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April 16, 2010

BY ELECTRONIC MAIL

Mr. Tim Fleury
R.I. Department of Environmental
Management
Office of Waste Management
235 Promenade Street
Providence, RI 02908

RE: Lincoln Lace and Braid Remediation Project
RIDEM Case No. 2009-18

Dear Mr. Fleury:

I am writing on behalf of the Hartford Park Residents Association (HPRA) regarding the proposed clean up of the above referenced contaminated site.

On or about March 16, 2010, representatives of HPRA and I met with Robert McMahon of the Providence Parks Department and EA Engineering to discuss concerns we had about the proposed clean up. Those concerns were memorialized in an unsigned letter from EA Engineering dated March 29, 2010 attached to this letter as Exhibit A. That letter accurately described the concerns expressed by HPRA regarding the clean up of the Lincoln Lace site.

After receiving the March 29 letter, I contacted Frank Postma about two outstanding concerns that the letter failed to address: sampling for dioxins on the site and placement of one of the four check dams. After discussing those concerns further the City of Providence agreed to reconfigure the fourth check dam into an area of quick water and to sample for dioxins at three locations before excavated soil is placed under the cap; and, also after extreme flooding events such as the one that just occurred, the City agreed to collect additional samples of surface soils HPRA and test them for dioxins. These last two measures were set forth in an email I received today from Mr. Postma and that email is attached to this letter as Exhibit B.

HPRA is largely in agreement with the measures set forth in the March 29 letter and today's email. HPRA would prefer to see dioxin samples taken for every 500 tons of soil placed under the cap as the City will do for other contaminants being placed under

the cap (arsenic, lead and mercury as described in the March 29th letter); and also asks to be notified of the results of those samples. Additionally, HPRA requests that DEM establish an Internet document repository for the entire Lincoln Lacey Site including the landfill portion of the site, and any periodic monitoring reports for the site be placed into the Internet document repository. Second HPRA requests that it be involved in the development of any post flooding sampling plan that may be implemented as part of long term monitoring of the site.

HPRA thanks Mr. Postma and his staff, as well as Mr. McMahon for meeting with HPRA and responding to HPRA's concerns. Should DEM have any questions about the contents of this letter please do not hesitate to call me at 274-2652 x-182.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Fischbach", written in a cursive style.

Steven Fischbach
Community Lawyer / Unit Head

Enclosures

CC: Gilberta Taylor, HPRA
Frank Postma, EA Engineering

Shibata



EA Engineering, Science, and Technology, Inc.

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29 March 2010

Mr. Timothy Fluery
RI Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, RI 02908

RE: 16 March 2010 Public Comments and Resolutions
Lincoln Lace and Braid Remediation Project
Ponagansett Avenue; Providence, Rhode Island
RIDEM Case No. 2009-18; EA Project No. 61891.05

Dear Mr. Fluery:

EA Engineering, Science, and Technology, Inc. (EA), on behalf of the City of Providence (the City), is providing this letter report to summarize the public hearing held on 16 March 2010 to obtain public comment on the proposed Lincoln Lace and Braid Remediation Project. Please find the comments and proposed resolutions provided below:

Present:

Robert McMahon – Providence Parks Department
Steven Fischbach – Rhode Island Legal Services
Anetta Godett – Hartford Park Resident’s Association (401-421-2101)
Vivian Medina - Hartford Park Resident’s Association
Jade Taylor - Hartford Park Resident’s Association
Sam Whitin, EA Engineering, Science, and Technology, Inc.
Ron Mack – EA Engineering, Science, and Technology, Inc.

J. Taylor expressed concerns regarding root systems of existing trees harming the cap.

To address this concern, EA is proposing to keep only three significant trees at the Site. All others will be removed to prevent potential compromise of the geotextile fabric. Furthermore, the engineered cap (geotextile fabric and one foot soil cap) will extend to the tree trunks to provide the most protection possible to the public.

R. McMahon suggested using an air spade to excavate root systems around trees. EA stated we would have to consider potential impacts to workers and identify these in the SMP.

As we have decided to install the engineered cap right up to the tree trunks, this air spade excavation would be redundant and a considerable expense to the City. Therefore, air spade excavations will not be conducted.



R. McMahon stated that quarterly inspections to evaluate the integrity of the cap and condition of trees by the Parks Department will be incorporated into the ELUR.

