



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-39-2059

November 22, 2021

CERTIFIED MAIL

Kevin Proft, City Planner
City of Woonsocket
169 Main Street
Woonsocket, RI 02895

RE: 719 River Street
719 River Street
Woonsocket, Rhode Island
Plat Map 8 / Lots 5, 35, 37, and 58

Dear Mr. Proft:

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 Letter of Responsibility (LOR) / 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 719 River Street, Woonsocket, Rhode Island (the Site). The Site is further identified by the City of Woonsocket Tax Assessor's Office as Plat Map 8 / Lots 5, 35, 37, and 58.
2. The Department is in receipt of the following documents:
 - a. Phase I Environmental Site Assessment (ESA), received by the Department on October 21, 2019, and prepared by BETA Group, Inc. (BETA);
 - b. Pre-Site Investigation Public Notice, received by the Department on June 21, 2021,

and prepared by Fuss & O'Neill, Inc. (F&O);

- c. Notification of Release and Site Investigation Report (SIR), received by the Department on November 15, 2021, and prepared by F&O.
3. The above referenced documents identify concentrations of metals, polycyclic aromatic hydrocarbons (PAHs), 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. Additionally, non-aqueous phase liquid (NAPL) has been observed in groundwater which is an exceedance of the Upper Concentration Limits (UCL) in accordance with Section 1.9.7(B)(1) of the Remediation Regulations.
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:

- To address petroleum contamination:
 - Targeted soil excavation and offsite disposal of petroleum impacted soils to a licensed facility. Confirmatory sampling shall be conducted from the excavation sidewalls and base in accordance with the Department's *Guidelines for Expedited Excavation and Disposal Response Actions*, to verify any remaining soils are compliant with Method 1 Direct Exposure Criteria and GB Leachability Criteria. Any remaining jurisdictional soils shall be encapsulated by an engineered control.

OR

- On-site soil stabilization and reuse of approximately 6,000 to 12,000 cubic yards of petroleum impacted soil identified proximal to the location of two (2) underground storage tanks (USTs), north of Building 1.
- All abandoned USTs shall be addressed in accordance with the RIDEM Rules and Regulations for Underground Storage Facilities Used for Regulated Substances and Hazardous Materials (UST Regulations, 250-RICR-140-25-1), under the jurisdiction of the Underground Storage Tank Management Program.
- Encapsulation of Site soils by a Department approved engineered control consisting of a minimum of two (2) feet of clean fill or an equivalent level of protection i.e. building foundations, one (1) foot of clean fill over a geotextile fabric, and/or four (4) inches of hardscape (asphalt or concrete) over six (6) inches of clean fill. In areas where encapsulation is impossible, a six (6) foot high fence shall be implemented to prevent access. Areas where fencing is being considered shall be approved by the Department.

- An Environmental Land Usage Restriction (ELUR) shall be recorded on the deed for the entire property (Plat Map 8 / Lots 5, 35, 37, and 58). 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 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. 2777105, 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
Ashley L. Blauvelt, RIDEM/LRSMM
Kevin Gillen, RIDEM/LRSMM – UST
Martin Wenceck, RIDEM/Wetlands