



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

May 24, 2004

REMEDIAL DECISION LETTER

Case No. 2004-014 (Formerly part of Case No. 97-030)

Ms Susan Rittscher
President and CEO
YMCA of Greater Providence
222 Richmond Street
Providence, RI 02903

RE: Providence YMCA – Parcel C (Formerly a portion of the Gorham/Textron Dump site)
333 Adelaide Avenue, Providence, RI

Ms. Rittscher:

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). A Remedial Decision Letter is a formal Department approval of a conceptual remedy proposed by the performing party as a result of the findings of the Site Investigation.

The Department's Office of Waste Management (OWM) has received the following documents, submitted on behalf of the YMCA of Greater Providence (YMCA), for the purpose of completing the Site Investigation of Parcel C:

1. Site Investigation Report – Additional Assessment Tasks, Providence YMCA – Parcel C, Providence, Rhode Island, prepared by GZA GeoEnvironmental, Inc., (GZA), dated 9 January 2002;
2. Site Investigation Report – Additional Assessment Tasks, Providence YMCA – Parcel C, Providence, Rhode Island, prepared by GZA, dated 29 May 2003, received 27 August 2003;
3. Letter from GZA to the Department, Re: Former Gorham Property, Site Investigation Report, YMCA Development, Providence, Rhode Island, dated 9 February 2004, received 17 February 2004;
4. Letter from GZA to the Department, Re: Response to Comments, Site Investigation Report – Additional Assessment Tasks (Revised), Former Gorham Site (Providence YMCA – Parcel C), Providence, Rhode Island, dated 21 April 2004; and

5. Letter from GZA to the Department, Re: Abutter Notification, Former Gorham Site (Providence YMCA – Parcel C), Providence, Rhode Island, dated 29 April 2004.

In accordance with Section 7 (Site Investigation) of the Remediation Regulations, OWM personnel have reviewed these documents in conjunction with the previously submitted site wide Site Investigation Reports prepared for former property owner, Textron, Inc. (Textron), by Harding Lawson Associates (HLA):

6. Supplemental Site Investigation Report, Proposed Park Subdivision, Former Gorham Manufacturing Property, Adelaide Avenue, Providence, Rhode Island, prepared by HLA, dated 1 December 1998; and
7. Site Investigation Summary Report and Risk Assessment, Former Gorham Manufacturing Property, 333 Adelaide Avenue, Providence, Rhode Island, prepared by HLA, dated 29 July 1999.

These documents fulfill the requirements of a Site Investigation Report (SIR), as described in Section 7 of the Remediation Regulations, for the “main” portion of Parcel C. It is the Department’s understanding that the YMCA intends to complete the SIR for the “campground” portion of Parcel C separately at a later date. Furthermore, given that appropriate public notice for a Site Investigation has been conducted pursuant to Rule 7.07 (Public Notice), as well as appropriate public review and comment pursuant to Rule 7.09 (Remedy Selection), the Department offers its conceptual concurrence with the proposed Remedial Action for the “main” portion of Parcel C.

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 the building foot print, side walks, asphalt parking areas, landscaped areas, or other engineered caps). All engineered controls will provide a level of protection equivalent to a minimum of two feet of clean soil. All engineered controls 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 continuous operation of an active sub-slab ventilation (SSV) system designed to extract soil vapor from under the building, and to prevent the accumulation and/or buildup of methane gas. The SSV system shall also be equipped with an alarm system, and system operation and maintenance will include periodic monitoring of methane levels below the building and in the extracted soil vapor;
- 3) 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, and clean fill sampling;

- 4) An Institutional Control in the form of an Environmental Land Usage Restriction (ELUR) will be recorded in the City of 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 Office of Waste Management (OWM) within 15 days, prior to the issuance of the No Further Action Letter; and
- 5) Maintenance and annual inspection and certification of the engineered controls and portions of the property subject to the institutional controls by an environmental professional.

Please submit a Remedial Action Work Plan (RAWP) to the Department for review and approval. Once the Department's review for consistency with Sections 8 and 9 of the Remediation Regulations is complete, any written comments generated as a result of the review will be forwarded to you immediately. Upon finalization of the RAWP the Department will issue an Order of Approval Letter (Order) signifying that the Department approved RAWP may be implemented. Pursuant to Rule 10.02 of the Remediation Regulations, the application fee for Remedial Action Approvals is one thousand (\$1,000) dollars. Please remit a check in that amount to this office made out to the State of Rhode Island General Treasurer.

