



EA Engineering, Science, and Technology, Inc.

Airport Professional Park  
2350 Post Road  
Warwick, Rhode Island 02886  
Telephone: 401-736-3440  
Fax: 401-736-3423  
www.eaest.com

31 August 2010

Mr. Timothy M. Fleury  
Senior Engineer  
Rhode Island Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, RI 02908-5767

*RE: Remedial Action Work Plan (RAWP) – Lincoln Lace & Braid Mill Site  
55-61 Ponagansett Street, Providence  
EA Project #: 61891.05*

Dear Mr. Fleury:

I am writing this letter in response to your comments on the above project, 11 August 2010. Please see the following for our responses to your questions and concerns regarding your question, concerns, and comments:

### **General Comments**

1. These remedial activities also fall under the jurisdiction of the Army Corps of Engineers (Army Corps) due to the filling in of a wetland (sluiceway) and due to dewatering activities. Please contact the Army Corps for any further permits that may be necessary.

*Response: A Category 2 – General Permit has been submitted to the U.S. Army Corps of Engineers – New England District.*

2. Please submit revised site plans that reflect the following changes:
  - The final layout of the bike path (be sure that the plan clearly notes that the bike path is not part of this remediation effort and is a separate project that will be pursued in the future).
  - The limits of disturbance, reflecting clearing, grading, and revegetation.
  - The areas to be preserved, which must include a thirty (30) foot buffer along the Woonasquatucket River (the River) extending from the sluiceway upstream to the concrete wall “overlook” and then running further in an upstream direction along the metal fence and continuing in a straight line to the northwesterly end of the project area.
  - The depiction of the specific trees to be preserved (greater than 12” in diameter unless showing visual signs of disease and/or infestation), along with their approximate diameters in the east-southeastern portion of the capped areas and in the preserved areas between the future, proposed bike path and the River.
  - The labeling of the sluiceway as an “area subject to flooding.”



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*Response:*

- *Our plans showing the latest layout of the bike path we have receive from RIDOT engineering's consultant.*
- *The Limit of Disturbance (LOD) is shown on Sheet 6, which has both the areas have direct construction activity and areas including temporary impacts from construction (i.e. staging areas, access points). The area within the Limits of Work (LOW) on Sheet 6 indicates only the area of direct construction activity (i.e. engineering cap).*
- *The Plans show all surveyed trees with a diameter of 12-inches or greater. On Sheet 3, the plans indicate that all trees with a diameter of 12-inches or greater to have a 6" layer of crushed stone on construction fencing around the tree in a 30 ft diameter or the drip line of the canopy, whichever is smaller.*
- *The sluiceway has been labeled as an "area subject to flooding" on all applicable sheets.*

## **Specific Comments**

### **1. Section 3.1 Engineered Cap**

The Department has concerns regarding the capping methods (one (1) foot of fill over a geotextile) in close proximity to the preserved trees. Discussion, during a site walkover on July 20, 2010, proposed replacing the clean fill with aggregate and replacing the geotextile with a geogrid to allow for water and oxygen to infiltrate through to the root system below the tree canopy. Please modify the capping scenarios proposed in these areas or include "tree wells" or metal grates to ensure that the root systems will get adequate water and oxygen for survival.

*Response: A Category 2 – Please see responses to General Comment 2.*

The Department also has concerns regarding the slope stability and wetland preservation between the proposed bike path and the River. The RAWP proposes to clear cut all of the vegetation and cap this area. This clear cutting will have significant implications on slope stabilization of the River and significantly impact wildlife. Such clearing must be eliminated (per the Office of Water Resources' Freshwater Wetlands Division) in this area as part of this work, and trees with a diameter of greater than 12" must be preserved. However, due to the presence of soil contamination, capping shall be implemented. Recent discussions with EA proposed capping this area with six (6) inches of clean fill or loam overlying construction fencing to serve as a cap and to also allow the wetland planing roots to thrive through the construction fencing material. Furthermore, during the site walkover on July 20,



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2010, EA and the Department discussed the construction of post and beam fencing along the proposed bike path and the use of “deterrent, thorny” species of plantings between the fence and the River, preventing and discouraging access to visitors. This fencing with the “deterrent, thorny” species of plantings must be part of this remedy and shall be installed prior to the Department issuing a Letter of Compliance for the property. Please update the RAWP and site plans to reflect these discussions in further detail (i.e. preserving larger trees for slope stabilization, etc.). Also, please notify the Department regarding a schedule for fence and bike path installation/construction.

*Response: Per discussions with the Department, EA is proposing to use the engineered cap for the five (5) feet between the DOT proposed bike path, and the DOT proposed fence. The area between the fence and the river will be 6-inches of clean loam on top of construction fencing in this area. No clearing or grubbing will occur in this area, and additional “deterrent, thorny” plant species will be planning per sheet 7. See response to General Comment 2 for preserving the larger trees.*

## **2. Figure 3. Proposed Conditions**

Please clarify the “cover system 5” on Figure 3. The area outside of the actual limits of the sluiceway (sub aqueous area) is shaded to be capped by this method. Which capping method is proposed for this area (the area south and west of the sluiceway)? Also note and ensure that the sluiceway itself will remain as wetland upon completion of the remediation efforts.

*Response: No contamination was found in areas south and west of the sluiceway, and therefore are not being capped.*

## **3. Figure 7. Planting Plan**

Figure 7 labels the “100-year flood plain line” as “edge of water”. Please resubmit this plan with the corrected change.

*Response: The plans have been revised to clearly indicate where the 100-year flood plain line and the edge of water are located.*

## **4. Appendix E. Floodplain Calculations**

Due to the capping modifications, the floodplain calculations may need to be updated. If so, please update and resubmit these calculations.

*Response: The floodplain calculations have been revised per the comments, and have been attached with these responses. The floodplain calculation indicated increasing the cut for cover system 1 to 16-inches.*



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We look forward to working with you in completing this remediation project. If you have any questions or require additional information, please contact me at (401) 736-3440, Ext. 203.

Sincerely,

EA ENGINEERING, SCIENCE,  
AND TECHNOLOGY, INC.

A handwritten signature in blue ink, appearing to read 'Frank B. Postma', is written over a horizontal line.

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