



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

September 26, 2005

RECEIVED

SEP 29 2005

EA ENGINEERING, SCIENCE
AND TECHNOLOGY, INC.
BY _____

CERTIFIED MAIL

PROGRAM LETTER

Case No. 2005-029

Alan Sepe, Acting Director
Department of Public Properties
City of Providence
25 Dorrance Street
Providence, RI 02903

RE: Proposed Providence Public School Site
(Former) Gorham Textron Dump Property, 333 Adelaide Avenue, Parcel B, Providence
City of Providence Tax Assessor's Office Plat 51, Lot 170, Parcel B

Dear Mr. Sepe:

On 24 February 2004, the Rhode Island Department of Environmental Management (the Department) enacted the amended 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, the Department's Office of Waste Management (OWM) has on file the following document prepared for former property owner, Textron, Inc. (Textron), concerning environmental conditions at the Site:

- A. Site Investigation Summary Report and Risk Assessment, Former Gorham Manufacturing Property, 333 Adelaide Avenue, Providence, Rhode Island, prepared by Harding Lawson Associates (HLA), dated 29 July 1999;

As well as the following documents concerning existing environmental conditions and the proposed development of the Site by the current property owner, the City of Providence (the "City"):

- B. Letter from EA Engineering, Science, and Technology, Inc. (EA), Re: Geotechnical Engineering Activities, Former Gorham Manufacturing Site, Parcel B, 333 Adelaide



Avenue, Providence, Rhode Island, dated March 8, 2005, received via electronic mail on March 15, 2005;

- C. Letter of Responsibility issued to the City by the Department, Re: Proposed Providence Public School Site, (Former) Gorham Textron Dump Property, 333 Adelaide Avenue, Parcel B, Providence, City of Providence Tax Assessor's Office Plat 51, Lot 170, Parcel B, dated April 1, 2005;
- D. Site Investigation Report Addendum, Former Gorham Manufacturing – Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, dated April 2005, received April 1, 2005;
- E. Letter from EA to the Department, Re: Remedial Alternatives, Gorham Manufacturing Site, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, dated April 5, 2005, received via electronic mail;
- F. Comment Letter from the Department to the City, Re: Site Investigation Report Comments - Proposed Providence Public School Site, (Former) Gorham Textron Dump Property, 333 Adelaide Avenue, Parcel B, Providence, City of Providence Tax Assessor's Office Plat 51, Lot 170, Parcel B, Case No. 2005-029,
- G. Letter Report from EA to the Department, Re: Response to RIDEM Letter of Responsibility, dated 1 April 2005, Former Gorham Manufacturing Facility, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, Case No. 2005-029, dated April 22, 2005, received April 25, 2005;
- H. Letter from EA to the Department, Re: Response to RIDEM Site Investigation Report Comments, dated 20 April 2005, Former Gorham Manufacturing Facility, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, Case No. 2005-029, dated May 6, 2005, received May 9, 2005;
- I. Comment Letter from the Department to the City, Re: Site Investigation Report Comments - Proposed Providence Public School Site, (Former) Gorham Textron Dump Property, 333 Adelaide Avenue, Parcel B, Providence, City of Providence Tax Assessor's Office Plat 51, Lot 170, Parcel B, Case No. 2005-029, dated May 19, 2005;
- J. Limited Remedial Action Work Plan, Former Gorham Manufacturing Site, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island (LRAWP), prepared by EA, dated July 12, 2005, received July 13, 2005;
- K. Comment Letter from the Department to the City, Re: Limited Remedial Action Work Plan Comments - Proposed Providence Public School Site, (Former) Gorham Textron Dump Property, 333 Adelaide Avenue, Parcel B, Providence, City of Providence Tax Assessor's Office Plat 51, Lot 170, Parcel B, Case No. 2005-029, dated July 15, 2005;

- L. DRAFT Response to RIDEM Limited Remedial Action Work Plan Comments dated 15 July 2005, Former Gorham Manufacturing Facility, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, prepared by EA, dated and received at Department meeting on July 26, 2005;
- M. Response to RIDEM Limited Remedial Action Work Plan Comments dated 15 July 2005, Former Gorham Manufacturing Facility, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, prepared by EA, dated and received August 4, 2005;
- N. Letter from the Department to EA, Re: Proposed Limited Remedial Action Work Plan, Former Gorham Manufacturing Facility, Parcel B, off Adelaide Avenue, Providence, CASE # 2005-029, dated August 5, 2005;
- O. Limited Remedial Action Work Plan and Supplementary Site Investigation Summary Report, Former Gorham Manufacturing Site, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island (LRAWP Summary), prepared by EA, dated September 2005, received September 23, 2005; and
- P. Letter from EA to the Department, Re: Final Limited Remedial Action Work Plan and Supplementary Site Investigation Summary Report, Former Gorham Manufacturing Site, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, dated September 2005, received September 23, 2005.

This Program Letter is issued pursuant to Rule 7.07 B. to confirm that the City's site investigation activities are complete and that the Department considers the above-listed reports to constitute a complete Site Investigation Report (SIR) pursuant to Rules 7.03 and 7.04 of the Remediation Regulations that adequately assesses the nature and extent of contamination at the subject site. Prior to the Department's consideration of the SIR for formal approval, the City must provide public notice that the site investigation is complete, inform the public of the findings of the investigation and the proposed remedial alternative and provide the public with the opportunity to comment on the technical feasibility of the preferred remedial alternative.

This Program Letter is given to the City contingent on the City supplementing its June 8, 2005 letter regarding environmental equity considerations with additional information describing the procedures and considerations used by the City in locating potential sites for the school construction project in question and describing how and why the subject site was selected from among other prospective sites given the site's historic use and well-documented contamination.

