



DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NEW ENGLAND DISTRICT  
696 VIRGINIA ROAD  
CONCORD MA 01742-2751

October 16, 2018

Engineering Division

Mr. Terrence Gray  
Associate Director for Air, Waste & Compliance  
Department of Environmental Management  
235 Promenade Street  
Providence, RI 02908

Dear Mr. Gray:

The U.S. Army Corps of Engineers, New England District (NAE) received your letter dated 13 September 2018 in which you outline Rhode Island's anticipated future use for the State-owned portion of Gould Island and request the Army Corps to consider existing unsafe structures for removal under the building demolition / debris removal (BD/DR) component of the Formerly Used Defense Sites (FUDS) program. (Encl 1)

The NAE will include an anticipated future use of expanded public recreation, to include overnight camping, in our risk analysis.

The NAE will explore options for opening a BD/DR program at Gould Island. Gould Island was the subject of investigation and discussions between NAE and Rhode Island Department of Environmental Management (RIDEM) in the 1980's and early 1990's. A November 1990 "Findings and Determination of Eligibility" report generated by USACE identified three buildings as structurally unsafe. (Encl 2) These included the former maintenance shop, the former firehouse, and the former torpedo storage warehouse. The report also identified a pier on the southeastern shoreline as structurally unsafe. The report further states that Mr. Jim Meyer of the State Department of Environmental Management informed the Army Corps that the State valued Gould Island as a bird sanctuary and did not want these structures removed under the BD/DR program because (1) the demolition and removal activity may disturb the bird nesting areas and (2) after the structures are removed and the site restored, more people may be attracted to the Island and increased human activity may disturb the birds. DOD policy at the time did not permit BD/DR projects where the likelihood of injury to the public posed by the unsafe structures was minimal and where the owner does not request that the structures be removed. When the report was written, neither criteria was met at Gould Island.

NAE understands Rhode Island would now like to modify the intended use of Gould Island to include more human access to the island and that under the proposed future use of the island, these structures may pose a risk to visitors. The NAE district will prepare an inventory project report (INPR) amendment for structures that were in a hazardous conditions at the time of property transfer to the State of Rhode Island. This INPR amendment will be submitted to the North Atlantic Division (NAD) for approval.

The ongoing hazardous, toxic & radioactive waste (HTRW) project, initiated in November 2017, will continue on Gould Island. This ongoing effort is statute-limited to addressing hazards as defined by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and subsequent amendments. Solid bulk waste remediation is outside the scope of this project's authority unless it presents a CERCLA risk. Some limited debris removal of solid bulk waste may be conducted under this HTRW project, however, any debris removal activity will be limited to that required to complete the HTRW project safety and will not be designed to address BD/DR concerns.

The point of contact for this letter is CPT Erik Patton, NAE GeoEnvironmental Branch, at 978-318-8051, and erik.m.patton.cpt@usace.army.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Margolis", with a long horizontal flourish extending to the right.

David I. Margolis, P.E., PMP  
Chief, Engineering Division

Enclosures

cc: (without enclosures)

Nicholas Noons, RIDEM  
CPT Erik Patton, USACE  
Gary Morin, USACE  
Heather Sullivan, USACE  
Deborah Acone, USACE