



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

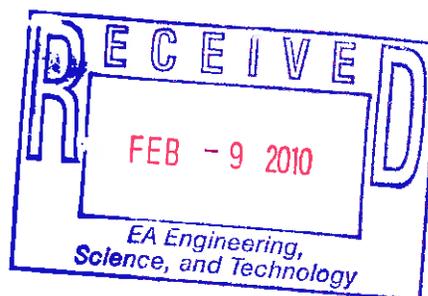
TDD 401-222-4462

PROGRAM LETTER

Mr. Robert F. McMahon, Superintendent
Providence Parks Department
Dalrymple Boathouse
Roger Williams Park
Providence, RI 02905

February 2, 2010

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



Dear Mr. McMahon:

On February 24, 2004, the Rhode Island Department of Environmental Management (the Department) amended the 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 contaminated sites in order to eliminate and/or control threats to human health and the environment in an efficient manner. The purpose of a *Program Letter* is to indicate that the Department deems the investigation of the reported release complete and to notify the Responsible Party that they must perform Public Notice in accordance with Sections 7.07 and 7.09 of the Remediation Regulations.

The Department has reviewed the following documents relative to the above referenced property:

1. Correspondence entitled Lab Project # C1203, Client Project # NA, received by the Department on November 21, 1996, prepared and submitted by Mitkem Corporation (Mitkem);
2. Correspondence entitled Gas Chromatography-Mass Spectrometry Analysis of Extractable Organics in Soils and Sediments – Lace Textile, received by the Department on December 4, 1996, prepared and submitted by the United States Environmental Protection Agency (USEPA);

3. Results of Subsurface Site Investigation, received by the Department on December 23, 1996, prepared and submitted by Fuss & O'Neill, Inc. (F&O);
4. Correspondence entitled Client Project #: Lincoln Lace, Lab Project #: E0020, received by the Department on January 27, 1998, prepared and submitted by Mitkem;
5. Correspondence entitled Work Plan, received by the Department on October 27, 1998, prepared and submitted by Cyn Environmental Services (Cyn);
6. Short-Term Response Report (Response Report), dated February 10, 1999, prepared and submitted by Cyn;
7. Laboratory Analytical Data Reports, dated May 27, 1999, prepared and submitted by ESS Laboratory;
8. Laboratory Analytical Data Reports, dated June 2, 1999, prepared and submitted by ESS Laboratory;
9. Laboratory Analytical Data Reports, dated July 17, 1999, prepared and submitted by ESS Laboratory;
10. Correspondence entitled Former Landfill / Dump Location and Extent, received by the Department on October 2, 1999, prepared and submitted by F&O;
11. Remedial Evaluation Report, dated December 1999, prepared by the Department's Office of Waste Management;
12. Correspondence entitled Testing Documentation, dated December 1999, prepared and submitted by the Trust for Public Land;
13. Laboratory Analytical Data Reports, received by the Department on February 24, 2000, submitted by F&O;
14. Pre-Design Investigation Report, dated August 2000, prepared by the Department's Office of Waste Management;
15. Correspondence entitled Proposal for Limited Subsurface Investigation, received by the Department on January 11, 2002, prepared and submitted by F&O;
16. Correspondence entitled Proposal for Remedial Assessment, received by the Department on January 8, 2003, prepared and submitted by F&O;
17. Remedial Evaluation Report Addendum, received by the Department on February 11, 2003, prepared and submitted by F&O;

18. **Remedial Evaluation Report Addendum**, received by the Department on March 17, 2003, prepared and submitted by F&O;
19. **Remedial Evaluation Report Addendum**, dated April 2003, prepared by the Department's Office of Waste Management;
20. **Public Notice Letters** notifying abutters of investigation work, received by the Department on October 10, 2003, prepared and submitted by the Department of Planning and Development for the City of Providence;
21. Correspondence entitled **Site Security – Former Lincoln Lace and Braid Property, Providence**, received by the Department on August 10, 2004, prepared and submitted by the Department of Public Parks for the City of Providence;
22. Correspondence entitled **Remedial Alternatives Analysis**, received by the Department on May 11, 2009, prepared and submitted by EA Engineering, Science, and Technology, Inc. (EA);
23. Correspondence entitled **Revised Remedial Alternatives Analysis**, received by the Department on July 8, 2009, prepared and submitted by EA;
24. **\$1,000.00 Remedial Action Approval Application Fee**, received by the Department on July 14, 2009;
25. **Historical Site Characterization Site Plan**, received by the Department on July 23, 2009, prepared and submitted by EA;
26. **Lincoln Lace and Braid Supplemental Sampling and Analysis Plan**, received by the Department on July 30, 2009, prepared and submitted by EA;
27. **Sampling and Analysis Plan and Site-Specific Quality Assurance Project Plan for Supplemental Sediment and Surface Water Sampling**, received by the Department on August 21, 2009, prepared and submitted by EA;
28. **Sluiceway Sampling and Analysis Plan**, received by the Department on August 25, 2009, prepared and submitted by EA;
29. **Supplemental Sampling Analytical Results**, received by the Department on December 1, 2009, prepared and submitted by EA;
30. **Revised Remedial Alternative No. 3**, received by the Department on December 1, 2009, prepared and submitted by EA; and

