main St Hope			7/23/24
21	Joe Dionne	Joe Dionne	29 Main St Hope			7/23/24
22	Valerie Rudolph	Valerie Rudolph	28 Main St Hope			7/23/24
23	John E. Rudolph	John E. Rudolph	28 Main St. Hope			7/23/24
24	John A. Rudolph	John A. Rudolph	28 Main St Hope			7/23/2024
25	" "	" "	" "			
26	ANNE LINSTROM	Anne Linstrom	44 Main St, Hope			7/23/24
27	Paul Medeiros	Paul Medeiros	9 Goddard St, Hope			7/23/24
28	E. GAUTHIER	E. Gauthier	407 North Rd			23 JUN 24
29	Abigail Cronisier	Abigail Cronisier	50 Main St.			23 JUN 2024
30	Brianne Hagan	Brianne Hagan	12 Ives Street			2733 7/23/24
31	Barral Ferguson	Barral Ferguson	12 Ives Street			7/23/24
32	Erin DiNobite	Erin DiNobite	88 Main St			7/23/24
33	JJ Matt	JJ Matt	103 Main St.			7/23/24
33	JOSEPHINE ODUYINGBO	Josephine Oduyingbo	21 Harrington Ave			7/23/24
34	Monica Hsu	Monica Hsu	33 Harrington Ave			7/23/24

	PRINTED NAME	SIGNATURE	ADDRESS	Email	Phone	DATE
35	Julie Brunelle	Julie Brunelle	44 Hammington Ave Hape, RI 02831			7/23
36	Melissa Argenti	Melissa Argenti	8 Richard St Hape RI 02831			7/23
37	Thomas Argenti	Thom D. Argenti	8 Richard St.			7/23
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Petition Printed Signatures for Rhode Island DEM to approve a Public Information Plan regarding National Historic Hope Mill site in the National Historic Hope Village of Scituate, RI.

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1	Matt Sanders	11 Mill Street	HOPE, RI 02831			7/22/24
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3	Cory Menard	17 Mill Street	HOPE, RI 02831			7/22/24
4	Kathleen Rogers	17 Mill Street	HOPE, RI 02831			7/22/24
5	Rachel Waverly	19 Mill Street	HOPE, RI 02831			7/22/24
6	Josh Batiste	25 Mill Street	HOPE, RI 02831			7/22/24
7	Michelle Lagasse	39 Mill Street	HOPE, RI 02831			7/22/24
8	Tabitha Coutu	39 Mill Street	HOPE, RI 02831			7/22/24
9	Susan Anderson	43 Main Street	HOPE, RI 02831			7/22/24
10	Diana Hopkins	8 High Street	HOPE, RI 02831			7/22/24
11	Kirk Loiselle	1 High Street	HOPE, RI 02831			7/23/24
12	Julie Windward	7 Harrington Avenue	HOPE, RI 02831			7/23/24
13	Dathen Fromen	80 Main Street Apt B	HOPE, RI 02831			7/23/24
14	Caterina Rainer	80 Main Street Apt A	HOPE, RI 02831			7/23/24
15	Lucy Barroso	76 Main Street	HOPE, RI 02831			7/23/24
16	Kenny Barroso	76 Main Street	HOPE, RI 02831			7/23/24

	PRINTED NAME	ADDRESS	Town/Zip Code	Email	Phone	DATE
17	Jose Barroso	76 Main Street	HOPE, RI 02831			7/23/24
18	Pat Jennings	68 Main Street	HOPE, RI 02831			7/23/24
19	Jack Jennings	68 Main Street	HOPE, RI 02831			7/23/24
20	Courtney Griffith	29 Main Street	HOPE, RI 02831			7/23/24
21	Joe Dionne	29 Main Street	HOPE, RI 02831			7/23/24
22	Valerie Rudolph	28 Main Street	HOPE, RI 02831			7/23/24
23	John E. Rudolph	28 Main Street	HOPE, RI 02831			7/23/24
24	John A. Rudolph	28 Main Street	HOPE, RI 02831			7/23/24
25	(Space was used to correct phone number)	---	---			7/23/24
26	Anne Linstrom	44 Main Street	HOPE, RI 02831			7/23/24
27	Paul Mederos	9 Goddard Street	HOPE, RI 02831			7/23/24
28	E. (Enrique) Gauthier	422 North Road	HOPE, RI 02831			7/23/24
29	Abigail Crovisier	56 Main Street	HOPE, RI 02831			7/23/24
30	Brianne Flanagan	12 Ives Street	HOPE, RI 02831			7/23/24
31	Barry Flanagan	12 Ives Street	HOPE, RI 02831			7/23/24
32	Erin DiNobile	88 Main Street	HOPE, RI 02831			7/23/24
33	JJ Wyatt	103 Main Streett	HOPE, RI 02831			7/23/24
33	Josephine Odutingbo	21 Harrington Avenue	HOPE, RI 02831			7/23/24

	PRINTED NAME	ADDRESS	Town/Zip Code	Email	Phone	DATE
34	Monica Austin	33 Harrington Avenue	HOPE, RI 02831			7/23/24
35	Julie Brunelle	44 Harrington Avenue	HOPE, RI 02831			7/23/24
36	Melissa Argenti	8 Richard Street	HOPE, RI 02831			7/23/24
37	Thomas Argenti *	8 Richard Street	HOPE, RI 02831			7/23/24
38						