



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

August 19, 2004

Nancy Kafka  
The Trust for Public Land  
33 Union Street  
Boston, MA 02108

RE: Lincoln Lace and Braid - Former Ponagansett Dump  
67 Melissa Street, Providence  
**CASE NO. 2001-024**

Dear Ms. Kafka:

In the matter of the above-referenced site (the "Site"), on July 14, 2004, the Rhode Island Department of Environmental Management (the "Department") received a document entitled Remedial Action Work Plan for Ponagansett Avenue Remediation Project (the "RAWP") dated July 2004, prepared by EA Engineering, Science, and Technology, Inc. on behalf of the Trust for Public Land, and submitted pursuant to the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the "Remediation Regulations"). Based on its review of this submittal, the Department's Office of Waste Management has the following comments that must be addressed in writing by **October 19, 2004**:

1. In accordance with Rule 10.02 of the Remediation Regulations, please remit to this Office the Remedial Action Approval Application Fee in the form of a check for one-thousand dollars (\$1000.<sup>00</sup>) made payable to the "**General Treasurer – State of Rhode Island**".
2. Please collect representative samples of prospective clean-fill (to be used in construction of the engineered barrier) for Polynuclear Aromatic Hydrocarbons (PAHs) laboratory analysis.
3. Please provide identify and include in the RAWP the types of vegetation proposed for stabilizing the engineered barriers for the landfill and the riparian buffer area. Prior to issuing any Letter of Compliance, all engineered barriers shall be stabilized with established, adequate, and uniform vegetative cover.
4. The design details in the RAWP depict a different engineered barrier than the one discussed in the RAWP narrative. Similarly, the engineered barrier discussed in the Soil Management Plan is also inconsistent with the other design proposals in the RAWP. Please revise these accordingly.



5. The engineered barrier proposed in the RAWP for the riparian buffer area consists of only 12 inches of topsoil. This engineered barrier proposal does not meet the Department's standard design requirements of two (2) feet of clean-fill or equivalent. Please revise the proposed engineered barrier design for this area to one consistent with Department requirements.
6. Please verify that the Tenax geotextile proposed for use in constructing the engineered barrier over the landfill meets the Department's general geotextile requirements for use in an engineered barrier (i.e., a minimum burst strength of 400 psi, and a minimum puncture strength of 120 lbs.).
7. Please identify, and include in the RAWP, **specific** plans for controlling dust at the Site during the performance of the Remedial Action.
8. Please provide a more detailed remediation schedule addressing the sequencing and duration of the main elements of the proposed Remedial Action. This would include, but may not be limited to, debris and surficial solid waste removal, establishment of erosion controls, clearing and grubbing, regrading, cap construction, buffer restoration, seeding, and post-remediation site inspections and reseeded as necessary to ensure the establishment of adequate and uniform vegetative cover.
9. Please be advised that the Department will require the submission of monthly status reports to document progress through the completion of the Remedial Action. The Department will also require that daily inspections are performed by a qualified environmental professional for the duration of earthmoving activities and through the completion of engineered barrier construction.
10. Based on the information on-file to date, the Department does not concur with the proposal for the future segregation of lots from the Site for the construction of residences.
11. The RAWP indicates that the City of Providence may potentially use the Site as a future tree farm. Please be advised that any temporary plantings at the Site shall be performed utilizing raised beds that incorporate a barrier between the plantings and the engineered cap to prevent the engineered cap from being disturbed.
12. Prior to the Environmental Land Usage Restriction (ELUR) being recorded in the City of Providence land evidence records, it shall be subject to Department review and approval as part of the Remedial Action Closure Report submitted upon completion of the Remedial Action.
13. *Section 9 – Security Procedures* of the RAWP indicates that the Site is completely secured with fencing. This is not entirely accurate. Based on recent security issues on the adjacent Lincoln Lace and Braid property, additional security fencing may be necessary to prevent unauthorized access to the Site. Please be advised that the Trust for Public Land, in its capacity as owner of the Site, is responsible for ensuring adequate and effective site security through the completion of the Remedial Action.

In addition to the previous comments, the Office of Water Resources - Freshwater Wetlands Program has also reviewed the RAWP submittal pursuant to Rule 6.08 (the Remedial Exemption provision) of the Rules and Regulations Governing the Administration and Enforcement of the Freshwater Wetlands Act (the "Wetlands Regulations"). Based on its review, the Freshwater Wetlands Program has the following comments that also must be addressed in writing:

14. Please provide a revised site plan that depicts the following:

- a) The location of the 100-year floodplain associated with the Woonasquatucket River. The narrative states that most of the restoration activity is planned within 100-year floodplain.
- b) All existing and proposed grades within the 100-year floodplain.
- c) The limits of the proposed riparian restoration area. These are not clearly depicted on the plans provided.
- d) All proposed grades within the riparian restoration area. Proposed grades illustrated on the provided plans cannot be determined. If necessary, please provide a larger scale drawing of this area.
- e) The proposed locations for all materials to be stockpiled.
- f) The locations of proposed dewatering areas, if any, along with a detail of the proposed dewatering basins.

15. Please explain the "proposed grade break" line depicted on the "Proposed Redevelopment Plan". It appears that grading is proposed outside of the line.

16. Please note that if displacement of 100-year floodplain is proposed at this site, such displacement must be compensated for on a one to one basis along the same stretch of the watercourse, and must be depicted on revised plans. Relief from this requirement may be obtained if a registered professional engineer can demonstrate to the satisfaction of the Freshwater Wetlands Program that the displacement of floodplain is so limited in scope that it will not impact the subject or adjacent freshwater wetlands, and/or any off-site property.

17. Please make sure that the revised plans that do not depict the proposed bike path. This construction is not exempt under Rule 6.08 and will not be authorized as part of the review process subject of this remediation activity. Similarly, only those activities specifically defined in Rule 6.08 are eligible for a wetlands exemption. Any additional work beyond that required to remediate the Site as enumerated in Rule 6.08 (such as the proposed bike path) will require the submission and review of an appropriate Application to the Freshwater Wetlands Program, such as a Request for Preliminary Determination. Such application will determine if the additional activities can be authorized as an insignificant alteration, or if the proposed work represents a significant alteration of the subject wetlands.

In closing, by October 19, 2004, please submit two (2) copies of the written responses to these comments, and the revised RAWP, to my attention in the Office of Waste Management.

If you have any questions relative to the Office of Waste Management's comments presented in this correspondence, or if you would like to meet with Department personnel to discuss this matter, please contact me by telephone at (401) 222-2797 extension 7609, or by email at [fgally@dem.state.ri.us](mailto:fgally@dem.state.ri.us). If you have any questions relative to the Freshwater Wetlands Program's comments presented in this correspondence, please contact Martin Wencek by telephone at (401) 222-6820 extension 7403, or by email at [mwencek@dem.state.ri.us](mailto:mwencek@dem.state.ri.us).

Sincerely,



Frank J. Gally, III  
Engineer  
Office of Waste Management

XC: K. Owens, DEM/OWM  
M. Wencek, DEM/OWR  
J. Crawford, DEM/OWM  
T. Regan, EA Engineering  
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