



EA Engineering, Science, and Technology, Inc.

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22 April 2010

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

RE: Public Involvement Comments and Response to  
Hartford Park Resident's Association (HPRA) Comments  
Lincoln Lace and Braid Remediation Project  
Ponagansett Avenue; Providence, Rhode Island  
RIDEM Case No. 2009-18  
EA Project No. 61891.05.1005

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 (LLB) Remediation Project.

Additionally, formal comments submitted to RIDEM by Rhode Island Legal Services (RILS) and associated responses are provided below.

Present at 16 March 2010 Meeting:

Robert McMahon - Providence Parks Department  
Steven Fischbach - RILS  
Anetta Godett - HPRA (401-421-2101)  
Vivian Medina - HPRA  
Jade Taylor - HPRA  
Sam Whitin - EA Engineering, Science, and Technology, Inc.  
Ron Mack - EA Engineering, Science, and Technology, Inc.

Comment 1) *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 1-ft soil cap) will extend to the tree trunks to provide the most protection possible to the public.



- Comment 2) *R. McMahon suggested using an air spade to excavate root systems around trees. EA stated that 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.

- Comment 3) *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 the draft ELUR, which will be submitted with the Revised RAWP.

- Comment 4) *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.

- Comment 5) *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.

- Comment 6) *S. Fischbach requested geotextile in areas of cattails and wetland plantings.*

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

- Comment 7) *S. Fischbach requested thorny plants rather than trees (removing American Holly and Arborvitaes).*

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

- Comment 8) *Consensus that geotextile and thorny bushes are preferable to trees with no geotextile.*

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



Comment 9) *S. Fischbach expressed concern regarding the area of the confluence of the river and sluiceway as an attraction to the public and stated that we need to consider preventing access to this area.*

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

Comment 10) *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.

Comment 11) *S. Fischbach requested post-flooding sampling/monitoring to determine if the cap is impacted.*

EA and the City have determined that, while the City cannot be responsible for potential impacts from depositional sediments, post-flooding sampling and analysis will be conducted (see Comment 20). Additionally, the City will examine the potential impacts of flooding on the cap in terms of damaging the cap integrity.

Comment 12) *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.

Comment 13) *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 will be approximately 80 ft from the bridge.

Comment 14) *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.

Comment 15) *EA will submit draft signs (regarding educating the public of the iron flocculent in the sluiceway) to the Hartford Park Resident's Association for review and approval.*

EA remains committed to this comment.



Comment 16) *Construction fencing is needed at the entrance to LLB from Merino Park.*

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

Comment 17) *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 a quarterly basis to determine if they remain healthy. If determined otherwise, the trees will be removed and the cap repaired in accordance with language to be inserted into the SMP.*

EA and the 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.

After the public meeting, a formal comment letter was submitted to RIDEM by RILS on behalf of HPRA and is provided as Attachment A. Please find the comments and proposed resolutions provided below:

Comment 18) RILS states “...the City of Providence agreed to reconfigure the fourth check dam into an area of quick water”.

The City has agreed to reconfigure the fourth check dam to allow for a riffle on the downgradient end rather than a drop. RILS and HPRA were concerned that the appearance of a waterfall-like structure would be an attraction to children visiting the bike path. The revision to a riffle would lessen the visual attraction. This check dam is the only one visible from the proposed bike path bridge crossing the sluiceway.

Comment 19) RILS states “...the City of Providence agreed...to sample for dioxins at three locations before excavated soil is placed under the cap...”.

The City has agreed to collect three composite samples of depositional sediment from areas impacted by the recent flooding. These samples will be analyzed for 2,3,7,8-tetrachlorodibenzo-*p*-dioxin (2,3,7,8-TCDD) via EPA Method 1613. These samples will be collected as a Limited Design Investigation in accordance with Section 9.05 of the RIDEM *Remediation Regulations*, as the presence or absence of dioxin will not alter the design of the selected remedial alternative.

Comment 20) RILS states “...the City of Providence agreed...to sample for dioxins...after extreme flooding events such as the one that just occurred...”.

The City has agreed to sample for 2,3,7,8-TCDD after extreme flooding events. EA and the City define an extreme flooding event as a 100-year storm, defined as 7 in. of rainfall over a 24-hour period, in addition to the LLB property being inundated by the Woonasquatucket River. If the definition of a 100-year rainfall



event is revised in the future, the City shall adopt the revised measure. After such events, the City agrees to collect three composite samples of depositional sediment and analyze the samples for 2,3,7,8-TCDD via EPA Method 1613.

Comment 21) RILS states "...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".

The City agrees with this request. The City agrees to forward the proposed sampling plans to HPRA and its representatives for comment prior to initiation of the sampling plan. The City will take into consideration all comments from HPRA in finalizing the post-flooding monitoring plan.

Comment 22) RILS states "...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 29<sup>th</sup> letter) and also asks to be notified of the results of those samples".

Please note that the City agreed to sample and analyze soils being placed beneath the engineered barrier at a frequency of one sample per 500 cubic yards, not per 500 tons.

The City has agreed to collect three composite samples of depositional sediment from across the site prior to initiation of construction of the proposed engineered barrier. This sampling scenario was proposed based on the ubiquitous distribution of sediments deposited upon the Site during the flood. This type of depositional environment would not concentrate dioxin in one location as would a point source (tank, discharge pipe, etc.). Therefore, collection of three composite samples will be adequate to determine the presence or absence of dioxins at the Site.

If you have any questions regarding these responses to public comment, please contact me at (401) 736-3440, Ext. 203.

Sincerely,  
EA ENGINEERING, SCIENCE,  
AND TECHNOLOGY, INC.

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

attachment

cc: Robert McMahon, Providence Parks Department  
Alan Peterson, U.S. Environmental Protection Agency  
Frank Postma, PG, LEP, LSP, EA Engineering, Science, and Technology, Inc.  
Sam Whitin, EA Engineering, Science, and Technology, Inc.

*Attachment A*

*RILS Comment Letter*  
*16 April 2010*

**RHODE ISLAND LEGAL SERVICES, INC.  
56 PINE STREET FOURTH-FLOOR  
PROVIDENCE, RHODE ISLAND 02903**

**TELEPHONE: (401) 274-2652  
TOLL FREE: 1-800-662-5034**

**TDD: (401) 272-5335  
FAX: (401) 453-0310**

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 29<sup>th</sup> 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

Exhibit A



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

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Present:

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Vivian Medina - Hartford Park Resident’s Association  
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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.

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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 &lt;steve.fischbach@gmail.com&gt;

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**LLB**

1 message

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**Postma, Frank <fpostma@eaest.com>**

Fri, Apr 16, 2010 at 1:47 PM

To: Steve Fischbach &lt;steve.fischbach@gmail.com&gt;

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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**P** Before printing, think about ENVIRONMENTAL responsibility

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