

Gorham Public Questions & Answers
Site Investigation Report, Former Gorham Manufacturing Facility,
Phase II Area – Mashapaug Pond and Cove,
Phase III Area – Northeast Upland Parcel C
333 Adelaide Ave., Providence, RI
Public Meeting Date: February 5, 2015
Public Comment Period Closed: February 20, 2015



Comment No. 1: Community members asked about residual slag in the sediment and on land.

Response: *Almost all of the slag was removed from the upland and Inner Cove shoreline in 2006 and sent off-site for proper disposal. This excavation included the sediment along the shore line of the Inner Cove. The upland area was subsequently capped in 2012. The proposed remedy for the Phase II Area will remove up to 2 feet of sediment from the Inner Cove and therefore remove any remaining residual slag near the shore. This area will then be backfilled, capped with one foot of clean soil and planted to restore the fringe wetland and shoreline along the Inner Cove. The Inner Cove will also receive a one foot cap of soil.*

Comment No. 2: Community members asked a general question regarding responsibility for maintaining the Gorham site, asphalt areas and other capped areas currently, and going forward.

Response: *The 2006 Consent Order between the Rhode Island Department of Environmental Management (RIDEM) and the City of Providence previously identified the Site as four separate parcels (A, B, C, and D [Park Parcel]). The Phase II and Phase III Areas were originally identified as part of the Park Parcel; however, based on property deeds filed by the City, this area is included within Parcel C. The City of Providence currently owns the three parcels that comprise the entire Former Gorham property Site, Parcels A, B and C.*

Parcel A – 2001 (Cap – soil, asphalt and building) – Retail. The City of Providence owns the parcel and either the City or their tenant will maintain the cap, which includes annual maintenance, inspection, and certification of the engineering and institutional controls. An Environmental Land Use Restriction (ELUR) is under review with the City of Providence and RIDEM to document these maintenance requirements. Textron continues to operate a groundwater treatment system and a vapor mitigation system on Parcel A. Textron provides quarterly monitoring and reporting for these systems to RIDEM.

Parcel B – 2006 (Cap - soil, asphalt and building) – High school. The City will maintain the cap, which includes annual maintenance, inspection, and certification of those engineering and institutional controls. The City continues to operate a vapor mitigation system at the school and provides quarterly monitoring and reporting to RIDEM.

Parcel C – Proposed 2015 (Cap – soil). Textron is responsible for maintaining the cap for one year following completion of the cap construction proposed for the fall 2015. After the first year the City, as owner, will become responsible for the cap maintenance. An ELUR will be prepared and filed at the completion of the cap construction to document the maintenance requirements. Annual maintenance, inspection, and certification of the engineering and institutional controls is required. A “no cut zone” will also be included within the ELUR that states vegetation within the Perimeter and Fringe wetlands will not be cut, but will be allowed to grow naturally.

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Comment No. 3: Community members asked about the methods that Textron will use to handle the pile of debris located on Parcel C.

Response: *Prior to the start of construction, green privacy fencing material will be installed on the outside of the existing fence to reduce dust. Trees along Adelaide Avenue within the fence will also be retained as much as possible. Vegetation that has grown over this pile will be removed and the dirt removed from the tree roots prior to off-site disposal of the brush at a permitted facility. Using construction equipment, the soil and debris pile on Parcel C will then be spread on Site, crushed, graded and compacted. This subgrade soil will then be covered with a high visibility marker fabric and one foot of clean soil meeting Residential Direct Exposure Criteria (RDEC), in accordance with the RIDEM approved work plan. Continuous dust monitoring of the work area and Site perimeter will be conducted and dust mitigation measures implemented as necessary during the active construction activities to prevent the creation of airborne dust. It is anticipated that the period between initial disturbance of the pile and capping of the compacted material will be approximately 2-3 weeks. Following selection of the contractor, Textron will post the weekly schedule of proposed construction work and the dust monitoring results for the Site on a bulletin board located at the construction gate near the southwest corner of the high school property.*

Comment No. 4: Community members raised concerns about airborne dust during construction activities.