As the Performing Party, the YMCA will be responsible for properly conducting the above-listed activities.

All correspondences should be sent to my attention. If you have any questions regarding this letter or if you would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 222-2797 x7109 or by e-mail at jmartell@dem.state.ri.us.

Sincerely,



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

Authorized by:



Kelly J. Owens, Supervising Engineer
Office of Waste Management
Department of Environmental Management

cc: John Langlois, Esq., RIDEM/OLS
Jeffrey Crawford, RIDEM/OWM
Frank Gally, RIDEM/OWM
Susan Kaplan, RIEDC
Christopher Walusiak, RIDEM/OWM
Judith Crowley, YMCA
Robert Nicoloro, MACTEC (f.k.a. Harding ESE & HLA)

David M. McCabe, Textron
John P. Hartley, GZA
Gregory Benik, Esq., H&K

File



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

REMEDIAL DECISION LETTER

June 15, 2001

Mr. Mark Salvetti
Harding ESE
107 Audubon Road
Suite 301
Wakefield MA 01880

RE: Former Gorham Manufacturing
Providence RI
Case No 97-030

Dear Mr. Salvetti:

In August 1996, 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 a timely and cost-effective manner. A Remedial Decision Letter is a formal Department approval of a remedy proposed by the performing party as a result of the findings of the Site Investigation.

In the matter of the above referenced site, the Department has received and reviewed:

1. Site Investigation Summary Report (SIR) for the Former Gorham Manufacturing submitted by Harding Lawson Associates (HLA) on behalf of Textron received September 2, 1999.
2. Responses to RIDEM Comments on Site Investigation Report and Risk Assessment received June 6, 2000
3. Notification to Abutters of Completion of Site Investigation Activities dated October 30, 2000 and received May 1, 2001.

These documents collectively fulfill the requirements of a Site Investigation Report (SIR) as described in Section 7 of the Remediation Regulations. Furthermore, given that appropriate public notice has been conducted pursuant to Rule 7.07 (Public Notice), the Department offers its concurrence with the proposed remedial alternative which includes excavation and asphalt batching

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|------------------------------|--------------------|--------------|--------------|
| NATURE SAVER™ FAX MEMO 01616 | | Date 6/21/01 | # of pages 3 |
| To Dave McCabe | From Mark Salvetti | | |
| Co./Dept. | Co. | | |
| Phone # | Phone # | | |
| Fax # | Fax # | | |

of soils containing petroleum and metal, treatment of groundwater, placement of a soil, asphalt, and/or buildings cover, groundwater-monitoring and an Environmental Land Usage Restriction (ELUR) and soil management plan.

In accordance with Section 9.0 of the Remediation Regulations, the Department has received and is reviewing a Remedial Action Work Plan associated with the implementation of this remedy. Upon approval of the ELUR, the Department will issue an Order of Approval signifying that the remedial action can begin.

If you have any questions or are in need of any clarification regarding this document, please contact me at (401) 222-2797 ext. 7107.

Sincerely,



Garry C. Waldeck
Acting Principal Engineer
Office of Waste Management

cc: Leo Hellested, Chief, RI DEM, Office of Waste Management
John Langlois, Esq, RI DEM Office of Legal Services
Dave McCabe, Textron



PROGRAM LETTER

January 20, 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) 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 petroleum and hazardous material contaminated sites in order to eliminate and/or control threats to human health and the environment in an efficient manner. A Program Letter is a document used by the Department to signify that a Site Investigation has been completed and that a Performing Party must conduct public notice in accordance with Rules 7.07(A)(ii) and 7.09 of the Remediation Regulations concerning the findings of the investigation and the proposed remedial alternatives.

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; and

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.

The Department regards the information provided in these reports as meeting the requirements pursuant to Rule 7.08 of the Remediation Regulations. The preferred remedial alternative proposes the following remedy:

The Phase II Area Remedial Alternative is removal of approximately two (2) feet of impacted inner cove sediment by either Option A (dredging via hydraulic pumping) or Option B (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.

