



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT

235 Promenade Street, Providence, Rhode Island 02908

VOLUNTARY PROCEDURE LETTER / PROGRAM LETTER
File No. SR-39-0263 B

May 27, 2020

CERTIFIED MAIL

Scott A. Gibbs, Interim Director
Department of Planning & Development
City of Woonsocket
169 Main Street
Woonsocket, RI 02895

RE: Sunnyside
176 Sunnyside Avenue
Woonsocket, Rhode Island
Plat Map 3 / Lot 7

Dear Mr. Gibbs:

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. A Voluntary Procedure Letter (VPL) / Program Letter is a preliminary document used by the Department to codify and define the relationship between the Department and a Performing Party and signifies that a Site Investigation has been completed and that a Performing Party must conduct public notice in accordance with Sections 1.8.7(A)(2) and 1.8.9 of the Remediation Regulations concerning the findings of the investigation and the proposed remedial alternatives.

Please be advised of the following facts:

1. The above referenced property is located at 176 Sunnyside Avenue, Woonsocket, Rhode Island (the Site). The Site is further identified by the City of Woonsocket Tax Assessor's Office as Plat Map 3 / Lot 7.
2. The Department is in receipt of the following documents:
 - a. Hazardous Material Release Notification Form, received by the Department on May 6, 2005, and prepared by Alliance Environmental Group, Inc. (AEG);

- b. Site Investigation Report (SIR), received by the Department on July 22, 2005, and prepared by AEG;
 - c. DRAFT SIR/Targeted Brownfields Assessment (TBA), received by the Department on June 16, 2014, and prepared by Fuss & O'Neill, Inc. (F&O);
 - d. Phase I Environmental Site Assessment, received by the Department on October 12, 2018, and prepared by BETA Group, Inc. (BETA);
 - e. Hazardous Material Release Notification Form, received by the Department March 12, 2020, and prepared by EA Engineering, Science, and Technology, Inc., PBC (EA);
 - f. SIR Addendum, received by the Department on April 30, 2020, and prepared by EA.
3. The above referenced documents identify concentrations of metals, polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs) and total petroleum hydrocarbons (TPH) in Site soils that exceed the Department's Method 1 Direct Exposure Criteria and/or GB Leachability Criteria, as referenced in the Remediation Regulations. The above referenced documents also identify concentrations of VOCs in the Site groundwater that exceeds the Department's GB Groundwater Objectives.
 4. Based on the presence and nature of these Hazardous Substances and petroleum hydrocarbons, the Department concurs that a Release of Hazardous Materials has occurred as defined by Sections 1.4(A)(33), 1.4(A)(34), 1.4(A)(59), and 1.4(A)(63) of the Remediation Regulations.

The Department regards the information provided in the above listed reports as meeting the requirements pursuant to Section 1.8.8 of the Remediation Regulations. The preferred remedial alternative proposes the following remedy:

- Completion of a Limited Design Investigation (LDI) to evaluate the following:
 - The extent of GB Leachability Criteria exceedances in soils;
 - The extent of urban fill in exceedance of the Method 1 Residential Direct Exposure Criteria (R-DEC) in soils; and
 - The extent of VOC impacts to groundwater.
- Determination of a remediation strategy to address groundwater contamination based off the results of the LDI;
- Excavation and off-site disposal of jurisdictional soils, as necessary;
- Encapsulation of Site soils by a Department approved engineered control consisting of any combination of the following: building foundations, one (1) foot of clean over a geotextile fabric, two (2) feet of clean fill, and/or four (4) inches of pavement (concrete or asphalt) over six (6) inches of clean fill;

- A Department approved Environmental Land Usage Restriction (ELUR) shall be recorded on the deed for the entire property (Play Map 3 / Lot 7). The ELUR shall require the performance of annual inspections to document the status of the ELUR and the condition of the engineered controls. The ELUR shall also include a Department-approved post-remediation Soil Management Plan (SMP) which will address any future activities that may disturb on-Site soils. The ELUR shall be recorded for the entire property in the Land Evidence Records for the City of Woonsocket, and a recorded copy forwarded back to the Department within fifteen (15) days of recording.

The Department acknowledges that the site investigation activities are complete. The Department is not yet able to formally approve the SIR, however, due to the necessity to first allow the public to comment on the technical feasibility of the preferred remedial alternative. Outlined in Section 1.8.7(A)(2) and 1.8.9 of the Remediation Regulations are the requirements for public notice after the SIR is deemed complete to all abutting property owners, tenants, easement holders, and the municipality and the Environmental Justice Focus Area, regarding the substantive findings of the completed investigation and the opportunity for public review and comment on the technical feasibility of the preferred remedial alternative. Please submit a draft notification to the Department via E-mail for review and approval prior to distribution. A boilerplate notification to be distributed can be found online at <http://www.dem.ri.gov/programs/wastemanagement/site-remediation/index.php>. The Department will require a copy of the approved public notice letter and a list of all recipients upon issuance.

The Department will formally approve the SIR in the form of a Remedial Decision Letter (RDL) once Public Notice is completed and upon Department approval of all final responses to relevant public comments. At that point, the Department will require submission of the Remedial Action Work Plan (RAWP) and draft versions of the ELUR and SMP, for review and approval in accordance with Sections 1.9 and 1.10 of the Remediation Regulations. Upon receipt of the RDL, be prepared to submit the Remedial Action Approval Application Fee of one thousand dollars (\$1,000.00) in check form made payable to General Treasurer -State of Rhode Island directly to the Office of Management Services.

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. 7105, or by E-mail at Rachel.simpson@dem.ri.gov.

Sincerely,



Rachel T. Simpson
Senior Environmental Scientist
Office of Land Revitalization &
Sustainable Materials Management

cc: Kelly J. Owens, RIDEM/LRSMM
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