EA will prepare this document and will provide with the draft ELUR, which will be submitted with the Revised RAWP.

S. Fischbach requested a copy of the checklist for inspections prior to finalization.

EA will forward a copy to S. Fischbach when the document is submitted to RIDEM.

S. Fischbach requested that the soil be sampled as it is moved to Area 2 prior to capping. EA suggests sampling once every 500 yards for contaminants of concern.

EA will sample and analyze the soil for metals of concern arsenic, lead, and mercury at a frequency of once per 500 cubic yards. The material will be disposed off Site if an Upper Concentration Limit is exceeded. The analytical results will be provided in the Remedial Action Closure Report.

S. Fischbach requested geotextile in areas of cattails and wetland plantings.

EA and City agree and the plans and specs have been revised accordingly.

S. Fischbach requested thorny plants rather than trees (removing American Holly and Arborvitaes).

EA and City agree and the plans and specs have been revised accordingly.

Consensus that geotextile and thorny bushes are preferable to trees with no geotextile.

EA and City agree and the plans and specs have been revised accordingly.

S. Fischbach expressed concern regarding the area of the confluence of the river and sluiceway as an attraction to the public and stated we need to consider preventing access to this area.

EA and City have proposed increasing the density of plantings in this area.

R. McMahon recommended cattail plantings within the sluiceway to block view of the potentially orange stained check dams.

EA is not confident of the cattail plantings surviving within the sluiceway in this area, as we have designed the check dams to increase velocity in this area.



S. Fischbach requested post-flooding sampling/monitoring to determine if the cap is impacted.

EA and the City have determined that the City cannot be responsible for potential impacts from depositional sediments. Therefore, post flooding sampling and analysis will not be conducted. The City will examine the potential impacts of flooding on the cap in terms of damaging the cap integrity.

R. McMahon suggested sampling Merino Park to determine impacts from flooding.

Based on the comment above, the City will not conduct sampling at Merino Park to determine impacts.

S. Fischbach suggested moving the check dams upstream.

EA has determined the check dams cannot be relocated upstream as they would be placed upon contaminated sediment. EA and the City would like to avoid working in contaminated sediments. Instead, EA has removed one of the check dams. Now only one will be visible from the bridge and it will be approximately 80 ft from the bridge.

EA will send a copy of the bridge design to S. Fischbach and R. McMahon upon receipt from Fay Spofford and Thorndike.

EA remains committed to this comment.

EA will submit draft signs (regarding educating public of the iron flocculent in sluiceway) to the Hartford Park Resident's Association for review and approval.

EA remains committed to this comment.

Construction fencing is needed at the entrance to LLB from Merino Park.

EA and City agree and the plans and specs have been revised accordingly.

A 1-ft soil cap and geotextile will be installed around existing trees after an air spade excavation is performed to remove surficial contamination. The trees will be monitored on quarterly basis to determine if the tree remains healthy. If determined otherwise, the tree will be removed and cap repaired in accordance with language to be inserted into the SMP.

EA and City agree to the cap design but will not air spade excavate in an effort to minimize worker exposures. The plans and specs have been revised accordingly.



Exhibit B

Steve Fischbach <steve.fischbach@gmail.com>

LLB

1 message

Postma, Frank <fpostma@eaest.com>

Fri, Apr 16, 2010 at 1:47 PM

To: Steve Fischbach <steve.fischbach@gmail.com>

Steve,

This e-mail has been prepared in response to the following concerns that you had voiced on behalf of the Hartford Park Residents Association:

- 1) The visual impact of check dam 4 to attack trespassers up the sluice way; and
- 2) The potential for dioxin to be in the soils or deposited from the river.

EA has conferred with the City of Providence and proposes the following remedies to address these concern.

The fourth check dam will be reconfigured to include a riffle structure on the down-gradient side of the check dam. this structure will appear as an area of quick water upon construction and lessen the visual impact of the check dam and allure of the sluice way.

City proposes to collect three samples for dioxin analyses (2,3,7,8-TCDD) from the soil to be placed under the proposed cap. Additionally, the City would collect additional samples for 2,3,7,8-TCDD after extreme flood events where the river flows beyond the proposed bike path.

Frank

Frank B. Postma, LSP, LEP, PG
Senior Project Manager

EA Engineering, Science, and Technology, Inc.

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