



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

Mr. Steven Fischbach
Rhode Island Legal Services, Inc.
56 Pine Street, Suite 400
Providence, RI 02903

August 3, 2010

CERTIFIED MAIL

RE: Lincoln Lace & Braid Mill Site
55-61 Ponagansett Street
Plat 113 / Lots 305 & 429
Providence, Rhode Island
RIDEM Case No. 2009-018

Dear Mr. Fischbach:

The Rhode Island Department of Environmental Management's (the Department) Office of Waste Management (OWM) has received a Remedial Action Work Plan (RAWP), dated June 2010, submitted by EA Engineering, Science, and Technology, Inc. (EA) on the behalf of the City of Providence. This document was submitted for the Lincoln Lace & Braid – Mill Site located at 55-61 Ponagansett Street in Providence, in accordance with the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations). This RAWP proposes a plan to clear cut trees and vegetation across the entire property, with the exception of three trees, and cap the soils with one foot of clean fill overlying a geotextile fabric. Following review of this document, the OWM and Office of Water Resources' Freshwater Wetlands Division has determined that this clear cutting will have significant implications on slope stabilization of the Woonasquatucket River and will also significantly impact wildlife. In ongoing discussions, the City of Providence and EA are proposing an alternative to complete clear cutting of the site. This new proposal consists of preserving additional trees (larger than twelve inches in diameter) for the area between the future, proposed bike path and the sluiceway by capping the soils beneath these tree canopies with one foot of aggregate or stone overlying a geogrid, which is the same material being used to cap the contaminated sediments in the sluiceway. This alternative capping method allows water and oxygen to infiltrate through the aggregate and geogrid, ultimately reaching the tree roots, which will prevent the death of the trees.

Another alternative capping method will be six inches of clean fill or loam overlain construction fencing in a thirty foot buffer zone from the Woonasquatucket River to the bike path (if the proposed bike path is within this thirty foot buffer zone then this capping method will extend to the post and beam fencing located on both sides of the bike path). Again, the trees in this buffer

Lincoln Lace & Braid – Mill Site
Providence, Rhode Island

Page 1 of 2
August 3, 2010

zone along the River play a crucial role in slope stability and the preserving of River wildlife. Capping this area with one foot of clean fill or loam will jeopardize the health and long-term existence of the trees, however, six inches of loam will serve as an adequate barrier to prevent direct exposure along with serving as a good base for the proposed wetland species plantings. The use of the construction fencing will also serve as an indicator barrier as well as allowing the roots from the future plantings to thrive. It shall also be noted that there will be post and beam fencing along the bike path with deterrent, thorny specie plantings that will further deter access to this area.

With respect to your previous request, the Lincoln Lace & Braid – Mill Site Internet repository has been established by the Department. Electronic copies of electronically available documents and letters can be found at the following website:

<http://www.dem.ri.gov/programs/benviron/waste/lincoln.htm>

Future milestone letters, E-mails, and documents related to this project will be added to this site upon becoming available.

If you have any questions regarding this letter, please contact me by telephone at (401) 222-2797 ext. 7147 or by e-mail at tim.fleury@dem.ri.gov.

Sincerely,



Timothy M. Fleury
Senior Engineer
Office of Waste Management

Cc: Kelly J. Owens, Supervising Engineer, Office of Waste Management
Jeffrey P. Crawford, Principle Environmental Scientist, Office of Waste Management
Elizabeth Stone, Office of the Director
Ronald Gagnon, Office of Customer and Technical Assistance
Martin Wencek, Office of Water Resources – Wetlands
Aaron Mello, Office of Water Resources - RIPDES
Alan Peterson, U.S. Environmental Protection Agency
Robert McMahon, City of Providence
Gilberta Taylor, Hartford Park Residents Association
Lisa Aurecchia, Woonasquatucket River Watershed Council
Frank Postma, EA Engineering, Science, and Technology, Inc.
Ronald Mack, EA Engineering, Science, and Technology, Inc.