The Department acknowledges that the site investigation activities are complete. The Department is not yet able to formally approve the SIR, however, due to the necessity to first allow the public to comment on the technical feasibility of the preferred remedial alternative. Rules 7.07(A)(ii) and 7.09 of the Remediation Regulations outline the requirements for public notice after the SIR is deemed complete to all abutting property owners, tenants, easement holders, the municipality and the Environmental Justice Focus Area, regarding the substantive findings of the completed investigation and the opportunity for public review and comment on the technical feasibility of the preferred remedial alternative. Please submit a draft notification to the Department via E-mail for review and approval prior to distribution. A boilerplate notification to be distributed can be found online at <http://www.dem.ri.gov/programs/benviron/waste/topicrem.htm>. The Department will require a copy of the approved public notice letter and a list of all recipients upon issuance.

The Department will formally approve the SIR in the form of a Remedial Decision Letter (RDL) once Public Notice is completed and upon Department approval of all final responses to relevant public comments. At that point, the Department will require submission of the draft Remedial Action Work Plan (RAWP), Environmental Land Usage Restriction (ELUR), and Soil Management Plan (SMP), for review and approval in accordance with Sections 8.00 and 9.00 of the

Remediation Regulations. Upon receipt of the RDL, be prepared to submit the Remedial Action Approval Application Fee of one thousand dollars (\$1,000.00) in check form made payable to General Treasurer - State of Rhode Island directly to the Office of Management Services.

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
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



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



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

ORDER OF APPROVAL

July 9, 2015

File No. SR-28-0549D

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

CERTIFIED MAIL

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

Doc No: 00121845
Book # 11167 Page # 54

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
Plat Map 051 / Lot 324

Dear Mr. Simpson:

Enclosed please find the Order of Approval (the Order) for the proposed Remedial Action Work Plan (RAWP), received March 13, 2015, for a multiphase remedy at the abovementioned property. The Phase II area remedy includes removal of impacted inner cove sediment, capping of residual impacted sediment, followed by wetland restoration activities. The Phase III area remedy includes capping of the existing impacted soils in place and capping the excavated and dewatered sediment from the inner cove remedy in the former Carriage House area. The Parcel C remedy includes capping of the existing impacted soils in place. All remedial areas will be subject to an Environmental Land Usage Restriction (ELUR) and Soil Management Plan (SMP). Please review the stipulations of this Order thoroughly to ensure your compliance with the requirements.

Please notify this office 48 hours prior to the beginning of any work related to the remediation of 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.

This Order shall be recorded in the land evidence records of the City of Providence within thirty (30) days of execution and a recorded copy returned to the Department within fifteen (15) days of recording.

Sincerely,

Joseph T. Martella II
Senior Engineer

Former Gorham Manufacturing Site, Phase II & Phase III Areas & Parcel C
Order of Approval

July 9, 2015
Page 1 of 7

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
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
David Heislein, Amec Foster Wheeler
EJLRI
Knight Memorial Library – Project Repository

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

In the matter of the application for Remedial Action Approval at:
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
File No. SR-28-0549D
(Formerly Case No. 2005-059 - Associated with Case No. 97-030)

ORDER OF APPROVAL

In the above entitled matter wherein Textron, Inc. (Textron) in their capacity as Former Owner, Responsible Party and Performing Party for the remediation of the property located at 333 Adelaide Avenue (the Site), Providence (Plat 051 / Lot 324), filed with the Rhode Island Department of Environmental Management (the Department) the following document(s), which collectively fulfill the requirements of Section 9.00 (Remedial Action Work Plan) of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations), amended November 9, 2011:

1. Remedial Action Work Plan, Phase II Area – Mashapaug Inner Cove, Phase III Area – Northeast Upland, and Parcel C, Former Gorham Manufacturing Facility, 333 Adelaide Avenue, Providence, Rhode Island, received by the Department on March 13, 2015, and prepared by Amec Foster Wheeler (AFW);
2. Contract Documents and Technical Specifications for Phase II, III and Parcel C Cap, Former Gorham Manufacturing Site, 333 Adelaide Avenue, Providence, Rhode Island, received by the Department on June 29, 2015, and prepared by AFW;
3. Contract Drawings, Textron, Inc., Phase II, III and Parcel C Cap, Former Gorham Manufacturing Site, 333 Adelaide Avenue, Providence, Rhode Island, received by the Department on June 29, 2015, and prepared by AFW; and
4. Final Response to RIDEM Review Comments, March 2015 Draft Remedial Action Work Plan, Parcel C and Phase II and Phase III Area Remediation, Former Gorham Manufacturing Facility, 333 Adelaide Avenue, Providence, Rhode Island, including the Site Perimeter Action Levels and Soil Management Plan, received by the Department on July 6, 2015, and prepared by AFW.

