

Town of Westerly, Rhode Island

# Remedial Action Work Plan

Potter Hill Mill

198 Potter Hill Road

Westerly, RI 02891

Grant No. 4B-00A00985

RIDEM File No. SR-38-1074

09/29/2025



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A handwritten signature in black ink that reads 'Hannah Pallein'.

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## Table of Contents

1	Introduction .....	1
2	Environmental Setting.....	2
2.1	Site Description .....	2
3	Site Background.....	2
3.1	Historical Use of Site.....	2
3.2	Previous Environmental Assessments .....	2
3.2.1	2006 – 2007 .....	2
3.2.2	2024 – 2025 .....	4
4	Remedial Objectives (1.10.2).....	5
4.1	Groundwater Objectives.....	5
4.2	Surface Water & Sediment Objectives.....	6
4.3	Soil Objectives .....	7
4.4	Air Objectives .....	7
5	Proposed Remedy (1.10.3).....	7
6	Remediation of Impacted Groundwater (1.10.4).....	8
7	Limited Design Investigation (1.10.5).....	8
8	Points of Compliance (1.10.6).....	8
9	Proposed Schedule for Remediation (1.10.7).....	9
10	Contractors and/or Consultants (1.10.8).....	9
11	Site Plan (1.10.9) .....	9
12	Design Standards and Technical Specification (1.10.10) .....	9
12.1	Geotextile Fabric .....	10
12.2	Certified Clean Fill.....	10
13	Set-up Plans (1.10.11).....	10
14	Effluent Disposal (1.10.12).....	10
14.1	Soil .....	11
15	Contingency Plan (1.10.13) .....	11
16	Operating Log (1.10.14).....	11
17	Security Procedures (1.10.15) .....	12
18	Shut-down, Closure and Post-closure Requirements (1.10.16).....	12



19	Institutional Controls and Notices (1.10.17).....	12
20	Compliance Determination (1.10.18).....	13
21	Certification Requirements (1.10.19).....	13

## Figures

Figure 1 – Site Location Map

Figure 2 – Site Map

Figure 3 – Sample Location Plan (Jacques Whitford Company, Inc.)

Figure 4 – Soil Sample Location Map

## Appendices

Appendix A – Remedial Decision Letter (RIDEM)

Appendix B – Typical Engineered Control Cross-Section Detail

Appendix C – Operating Log and Supplemental Forms

Appendix D – Certification Letters



## 1 Introduction

On behalf of the Town of Westerly, RI, Groundwater & Environmental Services, Inc. (GES) has prepared this *Remedial Action Work Plan* (RAWP) for the Potter Hill Mill property located at 198 Potter Hill Road in Westerly, RI (the “site”). The site is further identified by the Rhode Island Department of Environmental Management (RIDEM) Office of Land Revitalization and Sustainable Materials Management (LRSMM) Site Remediation Program as File No. SR-38-1074.

On July 10, 2025, RIDEM LRSMM Site Remediation Program issued a *Remedial Decision Letter* (RDL), which approved the following preferred remedial alternatives for the site:

- 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 sub-base material);
- Monitored natural attenuation (MNA) of groundwater monitoring wells MW-105, MW-106, and MW-107, impacted by arsenic, until such a time that the GA Groundwater Objectives are achieved for three (3) quarterly consecutive rounds of sampling; and
- An Environmental Land Usage Restriction (ELUR) shall be recorded on the deed for the entire property (Plat Map 8 / Lot 23). The ELUR shall require the performance of annual inspections to document the status of the ELUR and the conditions of the engineered controls. The ELUR shall include a Department-approved post remediation soil management plan (SMP) which shall address any future activities that may disturb site soils. The ELUR shall be recorded on the deed for the Site in the Land Evidence Records for the Town of Westerly and a recorded copy forwarded back to the Department within fifteen (15) days of recording.

This RAWP has been developed in accordance with the RDL (RIDEM, July 10, 2025), and Sections 1.9 and 1.10 of the *Rules and Regulations for the Investigation of Remediation of Hazardous Material Releases (Remediation Regulations)* in order to achieve environmental clean-up of the site. The RAWP documents how the encapsulation of site soils by approved engineered controls will be implemented at the site in order to address the remedial objectives for soil and sediment, while also considering and managing any short-term risks to site property users and environmental receptors.

In accordance with Section 1.11.2 of the Remediation Regulations, an application fee for Remedial Action Approvals for \$1,000 will be submitted separately to the Office of LRSMM, per the RDL, by the responsible party with the required *Remedial Action Approval Application Fee Form*.

A copy of the July 10, 2025, RDL is included as **Appendix A**.

## 2 Environmental Setting

### 2.1 Site Description

The site consists of a loosely rectangular-shaped parcel of land located at 198 Potter Hill Road in Westerly, RI, approximately 170 feet west of the intersection of Potter Hill Road and River Road. The parcel of land is identified by the Town of Westerly as Map 8, Block 23, is zoned RR-60 for rural residential use, and totals approximately 4.55 acres in size.

The site no longer appears to be connected to active utilities. Available utilities in the area include public water, electricity, telephone, and natural gas services observed in the right-of-way of Potter Hill Road. Based on available records, the site formerly utilized a private well and water storage tower for the fire suppression system. The water tower is no longer present at the site; however, the former private well is likely present in the western area of the site in overgrown vegetation.

The Pawcatuck River abuts the site to the north and east. A dam across the Pawcatuck River located to the east of the site channels river water under the site via a network of channels (raceway). No other surface water bodies were observed in the immediate vicinity of the site.

A Site Location Map derived from the U.S. Geological Survey (USGS) *7.5 Minute Series Topographical Quadrangle, 2021, Ashaway, Rhode Island* is provided as **Figure 1**. A Site Map depicting current site features is included as **Figure 2**.

## 3 Site Background

### 3.1 Historical Use of Site

Based on available information, the site was formerly used as a gristmill and sawmill from approximately 1762 until 1810, a cotton mill and small-scale boat building from 1810 until 1844, and a woolen mill from 1844 until 1955 when activities on-site reportedly ceased. In the years since, the site has become vacant, and the buildings have fallen into disrepair. The site is currently owned by the Town of Westerly, who acquired the property from Renewable Resources Inc. in August 2022. Renewable Resources Inc. had owned the property since October 1992.

