



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

May 24, 2004

REMEDIAL DECISION LETTER

Case No. 2004-014 (Formerly part of Case No. 97-030)

Ms Susan Rittscher
President and CEO
YMCA of Greater Providence
222 Richmond Street
Providence, RI 02903

RE: Providence YMCA – Parcel C (Formerly a portion of the Gorham/Textron Dump site)
333 Adelaide Avenue, Providence, RI

Ms. Rittscher:

On 24 February 2004, the Rhode Island Department of Environmental Management (the Department) enacted the amended Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, (the Remediation Regulations). A Remedial Decision Letter is a formal Department approval of a conceptual remedy proposed by the performing party as a result of the findings of the Site Investigation.

The Department's Office of Waste Management (OWM) has received the following documents, submitted on behalf of the YMCA of Greater Providence (YMCA), for the purpose of completing the Site Investigation of Parcel C:

1. Site Investigation Report – Additional Assessment Tasks, Providence YMCA – Parcel C, Providence, Rhode Island, prepared by GZA GeoEnvironmental, Inc., (GZA), dated 9 January 2002;
2. Site Investigation Report – Additional Assessment Tasks, Providence YMCA – Parcel C, Providence, Rhode Island, prepared by GZA, dated 29 May 2003, received 27 August 2003;
3. Letter from GZA to the Department, Re: Former Gorham Property, Site Investigation Report, YMCA Development, Providence, Rhode Island, dated 9 February 2004, received 17 February 2004;
4. Letter from GZA to the Department, Re: Response to Comments, Site Investigation Report – Additional Assessment Tasks (Revised), Former Gorham Site (Providence YMCA – Parcel C), Providence, Rhode Island, dated 21 April 2004; and

5. Letter from GZA to the Department, Re: Abutter Notification, Former Gorham Site (Providence YMCA – Parcel C), Providence, Rhode Island, dated 29 April 2004.

In accordance with Section 7 (Site Investigation) of the Remediation Regulations, OWM personnel have reviewed these documents in conjunction with the previously submitted site wide Site Investigation Reports prepared for former property owner, Textron, Inc. (Textron), by Harding Lawson Associates (HLA):

6. Supplemental Site Investigation Report, Proposed Park Subdivision, Former Gorham Manufacturing Property, Adelaide Avenue, Providence, Rhode Island, prepared by HLA, dated 1 December 1998; and
7. Site Investigation Summary Report and Risk Assessment, Former Gorham Manufacturing Property, 333 Adelaide Avenue, Providence, Rhode Island, prepared by HLA, dated 29 July 1999.

These documents fulfill the requirements of a Site Investigation Report (SIR), as described in Section 7 of the Remediation Regulations, for the “main” portion of Parcel C. It is the Department’s understanding that the YMCA intends to complete the SIR for the “campground” portion of Parcel C separately at a later date. Furthermore, given that appropriate public notice for a Site Investigation has been conducted pursuant to Rule 7.07 (Public Notice), as well as appropriate public review and comment pursuant to Rule 7.09 (Remedy Selection), the Department offers its conceptual concurrence with the proposed Remedial Action for the “main” portion of Parcel C.

It is the Department’s understanding that the proposed Remedial Action will incorporate the following items:

- 1) Encapsulation of all regulated site soils through the installation of Department approved engineered controls (including the building foot print, side walks, asphalt parking areas, landscaped areas, or other engineered caps). All engineered controls will provide a level of protection equivalent to a minimum of two feet of clean soil. All engineered controls over areas known or suspected to be subject to the Rules and Regulations for Composting Facilities and Solid Waste Management Facilities (Solid Waste Regulations), and under the jurisdiction of the Solid Waste Program, will consist of a minimum of two feet of clean soil;
- 2) Installation and continuous operation of an active sub-slab ventilation (SSV) system designed to extract soil vapor from under the building, and to prevent the accumulation and/or buildup of methane gas. The SSV system shall also be equipped with an alarm system, and system operation and maintenance will include periodic monitoring of methane levels below the building and in the extracted soil vapor;
- 3) Preparation and submission of a Remedial Action Closure Report documenting the work performed, and including, as applicable, all original laboratory analytical data results from

the remedial activities, disposal documentation, compliance and confirmation sampling, and clean fill sampling;

- 4) An Institutional Control in the form of an Environmental Land Usage Restriction (ELUR) will be recorded in the City of Providence Land Evidence Records at the time of this project's completion and will specify all of the site conditions, restrictions and emergency provisions in order to meet the appropriate Remedial Objectives as defined in the Remediation Regulations. A recorded copy of the Department approved ELUR will be forwarded back to the Office of Waste Management (OWM) within 15 days, prior to the issuance of the No Further Action Letter; and
- 5) Maintenance and annual inspection and certification of the engineered controls and portions of the property subject to the institutional controls by an environmental professional.

Please submit a Remedial Action Work Plan (RAWP) to the Department for review and approval. Once the Department's review for consistency with Sections 8 and 9 of the Remediation Regulations is complete, any written comments generated as a result of the review will be forwarded to you immediately. Upon finalization of the RAWP the Department will issue an Order of Approval Letter (Order) signifying that the Department approved RAWP may be implemented. Pursuant to Rule 10.02 of the Remediation Regulations, the application fee for Remedial Action Approvals is one thousand (\$1,000) dollars. Please remit a check in that amount to this office made out to the State of Rhode Island General Treasurer.

As the Performing Party, the YMCA will be responsible for properly conducting the above-listed activities.

All correspondences should be sent to my attention. If you have any questions regarding this letter or if you would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 222-2797 x7109 or by e-mail at jmartell@dem.state.ri.us.

Sincerely,



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

Authorized by:



Kelly J. Owens, Supervising Engineer
Office of Waste Management
Department of Environmental Management

cc: John Langlois, Esq., RIDEM/OLS
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Robert Nicoloro, MACTEC (f.k.a. Harding ESE & HLA)

David M. McCabe, Textron
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