



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

**CERTIFIED MAIL**

August 7, 2008

Mr. Gregory L. Simpson  
Project Manager  
Textron, Inc.  
40 Westminster Street  
Providence, RI 02903

RE: Order of Approval Addendum – Short Term Response Action  
Former Gorham Manufacturing Facility – Parcel A Retail Complex  
333 Adelaide Ave., Providence, RI, Plat 51, Lot 170  
Case No. 97-030

Dear Mr. Simpson:

Enclosed please find the Order of Approval Addendum (OA Addendum) for the proposed remediation plan for the above referenced facility. Please review the stipulations of this OA Addendum thoroughly to ensure your compliance with the requirements. The Order and OA Addendum place primary responsibility for the construction, operation, maintenance and monitoring of the approved Short Term Response Action Work Plan (STRAWP) on Textron, Inc. (Textron). In order to enable the Department to monitor Textron's compliance with the STRAWP, the Order and OA Addendum require Textron to notify the Department of any condition that is non-compliant with the Order or the OA Addendum or that constitutes an interruption of the STRAWP. In order to maintain compliance with the Order, the OA Addendum and the STRAWP, Textron's responsibilities under the Order and OA Addendum necessarily include the responsibility to respond to and correct non-compliant conditions in a timely and proactive manner that minimizes non-compliance with the Order, OA Addendum and STRAWP, and protects human health and the environment.

Please notify this office 48 hours prior to the beginning of any work related to the implementation of the STRAWP. If you have any questions regarding this matter, please contact me at (401) 222-2797 x7109.

This OA Addendum shall be recorded in the land evidence records of the City of Providence as required by law, and a recorded copy must be returned to the Department within 7 days of recording.

Sincerely,

Joseph T. Martella II  
Senior Engineer, Office of Waste Management

cc: Terrence D. Gray, P.E., Assistant Director, RIDEM/AW&C  
Leo Hellested, P.E., Chief, RIDEM/OWM  
Kelly J. Owens, RIDEM/OWM  
John Langlois, Esq., RIDEM/OLS  
Robert Vanderslice, PhD, RIDOH  
Tammie A. McRae, ATSDR  
Hon. David N. Cicilline, Mayor, City of Providence  
Senator Juan M. Pichardo, District 2  
Representative Thomas Slater  
Councilman John J. Lombardi  
Councilman Leon F. Tejada  
Thomas Deller, City of Providence  
Sara Rapport, Esq., City of Providence  
David Heislein, Mactec  
Knight Memorial Library – Project Repository

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

**In the matter of Remedial Action Approval at:  
Former Gorham Manufacturing Facility – Parcel A Retail Complex  
333 Adelaide Avenue, Providence, RI, Plat 51, Lot 170 (the Site)**

**Case No. 97-030**

ORDER OF APPROVAL ADDENDUM

In the above entitled matter wherein, **Textron, Inc. (Textron)**, in its capacity as **Responsible Party for the remediation of property located at 333 Adelaide Avenue, Providence (the Site)**, has filed the following documents with the Rhode Island Department of Environmental Management (the Department):

1. Active Soil Depressurization System Design, Former Gorham Manufacturing Facility, Parcel A Retail Complex, 333 Adelaide Avenue, Providence, Rhode Island (ASD System Design), prepared by MACTEC Engineering and Consulting, Inc. (Mactec), and dated March 31, 2008;
2. Short Term Response Action Work Plan, Retail Complex Sub-Slab Soil Mitigation, Former Gorham Manufacturing Facility, 333 Adelaide Avenue, Providence, Rhode Island (STRAWP), prepared by Mactec, and dated May 9, 2008;
3. Response to RIDEM Comments - Short Term Response Action Work Plan, Retail Complex Sub-Slab Soil Mitigation, Former Gorham Manufacturing Facility, 333 Adelaide Avenue, Providence, Rhode Island (Response to STRAWP Comments), prepared by Mactec, and dated June 26, 2008; and
4. Revised Figure C-101 (Existing Conditions Plan and Proposed Layout), prepared by Mactec, and dated July 8, 2008.

Subject to the conditions herein, these documents are consistent with the requirements of Section 6.00 (Emergency and Short-Term Response) of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (Remediation Regulations), as amended February 24, 2004. These documents also describe a plan to remediate existing contamination pursuant to RI General Laws 23-19.14-1 et seq., and the Department's Remediation Regulations, as amended February 24, 2004, in accordance therewith.

