



ALTERATIONS TO ELUR AREA APPROVAL LETTER

January 3, 2018

File No. SR-28-0549D

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

Wendy Nilsson, Superintendent of Parks
City of Providence
Department of Parks
Roger Williams Boathouse
1000 Elmwood Avenue
Providence, RI 02905

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
Plat Map 051 / Lot 324

Dear Ms. Nilsson:

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.

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:

1. Notification of Proposed Alteration to ELUR at Parcel C - Gorham Park, Former Gorham Manufacturing Facility- Textron, Inc., 333 Adelaide Avenue, Providence, RI, with certain supporting attachments including Construction Drawings, Environmental Land Usage Restriction, and Correspondence of June 15, 2017, received by the Department on January 2, 2018, and prepared by the City of Providence Parks Department.

This document indicates that the Providence Parks Department has proposed improvement activities for a portion of the Site adjacent to Mashapaug Pond and abutting the Alvarez High School. The entire Site is subject to an Environmental Land Usage Restriction (ELUR) and an associated Soil Management Plan (SMP), and the area of proposed work is currently capped by a Department approved engineered control consisting of 12 inches of clean material over a geotextile marker fabric. The proposed improvement activities include construction of a 2,000-foot-long, 4-foot-wide, by 6-inch-deep stonedust pathway. Clean cap material removed for installation of the pathway will be stockpiled for re-use on site for landscape berms and backfill at the edge of the proposed pathway. The pathway will be comprised of 2 inches of clean imported processed granite

stonedust atop 4 inches of clean imported compacted processed aggregated base. Construction of four 10-foot-long by 4-foot-wide by 4-inch-deep concrete pads at the edge of the stonedust path. Placement of approximately ten pre-selected landscape boulders, and installation of an approximately 8,000 square foot wildflower meadow seeded with native wildflower seed mix. The Providence Parks Department's proposed activities include plans to abide by the Site's existing Department approved SMP, regarding the proper management of all cap materials, any excavated regulated soils, and to restore the disturbed engineered control cap in a manner consistent with Department approvals. It is not anticipated that any regulated impacted soils beneath the existing engineered cap will be disturbed during the project.

Based upon review of the referenced document in accordance with Sections 8.00 (Risk Management), 9.00 (Remedial Action Work Plan), 10.00 (Remedial Action Approvals), and 11.00 (Remedial Action) of the Remediation Regulations, the Department approves the proposed scope of work for alterations to the ELUR area with the following conditions and requirements:

- 1) During site work, the appropriate precautions will be taken to restrict unauthorized access to the restricted area.
- 2) In the event that excavation of regulated soil is required from the restricted area:
 - a) Excavated regulated soils will be staged and temporarily stored in a designated area of the property. Within reason, the storage location will be selected to limit the unauthorized access to the materials (i.e., away from public roadways / walkways). No regulated soil shall be stockpiled on-site for greater than 60 days without prior Department approval.
 - b) Soils excavated from the site may not be re-used as fill on residential property.
 - c) If any regulated material cannot be returned to the subsurface of the restricted area, then all such excess regulated material shall be properly managed and disposed at an appropriately licensed facility.
 - d) Site soils, which are to be disposed of off-site, must be done so at a licensed facility in accordance with all local, state, and federal laws. Copies of the material shipping records associated with the disposal of the material shall be maintained by the site owner and included in the annual ELUR inspection report for the site and Closure Report for this project.
- 3) Any portion of the engineered control cap that is disturbed during the project which is not specifically part of the proposed improvement activities (i.e. not part of the constructed stonedust path, concrete pads, etc.) shall be restored to its original Department approved design specifications immediately following completion of the approved work.
- 4) Please notify the Office of Waste Management 48 hours prior to initiating the proposed activities.

- 5) Within 30 days of completion of the proposed work, a brief Closure Report shall be submitted to the Department summarizing the remedial activities performed and documenting the proper restoration of the engineered control cap.

This Approval Letter does not remove your obligation to obtain any necessary permits from other state, local or federal agencies, or your obligation to obtain consent for access to the Site from the appropriate property owners. Please review the stipulations of this Approval Letter thoroughly to ensure your compliance with the requirements.

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
Principal Engineer
Office of Waste Management

Cc: Kelly J. Owens, RIDEM/OWM
Susan Forcier, Esq., RIDEM/OLS
Neal Personeus, RIDEM/OWR
Charles Horbert, RIDEM/OWR/Freshwater Wetlands Program
Hon. Jorge Elorza, Mayor, City of Providence
Senator Ana B. Quezada, District 2
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Greg Simpson, Textron