



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF THE DIRECTOR
235 Promenade Street, Room 425
Providence, Rhode Island 02908

September 13, 2018

Mr. Gary Morin, FUDs Program Manager
USACOE - New England District
696 Virginia Road
Concord, MA 01742

Mr. Morin,

The Department of Environment Management (the Department) has identified conditions on the State-owned portion of Gould Island, which is currently designated a Formerly Used Defense Site (FUDS), which would impact the Department's anticipated future use for this property. Under the current Park and Management Area Rules and Regulations, access to Gould Island is restricted during bird nesting season from April 1st to August 15th unless specifically permitted by the Director. However, outside of this window, public access is not prohibited, and the only prohibited activity is camping. The Department anticipates the future use of the island will be for expanded public recreational use, including overnight camping, as part of a larger Bay Islands Park System. This will of course be dependent on the environmental conditions at the site at the time.


Gould Island currently includes several areas of bulk solid (and potentially hazardous) waste disposal. Including, but not limited to, Bunker #11, Bunker #12, Disposal Area #14, and the former incinerator. These disposal areas existed prior to the land transfer and are jurisdictional under the Department's Solid Waste Regulations. As such, these areas will need to be brought into compliance independent of whether or not they pose a CERCLA risk.

The existing structures and utilities on Gould Island present numerous hazardous to human health, which may adversely impact any future use of the island. These hazards include, but are not limited to, partially collapsed or unstable structures, open manholes and other underground utilities, asbestos, leaking transformers, and potential underground storage tanks (USTs). The use of Gould Island for the storage and refurbishment of torpedoes ceased in the 1950's. Some of the former building were demolished prior to the property transfers in 1975 and 1989; however, many of the building and utilities remain to this day in various states of disrepair. Given the over two decades that elapsed between the decommissioning of the Naval Torpedo Station in Newport and the property transfers, during which these buildings were not being utilized and maintained by the Navy nor being used by the State, the Department requests that the ACOE consider these

structures for removal under the building demolition and/or debris removal (BD/DR) component of the FUDS Program.

The Department respectfully requests a response from the ACOE, which details how it will address the aforementioned issues at Gould Island under the FUDS Program.

Sincerely,

A handwritten signature in black ink, appearing to read "Terrence Gray". The signature is fluid and cursive, with a large loop at the beginning and end.

Terrence Gray, P.E., Associate Director for Air, Waste & Compliance

Cc: Dean Hoxsie, RIDEM
Cathy Sparks, RIDEM
Mary Kay, Esq., RIDEM
Matthew DeStefano, RIDEM
Nick Noons, RIDEM