



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

May 25, 2006

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

RE: Former Gorham Manufacturing Facility – Park Parcel, 333 Adelaide Ave., Providence, RI
Impacts to Park Parcel Soil and Mashapaug Pond Surface Water and Sediment
Case No. 2005-059 (Associated with Case No. 97-030)

Dear Mr. Simpson:

As you will recall, on May 2, 2006, representatives of the Rhode Island Department of Environmental Management (the Department) met with you and other representatives of Textron, Inc. (Textron) and its consultant MACTEC Engineering and Consulting, Inc. (MACTEC), regarding the above referenced property (the Site). The purpose of the meeting was to discuss the Department's March 14, 2006 comments on the Supplemental Site Investigation Work Plan to Support Human Health and Ecological Risk Assessment Activities, Park Parcel/Mashapaug Cove, Former Gorham Manufacturing Property, 333 Adelaide Avenue, Providence, Rhode Island, (SSIWP) prepared by MACTEC, dated November 2005, and to introduce various newly prepared submittals designed to describe and support Textron's revised scope and conceptual approach to the proposed investigation.

The Department has reviewed the site figures, prior sample analytical data summary tables, and proposed additional sampling locations supplied by Textron and MACTEC, in accordance with Sections 7.00 (Site Investigation) and 8.00 (Risk Management) of the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, (the Remediation Regulations), as amended February 24, 2004. Accordingly, in consideration of our discussions and review of the submitted documents, Department personnel have the following comments and concerns specific to the work plan as it relates to completion of the characterization of the Park Parcel:

- 1) It is the Department's position that portions of the site require more comprehensive characterization than current plans propose, particularly in areas where an engineered cap is not also proposed. Specific areas of concern include, but are not necessarily limited to, the following locations:
 - a) Based upon the proposed surface soil locations identified on Figure 1 (Investigation Locations Park Parcel), the Department recommends that additional sampling locations be proposed in the following areas due to incomplete characterization of soils.

- a) As previously requested at our May 2, 2006 meeting, please submit a Site figure which specifically identifies and delineates the area proposed for capping on the northeast portion of the Site.
- b) Please clarify the rationale for selecting sample locations A-G. It is presumed that location "E" at SS-201 was chosen due to prior arsenic detections at 15 parts per million (ppm), although no other contaminants were tested for. In other cases, such as SS-101 and SS-202, where only low levels (no exceedances) of metals were found, the Department questions the rationale for taking additional samples (e.g. at "F" and "G") for a comprehensive screen (unless the goal is to demonstrate that these limited areas are not contaminated).

If that is not the case, it may be more productive to relocate these sample points elsewhere and add metals to the proposed SVOC, dioxin/furan and pesticide suite. Very often in past samples, but not always, high metals correlated with higher SVOC or dioxin concentrations. Location SS-1003 for example reported detections of dioxin with a toxic equivalency (TEQ) of 518 parts per trillion (ppt), lead at 2900 ppm, and benzo(a)pyrene (BaP) at 2.2 ppm, while location SS-1002 reported lead at 390 ppm and BaP at 13.0 ppm. Unless there is something unusual about a sample location, such as the presence of a discharge pipe, it would be more valid to perform random sampling over the entire northeast portion of the site. In this case that would mean employing a grid pattern and randomly selecting a statistically valid number of samples for that area. US EPA guidance has been published regarding this process and is readily available at www.epa.gov.

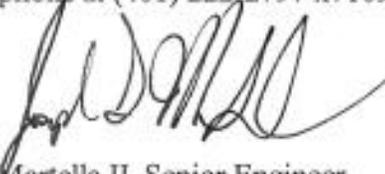
- 3) Please submit the analytical data from soil sample EX-002, as identified on Figure 1 (Investigation Locations Park Parcel), for review and inclusion in Table 3 (Summary of Compounds Detected in Soil Samples Collected from the Shore Area).
- 4) As provided in the Department's previous comments, although the maps provided by Textron have identified many historical sample locations, the majority of those sample points were only analyzed for a limited number of constituents resulting in incomplete data sets for the site. Furthermore, sporadic historical sampling conducted along the western boundary and resulting in the identification and removal of hot spot locations (such as SS-411 where lead was detected at 22,600 ppm) was insufficient to fully delineate the possible presence of other potential hot spots in the immediate area.
- 5) With respect to the sampling in the Mashapaug Pond/Cove area:
 - a) As indicated at our May 2, 2006 meeting, please include collection and analysis of deep sediment samples (i.e. 30 to 36 inch depth) in addition to shallow (0 to 6 inch depth) at all sediment sampling locations.
 - b) Additional samples are needed to delineate the degree to which metal contaminants from the slag pile extend into Mashapaug Cove. Grid dimensions for sediment samples should, at a minimum, correspond to the approximate width of the slag pile with two to three

discrete samples taken across the width starting at the waters edge. Sampling should continue every two to four feet toward the center of the pond. To delineate contaminant boundaries, while saving on laboratory costs, analytes may be initially limited to indicator metals (e.g. total lead).

- c) Department sample SS-1003 and samples SD-007 and SD-008 showed elevated levels of lead, BaP and dioxin (TEQ>500 ppt) at near-shore locations. To properly determine whether a "hot spot" exists in nearby sediment, additional sediment samples are needed closer to shore and adjacent to sample location SS-1003.
- d) With regard to the legend on Figure 5, as additional surface water samples are proposed, the legend should reflect this by changing the year to 2006.
- 6) Based upon the results presented in the SIR, the Department will make a determination whether the Site Investigation (SI) is complete or if further assessment is necessary to properly characterize the nature and extent of contamination at the Park Parcel and Cove. Therefore, please be advised that the collection and analysis of additional soil and/or sediment samples may be required following the Department's review of the data results obtained from the proposed sampling plan.
- 7) The SIR must also completely address all of the comments included in the Department's March 14, 2006, response letter to the previously referenced SSIWP.

If you have any questions regarding this letter or wish to arrange another meeting, please contact me by telephone at (401) 222-2797 x7109 or by e-mail at joseph.martella@dem.ri.gov.

Sincerely,



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

XC: Terrence D. Gray, P.E., Assistant Director, RIDEM/AW&C
Leo Hellested, P.E., Chief, DEM/OWM
Michael Andrews, RIDEM/OWM
Brian Wagner, Esq., DEM/OLS
Richard Enander, RIDEM/OT&CS/Risk Assessment
Charles Horbert, RIDEM OWR/Wetlands Permitting
Martin Wencsek, RIDEM OWR/Wetlands Permitting
Elizabeth Scott, RIDEM / OWR
Dr. Robert Vanderslice, PhD, RIDOH
Hon. David N. Cicilline, Mayor, City of Providence
Senator Juan M. Pichardo, District 2
Representative Thomas Slater
Providence City Councilman Ronald Allen
John J. Lombardi, City of Providence
Thomas Deller, City of Providence
Sara Rapport, Esq., City of Providence
Gerald Petros, Esq., Hinkley Allen
Steven Fischbach, Esq., RILS
Michael J. Murphy, MACTEC