



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

August 11, 2010

Mr. Robert F. McMahon, Superintendent
Providence Parks Department
Dalrymple Boathouse
Roger Williams Park
Providence, RI 02905

RE: Lincoln Lace & Braid – Mill Site
55-61 Ponagansett Street
Plat 113 / Lots 305 and 429
Providence, Rhode Island
Case No. 2009-018

Dear Mr. McMahon:

In the matter of the above referenced site, the Rhode Island Department of Environmental Management (the Department) Office of Waste Management (OWM) has received and reviewed the following document, submitted on behalf of the City of Providence (the City), in accordance with Section 9.00 (Remedial Action Work Plan) of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (Remediation Regulations):

- **Remedial Action Work Plan (RAWP)**, dated June 2010, prepared and submitted by EA Engineering, Science, and Technology, Inc. (EA), received by the Department on June 9, 2010.

In addition to the abovementioned item, the Department requires that you address the attached questions, concerns, and/or comments in order to obtain a **Remedial Approval Letter** in accordance with Section 9.0 of the Remediation Regulations.

If you have any questions, please contact me by telephone at (401) 222-2797 x7147 or by e-mail at tim.fleury@dem.ri.gov.

Sincerely,

Timothy M. Fleury
Senior Engineer
Office of Waste Management

Cc: Kelly Owens, RIDEM / Office of Waste Management
Jeffrey Crawford, RIDEM / Office of Waste Management
Elizabeth Stone, Office of the Director
Ronald Gagnon, Office of Customer and Technical Assistance
Martin Wencek, Office of Water Resources – Wetlands
Aaron Mello, Office of Water Resources - RIPDES
Alan Peterson, U.S. Environmental Protection Agency
Steven Fischbach, Rhode Island Legal Services
Gilberta Taylor, Hartford Park Residents Association
Lisa Aurecchia, Woonasquatucket River Watershed Council
Frank Postma, EA Engineering, Science, and Technology, Inc.
Ronald Mack, EA Engineering, Science, and Technology, Inc.

RIDEM COMMENTS

August 11, 2010

Remedial Action Work Plan Lincoln Lace & Braid – Mill Site 55-61 Ponagansett Street, Providence

General Comments

1. These remedial activities also fall under the jurisdiction of the Army Corp. of Engineers (Army Corp.) due to the filling in of a wetland (sluiceway) and due to dewatering activities. Please contact the Army Corp. for any further permits that may be necessary.
2. Please submit revised site plans that reflect the following changes:
 - The final layout of the bike path (be sure that the plan clearly notes that the bike path is not part of this remediation effort and is a separate project that will be pursued in the future).
 - The limits of disturbance, reflecting clearing, grading, and revegetation.
 - The areas to be preserved, which must include a thirty (30) foot buffer along the Woonasquatucket River (the River) extending from the sluiceway upstream to the concrete wall “overlook” and then running further in an upstream direction along the metal fence and continuing in a straight line to the northwesterly end of the project area.
 - The depiction of the specific trees to be preserved (greater than 12” in diameter unless showing visual signs of disease and/or infestation), along with their approximate diameters in the east-southeastern portion of the capped areas and in the preserved areas between the future, proposed bike path and the River.
 - The 200 foot riverbank wetland associated with the River.
 - The labeling of the sluiceway as an “area subject to flooding.”

Specific Comments

1. Section 3.1 Engineered Cap

The Department has concerns regarding the capping methods (one (1) foot of fill over a geotextile) in close proximity to the preserved trees. Discussion, during a site walkover on July 20, 2010, proposed replacing the clean fill with aggregate and replacing the geotextile with a geogrid to allow for water and oxygen to infiltrate through to the root system below the tree canopy. Please modify the capping scenarios proposed in these areas or include “tree wells” or metal grates to ensure that the root systems will get adequate water and oxygen for survival.

The Department also has concerns regarding the slope stability and wetland preservation between the proposed bike path and the River. The RAWP proposes to clear cut all of the vegetation and cap this area. This clear cutting will have significant implications on slope stabilization of the River and significantly impact wildlife. Such clearing must be eliminated (per the Office of Water Resources’ Freshwater Wetlands Division) in this area as part of this work, and trees with a diameter of greater than 12” must be preserved. However, due to the presence of soil contamination, capping shall be implemented. Recent discussions with EA proposed capping this area with six (6) inches of clean fill or loam overlying construction fencing to serve as a cap and to also allow the wetland planting roots to thrive through the construction fencing material. Furthermore, during the site walkover on July 20, 2010,

EA and the Department discussed the construction of post and beam fencing along the proposed bike path and the use of “deterrent, thorny” species of plantings between the fence and the River, preventing and discouraging access to visitors. This fencing with the “deterrent, thorny” species of plantings must be part of this remedy and shall be installed prior to the Department issuing a Letter of Compliance for the property. Please update the RAWP and site plans to reflect these discussions in further detail (i.e. preserving larger trees for slope stabilization, etc...). Also, please notify the Department regarding a schedule for fence and bike path installation/construction.

2. Figure 3. Proposed Conditions

Please clarify the “cover system 5” on Figure 3. The area outside of the actual limits of the sluiceway (sub aqueous area) is shaded to be capped by this method. Which capping method is proposed for this area (the area south and west of the sluiceway)? Also note and ensure that the sluiceway itself will remain as wetland upon completion of the remediation efforts.

3. Figure 7. Planting Plan

Figure 7 labels the “100-year flood plain line” as “edge of water.” Please resubmit this plan with the corrected change.

4. Appendix E. Floodplain Calculations

Due to the capping modifications, the floodplain calculations may need to be updated. If so, please update and resubmit these calculations.