



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

April 19, 1999

Alan Sepe, Director
Division of City Property
City Hall
25 Dorrance Street
Providence, R.I. 02903

RE: Preliminary Comments concerning the Remedial Action Work Plan for the proposed Elementary and Middle Schools on Springfield Street in Providence (Case #99-018).

Dear Mr. Sepe:

Please find attached a copy of the Office of Waste Management's preliminary comments on the Remedial Action Work Plan submittal to date by ATC Associates, Inc. Please forward the outstanding items which are subject to review as soon as possible so that this Office can continue the RAWP review.

Should you have any questions, please call me at (401) 222-2797 x 7102.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Crawford".

Jeffrey Crawford
Principal Environmental Scientist
Office of Waste Management

cc: Terrence Gray, Chief OWM
Greg Fine, Supervising Engineer OWM Site Remediation & Restoration
Leo Hellested, Supervising Engineer OWM Solid Waste
Walid Ali, Senior Engineer, OWM Solid Waste

Springfield Street cover letter /jc

**City of Providence- proposed Elementary and Middle schools
Springfield Street and Hartford Avenue, Providence
(Former City of Providence dump)
Site area approximately 11 acres**

Preliminary Remedial Action Work Plan Comments of the ATC Associates, Inc. submittals.
April 19, 1999

1. ATC Associates has requested a Variance to the Residential Direct Exposure Criteria as part of the Remedial Action Work Plan submittal.
2. Final exterior areas of the site will require a minimum of two (2) feet of clean soil as a cover with a proposed indicator barrier such as a snow fencing or geotextile layer. All areas where the two-foot minimum cover will not occur, a geotextile layer must be installed and covered by a minimum of one (1) foot of clean soil.
3. Any solid waste or fill material excavated, as part of footings, foundations, pilings etc. must be disposed of at an offsite licensed solid waste disposal facility. These records of disposal must be included in the Site Closure Report to be submitted to RIDEM OWM at the end of remedial implementation.
4. The design sheet for the elementary school and associated subsurface gas collection system has not been submitted to date. The design sheets should indicate the location of the sensor alarms on the first floor of each building.
5. The Sub-slab Ventilation system will require registration with the Office of Air Resources.
6. The OWM has not received a design sheet for the entire site indicating the proposed location of the gas monitoring wells and the groundwater monitoring wells around the site perimeter.
7. A section should be added to the RAWP –Compliance Determination section to clarify the schedule and proposed parameters for post construction/pre-occupation air quality monitoring of the Sub-Slab Ventilation system and the building interiors in general. Also, clarification of the post construction surficial soil sampling, analytical parameters and cover inspection should be stated in this section of the RAWP.
8. Please clarify the location of blower units in respect to the mechanical rooms of the school or its location in a separate secured room. Is there going to be an automatic shut down control if a problem develops. Also, the blower specifications have not been submitted.
9. A post construction/pre-occupation contingency plan should be developed for the schools to pickup where the site construction contingency plan leaves off especially for system failure of the sub-slab ventilation system or alarm detection.

10. The gas monitoring wells to be located around the site boundary must be depicted on a schematic plan and located so as to appropriate obtain gas monitoring of the gas which may migrate towards the abutting residents. The schematic drawing should also include the valves, blower and treatment system. These wells will require to be monitored weekly at first, then monthly and then quarterly.
11. A compliance monitoring schedule should be developed as part of the long term Operation & Maintenance for the site and shall be performed at the outfall of the gas collection system to include testing for methane, CO₂, H₂S and VOC's. All results must be submitted to RIDEM OWM for review. These results can be compiled in an annual inspection report along with the annual inspection of the site cover.
12. How deep are the utility trenches and what measures are going to be taken to prevent exposure if the trenches are constructed in the fill material.
13. Design sheet S2.2 is in error. The middle school orientation is not over the Narragansett Bay Commission's (NBC) Stanfield Street pipe.
14. Please explain the status of the NBC's review of the proposal and their comments on the project.
15. Design sheet S2.2 in the text makes no mention of the foundation construction in a dump area.
16. The RAWP Certification page is unsigned.
17. The Site Closure Report shall include a copy of all operating logs.
18. The OWM has not received a design cross section sheet including the following information:
 - Final asphalt areas- Parking and walkways
 - Playground area
 - Baseball field
 - Basketball court
 - Soccer field
 - General grass and landscaped areas (plantings included)
 - Typical gas monitoring well
 - Gas headers and laterals
19. Please provide a description in the RAWP text and drawing indicating how surface water leaves this site.
20. Institutional Controls