### 3.2 Previous Environmental Assessments

#### 3.2.1 2006 – 2007

Jacques Whitford Company, Inc. (JWC) on behalf of the former property owner, Renewable Resources, Inc (RRI), completed a Phase I Environmental Site Assessment (ESA) for the site in 2006. The *Phase I ESA* (JWC, March 2006) identified several recognized environmental conditions (RECs) relating to historical mill operations and recommended a Phase II ESA to evaluate if identified RECs had impacted soil or groundwater at the site.

On April 3, 2006, JWC oversaw the advancement of three test pits (TP-1 through TP-3), advanced in the buried debris pile on the northwestern area of the site, and three test pits (TP-4 through TP-



6), advanced to the west of the building near the former boiler building where coal was historically stored. Locations of the test pits advanced at the site are depicted in **Figure 3**. Two soil samples, collected from test pits TP-3 and TP-5 between 3-5 feet below grade (fbg), were submitted for laboratory analysis of 13 priority pollutant metals (PPM 13) and PAHs. Total arsenic and beryllium were detected in the sample collected from test pit TP-5, at concentrations exceeding RIDEM Residential Direct Exposure Criteria (RDEC).

On September 27, 2006, a *Hazardous Material Release Notification Form* (RNF) was submitted to RIDEM by JWC on behalf of RRI. The RNF documented the presence of arsenic and beryllium in soil exceeding applicable RIDEM RDEC. On October 16, 2006, RIDEM issued a *Letter of Responsibility* assigning case number SR-38-1074 to the site, and requested the completion of a site investigation in accordance with the Remediation Regulations.

To further assess the extent of impacts surrounding test pit TP-5, between September 5 and November 20, 2006, JWC oversaw the collection of an additional twenty-six surface samples (SS-1 through SS-26) between 0-2 fbg. Locations of the surface samples collected at the site are depicted in **Figure 3**. The samples were analyzed for total arsenic, six were also analyzed for Resource Conservation and Recovery Act (RCRA) 8 Metals and three for PAHs. Analytical results indicated arsenic was detected in multiple surface samples at concentrations exceeding RIDEM Residential Direct Exposure Criteria (RDEC). Beryllium and lead were also detected in at least one soil sample at concentrations greater than RIDEM RDEC. On November 8, 2007, following the excavation and removal of buried debris in the northwestern area of the site, two additional samples (SS-30 and SS-31) were collected between 0-2 fbg and submitted for analysis of VOCs, semi-volatile organic compounds (SVOCs) and PPM 13. No compounds were detected in exceedance of RIDEM RDEC. On November 8, 2007, an additional two soil samples (SS-32 and SS-33) were collected between 0-2 fbg, in the area of soil samples SS-20 and SS-23 where the highest concentrations of total lead were previously detected. Soil samples SS-32 and SS-32 were submitted for analysis of lead by Synthetic Precipitation Leaching Procedure (SPLP) methodology. Lead via SPLP methodology was not detected in exceedance of RIDEM RDEC.

To evaluate groundwater quality at the site, JWC oversaw the installation of monitoring wells MW-1 and MW-2 (borings B-1 and B-2, respectively) on October 23, 2006, and MW-3, MW-4 and MW-5 (borings B-3, B-4 and B-5, respectively) on November 8, 2007. Locations of the monitoring wells are depicted in **Figure 3**. During the November 2007 monitoring well installation, one soil sample was collected from each boring (SS-27 through SS-29) at a depth of 5-7 fbg above the apparent observed groundwater sample, and submitted for analysis of volatile organic compounds (VOCs), PAHs and 16 metals in the RIDEM Remediation Regulations. No concentrations were detected in exceedance of RIDEM RDEC criteria. Monitoring wells MW-1 through MW-5 were constructed as 1-inch monitoring wells installed with 10-feet of screen set at depths of 15 to 33 fbg. Each monitoring well was completed with a flush mounted roadbox. Following the installation of monitoring wells at the site, JWC completed two groundwater monitoring events. On October 26, 2006, monitoring wells MW-1 and MW-2 were gauged and sampled and analysis of PAHs, RCRA 8 metals. On November 14, 2007, monitoring wells MW-1 through MW-5 were gauged and sampled for analysis of VOCs and 16 metals in the RIDEM Remediation Regulations. No

compounds were detected in exceedance of RIDEM GA groundwater objectives (GOs) during the two events.

On November 8 2007, JWC collected 8 sediment samples (SED-1 through SED-11) from the Pawcatuck River from a depth of 0-1 feet below river bottom. Locations of the sediment samples collected are depicted in **Figure 3**. Sediment samples SED-1 through SED-7 were collected along the Pawcatuck River adjacent to where discharge pipes were observed from a former mill building. Sediment sample SED-8 was collected from under the main mill building where the raceway discharges and in the area of a potential former pipe discharge. Sediment samples SED-1 through SED-8 were submitted for analysis of VOCs, SVOCs and 16 metals in the RIDEM Remediation Regulations. Analytical results indicated concentrations of PAHs in exceedance of the United States Environmental Protection Agency (USEPA) Sediment Quality Guidelines (SQGs) from the *Development and Evaluation of Consensus-Based Sediment Quality Guidelines for Freshwater Ecosystems* (MacDonald, et. al., January 2000) and/or the RIDEM RDEC in sediment samples SED-1 and SED-8. One or more metals including beryllium, chromium, copper, lead, mercury, and/or zinc, were detected in exceedance of USEPA SQGs and/or RIDEM RDEC in sediment samples SED-1, SED-2, SED-4, SED-5, and SED-7.

To further assess the extent of impacts detected in sediment sample SED-1, on December 5, 2008, JWC collected three additional sediment samples (SED-9 through SED-11) between 0-1 feet below river bottom. Sediment samples were analyzed for PAHs and RCRA 8 metals. Analytical results indicated concentrations of PAHs in exceedance of USEPA SQGs and/or RIDEM RDEC in sediment sample SED-10.

Based on results of 2006-2007 site investigation, including investigation of soil, groundwater, and sediment, JWC concluded that soil near the former boiler building had been impacted by historical coal storage and use at the site to an estimated extent of approximately 9,750 square-feet. Findings of the 2006-2007 site investigation are summarized in the *Revised Site Investigation Report – 198 Potter Hill Road, Westerly, RI* (JWC, March 2008). JWC could not conclude the source of the PAHs and metals in sediment samples, and suggested the PAHs and metals did not appear to be related to former wool dyeing operations. The concentrations of PAHs in sediment samples are higher than concentrations of PAHs in soil near the former boiler house. Therefore, JWC concluded that the site may have contributed to the PAHs and metals detected in sediment samples; however, other off-site sources also likely contributed to the impacts identified in sediment samples.