These documents describe a plan to remediate existing contamination pursuant to Rhode Island General Laws 23-19.14-1 et seq. and the Department's Remediation Regulations, as amended November 9, 2011, in accordance therewith.

It is the Department's intent that all conditions set forth in this Order of Approval (Order) shall remain in full force and effect unless specifically altered by the Department in writing. Furthermore, this letter continues to place primary responsibility for the construction, operation, maintenance, and monitoring of the approved Remedial Action Work Plan (RAWP) and its associated implementation

on Textron. As the Responsible Party and Performing Party, Textron is expected to implement the RAWP in an expeditious and professional manner that prevents non-compliance with this Order and said RAWP, and is protective of human health and the environment.

Upon consideration thereof, the Department of Environmental Management's Office of Waste Management (OWM) approves said plan or means to remediate contamination through this Order provided that:

1. Implementation of the RAWP at the Site shall be initiated within sixty (60) days of execution of this Order.
2. The OWM shall receive written notification forty-eight (48) hours prior to the initiation of any remedial activities.
3. Prior to initiating any remedial activities, the Department shall be provided with a list of all contractors, and their respective contact information, that will be used on Site to complete the remedial work described in the Department approved RAWP. The Department shall be notified, when feasible, a minimum of five (5) working days in advance of any changes in contractors and/or consultants involved with the remedial work on this Site. The notification must be promptly supplied in writing with complete contact information for each new contractor or consultant (including but not limited to company name and address, contact name and address, contact telephone number and e-mail address).
4. All work must be performed in accordance with all applicable regulations and the Department approved RAWP, inclusive of schedules, and must be consistent with Section 11.00 of the Remediation Regulations.
5. The multiphase excavation, capping and restoration remedy remediation goal shall be consistent with Rule 8.01 of the Remediation Regulations, achieved in the Phase II area by dewatering the Mashapaug Pond inner cove, removal of the upper two (2) feet of impacted inner cove sediment, capping of residual impacted sediment with one (1) foot of clean material, followed by wetland restoration activities. The Phase III area remedy shall include capping the excavated and dewatered sediment from the inner cove remedy in the former Carriage House area, and capping the remaining existing impacted Phase III area soils in place. The permeable engineered cap shall be constructed of one (1) foot of clean material placed over a geotextile marker barrier. The Parcel C remedy shall include regrading of the Parcel C area followed by capping of the existing impacted soils in place by construction of a permeable engineered cap consisting of one (1) foot of clean material placed over a geotextile marker barrier. All remedial areas will be subject to a Department approved Environmental Land Usage Restriction (ELUR) and Soil Management Plan (SMP). Parcel C groundwater shall be monitored until it is demonstrated to be compliant with the Department's Method 1 GB Groundwater Objectives. Parcel C-1 groundwater shall be monitored until it is demonstrated to be compliant with the Massachusetts Department of Environmental Protection's (MassDEP's) GW-3 Standards.
6. Textron, and their consultant, are aware of the points of compliance requirements and Rule 8.08 of the Remediation Regulations for offsite GB groundwater exceedances (if applicable).

Rule 8.08 requires a Performing Party to meet compliance with the GB Soil Leachability Objectives and GB groundwater objectives for all contaminants of concern at the property line.

