



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

**REMEDIAL DECISION LETTER**

March 27, 2015

**File No. SR-28-0549D**

(Formerly Case No. 2005-059 - Associated with Case No. 97-030)

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

RE: Former Gorham Manufacturing Site  
Phase II Area- Mashapaug Pond and Cove, Phase III Area - Northeast Upland and Parcel C  
333 Adelaide Avenue, Providence, Rhode Island

Dear Mr. Simpson:

On November 9, 2011, the Rhode Island Department of Environmental Management's (the Department) Office of Waste Management (OWM) 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 a timely and cost-effective manner. A Remedial Decision Letter (RDL) is a formal, written communication from the Department that approves a site investigation, identifies the preferred remedial alternative and authorizes the development of a Remedial Action Work Plan (RAWP) in order to achieve the objectives of the environmental clean-up.

In the matter of the above-referenced property (the Site), the Department's OWM is in receipt of the following documentation submitted pursuant to the Remediation Regulations in response to the reported release at the Site:

1. Site Investigation Report, Former Gorham Manufacturing Site, Phase II Area – Mashapaug Pond and Cove, Phase III Area – Northeast Upland and Parcel C, 333 Adelaide Avenue, Providence, Rhode Island, received by the Department on November 12, 2013, and prepared by AMEC Environment & Infrastructure, Inc. (AMEC);
2. Site Investigation Report, Former Gorham Manufacturing Site, Phase II Area – Mashapaug Pond and Cove, Phase III Area – Northeast Upland and Parcel C, 333 Adelaide Avenue, Providence, Rhode Island, received by the Department on December 19, 2014, and prepared by AMEC;

3. Response to RIDEM Review Comments, December 17, 2014 Risk Memo, Former Gorham Manufacturing Facility, 333 Adelaide Avenue, Providence, Rhode Island, received by the Department on January 19, 2015, and prepared by AMEC; and
4. Gorham Public Questions & Answers, Site Investigation Report, Former Gorham Manufacturing Facility, Phase II Area – Mashapaug Pond and Cove, Phase III Area – Northeast Upland Parcel C, 333 Adelaide Ave., Providence, RI, Public Meeting Date: February 5, 2015, Public Comment Period Closed: February 20, 2015, received by the Department on March 16, 2015, and prepared by AMEC.

Collectively, these documents define “Existing contamination” at the Site, and fulfill the requirements of a Site Investigation Report (SIR) as described in Rule 7.08 of the Remediation Regulations. In addition, according to our records, public notice was conducted to all abutting property owners, tenants, easement holders, the municipality and the Environmental Justice Focus Area, regarding the substantive findings of the completed investigation in accordance with Rules 7.07(A)(ii) and 7.09 of the Remediation Regulations. The Department has received documentation demonstrating that the requirements of Rhode Island General Laws (R.I.G.L.), Title 23, Health and Safety, Chapter 23-19.14, Industrial Property Remediation and Reuse Act, 23-19.14-5, Environmental Equity and Public Participation, have been fulfilled. The opportunity for public review and comment on the technical feasibility of the proposed remedial alternatives commenced on February 5, 2015, and the period closed on February 20, 2015. Public comments were received regarding dust management, sediment removal, dewatering activities, and responsibility for maintaining the engineered caps, and were formally responded to in writing on March 17, 2015, by AMEC on behalf of Tectron. No additional comments on the technical feasibility of the proposed remedy were received.

The preferred remedial alternative, as stated in the SIR, consists of the following conceptual measures:

**The Phase II Area Remedial Alternative is removal of approximately two (2) feet of impacted inner cove sediment by placement of a Porta Dam between the inner cove and outer cove, dewatering the inner cove and mechanical excavation of the sediment. The excavated and dewatered sediment will be placed in the former Carriage House portion of the Phase III Area, under an engineered cap. After the sediment removal is completed, the remaining inner cove sediments will be capped by one foot of clean soil, followed by wetland restoration activities.**

**The Phase III Area Remedial Alternative is capping of the existing impacted soils in place and capping the excavated and dewatered sediment from the inner cove in the former Carriage House area. The proposed engineered cap will be constructed of a permeable high-visibility marker fabric, placed over the compacted surface soil and impacted sediments, overlain by 12 inches of clean imported topsoil, which will be seeded and maintained.**

**The Parcel C Area Remedial Alternative is an engineered cap consistent with what is proposed for the Phase III Area, constructed of a permeable high-visibility marker fabric,**