### 3.2.2 2024 – 2025

On July 31, 2024, GES completed a *Phase I ESA* for the Town of Westerly, on behalf of RIDEM through the Targeted Brownfields Assessment (TBA) program. Based on the results of the assessment, several RECs were identified relating to historical mill operations and RIDEM Remediation case number SR-38-1074. To supplement the predetermined TBA assessment, which requested the site-wide assessment of soil and groundwater quality, the *Phase I ESA* (GES, July 2024) recommended additional site investigation to further evaluate the extent of



historical impacts identified in soil and an evaluation of additional RECs identified in GES' *Phase I ESA*.

Between December 5 and 12, 2024, GES oversaw the advancement of eight soil borings (SB-1 through SB-8), and advancement of eight additional soil borings completed as groundwater monitoring wells (MW-101 through MW-108). Soil boring and monitoring well locations are depicted in **Figure 4**. Monitoring wells MW-101 through MW-108 were constructed as 2-inch diameter wells installed with 10 feet of screen set at depths between approximately 15 and 18 fbg. Each monitoring well was completed at the surface within a locking steel standpipe. Soil borings SB-1 through SB-5 and monitoring wells MW-101 through MW-105 were installed to complete a site-wide evaluation of soil and groundwater quality pursuant to the TBA assessment, while soil borings SB-6 through SB-8 and monitoring wells MW-106 through MW-108 were completed to evaluate AOCs identified in GES' *Phase I ESA*. Twenty-six soil samples, including three duplicate samples, were submitted for analysis of constituents of concern (COCs) pursuant to the October 30, 2024 *Site Specific Quality Assurance Project Plan Addendum (SSQAPPA)* prepared by Nobis Engineering (Nobis) on behalf of GES for the Town of Westerly, RI. Soil analytical results indicated that PAHs were detected in exceedance of RIDEM RDEC in seven samples (SB-6 [0-2], SB-6 [5-6.5], MW-101 [2-4], MW-102 [0-2], MW-106 [0-2], MW-108 [13-15] and MW-108 [13-15] Duplicate) from borings advanced adjacent to the former building remnants and/or in areas of observed coal combustion residuals. Arsenic was detected in exceedance of the RIDEM RDEC in two soil samples, SB-4 (0-2) and MW-108 (0-2), from borings advanced in the center of the site and in the area of the former boiler house and engine room, respectively. Lead was also detected in exceedance of the RIDEM RDEC in one sample, MW-102 (0-2) from the soil boring advanced in the area of the former oil house building.

Following the installation of monitoring wells MW-101 through MW-108, GES completed two groundwater monitoring events. On December 26, 2024, monitoring wells MW-101 through MW-108 were gauged and sampled for analysis of COCs in accordance with the SSQAPPA. Total arsenic was detected in exceedance of the RIDEM GA GO in monitoring wells MW-105, MW-107 and MW-106 (duplicate sample). No other COCs were detected in exceedance of RIDEM GA GOs. On April 28, 2025, monitoring wells MW-105 through MW-108 were gauged and sampled for analysis of total and dissolved arsenic. Total and dissolved arsenic were not detected in exceedance of the RIDEM GA GO during this event.

## **4 Remedial Objectives (1.10.2)**

### **4.1 Groundwater Objectives**

According to the RIDEM *Summary of Rhode Island Groundwater Classification and Groundwater Standards* (RIDEM Office of Water Resources), the site is located in an area classified by RIDEM as "GAA." Groundwater classified as GAA is groundwater that is presumed suitable for human consumption without treatment, and is located in an area defined by RIDEM as a major stratified drift aquifers capable of serving as a significant source for a public water supply, a wellhead



protection area for public water system community water supply wells, or a groundwater-dependent area physically isolated from reasonable alternative water supplies.

According to the online *RIDEM Environmental Resource Map*, the site is located in an area classified by the United States Environmental Protection Agency as the Pawcatuck sole source aquifer. Sole source aquifers are defined as the sole or principal source of drinking water for the area above the aquifer and including those lands where the population served by the aquifer live; that is, an aquifer which is needed to supply 50% or more of the drinking water for that area and for which there are no reasonably available alternative sources should the aquifer become polluted.

As documented in the *Site Investigation Report* (GES, 5/30/2025), total arsenic was detected above the RIDEM GA GO in three of the monitoring wells sampled, MW-105, MW-106 (duplicate sample) and MW-107 during the December 2024 monitoring event. Due to these detections, in April 2025, GES returned to the site to re-sample monitoring wells MW-105, MW-106, MW-107 and MW-108 for total and dissolved arsenic, which were not detected in the monitoring wells sampled above laboratory reporting limits or RIDEM GA GOs.

Based on the GAA groundwater classification for the site, the objective for groundwater is for arsenic to meet RIDEM GA GOs at monitoring wells MW-105, MW-106 and MW-107 for three consecutive quarters. In accordance with the *Remedial Decision Letter* (RIDEM, July 10, 2025), monitored natural attenuation (MNA) is expected to achieve this goal.

## **4.2 Surface Water & Sediment Objectives**

The Pawcatuck River abuts the site to the north and east. A dam across the Pawcatuck River located to the east of the site channels river water under the site via a network of channels (raceway). No other surface water bodies were observed in the immediate vicinity of the site.

Sediment sampling was completed along the Pawcatuck River during the 2006-2007 site investigation, and is summarized in the *Revised Site Investigation Report – 198 Potter Hill Road, Westerly, RI* (JWC, March 2008). Analytical results indicated concentrations of PAHs in exceedance of the USEPA SQGs and/or the RIDEM RDEC in sediment samples SED-1, SED-8 and SED-10. One or more metals including beryllium, chromium, copper, lead, mercury, and/or zinc were detected in exceedance of USEPA SQGs and/or RIDEM RDEC in sediment samples SED-1, SED-2, SED-4, SED-5, and SED-7. JWC could not verify the source of the PAHs and metals in sediment samples, and suggested the PAHs and metals did not appear to be related to former wool dyeing operations. The concentrations of PAHs in sediment samples were higher than concentrations of PAHs in soil near the former boiler house. Therefore, JWC concluded that the site may have contributed to the PAHs and metals detected in sediment samples; however, other off-site sources also likely contributed to the impacts identified in sediment samples.

The long-term remedial objective for surface water and sediment is to prevent the erosion and runoff of any contaminated soil at the site. The encapsulation of site soils by approved engineered controls along with the recording of an ELUR to the title of the property will achieve this goal.



