



engineering and constructing a better tomorrow

June 26, 2008

Mr. Joseph T. Martella II, Senior Engineer
RIDEM Office of Waste Management
Site Remediation Program
235 Providence Street
Providence, RI 02908

**RE: Responses to RIDEM Comments -
Short Term Response Action Work Plan
Retail Complex Sub-Slab Soil Mitigation
Former Gorham Manufacturing Facility
333 Adelaide Avenue, Providence, Rhode Island
MACTEC Project No. 3650080114.01**

Dear Mr. Martella:

On behalf of Textron, Inc. (Textron), MACTEC Engineering and Consulting, Inc. (MACTEC) has prepared responses to Rhode Island Department of Environmental Management (RIDEM) comments on the Short Term Response Action Work Plan for sub-slab soil mitigation at the Adelaide Avenue site. Comments were conveyed to Dave Heislein, MACTEC, on June 23, 2008 via a telephone conversation. Comments have been paraphrased, but meaning and intent have been maintained.

Comment 1: There needs to be some type of an alarm system to monitor operation.

Response: Flow switches linked to an auto dialer will be installed and programmed to call phone numbers in succession until acknowledged in the event of a "no flow" condition.

Comment 2: The monitoring plan as proposed is fine (weekly first month, monthly 2-3, Quarterly for first year). However, monitoring results must support this schedule or continued monthly monitoring will be required.

Response: It is acknowledged that monitoring frequency will not be decreased to Quarterly if not supported by appropriate monitoring results.

Comment 3: Extraction wells should include sampling ports for direct well testing and to allow adjustments to the system.

Response: Sampling ports will be added to the typical extraction well detail on Sheet C-501 – Civil Details and installed accordingly.

Comment 4: Plans should include sealing all existing cracks in the floor and any construction related cracks to restrict short circuiting.

Response: A general note will be added to Sheet C-101 indicating that all visible cracks in the floor either existing or the result of construction are to be sealed using epoxy or similar method prior to system start-up.

Comment 5: Baseline indoor air testing should be conducted (4 in the supermarket and one in each retail unit for a total of 7).

Response: Baseline indoor air samples will be collected and analyzed prior to system start-up.

Comment 6: If soil is being removed or is being brought into the site for construction, proper testing is required. Disposal testing is as required by the receiving facility. Testing of soil brought on site has been previously defined to meet residential standards. Analytical and disposal documentation should be included in the Construction Closure Report.

Response: Any excess soil generated during construction will be appropriately characterized and disposed of at a licensed facility permitted to accept the material. Characterization and disposal documentation will be included in the Short Term Response Construction Report. Aggregate construction materials brought on site will be laboratory tested to ensure they meet applicable residential standards.

Comment 7: Need to state whom is responsible to operate and maintain the vapor mitigation system for long term.

Response: The long term operation and maintenance of the vapor mitigation system will be the responsibility of Textron until such time as site conditions or legal provisions warrant otherwise. Textron will coordinate with RIDEM any future changes in these responsibilities.

Comment 8: Is VMW-2 (Dwg C-101) sufficient to monitor the entire eastern side of the operations? Also, is there a need for a monitoring point in the middle of the extraction wells in S&S.?

Response: The location of the soil vapor extraction and monitoring points (Dwg C-101) were based on the results of the January 2008 soil vapor investigation, March/April 2008 groundwater investigation and May 2008 soil investigation beneath the retail complex. The soil vapor investigation identified elevated volatile organic compound (VOC) concentrations in the western half of the supermarket and low concentrations in the eastern half of the store. The groundwater investigation confirmed that the VOC plume is located in the western half of the supermarket and is the source of soil vapor concentrations. The soil investigation confirmed that the vadose zone is not a substantial source of VOCs to the soil vapor. Therefore, the soil vapor extraction and monitoring wells are proposed for the western half of the supermarket and we anticipate that the low concentrations of VOC vapors in the eastern half will be reduced or removed by the mitigation system and will not be a source of vapor intrusion.

Comment 9: Please identify indoor air sampling locations, including one in each qtr of the supermarket and one in each of the smaller retail units for a total of 7 indoor air sampling locations.

Response: Seven indoor air sampling locations have been identified as suggested and will be added to Sheet C-101.

Comment 10: Will need to respond to any planned changes of the building interior and exterior to maintain as much as possible the existing operating and monitoring system and add additional points based on any changes to the building (e.g., new closed office spaces).

Response: Upon notice of the intent to alter the interior or exterior of the building, the system and operating scheme will be evaluated and appropriate physical and/or operational modifications made as needed to ensure consistent and effective system operation. These changes will be coordinated and as-built plans submitted to RIDEM.

Comment 11: Explain the intent and operation of the dilution filter shown on Dwg D-601 prior to the particulate filter.

Response: The dilution air system will prevent potential wear and tear on the blower by providing a way to provide additional air to the blower, as necessary, during operation or maintenance. This will also allow for over sizing of the blower to handle the potential future addition of vapor extraction wells to the main system and for operation of the blower during construction and/or maintenance when the blower is installed in-line, but the influent lines from the extraction wells are closed. The dilution filter includes a silencer on the dilution air intake to reduce potential noise from the air intake. This silencer will also provide protection to the dilution air inlet pipe end.

If you have any additional comments or need clarification on any of the responses provided, please let contact us.

Sincerely,
MACTEC Engineering and Consulting, Inc.



Chuck Collet
Sr. Principal Engineer



David E. Heislein
Principal Engineer

cc: T. Deller, City of Providence
P. Grivers, EA Engineering, Science, and Technology
G. Simpson, Textron, Inc.
J. Schiff, Textron, Inc.
G. Wilson, Kimco Realty
J. Morgan, Stop & Shop, LLC
Knight Memorial Library Repository
MACTEC Project File

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