7. The remedial objectives for Parcel C groundwater at the Site shall be the GB Groundwater Objectives, as specified in the Department's Remediation Regulations.
8. The remedial objectives for Parcel C-1 groundwater at the Site shall be the GW-3 Standards, as specified in the MassDEP's Massachusetts Contingency Plan, 310 CMR 40.
9. Sampling and analysis of all media involved in the Remedial Action shall be conducted in strict accordance with the RAWP, the Remediation Regulations, and the requirements of this Order.
10. Groundwater samples shall be collected from monitoring wells MW-235S, MW-236S, MW-237S, MW-FS, MW-241 and MW-D. All groundwater samples shall be laboratory analyzed for volatile organic compounds (VOCs) using EPA Method 8260 until all monitoring wells demonstrate a minimum of three (3) consecutive rounds of sampling where concentrations of VOCs in Parcel C groundwater are below the Department's GB Groundwater Objectives and not showing any increasing concentration trends, and VOCs in Parcel C-1 groundwater are below the MassDEP's GW-3 Standards and not showing any increasing concentration trends.
11. Surface water samples shall be collected from the inner and outer coves 30 days after the completion of Phase II inner cove restoration is complete. The samples from locations SED/SW11 (Mashapaug Pond), SED/SW27 and SED/SW28 (inner cove), and SED/SW36 and SED/SW39 (outer cove), shall be analyzed for PAHs, total and dissolved metals and dioxins.
12. Status reports with project updates and laboratory results as applicable will be due monthly through remediation and construction activities and quarterly thereafter at the OWM for review and within thirty (30) days of each sampling event.
13. Results of all environmental sampling shall be sent to Joseph T. Martella II, Office of Waste Management, 235 Promenade Street, Providence, RI 02908.
14. Tectron or a future performing party may request an alteration of the compliance sampling frequency. All requests must be submitted in writing to the Department, and are subject to final Department review and approval.
15. The OWM shall be immediately notified of any Site or operational condition that results in non-compliance with this Order.
16. Any interruptions of the remedy shall be reported to the OWM's Project Manager, Joseph T. Martella II, by telephone within one (1) working day and in writing within seven (7) days of occurrence.
17. All waste derived from installation and operation of the remedy shall be disposed of in accordance with the RAWP, the Department's Rules and Regulations for Hazardous Waste Management, the Rules and Regulations for Composting Facilities and Solid Waste

Management Facilities, and the Regulations for the Rhode Island Pollutant Discharge Elimination System, as well as any other applicable local, State, or Federal regulations and policies. Documentation of proper disposal shall be provided to the OWM.

18. This Order does not remove Textron's obligation to obtain any other necessary permits from other local, State, or Federal agencies.
19. Textron shall have this Order recorded by the City of Providence in the City of Providence Land Evidence Records for the subject property within thirty (30) days of execution of this Order and prior to any remedial activities. A copy of the recorded Order (stamped with the book and page number) must be submitted to the Department within fifteen (15) days of recording.
20. Within ninety (90) days of the Department approved conclusion of remedial actions at the Site, submit a Closure Report, detailing the Remedial Action, current Site status, groundwater monitoring results, and all disposal documentation to the OWM.
21. Based upon the results of groundwater monitoring, the Department reserves its rights to require additional remedial actions or monitoring at the Property to achieve final compliance at the Site, if warranted.
22. No hazardous waste shall be accepted from any off-site sources for treatment, storage or disposal at the Site.
23. Closure and removal of the remedial system(s) at the conclusion of the remedy will be contingent upon final Department approval.
24. All excavated regulated soil, if not approved for encapsulation onsite, shall be disposed of off-site at an appropriately licensed disposal facility in accordance with all local, State, and Federal laws. Copies of the material shipping records and manifests associated with the disposal of the material shall be included along with the Closure Report.
25. Areas of the site where contaminated soils are to be excavated must be staged and temporarily stored in a designated area, as proposed in the RAWP, of the site with proper polyethylene covers. Any stockpiled materials, including clean fill, must be underlain and covered with polyethylene sheeting and be secured at the end of each day with all appropriate erosion and sediment controls to limit the loss of the cover and protect against storm-water and wind erosion (i.e. hay bales, rocks, silt fencing). These appropriate sedimentation and erosion controls must be in place and in proper working order at all times until all disturbed areas are stabilized and capped as proposed. Within reason, the storage location will be selected to limit the unauthorized access to the materials (i.e. away from public roadways/walkways). No regulated soil will be stockpiled on-site for greater than thirty (30) days. In the event that stockpiled soils pose a risk or threat of leaching hazardous materials, a proper leak-proof container (i.e. drum or lined roll-off) or secondary containment will be required and utilized.
26. The OWM no longer requires the submittal of analytical data prior to clean fill being brought

to a Site. It is the sole responsibility of the Performing Party and their consultant to analyze the material, certify that the material meets the Department's Residential Direct Exposure Criteria (RDEC), as defined by the Remediation Regulations, for all constituents, and is suitable for use on the Site. The OWM strongly suggests that enough representative samples of the clean fill are collected prior to moving the material to the Site to satisfy the Performing Party and their consultant that the material meets the RDEC. Please note that the OWM reserves its rights to sample the fill, if suspect, to confirm compliance with the RDEC.

