



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

December 4, 2012

Mr. Gregory L. Simpson  
Project Manager  
Textron, Inc.  
40 Westminster Street  
Providence, RI 02903

RE: Draft Remedial Action Work Plan for Groundwater Pump and Treat System  
Former Gorham Manufacturing Facility – Parcel A Retail Complex  
333 Adelaide Ave., Providence, RI  
**Case No. 97-030**

Dear Mr. Simpson:

On November 9, 2011, the Rhode Island Department of Environmental Management (the Department) amended the 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 an efficient manner.

In the matter of the above referenced “Site” (as defined in the Industrial Property Remediation and Reuse Act), the Department’s Office of Waste Management (OWM) has on file the following document regarding the proposed remedial action:

1. Remedial Action Work Plan, Former Gorham Manufacturing Facility, Textron, Providence, RI (RAWP), prepared by AECOM Environment (AECOM), dated October 2012, and received October 31, 2012.

Based upon the Department’s review of the above listed document for consistency with Sections 8.00 (Risk Management) and 9.00 (Remedial Action Work Plan) of the Remediation Regulations, the OWM has the following questions and comments:

- 1) Regarding RAWP Section 2.2 (Surface Water and Sediment Objectives), discussions are ongoing between the OWM and the Department’s Office of Water Resources to determine if the current site specific remedial objective compliance standards for groundwater migrating to surface water need to be revised. Therefore, the Department reserves the right to require the adjustment or modification of the currently used site specific remedial objective compliance standards (applicable to the groundwater monitoring wells being used to monitor groundwater migrating into Mashapaug Cove) in the future at the Department’s discretion.

- 2) Regarding RAWP Section 2.4 (Air Objectives) and Section 3.5 (Vapor Treatment), in accordance with the Department's Office of Air Resources (OAR), Air Pollution Control Regulation No. 9 - Air Pollution Control Permits, Rule 9.3.2 (Exemptions), prior to the construction, installation or modification of the air stripper vapor treatment system, Textron/AECOM must file a registration form with the OAR. Following the installation of the air stripper vapor treatment system, its proper operation must be evaluated by periodic compliance sampling with analytical laboratory testing of the inflow and outflow to verify actual emission values, and to demonstrate compliance with the applicable air pollution emissions thresholds in order to confirm that an Air Pollution Control (APC) permit is not required under the OAR APC Reg. No. 9.
- 3) Regarding RAWP Section 6.0 (Points of Compliance):
  - a) In order to demonstrate and measure the progress of groundwater remediation of the chlorinated volatile organic compound (CVOC) groundwater plume, please include the periodic sampling and analysis of groundwater from monitor wells that have historically exhibited significantly elevated concentrations of CVOCs. At a minimum please include the following monitor wells if they still exist: MW-222S, MW-224S, MW-226D, MW-227D and MW-228S. Also, please include the sampling and analysis of groundwater from a monitor well located downgradient of RW-1.
  - b) Based upon our recent conversations, the Department understands that the periodic site groundwater monitoring currently being performed by Shaw Environmental, Inc. (Shaw) will continue for at least one more year. As we discussed, it is the Department's position that several of the wells monitored by Shaw must be considered when evaluating the compliance status and effectiveness of the groundwater treatment system. Therefore, any alterations to the Shaw groundwater monitoring program must be approved by the Department before implementation.
- 4) Regarding RAWP Section 11.0 (Set-up Plans), the first sentence references "*sediment and surface soil removal.*" The Department has presumed that the reference to sediments is a typographical or transcription error. Please verify this or clarify the sediment reference.
- 5) Regarding RAWP Section 11.2 (Site Access), site access should be limited to authorized personnel only. Trespassers and unauthorized personnel must be restricted from entering the secured work area and temporary stockpile area.
- 6) Regarding RAWP Section 11.5 (Stockpile Areas), all excavated soil must be presumed to be impacted and regulated until such time as it is demonstrated to the Department, through sampling and laboratory analysis, that it is not regulated. All excavated soil must be either containerized or placed upon and covered by polyethylene sheeting in the secured work area or stockpile area until backfilled into the excavated trenches. Regulated soil and clean fill must be segregated from each other in the stockpile area. If it is anticipated that stockpiled regulated soil will not be backfilled or transported from the site for proper disposal at the end of the work day, then temporary security fencing should be employed around the stockpile area. Best

