



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

CERTIFIED MAIL

July 26, 2007

Alan Sepe, Acting Director
Department of Public Properties
City of Providence
25 Dorrance Street
Providence, RI 02903

RE: Order of Approval Addendum 2, Proposed Providence Public School Site – Parcel B
Formerly a portion of the Gorham/Textron Dump site, 333 Adelaide Avenue, Providence
City of Providence Tax Assessor's Office Plat 51, Lot 323, Parcel B
Case No. 2005-029 (Formerly part of Case No. 97-030)

Dear Mr. Sepe:

Enclosed please find the Order of Approval Addendum 2 (OA Addendum 2) for the remediation plan for the above referenced facility. Please review the stipulations of the attached OA Addendum 2 thoroughly to ensure your compliance with the requirements. The original Order of Approval (Order) dated June 9, 2006, the Order of Approval Addendum 1 (OA Addendum 1) dated February 27, 2007, and this OA Addendum 2 (collectively the Amended Orders) place primary responsibility for the construction, operation, maintenance and monitoring of the approved Remedial Action Work Plan (RAWP) and its associated remedy on the City of Providence (the City). In order to enable the Department to monitor the City's compliance with the RAWP, the Amended Orders require the City to notify the Department of any condition that is non-compliant with the Amended Orders, or that constitutes an interruption of the RAWP. In order to maintain compliance with the Amended Orders and the RAWP, the City's responsibilities under the Amended Orders necessarily include the responsibility to respond to and correct non-compliant conditions in a timely, proactive and professional manner that minimizes non-compliance with the Amended Orders and RAWP, and protects human health and the environment.

This OA Addendum 2 shall be recorded in the land evidence records of the City of Providence within 30 days of execution as required by law, and a recorded copy must be returned to the Department within 7 days of recording. If you have any questions regarding this matter, please contact me at (401) 222-2797 x7109.

Sincerely,

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

cc: Terrence D. Gray, P.E., Assistant Director, RIDEM/AW&C
Leo Hellested, P.E., Chief, RIDEM/OWM
Kelly J. Owens, RIDEM/OWM
John Langlois, Esq., RIDEM/OLS
Richard Enander, PhD, RIDEM/OTCA/Risk Assessment
Christopher Walusiak, RIDEM/OWM
Douglas McVay, RIDEM/OAR
Barbara Morin, RIDEM/OAR
Robert Vanderslice, PhD, RIDOH
Frank Battaglia, EPA – Region 1
Tammie A. McRae, ATSDR
Richard A. Sullivan, ATSDR
Hon. David N. Cicilline, Mayor, City of Providence
Senator Juan M. Pichardo, District 2
Representative Thomas Slater
Councilman John J. Lombardi
Councilman Leon F. Tejada
Thomas Deller, City of Providence
Dr. Donald Evans, Superintendent, Providence Schools
Mary McClure, President – Providence School Bd.
Sara Rapport, Esq., City of Providence
John Boehnert, Esq, PS&H
Peter M. Grivers, EA
Gregory L. Simpson, Textron
Gerald Petros, Esq., Hinkley Allen
Steven Fischbach, Esq., RILS
Knight Memorial Library – Project Repository

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

**In the matter of the application for a Remedial Action Approval at:
Proposed Providence Public School Site – Parcel B
(Formerly a portion of the Gorham/Textron Dump site)
333 Adelaide Avenue, Providence, RI, Plat 51, Lot 323 (the Site)**

Case No. 2005-029

ORDER OF APPROVAL ADDENDUM 2

In the above entitled matter the Rhode Island Department of Environmental Management (the Department), issued to the **City of Providence (the City), in its capacity as owner and Responsible Party for the remediation of property located at 333 Adelaide Avenue, Providence**, an Order of Approval (Order) dated June 9, 2006, and an Order of Approval Addendum (OA Addendum 1) dated February 27, 2007.

On June 26, 2007, and June 29, 2007 respectively, the Department received written requests from EA Engineering, Science, and Technology, Inc. (EA) and Partridge Snow & Hahn. LLC (PS&H), to amend the City's indoor air and sub slab vapor sampling frequency as required by OA Addendum 1. In response to the formal requests, the Department met on July 18, 2007 with representatives of EA to discuss the ongoing operation of the system and the air and soil vapor data results collected to date. Based on that review, the Department concluded that additional modification to the prior Order is warranted. Following the meeting, the following additional document was filed on behalf of the City:

- Electronic mail from EA to the Department, Re: Proposed Interior Vapor Probe Locations, dated July 19, 2007, including a Letter Attachment Figure showing three new proposed sub slab vapor probe locations, located centrally within the building footprint.

Subject to the conditions herein, the listed document, as well as the documents listed in the Order dated June 9, 2006, and the OA Addendum 1 dated February 27, 2007, 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 Materials Releases (Remediation Regulations), as amended February 24, 2004, and describe a plan to remediate existing contamination pursuant to 23-19.14-1 et seq. and the Department's Remediation Regulations, as amended February 24, 2004, in accordance therewith.