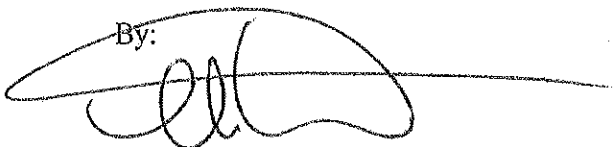
27. All regulated soil remaining onsite shall be encapsulated by an engineered control consistent with those described in the Department approved RAWP.
28. Dust suppression techniques (i.e. watering) must be employed at all times during all soil disturbing/handling activities at the site in order to minimize the generation of fugitive dust.
29. Within sixty (60) days of completion of the work described in the Department approved RAWP, the final Department approved ELUR shall be recorded in the City of Providence Land Evidence Records for the property and a stamped, certified copy returned to the Department within fifteen (15) days of recording. Upon receipt of a copy of the recorded (stamped) ELUR, the OWM will issue an Interim Letter of Compliance.
30. Following recording of the ELUR, the site shall be maintained and annually inspected to evaluate the compliance status of the site with the ELUR. Within thirty (30) days of each annual inspection, an evaluation report shall be prepared and submitted to the OWM detailing the findings of the inspection and noting any compliance violations at the site.
31. Any changes in the activities detailed in the RAWP shall be reported to the OWM by telephone within one (1) working day and in writing within five (5) business days.

This Order shall remain in full force and effect provided said RAWP is implemented in a manner satisfactory to the Department of Environmental Management. Failure to comply with all points outlined in the Department approved RAWP and stipulated in this Order shall result in the revocation of this Order of Approval and may result in the issuance of a Notice of Violation against the Performing Party.

This Order shall be subject to modification or revocation in accordance with law.

Entered as the Order of the Department of Environmental Management this 9TH day of July, 2015.

By:



Matthew D. DeStefano
Deputy Chief, Office of Waste Management
Department of Environmental Management

RECEIVED:

Providence
Received for Record
Jul 13, 2015 at 10:45A
Document Num: 00121845
John A. Murphy
Recorder of Deeds

Notification To Abutters
Extended Work Hours
Former Gorham Manufacturing Facility
Adelaide Avenue, Providence, Rhode Island

August 12, 2015

In accordance with the Rhode Island Department of Environmental Management's (RIDEM's) Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations), **and the Industrial Property Remediation and Reuse Act (Rhode Island General Law 23-19.14, Section 11)**, **Textron Inc. (Textron)** is providing notice to abutters that extended work hours for the remediation activities being conducted at the above listed property have the potential to begin the week of August 15, 2015. The property is further designated as Parcel 324, Plat 051 (Open Space) of the City of Providence Tax Assessor's plat maps.

As indicated in a previous correspondence, Textron's site remediation contractors began activities in late July. To maximize the potential to complete activities this year, the contractors have requested an extension of work hours.

The following work day and hours will be implemented:

- 1) Monday through Friday work hours will be from 7 a.m. to 5 p.m.
- 2) Saturday work hours will be from 8 a.m. to 5 p.m.

This notice, along with historical site information, is available for review on the RIDEM project website: <http://www.dem.ri.gov/programs/benviron/waste/gorham.htm>

Should you have questions about the extended work hours or about the construction of the remedy, please contact Textron or RIDEM at the address below or by calling the telephone number listed below.