Response: *See also the Response to Comment No. 3.*

In addition, Textron's contractors will execute the construction work in accordance with strict construction specifications that prescribe the soil management practices and the methods and procedures to be used to prevent, reduce, and control dust emissions during construction activities at the Site. These procedures will be implemented for all active construction activities that have the potential to generate dust (e.g., grading, excavation, etc.) to provide assurances that nearby residential populations and retail operations are not impacted by dust. Using these same standard dust control measures (e.g., water spray, locating designated soil stockpiles away from residences and buildings, construction entrances to clean truck wheels, use of polyethylene sheeting to cover stockpiles, etc.), Textron successfully prevented dust emissions during the previous soil grading and capping activities conducted at the Site in 2012. Textron will post the weekly schedule of proposed construction work and the dust monitoring results for the Site on a bulletin board located at the construction gate near the southwest corner of the high school property. This will include points of contact at RIDEM, Textron and the City if the public has any questions regarding the ongoing and planned construction activities.

Comment No. 5: Community members asked a general question about the soil quality and testing requirements for the material that will be brought to the site to be used for capping the site.

Response: *All soil brought to the Site will be stockpiled, and then tested and verified that the soil meets RIDEM RDEC prior to use. Records of the origin and testing results will be maintained in accordance with RIDEM requirements, and will be included in the the final Remedial Action Closure Report for the Phase II, Phase III and Parcel C Capping. Once the cap construction is completed the Parcel C surface soils will meet the RDEC.*

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Comment No. 6: Community members asked that the neighborhood be notified in advance of the grading of the soil pile on Parcel C.

Response: *Textron will notify the community prior to grading of the soil pile on Parcel C. Textron will also post the weekly schedule of proposed construction work and the dust monitoring results for the Site on a bulletin board located at the construction gate near the southwest corner of the high school property.*

Comment No. 7: Community members asked a general question about the dewatered cove water, where it would go and how it would be managed/permitted.

Response: *Textron is proceeding with the technical approach that the sediment removal will be done in the “dry” due to the depth of water within the Inner Cove ranging from only 2-4 feet. Extensive surface water sampling and analysis during the Site Investigation phase showed that the water in the Inner Cove is not contaminated and does not pose an adverse risk to human health, allowing the water to be discharged into the Outer Cove during the Inner Cove remediation. The initial dewatering of the Inner Cove will use a pump located near the water surface to limit sediment disturbance and to bring the water level down to 1 foot above the Inner Cove sediment. This will be accomplished using a pump and piping system installed within the Inner Cove. The piping system will extend from the Inner Cove around the eastern side of the dam and into the Outer Cove of Mashapaug Pond. A splash block or turbidity curtain will also be installed at the discharge point to prevent scour of the pond bottom and/or mixing during dewatering. The remaining 1 foot depth of water within the Inner Cove will be pumped into a proposed Phase III Area infiltration gallery to promote water infiltration and collection of the sediment particulate for dewatering, stabilization and consolidation in the former Carriage House area. Following the dewatering of the Inner Cove down to the sediment surface, construction dewatering of Site groundwater will be conducted to temporarily depress the groundwater table within small working cells of the Inner Cove. Pumps will be installed approximately five feet below the sediment surface layer and operated to remove the majority of water from the zone of sediment targeted for removal. This will allow sediment removal in the dry. Captured groundwater will be directed to a frac tank or to an infiltration gallery located on the Phase III Area to allow potential sediment in the captured groundwater to settle out prior to the water being discharged to the Outer Cove. Water will be tested and monitored during the dewatering activities to meet RIDEM surface water discharge criteria set by the RIDEM Water Resources.*

Comment No. 8: Community members asked several questions directed more at the City regarding the long-term usages of Parcel C and the Phase III Area (concerns about the types of field usage, maintenance, security, lighting, potential for illegal activity, suggestion that school representatives and students be involved in the decisions for parcel usage).

Response: *The City of Providence will address questions and concerns, and solicit public input during the planning process on potential site reuse options in the future.*