### 4.3 Soil Objectives

As documented in the *Site Investigation Report* (GES, 5/30/2025), results of the December 2024 site investigation indicated that concentrations of arsenic, lead and/or PAHs are present in soils exceeding the RIDEM RDEC at depths between existing grade and up to approximately 15 fbg.

The long-term remedial objective for soil is to prevent direct exposure to soil containing concentrations of arsenic, lead and PAHs above RIDEM RDEC. Limited excavation and the encapsulation of site soils by approved engineered controls along with the recording of an ELUR to the title of the property will achieve this goal.

### 4.4 Air Objectives

During the December 2024 site investigation, the highest total volatile organic vapor (TVOV) detection in soil was 2,203 parts per million at soil boring SB-3 in the 7-9 fbg soil sample. Concentrations of VOCs in soil sample SB-3 (7-9) were not detected above laboratory reporting limits or RIDEM RDEC. Furthermore, VOCs were not detected above laboratory reporting limits or RIDEM RDEC in the remainder of the samples analyzed during the December 2024 site investigation.

At this time, the future redevelopment plans for the site do not include structures that would continually be occupied. Impacts to the indoor air quality of the site, or to surrounding properties, is unlikely due to the limited volatilization potential inherent to the nature of the site contaminants (metals and PAHs), therefore; there are no long term objectives for air.

## 5 Proposed Remedy (1.10.3)

The proposed remedy for the site includes limited soil removal to facilitate the encapsulation of site soils to render all contaminants exceeding RIDEM Method 1 RDEC inaccessible beneath a combination of engineered controls designed for the site. Encapsulation of the site soils will be completed in conjunction with the redevelopment of the property as a recreational park for public use, and will employ one or more the following presumptively approved capping methods:

- Building foundations
- Two (2) feet of clean fill
- Four (4)-inches of hardscape (concrete or bituminous asphalt) underlain by 6-inches of certified clean sub-base material
- One (1) foot of certified clean material underlain by a geotextile liner

A cross-section detail of typical engineered controls is included as **Appendix B**.

An ELUR shall be recorded on the deed for the entire property (Plat Map 8 / Lot 23). The ELUR shall require the performance of annual inspections to document the status of the ELUR and the conditions of the engineered controls. The ELUR shall include a Department-approved post remediation SMP which shall address any future activities that may disturb site soils. The ELUR



shall be recorded on the deed for the Site in the Land Evidence Records for the Town of Westerly, RI, and a recorded copy forwarded back to the Department within fifteen (15) days of recording. Any proposed soil disturbance or excavation into the engineered control will be approved in advance by RIDEM. Annual ELUR inspections and subsequent certification submittals to RIDEM would ensure that the engineered controls designed for the site remain in good condition and meet the requirements set forth in the ELUR. Any deficiencies to the engineered control would be maintained and repaired on an as needed basis.

## **6 Remediation of Impacted Groundwater (1.10.4)**

In accordance with the *Remedial Decision Letter* (RIDEM, July 10, 2025), MNA of groundwater monitoring wells MW-105, MW-106 and MW-107 for arsenic shall also be completed until such a time that GA GOs are achieved for three (3) quarterly consecutive rounds of groundwater sampling. Therefore, MNA shall be completed in conjunction with, or before (if completed prior to redevelopment) the proposed remedy for the site is implemented.

Once RIDEM has confirmed that compliance with RIDEM GA GOs, the existing monitoring well network shall be abandoned in accordance with the RIDEM re-codified 250-RICR-150-05-3 *Groundwater Quality Rules* section 3.22 H. *Abandonment of Private Drinking Water Wells, Monitoring Wells, Piezometers and Other Subsurface Borings*.

## **7 Limited Design Investigation (1.10.5)**

A Limited Design Investigation (LDI) may be required to implement the proposed remedy for this site due to the location within a special flood hazard area. The design considerations shall ensure that flooding would not result in the erosion or wash-out of backfill and/or capping materials used to resurface the excavated areas. Installation of additional controls such as revetment along the riverbank to help prevent runoff into the river during flood events would also be considered as part of the design. If warranted, the LDI shall be included in an addendum to this RAWP prior to redevelopment activities.

## **8 Points of Compliance (1.10.6)**

During the redevelopment of the property and encapsulation of site soils, the responsible party and/or their environmental consultant shall complete periodic site visits to ensure and document that the engineered controls are properly constructed in accordance with the RAWP. Short-term compliance with the remedial objectives for the site will be considered complete once the engineered controls and ELUR are in place for the site.

Long-term points of compliance will include the completion of annual site inspections and submittal of Annual Compliance Self-Evaluation Form to RIDEM. If the findings of the annual site inspection determine the site is non-compliant with the terms of the ELUR, a *Corrective Action Plan* will be prepared and submitted to the Department within ten (10) days following the receipt of the Annual Compliance Self-Evaluation Form. The *Corrective Action Plan* will indicate the plans



to bring the site into compliance with the ELUR, including, at a minimum, a schedule for implementation of the plan.

## **9 Proposed Schedule for Remediation (1.10.7)**

At this time, a schedule for site redevelopment is not available. The responsible party shall provide a proposed schedule for remediation in an addendum to this RAWP at least 60 days prior to the start of work. Any changes to the schedule will be communicated with RIDEM.

The responsible party must notify RIDEM a minimum of 48 hours prior to the start of site redevelopment activities.

Quarterly *RAWP Progress Reports* shall be submitted to RIDEM documenting the progress of remedial actions at the site, including groundwater monitoring, for the duration of the project.

Within 60 days following the completion of site redevelopment activities, a Class I Survey shall be completed to document the as-built conditions of the site and engineered controls, and an ELUR and SMP shall be recorded on the deed for the entire property (Plat Map 8 / Lot 23). The ELUR shall be recorded on the deed for the Site in the Land Evidence Records for the Town of Westerly, RI, and a recorded copy forwarded back to the Department within fifteen (15) days of recording.

A *RAWP Completion Report* summarizing implementation of engineered controls and recording of the ELUR and SMP shall be completed by the responsible party and submitted within 60 days of completion of site redevelopment activities.

## **10 Contractors and/or Consultants (1.10.8)**

At this time, contractors and consultants implementing the proposed remedy on behalf of the responsible party have not been selected. The responsible party shall provide the names, addresses and telephone numbers of the contact persons of any contractors or consultants hired to implement the proposed remedy in an addendum to this RAWP at least 60 days prior to the start of work.

## **11 Site Plan (1.10.9)**

At this time, site redevelopment plans, and thus, soil encapsulation plans, have not been prepared for the site. The responsible party shall provide any site plans for the proposed remedy in an addendum to this RAWP at least 60 days prior to the start of work.