Greg Simpson
Textron Inc.
40 Westminster Street
Providence, RI 02903
(401) 457-2635

Joseph T. Martella II, Senior Engineer
R.I. Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, RI 02908-5767
(401) 222-2797

Aviso a los Accionistas
Extensión de las Horas de Trabajo
El antiguo Sitio de Manufactura Gorham
Avenida Adelaide, Providence, Rhode Island

Agosto 12, 2015

De acuerdo con las Reglas y Regulaciones para la Investigación y Rehabilitación del desecho de Materiales Peligrosos (Reglamento de Remediación) del Departamento de Gestión Ambiental de Rhode Island (RIDEM), **y el Acto de Re-uso y Remediación de la Propiedad Industrial (Ley General de Rhode Island 23-19.14, Sección 11), Textron, Inc. (Textron)** está presentando este aviso a los accionistas de que existe la probabilidad de que se requiera una extensión a las horas de trabajo durante las actividades de remediación que se están conduciendo en la propiedad mencionada anteriormente y las nuevas horas pudieran comenzar durante la semana de Agosto 15 del 2015. Adicionalmente, la propiedad en cuestión será nombrada como Parcela #324, Plat 051 (Espacio Abierto) de mapas catastrales del Tasador de Impuestos de la Ciudad de Providence.

Como se indicó en una previa correspondencia, contratistas trabajando en la remediación del sitio Textron comenzaron sus actividades a finales de Julio. Para maximizar la probabilidad de completar las actividades de este año, los contratistas han solicitado una extensión a las horas de trabajo. El siguiente horario de trabajo se llevarán a cabo:

- 1) Lunes a Viernes, las horas de trabajo serán de 7:00 a.m. a 5:00 p.m.
- 2) Sábado, las horas de trabajo serán de 8:00 a.m. a 5:00 p.m.

Este aviso, junto con la información histórica del sitio, estará disponible para su revisión en el sitio web de RIDEM del proyecto: <http://www.dem.ri.gov/programs/benviron/waste/gorham.htm>

Si tiene preguntas acerca de los nuevos horarios de trabajo, o acerca de la construcción de la solución, póngase en contacto con Textron o RIDEM usando la siguiente dirección o llamando al número de teléfono que aparece a continuación:

Greg Simpson
Textron Inc.
40 Westminster Street
Providence, RI 02903
(401) 457-2635

Joseph T. Martella II, Ingeniero Superior
R.I. Departamento de Gestión Ambiental
Oficina de Gestión de Residuos
235 Promenade Street
Providence, RI 02908-5767
(401) 222-2797

Notification To Abutters
Construction of Selected Remedy
Former Gorham Manufacturing Facility
Adelaide Avenue, Providence, Rhode Island

June 26, 2015

In accordance with the Rhode Island Department of Environmental Management's (RIDEM's) Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations), and the **Industrial Property Remediation and Reuse Act (Rhode Island General Law 23-19.14, Section 11)**, **Textron, Inc. (Textron)** is providing notice to abutters that construction of the selected remedial alternative for the remaining areas of the above listed property will begin the week of July 13, 2015. The property is further designated as Parcel 324, Plat 051 (Open Space) of the City of Providence Tax Assessor's plat maps.

RIDEM has approved the selected remedial alternative (the remedy) which includes *Removal of Impacted Mashapaug Inner Cove Sediment and Capping of the Phase III Area (behind the retail building) and Parcel C (adjacent to the high school)*. Construction of the remedy includes: removal of up to two feet of sediment from the Mashapaug Inner Cove, dewatering and then placing the sediment on the Phase III Area. The Phase III surface soils and dewatered sediment will be then capped with marker fabric, one foot of clean soil and seeded. The remaining Inner Cove sediments will be covered with one foot of clean soil, and the wetlands surrounding the Inner and Outer Cove will be restored. The selected remedy also includes the spreading of an existing Parcel C soil pile onsite, and then placing a marker fabric, one foot of clean soil and seeding. Both Parcels C and the Phase III area will become open space for development by the City as potential recreational fields. The selected remedy also incorporates an *Environmental Land Usage Restriction and Soil Management Plan* which will be recorded on the property deed. Construction on the Site is scheduled to be completed the end of November 2015.

All of this information, along with historical site information, is available for review on the RIDEM project website: <http://www.dem.ri.gov/programs/benviron/waste/gorham.htm>

Should you require additional information regarding the construction of the remedy, please contact Textron or RIDEM at the address below or by calling the telephone number listed below.