**placed over the compacted surface soil and overlain by 12 inches of clean imported topsoil, which will be seeded and maintained.**

**All remedial areas will be subject to an Environmental Land Usage Restriction (ELUR) and Soil Management Plan (SMP).**

The Department hereby approves the SIR, with the above identified preferred remedial alternative, and requires a RAWP be submitted for review and approval, and implemented, to achieve the objectives of the environmental clean-up, in accordance with the following conditions:

1. In accordance with Sections 8.00 and 9.00 of the Remediation Regulations, a RAWP, ELUR, and SMP shall be submitted for Department review and approval within sixty (60) days from the date of this letter. The RAWP shall describe all of the technical details, engineer design elements, and schedules associated with the implementation of the proposed remedy. All of the subsections outlined in Section 9.00 of the Remediation Regulations must be included in order to facilitate the review and approval of the RAWP. If an item is not applicable to this Site, simply state that it is not applicable and provide an explanation in the RAWP.
2. Pursuant to Rule 10.02 of the Remediation Regulations, an application fee for Remedial Action Approvals in the amount of one thousand (\$1,000.00) dollars shall be made payable to the State of Rhode Island General Treasurer and remitted to the Office of Management Services with the attached Remedial Action Approval Application Fee Form. Receipt of this Remedial Action Approval Application Fee is required prior to the Department's RAWP review.
3. Once the Department reviews the RAWP for consistency with Sections 8.00 and 9.00 of the Remediation Regulations, any written comments generated and forwarded as a result of the review(s) shall be incorporated forthwith into a RAWP Addendum, to be submitted for final approval.
4. Upon finalization of the RAWP, the Department will issue a Remedial Approval Letter (RAL), signifying Department approval. All remedial measures required by the Department shall be implemented, in accordance with the approved schedule, to ensure all applicable exposure pathways at the site are appropriately addressed.

**Please be advised that the Department reserves the right to require additional actions under the aforementioned Remediation Regulations at the Property should any of the following occur:**

- Conditions at the Site previously unknown to the Department are discovered;
- Information previously unknown to the Department becomes available;
- Policy and/or regulatory requirements change; and/or

- Failure by Textron, the City of Providence, or any future holder of any interest in the Property to adhere to the terms and conditions of the Department approved RAWP, schedule, RAL, ELUR and/or SMP for the Property.

If you have any questions regarding this letter or would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 222-2797, ext. 7109, or by E-mail at joseph.martella@dem.ri.gov.

Sincerely,



Joseph T. Martella II  
Senior Engineer  
Office of Waste Management

cc: Terrence D. Gray, P.E., Assistant Director, RIDEM/AW&C  
Kelly J. Owens, RIDEM/OWM  
Susan Forcier, Esq., RIDEM/OLS  
Elizabeth Scott, RIDEM/OWR  
Alisa Richardson, RIDEM/OWR  
Charles Horbert, RIDEM/OWR/Freshwater Wetlands Program  
Richard Enander, PhD, RIDEM/OC&TA  
Michael J. Elliott, Army Corps of Engineers  
Hon. Jorge Elorza, 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 Planning Department  
Robert F. McMahon, Providence Parks Department  
David Heislein, AMEC  
EJLRI  
Knight Memorial Library – Project Repository

Attachment: Remedial Action Approval Application Fee Form



**Rhode Island Department of Environmental Management  
Office of Waste Management**

**REMEDIAL ACTION APPROVAL APPLICATION FEE FORM**

Rule 10.02 of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, requires an application fee for Remedial Action Approvals in the amount of one thousand (\$1,000) dollars. Please submit this form and check, made payable to the State of Rhode Island General Treasurer, directly to:

**R.I. Department of Environmental Management  
Office of Management Services - Rm 340  
235 Promenade Street  
Providence, RI 02908**

Please complete this page and attach it to the check or money order. This information must be provided to coordinate your fee with the application submitted.

Site Name: Textron Mashapaug Pond – Phase 2

Address: \_\_\_\_\_

Town/City: \_\_\_\_\_

File Number: SR-28-0549D

Contact Person: \_\_\_\_\_

Phone No: \_\_\_\_\_

RIDEM Project Manager: Joseph Martella

**FOR RIDEM OFFICE USE ONLY:**

Fee Amount Received: \_\_\_\_\_

Date Received: \_\_\_\_\_

Check#: \_\_\_\_\_

Receipt Account:

10.074.3765103.03.461043

cc:74:3481 Leg.17-18-841