## **12 Design Standards and Technical Specification (1.10.10)**

The encapsulation of site soils by approved engineered controls will be in accordance with federal, state, and local regulations. The construction of the engineered controls will be conducted under the supervision of a registered Professional Engineer (PE) in the State of Rhode Island. Design standards including materials, sampling requirements (certified clean fill), and technical specifications are discussed in the following sections. Additional design standards or technical



specifications utilized to encapsulate site soils, other than those included within this RAWP, shall be provided by the responsible party in an addendum to this RAWP at least 60 days prior to the start of work.

## 12.1 Geotextile Fabric

Landscape areas developed with one foot of certified clean material will require the installation of a geotextile liner as shown in the cross-section detail included as **Appendix B**. The geotextile fabric shall be certified by the manufacturer to meet the puncture strength of 120 pounds. If RIDEM Bipartisan Infrastructure Law (BIL) funding is utilized for remediation, the geotextile fabric must additionally be manufactured in the United States of America.

## 12.2 Certified Clean Fill

To evaluate compliance with the RIDEM RDEC, and thus consistency with the “Clean Fill” definition, samples of each type and/or source of imported fill material to be used to encapsulate site soils shall be collected at a minimum frequency of one sample per 2,000 cubic yards. Each sample shall be submitted for laboratory analysis of the following:

- VOCs by USPEA Method 8260
- SVOCs by USEPA Method 8270
- Total Petroleum Hydrocarbons (TPH) by USEPA Method 8015
- Polychlorinated biphenyls (PCBs) by USEPA Method 8082
- PPM 13 (antimony, arsenic, beryllium, cadmium, chromium, copper, lead, mercury, nickel, silver, thallium, and zinc) by USEPA Method 6010/747

The analytical results for the imported fill will be reviewed by an Environmental Professional (EP) to confirm compliance with the RIDEM RDEC prior to use or emplacement as part of the engineered control. Any sample representation of imported fill that does not comply with RIDEM RDEC based on laboratory analytical results shall be rejected and not utilized to encapsulate the site.

## 13 Set-up Plans (1.10.11)

Prior to the construction of the engineered controls at the site, set-up plans shall be implemented to minimize the erosion of soil and migration of sediment from the site during construction activities and until site stabilization has been achieved. Set-up plans shall be provided by the responsible party in an addendum to this RAWP at least 60 days prior to the start of work.

## 14 Effluent Disposal (1.10.12)

During site redevelopment and encapsulation of site soils with approved engineered controls, it is anticipated that excess soil will be generated and require off-site disposal and/or recycling to



licensed facilities. Details regarding the management and disposal/recycling of soil are detailed in Section 14.1. Groundwater has been encountered at approximately 8 to 13 fbg at the site and is not anticipated to impact redevelopment activities, and therefore an effluent disposal plan for groundwater has not been prepared. If future redevelopment plans indicate that effluent groundwater disposal may be needed, the responsible party shall provide effluent disposal plans in an addendum to this RAWP at least 60 days prior to the start of work.

## **14.1 Soil**

Soils excavated at the site with concentrations exceeding RIDEM Method 1 DEC will not be re-used on-site. The soils exceeding Method 1 DEC shall be stockpiled as described within this section, and disposed of at a licensed facility in accordance with local, state and federal regulations. The responsible party shall ensure that excavation activities associated with soil exceeding RIDEM Method 1 DEC is overseen by an EP. All analytical testing, soil profiling, and waste disposal/recycling shall be summarized in the *RAWP Completion Report* submitted to RIDEM.

Soil exceeding RIDEM Method 1 DEC shall be stockpiled on polyethylene sheeting (poly) for the duration of its staging, and covered with poly at the end of each workday. Hay waddles or hay bales shall be installed surrounding the staging area to limit the loss of the cover and protect against stormwater and / or wind erosion. The location of the soil staging areas will be available at the request of RIDEM. No regulated soil will be stockpiled on-site for greater than 60 days without prior Department approval.

## **15 Contingency Plan (1.10.13)**

Prior to site redevelopment activities, the responsible party shall provide a contingency plan in accordance with section 1.10.13 of the Remediation Regulations that explains the procedures to be followed and persons to be notified in the event of an unexpected incident involving hazardous materials at the site. The contingency plan shall be provided by the responsible party in an addendum to this RAWP at least 60 days prior to the start of work.

## **16 Operating Log (1.10.14)**

Progression of on-site activities and construction of the engineered controls shall be documented by the responsible party, their contractors and consultants. The operating log will document that remediation is conducted in accordance with the specifications described within this RAWP. The operating log may contain the following:

- General daily site activities and contractors involved
- Field instrument calibration logs
- Condition of erosion and sedimentation controls
- Effluent disposal practices



- Photograph log
- Sampling methodology and locations
- Analytical chain-of-custody
- Any note-worthy findings, repairs made or repairs needed

Operating logs shall be retained by the responsible party and made available to RIDEM upon request. An example of an operating log, including supplemental forms that may be utilized for documentation, is included as **Appendix C**. A summary of the site operations will be included in the quarterly *RAWP Progress Reports*, as needed and in the *Closure Report* prepared for the site.

## **17 Security Procedures (1.10.15)**

To prevent unauthorized access to the site, a chain-link fence shall be installed around the perimeter of the site. Additionally, to prevent unauthorized access to contaminated soil, generated stockpiles will be covered with poly at the end of each workday. At the end of each workday, the site superintendent or designated person shall lock the fence and open excavation area(s) shall be secured with orange snow fence to provide additional visibility.

## **18 Shut-down, Closure and Post-closure Requirements (1.10.16)**

Following the encapsulation of site soils and completion of construction activities, shutdown will consist of removal and disposal of any remaining soil to an approved disposal facility, a final clean up, equipment demobilization and removal of site fencing and erosion controls.

Within 60 days following the completion of site redevelopment activities, a Class I Survey will be completed to document the as-built conditions of the site and engineered controls, and an ELUR and SMP will be recorded to the title of the property. A *RAWP Completion Report* summarizing implementation of engineered controls and recording of the ELUR will be submitted within 60 days following the completion of site redevelopment activities.