It is the Department's intent that all conditions set forth in the Order of Approval (Order) dated July 24, 2008, shall remain in full force and effect unless specifically altered by this Order of Approval Addendum (OA Addendum). This OA Addendum continues to place primary responsibility for the construction, operation, maintenance and monitoring of the approved Short Term Response Action (STRA) on Textron. As the responsible party and performing party, Textron is expected to implement the Short Term Response Action Work Plan (STRAWP) in an expeditious manner that prevents non-compliance with the Order, OA Addendum and STRAWP, and protects human health and the environment. For the convenience of Textron and its contractors and consultants, the changes made to the Order by this OA Addendum have been highlighted below using boldfaced type and include a reference to the original paragraph of the Order as applicable.

Upon consideration thereof, and in accordance with Rule 10.1 (Remedial Action Approvals) of the Remediation Regulations, the Department approves said STRAWP through this OA Addendum, subject to the following amended conditions:

- 1) **All conditions set forth in the Order of Approval dated July 24, 2008, shall remain in full force and effect unless specifically altered by this OA Addendum.**
- 2) The remedial Action Level for **volatile organic compounds (VOCs)** shall be the Connecticut **Industrial/Commercial** Proposed Target Indoor Air Concentrations (TACs), **as long as the usage of the site is restricted to industrial/commercial activities. In the event that the usage of the site changes to residential, the remedial Action Level for VOCs shall immediately be changed to the Connecticut Residential Proposed Target Indoor Air Concentrations.** An appropriate analytical method shall be selected with a detection limit (DL) or reporting limit (RL) sufficiently sensitive to allow proper comparison of detected VOC concentrations to each applicable TAC (e.g. speciated VOCs using EPA method TO-15 with the Selective Ion Monitoring [SIM] procedure RLs, or equivalent). **In the event that there are any VOC contaminants with TAC RLs that no identified analytical laboratory can reliably achieve, then their provisional remedial Action Levels shall be their respective SIM procedure RLs, until such time as laboratory technology allows detection of the TACs, or an alternative laboratory capable of lower detection levels is identified.** Prior to each analytical sampling round, Textron's environmental contractor shall contact the laboratory to determine their ability to achieve detection limits consistent with the TACs. The results of each inquiry shall be documented in the quarterly monitoring and compliance sampling reports. **Once a reporting limit consistent with a TAC is achievable, it shall become the required reporting limit, remedial objective and remedial Action Level for that VOC in air [This paragraph shall replace in full Order paragraph 6.d.i.(1)].**
- 3) A "complete round" of compliance sampling shall include 12 sample locations per sampling event as follows [This paragraph shall replace in full Order paragraph 6.d.vi]:
- 4) **The three (3) extraction well sample collection locations, representing each of the three small retail units (EW-5 through EW-7), as well as one (1) sample collected from the combined air stream of the four (4) extraction wells located in the main building (EW-1 through EW-4). In the event that there are exceedances of the applicable remedial Action Levels in the indoor air of the main building, Textron shall include samples from each of the four (4) individual extraction wells (EW-1 thorough EW-4) in the "complete round" of compliance sampling, until such time as the source of the exceedance has been determined and the failure of the ASD system has been corrected [This paragraph shall replace in full Order paragraph 6.d.vi (2)];**

Subject to future revisions or amendments by the Department, the Order **and this OA Addendum** shall remain in full force and effect for as long as said STRAWP shall be operated and maintained in a condition satisfactory to the Department. Failure to comply with all points outlined

ORDER OF APPROVAL  
Former Gorham Manufacturing Facility – Parcel A Retail Complex  
333 Adelaide Avenue, Providence, RI

CASE NO. 97-030  
August 7, 2008

in the Department approved STRAWP and stipulated in the Order **and this OA Addendum** shall result in the issuance of a Notice of Violation and Order against Textron.

The Order **and this OA Addendum** shall be subject to modification or revocation in accordance with law.

Entered as an approval by the Department this 8<sup>TH</sup> day of August, 2008.

By: 

Leo Hellested, P.E.  
Chief, Office of Waste Management  
Department of Environmental Management