31. Correspondence entitled Lincoln Lace and Braid Response to Comments, received by the Department on February 1, 2010, prepared and submitted electronically by EA.

The Department regards the information provided in these reports as collectively meeting the requirements pursuant to Rule 7.08 Site Investigation Report (SIR) of the Remediation Regulations.

The Department requires that you give public notice to all abutting property owners, tenants, and utilities with easements on the completed SIR with the preferred alternatives being:

The preferred remedial alternative calls for the minimum placement of one foot of clean fill in the wetland buffer areas along the sluiceway and river, in addition to the introduction of wetland vegetation. The remaining areas of the site will be capped with a minimum of one foot of clean fill over a geofabric material. Due to floodplain displacement, excavation may be necessary prior to capping, therefore, any excess contaminated soils that cannot be consolidated and encapsulated onsite will be properly disposed of off-site at a licensed disposal facility in accordance with all local, State, and Federal laws. This remedial alternative also calls for the maintenance and monitoring of the engineered controls through the recording of an institutional control in the form of a Department approved Environmental Land Usage Restriction (ELUR) and Soil Management Plan (SMP), followed by annual compliance certification of the ELUR.

Remediation of the upper sluiceway shall consist of encapsulating the contaminated sediments with a geotextile overlaid by a geogrid and a minimum of six inches of 1 ½" stone aggregate. Excavation of the lower sluiceway will also be performed to allow for the installation of four check dams.

The Department acknowledges that the site investigation activities are complete. The Department is not yet able to formally approve the SIR, however, due to the necessity to first allow the public to comment on the preferred Remedial Alternative. Sections 7.07 and 7.09 of the Remediation Regulations outline the requirements for public notice to property abutters, tenants, and utilities with easements regarding the substantive findings of the completed investigation, and the opportunity for public review and comment on the technical feasibility of the preferred remedial alternative. Please submit a draft notification to the Department via e-mail for review and approval prior to distribution. The Department will require a copy of the approved Public Notice letter and a list of all recipients. The City of Providence is also reminded of its obligation to comply with **Rhode Island General Law 23-19.14-5 Environmental Equity and Public Participation** due to the re-use of the property as a recreational facility. Despite the Office of Waste Management being notified of this release prior to the August 1, 2007, implementation of the **Policy for Considering Environmental Justice in the Review of Investigation and Remediation of Contaminated Properties (the Policy)**, the Department strongly recommends that the

City of Providence adhere to this Policy to inform the public of future remedial activities at the site.

The Department will formally approve the SIR in the form of a **Remedial Decision Letter** once Public Notice is completed and upon Department approval of all final responses to relevant public comments. At that point, the Department will require submission of the draft Remedial Action Work Plan (RAWP) that shall include the draft ELUR and Soil Management Plan for review and approval in accordance with Sections 8.0 and 9.0 of the Remediation Regulations.

The ELUR, once approved, shall be recorded for Plat 113 / Lots 305 and 429 in the Land Evidence Records for the City of Providence and a recorded copy forwarded back to the Department.

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

Sincerely,



Timothy M. Fleury
Engineer
Office of Waste Management

Authorized by,



Jeffrey P. Crawford
Principal Environmental Scientist
Office of Waste Management

cc: Kelly J. Owens, Office of Waste Management
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
Lisa Aurecchia, Woonasquatucket River Watershed Council
Steven Fischbach, Rhode Island Legal Services, Inc.
Ronald Mack, EA Engineering, Science, and Technology, Inc.