## **19 Institutional Controls and Notices (1.10.17)**

The Completion of Investigation public notice was mailed to site abutters, the Town of Westerly and RIDEM on June 12, 2025, and a public meeting was held on June 24, 2025. The Completion of Investigation public notice documented the proposed remedial alternative for the site (application of institutional controls such as the recording of an ELUR to the title of the property) whereas RIDEM establishes guidelines for any future subsurface intrusive activities at the property. Guidelines would require engineered controls such as asphalt, building foundations, concrete, and certified clean material underlain with a geotextile liner, to eliminate potential exposure to impacted media by users of the site. RIDEM guidelines will also require that the property is inspected on an annual basis to document compliance with the ELUR and repair any deficiencies on an as needed basis.



## **20 Compliance Determination (1.10.18)**

Short-term compliance determination will be made based on periodic site visits, *RAWP Progress Reports*, and submittal of a *RAWP Completion Report* documenting the encapsulation of site soils with engineered controls and recording of an ELUR and SMP to the title of the property. Long-term compliance determination will be based on the findings of the Annual ELUR Inspections and subsequent reporting.

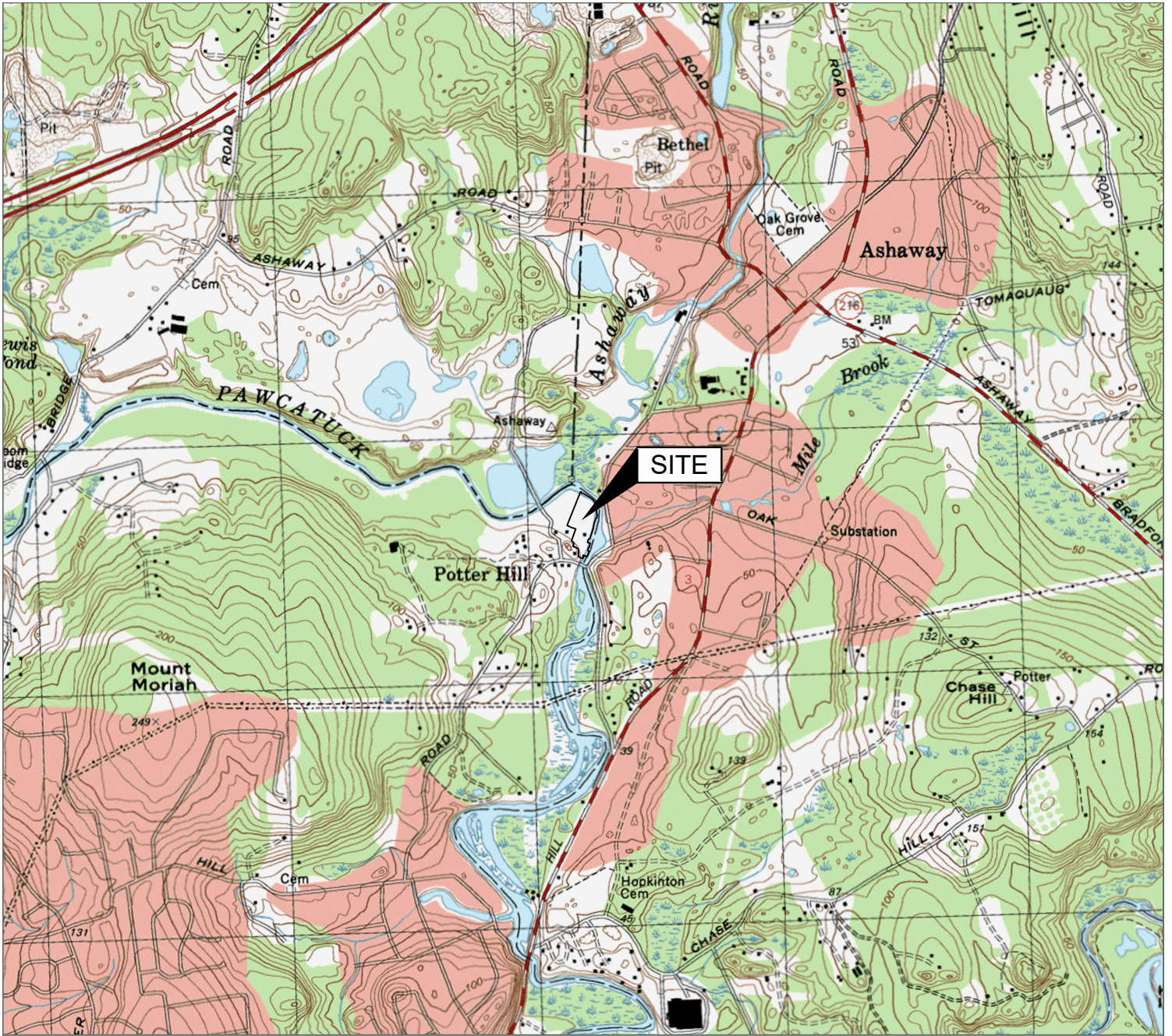
## **21 Certification Requirements (1.10.19)**

This RAWP was certified by GES and the Town of Westerly pursuant to section 1.10.19 of the Remediation Regulations. The Certification letters from GES and Town of Westerly are provided in **Appendix D**.



## Figures

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Source:  
 USGS 7.5 Minute Series  
 Topographic Quadrangle, 2001  
 Ashaway, Rhode Island  
 Contour Interval = 10 feet



Quadrangle Location

Site Location Map

Town of Westerly  
 Potter Hill Mill  
 198 Potter Hill Road  
 Westerly, Rhode Island