management practices must be utilized to minimize and control generation of dust during excavation, movement or storage of regulated soils. At the completion of site work, all exposed soils are required to be recapped with Department approved engineered controls consistent or better than the site surface conditions prior to the work that took place. Soils excavated from the site may not be re-used as fill on residential property.

- 7) Regarding RAWP Section 15.2 (Closure Requirements), in accordance with Rule 11.09 (Closure and Post Closure) of the Remediation Regulations, compliance with the Remedial Action Approval shall be documented in a Closure Report submitted to the Department for review and approval. In addition to the items listed on page 15-1, the Remedial Action Closure Report should also include the following items:
  - a) Results of all analytical sampling of any media (e.g. soil, groundwater, effluent, dust or air) performed during the remedial activities;
  - b) All original laboratory analytical data results from the remedial activities, compliance and confirmation sampling, as applicable; and
  - c) Documentation that all excess regulated soil, solid waste, remediation waste, etc. was properly disposed of off site at an appropriately licensed facility in accordance with all applicable laws.
  
- 8) Regarding RAWP Section 17.1 (Primary Source Areas):
  - a) The Department requests at a minimum for the first year of operation that groundwater sampling be performed and reported on a quarterly basis and semi annually thereafter. Periodic groundwater monitoring reports should be prepared after each groundwater sampling round and include at a minimum the following items:
    - i) The groundwater sampling results from the current round;
    - ii) A tabulated comparison of the current groundwater sampling results to the remedial objectives;
    - iii) An updated site figure depicting all sampling and point of compliance locations;
    - iv) Individual site figures depicting the current groundwater sampling round's concentration gradient for each contaminant of concern that currently exceeds the applicable groundwater remedial objective. At a minimum the list should include trichloroethylene and tetrachloroethylene;
    - v) The periodic water sampling and analysis results required under the Department's Rhode Island Pollution Discharge Elimination System (RIPDES) Permit (i.e. extracted groundwater influent prior to treatment and groundwater at the discharge point after treatment) collected during the current reporting period; and

- vi) Periodic air stripper vapor treatment system compliance sampling results and a comparison to applicable air pollution emissions thresholds.
- b) The Department does not concur with the statement that *“Compliance with remedial objectives in the primary source areas will be achieved when POC sampling indicates that the remedial objectives have substantially been met. Minor exceedances will be considered to be in compliance.”* It is the Department’s position that compliance is determined when remedial objectives have been demonstrated to have been achieved to the Department’s satisfaction. In the event that the remedial objectives cannot reasonably be achieved with the approved remedial approach, discussions about revising the remedial approach may be initiated.

All correspondence regarding this Site should be sent to the attention of:

Joseph T. Martella II – Senior Engineer  
RIDEM / Office of Waste Management  
235 Promenade Street  
Providence, RI 02908

If you have any questions regarding this letter, please contact me by telephone at (401) 222-2797 extension 7109 or by e-mail at [joseph.martella@dem.ri.gov](mailto:joseph.martella@dem.ri.gov).

Sincerely,



Joseph T. Martella II  
Senior Engineer  
Rhode Island DEM  
Office of Waste Management

cc: Kelly J. Owens, RIDEM/OWM  
Alisa Richardson, RIDEM/OWR  
Douglas McVay, RIDEM/OAR  
Hon. Angel Taveras, Mayor, City of Providence  
Senator Juan M. Pichardo, District 2  
Representative Scott A. Slater  
Councilman Wilbur W. Jennings Jr., Ward 8  
Robert E. Azar, Providence Department of Planning and Development  
April H. Wolf, Providence Planning Department  
Richard P. Michalewich, AECOM  
Amelia Rose, EJLRI  
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