Rules 7.07 and 7.09 of the Remediation Regulations address the requirements for public notice regarding the substantive findings of the completed investigation and the opportunity for public review and comment on the technical feasibility of the proposed remedial alternative. To date it is the Department's understanding that the City intends to fulfill its public notice obligation through written notification to abutting property owners, members of the Reservoir Triangle neighborhood and parents of prospective students at the proposed public school, followed by a Public Forum and subsequent Public Hearing.

The Department will formally approve the SIR in the form of a Remedial Decision Letter (RDL) upon Department approval of all final responses to relevant public comments submitted at the completion of the public comment and hearing process, and approval of the City's supplemental submission to its June 8, 2005, letter regarding environmental equity considerations. At that point, we can proceed into the Remedial Action phase of the project, which entails the submission of a draft Remedial Action Work Plan (RAWP) for review and approval. The RAWP should include a site-specific version of the Soil Management Plan (SMP) as well as the proposed Environmental Land Usage Restriction (ELUR). It is the Department's understanding that the proposed Remedial Action will incorporate the following items:

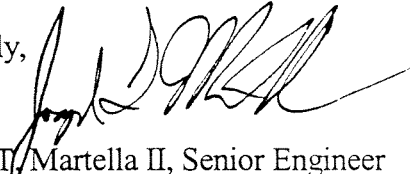
1. Encapsulation of all regulated site soils through the installation of Department approved engineered controls (including building foot prints, side walks, asphalt paved driveways and parking areas, landscaped areas, or other engineered caps). All Department approved engineered controls will provide a level of protection equivalent to a minimum of two feet of clean soil. All engineered controls installed over areas known or suspected to be subject to the Rules and Regulations for Composting Facilities and Solid Waste Management Facilities (Solid Waste Regulations), and under the jurisdiction of the Solid Waste Program, will consist of a minimum of two feet of clean soil;
2. Installation and maintenance of a secure fence surrounding the school property as well as posting of signs in multiple languages (as applicable), to deter trespassing into areas of the former Gorham/Textron property, including the shore of Mashapaug Pond, which have not been assessed or remediated and/or which pose exposure risks due to elevated levels of contamination.
3. Restricted residential usage of the property in the form of a public high school, by recording in the property's land evidence records an approved Institutional Control, as well as maintenance of all installed engineered controls;
4. Installation, testing, operation, monitoring and maintenance of an active sub slab vapor collection and control system, properly designed to prevent the infiltration and/or buildup of dangerous levels of volatile organic compound (VOC) vapors or methane gas in the subsurface or within the indoor air of onsite structures.
5. Based upon the final design of the active venting system, submission to the Department's Office of Air Resources, a calculated estimate of the amount of contaminant vapor to be discharged in order to determine if treatment or a Permit under Air Pollution Control (APC) Regulation No. 9 is required for the proposed active venting system. Following the installation of the sub-slab ventilation system, its proper operation shall be tested to demonstrate compliance with the Department approved performance criteria in the final RAWP, and to verify actual emission values.
6. Preparation and submission of a Remedial Action Closure Report documenting the work performed, and including as applicable all original laboratory analytical data results from

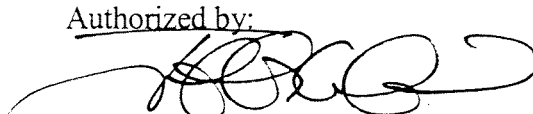
the remedial activities, disposal documentation, compliance and confirmation sampling, clean fill sampling, dust and air monitoring data, and the sub-slab ventilation system Performance Certification signed by authorized representatives of the City and EA;

7. Allowing access to site to other responsible parties for the purpose of future investigation, remediation and/or monitoring of contamination at the site.
8. The above mentioned Institutional Control shall be in the form of an ELUR with an associated site specific SMP. The ELUR will be recorded in the Providence Land Evidence Records at the time of this project's completion, and will specify all of the site conditions, restrictions and emergency provisions in order to meet the appropriate Remedial Objectives as defined in the Remediation Regulations. A recorded copy of the Department approved ELUR will be forwarded back to the OWM prior to the issuance of the Interim Letter of Compliance (ILOC); and
9. Maintenance and annual inspection and certification of the engineered controls and portions of the property subject to the institutional controls by an environmental professional.

As the Performing Party, the City of Providence will be responsible for properly conducting the all of the above-listed activities.

If you have any questions regarding this letter, please contact me by telephone at (401) 222-2797 ext. 7109, or by email at joseph.martella@dem.ri.gov.

Sincerely,

Joseph T. Martella II, Senior Engineer
Office of Waste Management
Department of Environmental Management

Authorized by:

Jeffrey Crawford, Principal Scientist
Office of Waste Management
Department of Environmental Management

XC: Terrence D. Gray, P.E., Assistant Director, RIDEM/AW&C
Leo Hellested, P.E., Chief, DEM/OWM
Kelly J. Owens, RIDEM/OWM
Brian Wagner, Esq., DEM/OLS
Christopher Walusiak, RIDEM/OWM Landfill Closure Program
Douglas McVay, RIDEM/OAR
Dr. Robert Vanderslice, PHD, RIDOH
Barbara Morin, RIDEM/OAR
Senator Juan M. Pichardo, District 2
Hon. David N. Cicilline, Mayor, City of Providence
John J. Lombardi, City of Providence
Thomas Deller, City of Providence
Sarah Rapport, Esq., City of Providence
John M. Boehnert, Esq, PS&H
Timothy Regan, EA
Gregory Simpson, Textron