

**EJLRI Comments and Questions re:
Draft Remedial Action Work Plan for Parcel D Phase 1
Submitted by Textron on February 27, 2012**

**pg. 3-2 Last sentence at bottom of Section 3-3 "Preferred Remedial Alternative":
"Stormwater management will be included with the construction of the cap to maintain its integrity and recharge stormwater runoff into the buffer zone, wetlands, and Cove."**

Could Textron explain more about how the drainage from the parking lot will be monitored over time through the slag pile? Also, more about how pollutants from the parking lots and road surfaces will be managed to reduce additional impacts on the pond after the Phase 1 cap is put into place? While recognizing that surface runoff is a lesser concern than the groundwater contamination and slag pile, at least in terms of toxicity, I would appreciate more explanation of how stormwater will be handled over time to create opportunities for infiltration of that stormwater rather than simply allowing it to go into the pond cove. I also recognize that the slag pile cap is designed to avoid any infiltration into the cap (though this needs to be monitored over time to ensure it stays that way) so that the slag pollutants aren't carried into the pond, but that seems to mean that stormwater will simply be able to go directly into the pond without any other infiltration or retention. And while there is a wetland buffer zone on either side of the slag pile cap, there isn't a wetland buffer at the base of the slag pile cap that could serve as a place for stormwater retention. How will all stormwater be directed to those buffer areas, if that is Textron's plan?

pg. 3-5 Invasive Species Management:

Are there any other methods other than using chemical herbicides to kill invasives? Can Textron confirm that the herbicides will be applied to individual plant roots rather than broadcast spraying, which seems better, but are there any other possibilities?

pg 8-1 Set Up Plans:

Is the bulleted list boilerplate language and/or could something like "To ensure abutting properties and residents are not impacted by site-related contaminants or waste and emissions generated during construction activities" be added? Or is there mention of minimizing impact to abutters and the surrounding community in another part of the RAWP?

pg 9-1 Effluent Disposal:

I did not see anything in the RAWP about employing methods to eliminate potential for tracking contaminated soil off-site. Though Textron does mention they will be following RIDEM regs concerning all effluent disposal. Could Textron spell this out in the RAWP more so that residents know what specific precautions will be taken? Will it include a truck-washing station, an "anti-tracking" pad to get dirt off the truck wheels, and a requirement that the trucks will be covered? Or something else?

Also, there have been a number of successful efforts to reduce diesel pollution in Rhode

Island, including an anti-idling law, which states that all diesel vehicles may not idle for more than 5 minutes anywhere in the state. Would Textron be willing to add this into the specs for the contractor in order to set that expectation?

There are also laws in RI that require construction equipment and diesel vehicles used in projects paid for with any public money to be retrofitted with diesel filters to reduce emissions. Since no public money is being used here, it's not required by law, but I would be interested in hearing from Textron about whether this could be included in the contract when it's put out to bid, and therefore any contractors with these retrofitted vehicles would be favored in the selection process.

pg. 10-1 Contingency Plan:

It is good to see the real-time dust monitoring, though the plan doesn't specify what would be done if the real-time monitors detect an exceedance—though it does say the area will be watered down if it seems too dusty from a visual inspection. Could Textron please clarify? Could Textron also specify what would be done if the dust exceedances continue after wetting down the area?

If live feed of the air monitoring results to a website is not practicable, could another way of doing this be through the operating log which is going to track the perimeter air monitoring dust readings—if that could be updated daily and done electronically?

pg 12-1 Security Procedures: "Areas where fencing is removed will be gated and/or properly secured with temporary fencing and signage. Signage will be in English and Spanish and will include a site contact phone number and other pertinent information."

Could Textron post signage along the entire fence at regular intervals as well as on the gates, not just where temporary fencing has been put up? I've seen this at the National Grid/Tidewater Site and think it is very important. In the past there has been a division of responsibility between the City and Textron for which entity puts up signs where—with the City only taking responsibility for the school property. Since Textron will be conducting remedial work directly along the school property it would make sense and be important to post signage along all of the fences separating the school from Parcel D. Could Textron clarify this or broaden the scope of where it will post signs in order to ensure proper public notification?