Greg Simpson
Textron Inc.
40 Westminster Street
Providence, RI 02903
(401) 457-2635

Joseph T. Martella II, Senior Engineer
R.I. Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, RI 02908-5767
(401) 222-2797

Arrangements to review RIDEM records for the former Gorham Site may be made by calling Angela Spadoni, Office of Customer and Technical Assistance, (401) 222-4700 ext. 7307.

Notificación a los Accionistas
Construcción de La Solución Elegida
El antiguo Sitio de Manufactura Gorham
Avenida Adelaide, Providence, Rhode Island

Junio 26, 2015

De acuerdo con las Reglas y Regulaciones para la Investigación y Rehabilitación del desecho de Materiales Peligrosos (Reglamento de Remediación) del Departamento de Gestión Ambiental de Rhode Island (RIDEM), y el **Acto de Re-uso y Remediación de la Propiedad Industrial (Ley General de Rhode Island 23-19.14, Sección 11)**, **Textron, Inc. (Textron)** está proveyendo aviso a los accionistas que la construcción de la alternativa para reparos elegida para las áreas que quedan de la propiedad mencionada anteriormente empezara la semana de Julio 12, 2015. La propiedad será nombrada como Parcela #324, Plat 051 (Espacio Abierto) de mapas catastrales del Tasador de Impuestos de la Ciudad de Providence.

RIDEM ha aprobado la alternativa para reparos elegida (la solución) la cual incluye *la Remoción de los Sedimentos del Mashapaug Inner Cove afectados* y el cubrimiento del *Área "Fase III" (detrás del edificio de ventas) y de la Parcela C (adjunta a la escuela secundaria)*. La construcción de la solución incluye lo siguiente: la remoción de hasta dos pies de sedimento del Mashapaug Inner Cove, deshidratación y colocar al sedimento deshidratado sobre el Área "Fase III". Luego, los suelos superficiales y sedimentos deshidratados de la Fase III serán cubiertos con tela marcada, con un pie de tierra limpia y finalmente serán sembrados. El resto de los sedimentos del Inner Cove serán cubiertos con un pie de tierra limpia, y los humedales que rodean al resto del Inner & Outer Cove se restaurarán. La solución elegida también incluye la difusión de un grupo de suelos de la Parcela C en el sitio, que luego serán cubiertos con una tela marcada, un pie de tierra limpia y también serán sembrados. Ambos sitios, La Parcela C y el Área Fase III, serán convertidos en espacios abiertos para futuro desarrollo por parte de la Ciudad, como posibles campos de recreo. La solución elegida también incorpora un Plan Ambiental de Restricción del Uso y Manejo de la Tierra, que será registrado en el título de la propiedad. La construcción en el sitio está programada para ser completada a finales de Noviembre del 2015.

Toda esta información, junto con la información histórica del sitio, estará disponible para su revisión en el sitio web de RIDEM del proyecto:

<http://www.dem.ri.gov/programs/benviron/waste/gorham.htm>

En caso de necesitar información adicional con respecto a la construcción de la solución, póngase en contacto con Textron o RIDEM a la siguiente dirección o llamando al número de teléfono que aparece a continuación:

Greg Simpson
Textron Inc.
40 Westminster Street
Providence, RI 02903
(401) 457-2635

Joseph T. Martella II, Ingeniero Superior
R.I. Departamento de Gestión Ambiental
Oficina de Gestión de Residuos
235 Promenade Street
Providence, RI 02908-5767
(401) 222-2797

Arreglos para revisar los registros del RIDEM relacionados con el antiguo Sitio Gorham pueden hacerse llamando a Angela Spadoni, en la Oficina del Cliente y Asistencia Técnica, (401) 222-4700 ext. 7307.

HIGH SCHOOL TRAFFIC PLAN







KEY SCHOOL TRAFFIC TIMES

7:15 – 8:15 am
(Monday, Tuesday, Thursday, Friday)

8:45 – 9:45 am
(Wednesdays)

2:25 – 2:50 pm
(Monday through Friday)

-  HIGH SCHOOL TRAFFIC
-  TRUCK TRAFFIC
-  RIPTA Bus
-  RIPTA BUS STOP

Former Gorham Manufacturing Facility
Adelaide Avenue
Providence, Rhode Island
Based map obtained courtesy RIGIS