



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

April 7, 2006

CERTIFIED MAIL

REMEDIAL DECISION LETTER

Case No. 2005-029 (Formerly part of Case No. 97-030)

Alan Sepe, Acting Director
Department of Public Properties
City of Providence
25 Dorrance Street
Providence, RI 02903

RE: Proposed Providence Public School Site
(Former) Gorham Textron Dump Property, 333 Adelaide Avenue, Parcel B, Providence
City of Providence Tax Assessor's Office Plat 51, Lot 323, Parcel B

Dear Mr. Sepe:

On 24 February 2004, the Rhode Island Department of Environmental Management (the Department) enacted the amended 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. A Remedial Decision Letter is a formal Department approval of a conceptual remedy proposed by the performing party as a result of the findings of the Site Investigation.

In the matter of the above referenced site, the Department's Office of Waste Management (OWM) has on file the following document prepared for former property owner and operator, Textron, Inc. (Textron), concerning environmental conditions at the Site:

- A. Site Investigation Summary Report and Risk Assessment, Former Gorham Manufacturing Property, 333 Adelaide Avenue, Providence, Rhode Island, prepared by Harding Lawson Associates (HLA), dated 29 July 1999;

As well as the following documents concerning existing environmental conditions and the proposed development of the Site by the current property owner, the City of Providence, by and through the Providence Redevelopment Agency (the "City"), for the purpose of completing the Site Investigation of Parcel B:



- B. Letter from EA Engineering, Science, and Technology, Inc. (EA), Re: Geotechnical Engineering Activities, Former Gorham Manufacturing Site, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, dated March 8, 2005, received via electronic mail on March 15, 2005;
- C. Letter of Responsibility issued to the City by the Department, Re: Proposed Providence Public School Site, (Former) Gorham Textron Dump Property, 333 Adelaide Avenue, Parcel B, Providence, City of Providence Tax Assessor's Office Plat 51, Lot 170, Parcel B, dated April 1, 2005;
- D. Site Investigation Report Addendum, Former Gorham Manufacturing – Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, dated April 2005, received April 1, 2005;
- E. Letter from EA to the Department, Re: Remedial Alternatives, Gorham Manufacturing Site, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, dated April 5, 2005, received via electronic mail;
- F. Comment Letter from the Department to the City, Re: Site Investigation Report Comments - Proposed Providence Public School Site, (Former) Gorham Textron Dump Property, 333 Adelaide Avenue, Parcel B, Providence, City of Providence Tax Assessor's Office Plat 51, Lot 170, Parcel B, Case No. 2005-029,
- G. Letter Report from EA to the Department, Re: Response to RIDEM Letter of Responsibility, dated 1 April 2005, Former Gorham Manufacturing Facility, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, Case No. 2005-029, dated April 22, 2005, received April 25, 2005;
- H. Letter from EA to the Department, Re: Response to RIDEM Site Investigation Report Comments, dated 20 April 2005, Former Gorham Manufacturing Facility, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, Case No. 2005-029, dated May 6, 2005, received May 9, 2005;
- I. Comment Letter from the Department to the City, Re: Site Investigation Report Comments - Proposed Providence Public School Site, (Former) Gorham Textron Dump Property, 333 Adelaide Avenue, Parcel B, Providence, City of Providence Tax Assessor's Office Plat 51, Lot 170, Parcel B, Case No. 2005-029, dated May 19, 2005;
- J. Limited Remedial Action Work Plan, Former Gorham Manufacturing Site, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island (LRAWP), prepared by EA, dated July 12, 2005, received July 13, 2005;
- K. Comment Letter from the Department to the City, Re: Limited Remedial Action Work Plan Comments - Proposed Providence Public School Site, (Former) Gorham Textron Dump Property, 333 Adelaide Avenue, Parcel B, Providence, City of Providence Tax Assessor's Office Plat 51, Lot 170, Parcel B, Case No. 2005-029, dated July 15, 2005;

- L. DRAFT Response to RIDEM Limited Remedial Action Work Plan Comments dated 15 July 2005, Former Gorham Manufacturing Facility, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, prepared by EA, dated and received at Department meeting on July 26, 2005;
- M. Response to RIDEM Limited Remedial Action Work Plan Comments dated 15 July 2005, Former Gorham Manufacturing Facility, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, prepared by EA, dated and received August 4, 2005;
- N. Letter from the Department to EA, Re: Proposed Limited Remedial Action Work Plan, Former Gorham Manufacturing Facility, Parcel B, off Adelaide Avenue, Providence, CASE # 2005-029, dated August 5, 2005;
- O. Limited Remedial Action Work Plan and Supplementary Site Investigation Summary Report, Former Gorham Manufacturing Site, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island (LRAWP Summary), prepared by EA, dated September 2005, received September 23, 2005;
- P. Letter from EA to the Department, Re: Final Limited Remedial Action Work Plan and Supplementary Site Investigation Summary Report, Former Gorham Manufacturing Site, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, dated September 2005, received September 23, 2005;
- Q. Response to Public Comments, Former Gorham Manufacturing Facility, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, Case No. 2005-029, prepared by EA, dated January 24, 2005; and
- R. Additional Response to Public Comments, Former Gorham Manufacturing Facility, Parcel B, 333 Adelaide Avenue, Providence, Rhode Island, Case No. 2005-029, prepared by EA, dated March 30, 2006, received March 31, 2006, including as attachments Consent Order (Parcels B & C) and Consent Order (Park Parcel), both executed on March 29, 2006.

