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June 19, 2007

Mr. Robert Dorr
Adelaide Avenue Environmental Justice Coalition
60 Crescent Street
Providence, RI 02907

**Subject: Response to Comments on Stop & Shop Parcel
Former Gorham Site
333 Adelaide Avenue
Providence, Rhode Island
MACTEC Project No. 3650-05-0041**

Dear Mr. Dorr:

We appreciate your interest in the Gorham site and in particular the work done to date on the Stop & Shop parcel on the former Gorham Site. We apologize for the delay in this response, but we have been working to develop a comprehensive cleanup plan for the entire Gorham Site that is consistent with the planned uses of the Site and present it to the community for their input. MACTEC Engineering and Consulting, Inc. (MACTEC) and Textron, Inc. (Textron) have prepared this response to your May 2, 2007 comments regarding the remediation status of the Stop & Shop Parcel (Parcel A) at the Former Gorham Site in Providence, RI.

As you stated in your letter the Remedial Action Work Plan (RAWP) was prepared by Textron and MACTEC, dated April 2001, and approved by the Rhode Island Department of Environmental Management (RIDEM) in October 2001. The construction of the cap remedy on Parcel A was then incorporated into the site development work conducted by Churchill & Banks, on behalf of the City of Providence. The property continues to be owned by the City of Providence, but is now managed by Kimco, under contract with the City.

The Remedial Goal for the soil on Parcel A (RAWP, 2001) was to eliminate or control the exposure and migration pathway of the contaminants in the soil exceeding the upper concentration limits (UCLs) and to eliminate the potential exposure to the remaining soils exceeding RIDEM Industrial/Commercial Direct Exposure Criteria (I/CDEC). As you noted in your letter, Textron did the treatment of the petroleum contaminated soil exceeding UCLs. The selected soil remedy for the soils exceeding the I/CDEC was a cap consisting of a 12-inch soil cover, pavement or building structures. As part of the Parcel A site development, Churchill & Banks constructed the cap on Parcel A between 2001 and 2002 in accordance with this RAWP and the current RIDEM guidance and regulations. The 12-inches of soil in the landscaped areas, pavement in the parking lot and the building foundation, and maintenance of these caps will continue to provide for the safe use of the property by the employees of the businesses and the community that access this site.

You raised a concern regarding the integrity of the pavement surface. During a site walk in March 2007, Textron observed the settling and cracks in the pavement surface. Textron provided photos of these conditions to the City, Kimco and RIDEM. In May 2007, Kimco responded with the filling of all the cracks and replacement of the pavement surface around a catch basin thereby maintaining the safety and integrity of the cap. This cap will continue to restrict the exposure to the subsurface soil.

Continued monitoring and annual reporting on the condition of the pavement and landscaped areas will be conducted by the City of Providence and their outside consultant. On behalf of the City, Kimco will continue to be responsible for the maintenance of the cap to ensure the safe use of the property. It is important that the public continue to provide any updates of this cap to RIDEM and the City.

You also asked about additional testing of the soils beneath the current Stop & Shop building prior to its construction to assess for UCL exceedances. The Site Investigation work plan was developed based on the facility operations which did not indicate that any releases occurred beneath that portion of the mill. The sampling locations were reviewed and approved by RIDEM prior to the work being conducted, as were the results of this investigation. The footprint of the former manufacturing facility was much larger than the current footprint of the Stop & Shop building such that additional soil sampling was not required in this area. However, one small area in the southeast corner of the existing Stop & Shop building did contain a fuel oil underground storage tank (UST). This UST was removed, the soil and groundwater investigated and the soil remediated as part of the 2001 RAWP. The former mill footprint is now covered by the Stop & Shop building and pavement thereby restricting the contact with the subsurface soil.

You had also asked if Textron, MACTEC or the City had any analytical data for the subgrade soil located immediately beneath the pavement installed by Churchill & Banks. None of us are aware of any data for this subsurface soil. However, the maintenance of the landscaped areas, paved surface and building structure will continue to protect the community and business employees at the site.

Both Textron and MACTEC understand your concerns with the cap on Parcel A and have discussed this in detail with RIDEM to ensure that the cap continues to be properly maintained by the City and Kimco to provide a safe environment. The monitoring and maintenance of this cap is only a part of the overall plans by Textron, the City of Providence, the YMCA and RIDEM to cleanup the entire property for the planned reuse. We look forward to talking with you at the Community Information Session on the other cleanup activities planned for the Gorham property.

Please contact Greg Simpson of Textron (401) 457-2635 or me (781) 245-6606 or if you have any further questions regarding the Gorham Site.

Sincerely,
MACTEC Engineering and Consulting, Inc.



David E. Heislein
Project Manager



Michael J. Murphy
Principal Scientist

cc: J. Martella, RIDEM
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