It is the Department's intent that all conditions set forth in the Order dated June 9, 2006, and OA Addendum 1 dated February 27, 2007, shall remain in full force and effect unless specifically altered by this second Order of Approval Addendum (OA Addendum 2). This OA Addendum 2 continues to place primary responsibility for the construction, operation, maintenance and monitoring of the approved Remedial Action Work Plan (RAWP) and its associated remedy on the City. As the responsible party and performing party, the City is expected to implement the RAWP in an expeditious and professional manner that prevents non-compliance with the original Order, OA Addendum 1, OA Addendum 2 and RAWP, and protects human health and the environment. For the convenience of the City and its contractors and consultants, the changes

made to the original Order by this OA Addendum 2 have been highlighted below using boldfaced type and include a reference to the original paragraph of the Order as applicable.

Upon consideration thereof, and in accordance with Rule 10.1 (Remedial Action Approvals) of the Remediation Regulations, the Department approves said RAWP to remediate contamination through this OA Addendum 2, subject to the following amended conditions:

- 1) **All conditions set forth in the Order of Approval dated June 9, 2006, and OA Addendum 1 dated February 27, 2007, shall remain in full force and effect unless specifically altered by this OA Addendum 2.**
- 2) **Sampling and laboratory analysis of all media involved in the Remedial Action shall be conducted in accordance with the requirements of the RAWP, the original Order, OA Addendum 1 and this OA Addendum 2 [Ref. original Order ¶ 5].**
- 3) **The Site remedy as described in the RAWP, original Order, and OA Addendum 1, shall also incorporate the following [Ref. original Order ¶ 6]:**
 - a) **Three (3) new sampling locations, centrally located within the sub-slab as identified in the previously referenced e-mail from EA to the Department, Re: Proposed Interior Vapor Probe Locations, dated July 19, 2007, specifically in the Letter Attachment Figure.**
 - b) **A “complete round” of compliance sampling shall include 12 sample locations per sampling event, selected from the network as follows:**
 - i) **All eight (8) interior sampling locations;**
 - ii) **Two (2) of the eight (8) perimeter sub slab sample collection locations (MP-1 through MP-8), selected on a rotational basis such that each location is sampled at an equal frequency;**
 - iii) **Two (2) of the three (3) new centrally located sub slab sample locations (IMP-1 through IMP-3), selected on a rotational basis such that each location is sampled at an equal frequency;**
 - iv) **All samples shall be analyzed for volatile organic compounds (VOCs) by EPA TO-15 SIM.**
 - c) **The schedule for periodic compliance sampling and compliance monitoring shall be as follows [Ref. Order ¶ 6.e.iv]:**
 - i) **Starting August 2007, and monthly thereafter, a “complete round” of VOC compliance sampling and analysis shall be performed at the locations identified in item b) above.**
 - ii) **Starting August 2007, and monthly thereafter, methane monitoring shall be performed at all interior and sub slab locations.**
 - iii) **Annually compliance monitoring/sampling shall occur at each of the three (3) stack pipes venting through the building roof. Each periodic event shall include performance of compliance monitoring for methane and compliance sampling and analysis for VOCs by EPA TO-15. Following each annual venting stack**

monitoring/sampling round, the actual measured emission values shall be used to calculate the cumulative emissions from all three venting pipes in order to determine if treatment, a permit, or registration for the Sub Slab Venting (SSV) system is required by the Department's Office of Air Resources.

- iv) **Following completion of the February 2008 monthly sampling round and submission of the complete sampling results, the City may petition the Department to modify the required compliance monitoring and compliance sampling plan.**
 - d) **Periodic monitoring of methane and compliance sampling and analysis of VOCs shall continue at the specified rate as long as a source of contamination exists, unless otherwise authorized by the Department in written correspondence to the City [Ref. Order ¶ 6.e.ix].**
- 4) **The City shall have this OA Addendum 2 recorded in the City of Providence, land evidence records of the subject property within thirty (30) days of execution of this OA Addendum 2 [Ref. Order ¶ 23].**

Subject to future revisions or amendments by the Department, the original Order, **OA Addendum 1 and this OA Addendum 2** shall remain in full force and effect for as long as said RAWP shall be operated and maintained in a condition satisfactory to the Department. Failure to comply with all points outlined in the Department approved RAWP and stipulated in the original Order, **OA Addendum 1 and this OA Addendum 2** shall result in the issuance of a Notice of Violation and Order against the City.

The original Order, **OA Addendum 1 and this OA Addendum 2** shall be subject to modification or revocation in accordance with law.

Entered as an approval by the Department this 26TH day of July, 2007.

By:



Leo Hellested, P.E.
Chief, Office of Waste Management
Department of Environmental Management