Drawn  
 E.V.  
 Designed  
 H.P.  
 Approved

Date  
 09/23/25  
 Figure  
 1

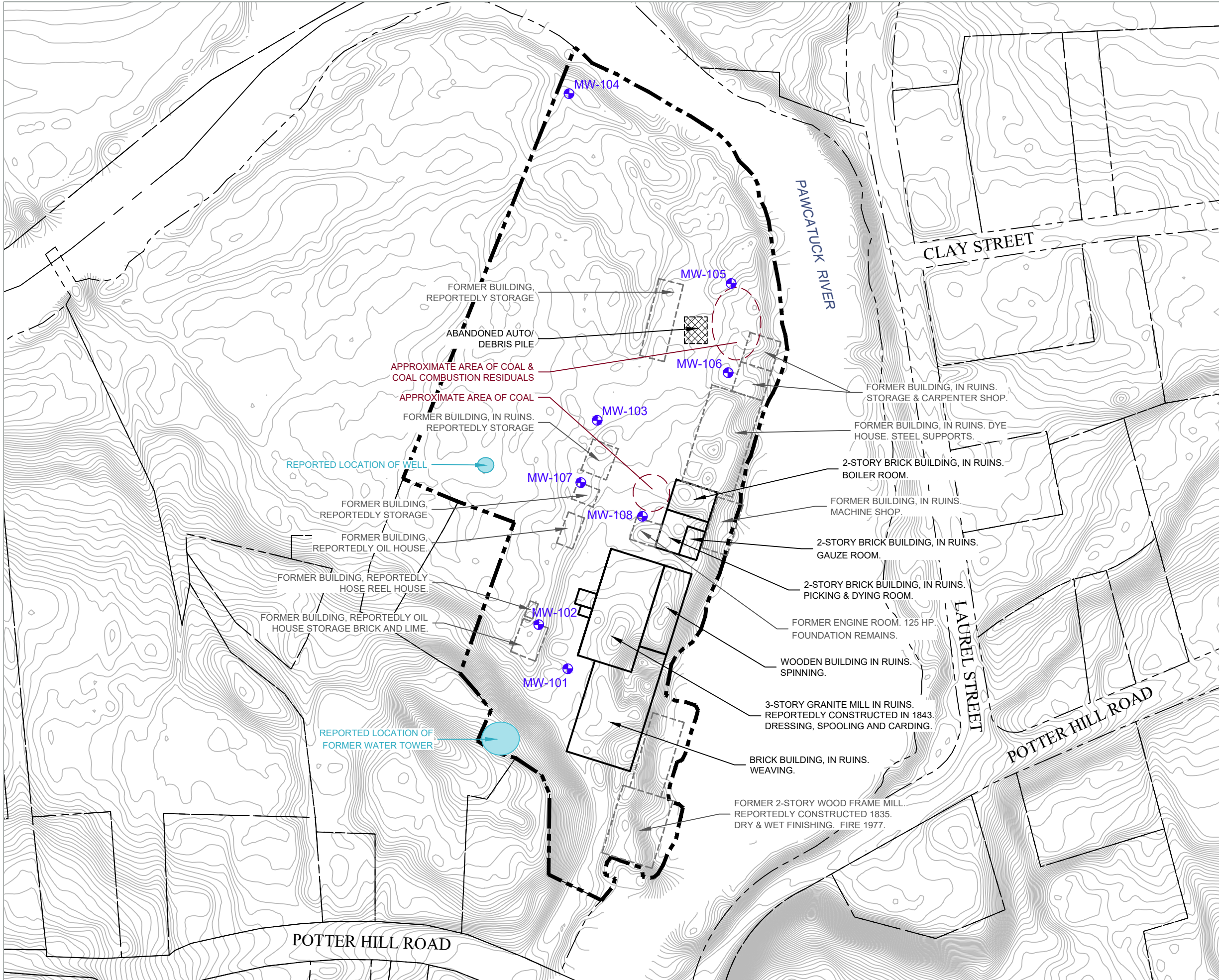


Scale In Feet



Groundwater & Environmental Services, Inc.


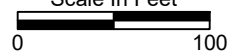

N:\Graphics\Graphics1500-Windson\Misc\RIDEM - Westerly\Town of Westerly SM.dwg, B-100, E\vega, 1:1

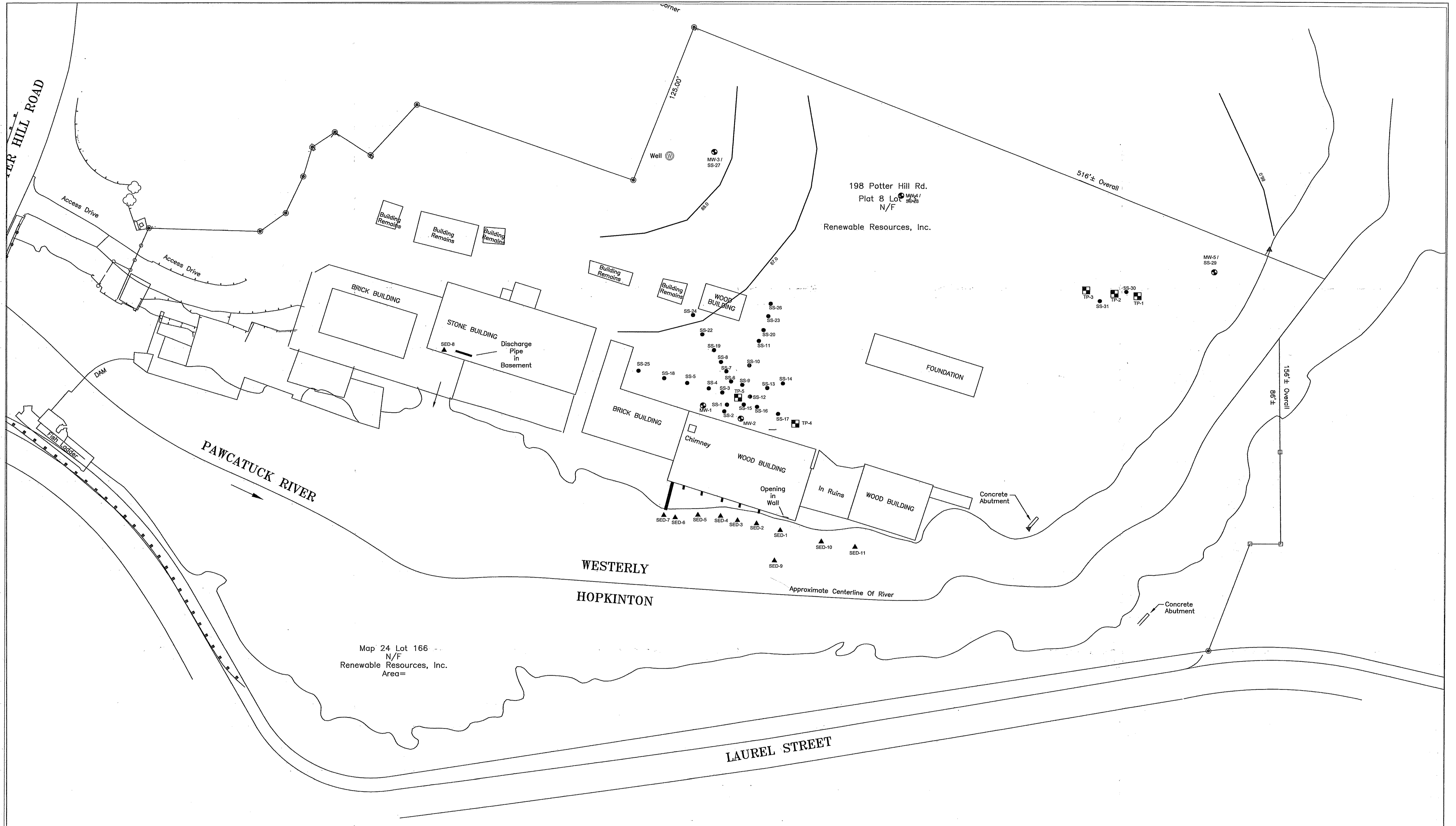


**LEGEND**

- SITE BOUNDARY (APPROXIMATE)
- - - PARCEL BOUNDARIES (APPROXIMATE)
- MONITORING WELL

Source:  
Hancock Associates, Monitoring Well Plan,  
Sheet: 1, Date: 12/23/24.