These documents fulfill the requirements of a Site Investigation Report (SIR) as described in Section 7 of the Remediation Regulations. Furthermore, given that appropriate public notice for a Site Investigation has been conducted pursuant to Rule 7.07 (Public Notice), as well as appropriate public review and comment pursuant to Rule 7.09 (Remedy Selection), the Department offers its conceptual concurrence with the proposed Remedial Action. Note: The conceptual concurrence contained in this Remedial Decision Letter is the Department's acknowledgment that the Remedial Action proposed by the City is capable of meeting the regulatory criteria applicable to the chosen use for the Site, i.e. residential/educational, if properly designed, implemented, operated and maintained. As such, this Remedial Decision Letter should be construed as a technical evaluation of the proposed Remedial Action and *not* as an endorsement of the City's proposed use of this Site, *nor* as a guarantee that the Site will be safe for its proposed use. The safety of the Site will largely be a function of the City's vigilance in monitoring, operating and maintaining the remedy once the Department's role in the remediation and development of the Site is complete.

8. Institutional Controls shall include an Environmental Land Usage Restriction (ELUR) with an associated site-specific Soil Management Plan (SMP). Both the ELUR and the SMP shall be subject to review and approval by the Department prior to implementation. Following approval by the Department, the ELUR will be recorded in the Providence Land Evidence Records at the time of this project's completion, and will specify all of the site conditions, restrictions and emergency provisions in order to meet the appropriate Remedial Objectives as defined in the Remediation Regulations. A recorded copy of the Department approved ELUR will be forwarded back to the OWM prior to the Department's issuance of the Interim Letter of Compliance (ILOC);
9. Maintenance and annual inspection and certification of the engineered controls and site, subject to the institutional controls, by an environmental professional;
10. A written commitment by the City to fully fund all costs associated with the operation, monitoring and maintenance of the proposed Remedial Action for a minimum of twenty (20) years from the date the facility is opened for classes; and
11. Protocols for timely, self-initiated response actions by the City to correct defects in the engineered controls, to remedy exceedances of any action levels or exposure limits for environmental contaminants, or to respond to other on-Site conditions.

Please submit a Remedial Action Work Plan (RAWP) to the Department for review and approval, including the site-specific version of the SMP as well as the proposed ELUR. Once the Department's review for consistency with Sections 8 and 9 of the Remediation Regulations is complete, any written comments generated as a result of the review will be forwarded to you immediately. Upon finalization of the RAWP the Department will issue an Order of Approval (Order) signifying that the Department approved RAWP may be implemented. Pursuant to Rule 10.02 of the Remediation Regulations, the application fee for Remedial Action Approvals is one thousand (\$1,000) dollars. Please remit a check in that amount to this office made out to the State of Rhode Island General Treasurer.

As the Performing Party, the City of Providence will be responsible for properly conducting the all of the above-listed activities.

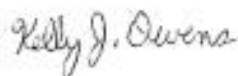
All correspondences should be sent to my attention. If you have any questions regarding this letter or if you would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 222-2797 ext. 7109, or by email at joseph.martella@dem.ri.gov.

Sincerely,



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

Authorized by:



Kelly J. Owens, Supervising Engineer
Office of Waste Management
Department of Environmental Management

XC: Terrence D. Gray, P.E., Assistant Director, RIDEM/AW&C
Leo Hellested, P.E., Chief, DEM/OWM
Jeffrey Crawford, RIDEM/OWM
Brian Wagner, Esq., DEM/OLS
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Dr. Robert Vanderslice, PHD, RIDOH
Barbara Morin, RIDEM/OAR
Senator Juan M. Pichardo, District 2
Representative Thomas Slater
Hon. David N. Cicilline, Mayor, City of Providence
Providence City Councilman Ronald Allen
John J. Lombardi, City of Providence
Thomas Deller, City of Providence
Mary McClure, President – Providence School Bd.
Sarah Rapport, Esq., City of Providence
James Ryan, Esq, PS&H
Timothy Regan, EA
Gregory Simpson, Textron
Gerald Petros, Esq., Hinkley Allen
Steven Fischbach, Esq., RILS

Attach: RIDEM Environmental Equity – Public Participation Analysis, April 6, 2006