



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

PROGRAM LETTER

January 20, 2015

File No. SR-28-0549D

(Formerly Case No. 2005-059 - Associated with Case No. 97-030)

Mr. Gregory L. Simpson, Project Manager
Textron, Inc.
40 Westminster Street
Providence, RI 02903

RE: Former Gorham Manufacturing Site
Phase II Area- Mashapaug Pond and Cove, Phase III Area - Northeast Upland and Parcel C
333 Adelaide Avenue, Providence, Rhode Island

Dear Mr. Simpson:

On November 9, 2011, the Rhode Island Department of Environmental Management's (the Department) Office of Waste Management (OWM) enacted the amended Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations). The purpose of these regulations is to create an integrated program requiring reporting, investigation and remediation of petroleum and hazardous material contaminated sites in order to eliminate and/or control threats to human health and the environment in an efficient manner. A Program Letter is a document used by the Department to signify that a Site Investigation has been completed and that a Performing Party must conduct public notice in accordance with Rules 7.07(A)(ii) and 7.09 of the Remediation Regulations concerning the findings of the investigation and the proposed remedial alternatives.

In the matter of the above-referenced property (the Site), the Department's OWM is in receipt of the following documentation submitted pursuant to the Remediation Regulations in response to the reported release at the Site:

1. Site Investigation Report, Former Gorham Manufacturing Site, Phase II Area – Mashapaug Pond and Cove, Phase III Area – Northeast Upland and Parcel C, 333 Adelaide Avenue, Providence, Rhode Island, received by the Department on November 12, 2013, and prepared by AMEC Environment & Infrastructure, Inc. (AMEC);
2. Site Investigation Report, Former Gorham Manufacturing Site, Phase II Area – Mashapaug Pond and Cove, Phase III Area – Northeast Upland and Parcel C, 333 Adelaide Avenue, Providence, Rhode Island, received by the Department on December 19, 2014, and prepared by AMEC; and

3. Response to RIDEM Review Comments, December 17, 2014 Risk Memo, Former Gorham Manufacturing Facility, 333 Adelaide Avenue, Providence, Rhode Island, received by the Department on January 19, 2015, and prepared by AMEC.

The Department regards the information provided in these reports as meeting the requirements pursuant to Rule 7.08 of the Remediation Regulations. The preferred remedial alternative proposes the following remedy:

The Phase II Area Remedial Alternative is removal of approximately two (2) feet of impacted inner cove sediment by either Option A (dredging via hydraulic pumping) or Option B (placement of a Porta Dam between the inner cove and outer cove, dewatering the inner cove and mechanical excavation of the sediment). The excavated and dewatered sediment will be placed in the former Carriage House portion of the Phase III Area, under an engineered cap. After the sediment removal is completed, the remaining inner cove sediments will be capped by one foot of clean soil, followed by wetland restoration activities.

The Phase III Area Remedial Alternative is capping of the existing impacted soils in place and capping the excavated and dewatered sediment from the inner cove in the former Carriage House area. The proposed engineered cap will be constructed of a permeable high-visibility marker fabric, placed over the compacted surface soil and impacted sediments, overlain by 12 inches of clean imported topsoil, which will be seeded and maintained.

The Parcel C Area Remedial Alternative is an engineered cap consistent with what is proposed for the Phase III Area, constructed of a permeable high-visibility marker fabric, placed over the compacted surface soil and overlain by 12 inches of clean imported topsoil, which will be seeded and maintained.

The Department acknowledges that the site investigation activities are complete. The Department is not yet able to formally approve the SIR, however, due to the necessity to first allow the public to comment on the technical feasibility of the preferred remedial alternative. Rules 7.07(A)(ii) and 7.09 of the Remediation Regulations outline the requirements for public notice after the SIR is deemed complete to all abutting property owners, tenants, easement holders, the municipality and the Environmental Justice Focus Area, regarding the substantive findings of the completed investigation and the opportunity for public review and comment on the technical feasibility of the preferred remedial alternative. Please submit a draft notification to the Department via E-mail for review and approval prior to distribution. A boilerplate notification to be distributed can be found online at <http://www.dem.ri.gov/programs/benviron/waste/topicrem.htm>. The Department will require a copy of the approved public notice letter and a list of all recipients upon issuance.

The Department will formally approve the SIR in the form of a Remedial Decision Letter (RDL) once Public Notice is completed and upon Department approval of all final responses to relevant public comments. At that point, the Department will require submission of the draft Remedial Action Work Plan (RAWP), Environmental Land Usage Restriction (ELUR), and Soil Management Plan (SMP), for review and approval in accordance with Sections 8.00 and 9.00 of the

Remediation Regulations. Upon receipt of the RDL, be prepared to submit the Remedial Action Approval Application Fee of one thousand dollars (\$1,000.00) in check form made payable to General Treasurer - State of Rhode Island directly to the Office of Management Services.

If you have any questions regarding this letter or would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 222-2797, ext. 7109, or by E-mail at joseph.martella@dem.ri.gov.

Sincerely,



Joseph T. Martella II
Senior Engineer
Office of Waste Management

cc: Terrence D. Gray, P.E., Assistant Director, RIDEM/AW&C
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Hon. Jorge Elorza, Mayor, City of Providence
Senator Juan M. Pichardo, District 2
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Robert E. Azar, Providence Planning Department
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