



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

June 2, 2006

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

RE: Former Gorham Manufacturing Facility – Park Parcel, 333 Adelaide Ave., Providence, RI  
Slag Removal Work Plan  
Case No. 2005-059 (Associated with Case No. 97-030)

Dear Mr. Simpson:

On February 24, 2004, 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 property located at 333 Adelaide Avenue, Providence, Rhode Island (the Site), the Department's Office of Waste Management (OWM) has received and reviewed the following document, submitted on behalf of Textron, Inc. (Textron), in accordance with Sections 7.00 (Site Investigation) and 8.00 (Risk Management) of the Remediation Regulations:

- Slag Removal Work Plan, Former Gorham Manufacturing Facility, Plat 51 – Lots 323, 324, and 326, 333 Adelaide Avenue, Providence, Rhode Island, 97-030 (Including Case No. 2005-029 and Case No. 2005-059), prepared by MACTEC Engineering and Consulting, Inc. (MACTEC), dated May 24, 2006, received via e-mail on May 25, 2006 ("the Work Plan").

Accordingly, in consideration of our discussions and review of the submitted document, Department personnel have the following comments, concerns and requests specific to the work plan:

- 1) As the Work Plan indicates that existing groundwater monitoring well GZA-5 may have to be abandoned due to its location within the slag material area, please conduct one round of groundwater sampling and analysis from this location prior the removal action. Also, please include plans to replace MW-110D, and if it is destroyed or rendered unusable, GZA-5.
- 2) Since a specific compliance sample strategy is not proposed, the Department recommends that following excavation activities, Textron collect confirmatory grab soil samples to determine if all impacted media has been sufficiently remediated. Confirmatory soil samples should be collected in accordance with the following requirements:
  - a) One (1) soil sample per every 15 feet of each sidewall (North, South, East and West). A minimum of one (1) sample per sidewall will be collected from excavations smaller than 15 feet in length or width.

- b) One (1) soil sample from each point within a 15 foot excavation bottom grid. A minimum of one (1) sample will be collected from excavations smaller than 15 feet in length, width or diameter.
- c) For excavations deeper than five (5) feet, one (1) shallow (0 to 2 feet deep interval) and one (1) deep sample (five feet deep or greater) for each sidewall sample location required.
- d) At a minimum each soil sample shall be analyzed for total petroleum hydrocarbons (TPH), semi-volatile organic compounds (SVOCs), and the 13 priority pollutant metals.
- e) For the purpose of better characterizing the slag material, please collect two (2) grab samples of the soil that is intermixed with the slag material for the Toxicity Characteristic Leaching Procedure (TCLP) analysis for the 13 priority pollutant metals.
- f) The remedial objective shall be the Department's Method 1 Industrial/Commercial Direct Exposure Criteria (I/CDEC) pursuant to the Remediation Regulations.
- g) Backfilling or regrading should not be completed until confirmatory grab soil samples indicate that the slag material area has been remediated to a concentration consistent with the I/CDEC.
- h) Since it is the Department's understanding that the ultimate remedial objective for the "Park Parcel" is to render soils compliant with the I/CDEC, and the soils surrounding the slag material area have not been sufficiently demonstrated to consistently meet the I/CDEC for all contaminants of concern, Textron may choose to either:
  - i) Backfill the slag material excavation area with a cap consisting of a minimum of 2 feet of certified clean fill. Clean fill and/or loam imported to the site to be utilized to construct the cap must be sampled prior to delivery and placement. Laboratory analytical results should be submitted via fax and written confirmation to use the fill will be given by the Department. Clean fill and loam must be sampled for arsenic at a frequency of one sample per 500 tons. One-quarter of the total number of compliance samples of clean fill and loam will be sampled for volatile organic compounds (VOCs), Total Metals (RCRA 13), and TPH. All soil utilized onsite for the cap must meet the Department's Method 1 Residential Direct Exposure Criteria (RDEC). Please also be advised that the Summary Report for the Site must include all original laboratory analytical data and a statement from the facility that provides the clean fill and/or loam attesting to the materials origin and suitability; or
  - ii) Backfill and regrade with existing site soils and provide written acknowledgement that the slag material excavation area is still subject to any future remedial requirements to be implemented in the remedy for the entire "Park Parcel" as applicable.

If you have any questions regarding this letter or wish to arrange another meeting, please contact me by telephone at (401) 222-2797 x7109 or by e-mail at [joseph.martella@dem.ri.gov](mailto:joseph.martella@dem.ri.gov).

Sincerely,



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

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