



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT

235 Promenade Street, Providence, Rhode Island 02908

ALTERATIONS TO ELUR AREA APPROVAL LETTER

November 12, 2020

File No. SR-28-0549A

(Formerly Case No. 97-030)

Mr. Gregory L. Simpson
Director - Site Remediation and Sustainability
Textron, Inc.
40 Westminster Street
Providence, RI 02903

RE: Former Gorham Manufacturing Site – Parcel A
333 Adelaide Avenue, Providence, Rhode Island
Plat Map 051 / Lot 326

Dear Mr. Simpson:

Effective April 22, 2020, the Rhode Island Department of Environmental Management's (the Department) Office of Waste Management has changed the office name to the Office of Land Revitalization and Sustainable Materials Management (LRSMM), as reflected in the re-codified 250-RICR-140-30-1, 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 a timely and cost-effective manner.

In the matter of the above-referenced property (the Site), the Department's Office of LRSMM is in receipt of the following documentation submitted pursuant to the Remediation Regulations on behalf of Textron, Inc. (Textron), indicating Textron's intent to disturb regulated soils in areas of the Site that are subject to an Environmental Land Usage Restriction (ELUR):

1. Alterations to ELUR Area Plan, Textron Groundwater Extraction and Treatment System – Sewer Connection, 333 Adelaide Avenue, Providence, Rhode Island, received by the Department on November 12, 2020, and prepared by AECOM.

The scope of work described in the above referenced documents describes activities related to the proposed activities associated with the trenching and installation of a new underground drain line for the discharge of treated groundwater to the City of Providence/Narragansett Bay Commission sewer system, as well as associated disturbances of Site soils subject to an existing ELUR. Activities associated with the project include disturbances to the existing engineered cap, including saw-cutting and removing asphalt, excavating soil, installation of the discharge piping, backfilling, disposal of excess soil, and repaving the asphalt surface. Following installation of the drain line, the existing engineered cap will be reconstructed by backfilling and compacting 8-inches of clean road base materials, and installing a new coat of asphalt pavement consisting of a 2-inch thick

(minimum) binder course followed by a 2-inch thick (minimum) topcoat. Based upon review of the referenced documents in accordance with Sections 1.9 (Risk Management), 1.10 (Remedial Action Work Plan), 1.11 (Remedial Action Approvals), and 1.12 (Remedial Action) of the Remediation Regulations, the Department approves the proposed scope of work for alterations to the ELUR area with the following conditions and requirements:

1. During site work, the appropriate precautions will be taken to restrict unauthorized access to the restricted area.
2. In the event that excavation of regulated soil is required from the restricted area:
 - a. Excavated regulated soils will be staged and temporarily stored in a designated area of the property. Within reason, the storage location will be selected to limit the unauthorized access to the materials (i.e., away from public roadways / walkways). Regulated soil that has not been approved for reuse onsite shall not be stockpiled onsite for greater than 60 days without prior Department approval.
 - b. During all earthwork activities, best management practices (BMPs) shall be implemented for dust, odor and organic vapor control.
 - c. If any regulated material cannot be returned to the restricted area, then all such excess regulated material, that has not been otherwise approved for reuse onsite, shall be properly managed and disposed of at an appropriately licensed facility. No soils excavated from the site may be re-used on residential property.
 - d. Site soils, which are to be disposed of off-site, must be done so at a licensed facility in accordance with all local, state, and federal laws. Copies of the material shipping records associated with the disposal of the material shall be maintained and included in the annual ELUR inspection report for the site.
3. Any portion of the engineered control cap that is disturbed during the project which is not specifically part of the proposed ELUR alteration activities (i.e. not part of the groundwater extraction and treatment system sewer connection related disturbance, etc.) shall be restored to its original Department approved design specifications immediately following completion of the approved work..
4. A comprehensive summary report of all activities completed under this approval shall be included in an Alteration of ELUR Area Closure Report to be submitted to the Office of LRSMM within 60 days of completion of all Department approved activities.

This Approval Letter continues to place primary responsibility for the construction, operation, maintenance, and monitoring of the approved alterations to the ELUR area and its associated implementation on Textron. As the Performing Party and Responsible Party, Textron is expected to implement the approved alterations to the ELUR area in an expeditious and professional manner that prevents non-compliance with this Approval Letter, the proposed scope of work and the Soil Management Plan (SMP), and that is protective of human health and the environment.

This Approval Letter does not remove your obligation to obtain any other necessary permits from other local, State, or Federal agencies. Please review the stipulations of this Approval Letter thoroughly to ensure your compliance with the requirements.

The Office of LRSMM shall require at least forty-eight (48) hours notice in advance of initiating any excavation work.

If you have any questions regarding this letter or would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 222-2797 ext. 7109 or by E-mail at joseph.martella@dem.ri.gov.

Sincerely,

A handwritten signature in black ink that reads "Joseph T. Martella II". The signature is written in a cursive style with a large, stylized "A" at the end.

Joseph T. Martella II
Environmental Engineer III
Office of Land Revitalization &
Sustainable Materials Management

cc: Kelly J. Owens, RIDEM/LRSMM
Susan Forcier, Esq., RIDEM/OLS
Joseph B. Haberek, RIDEM/OWR/RIPDES
Robert E. Azar, Providence Planning Department
Rory Henderson, AECOM