<b>Site Map</b>	
Town of Westerly Potter Hill Mill 198 Potter Hill Road Westerly, Rhode Island	
Drawn E.V. Designed H.P. Approved	Date 09/23/25 Figure 2
 Scale In Feet   Groundwater & Environmental Services, Inc.	



Map 24 Lot 166  
N/F  
Renewable Resources, Inc.  
Area=

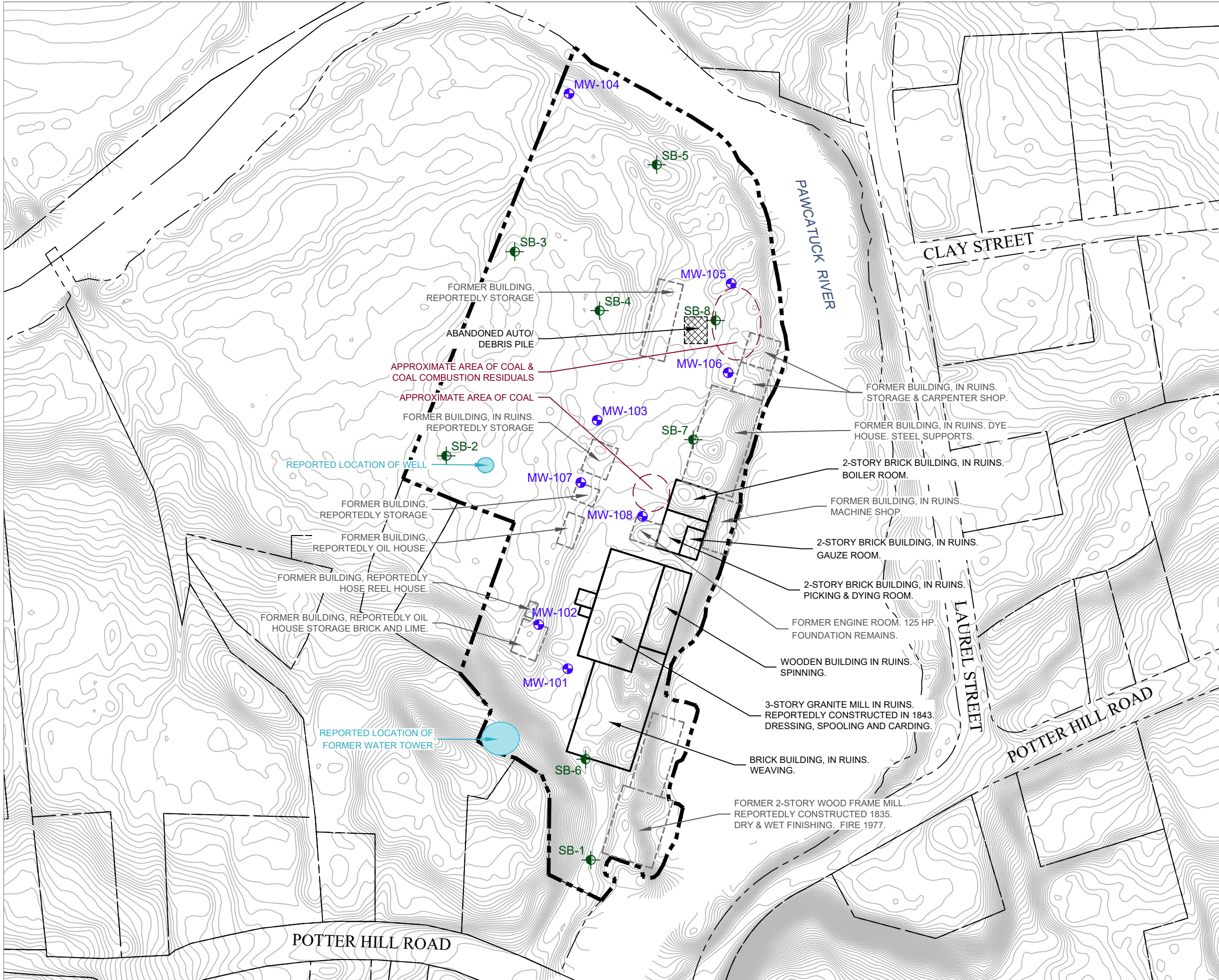
198 Potter Hill Rd.  
Plat 8 Lot  
N/F  
Renewable Resources, Inc.

- LEGEND**
- MW-1 MONITORING WELLS
  - SOIL SAMPLES  
SS-1
  - TEST PITS  
TP-1
  - SEDIMENT SAMPLES  
SED-1

- NOTE**
1. PLAN DEVELOPED FROM AN UNTITLED, UNDATED SITE PLAN PROVIDED BY THE CLIENT IN ELECTRONIC FORMAT.
  2. MONITORING WELL LOCATIONS DETERMINED IN THE FIELD BY REFERENCING EXISTING SITE FEATURES. ALL LOCATIONS ARE APPROXIMATE.

	<b>Jacques Whitford Company, Inc.</b>			
	Jacques Whitford Location: <i>Lincoln, Rhode Island</i>			
	DRAWING TITLE: <b>SAMPLE LOCATION PLAN</b>			
	POTTER HILL MILL POTTER HILL ROAD WESTERLY, RHODE ISLAND			
DATE PREPARED: 1/4/08	DESIGNED BY: RLS	DRAWN BY: JLU	CHECKED BY: JLU	REVIEWED BY: -
REVISION DATE: -	REVISION NO: -	DRAWN BY: -	CHECKED BY: -	REVIEWED BY: -
PROJECT NAME/FILE NAME: Potter Hill Mill	PROJECT NUMBER/PHASE: 1009825.	SCALE: 1"=40'	PREPARED FOR: RENEWABLE RESOURCES	
				DWG NO. <b>3</b>

N:\Graphics\Graphics1500-Windson\Misc\RIDEM - Westerly\Town of Westerly SM.dwg, B-100, E\vega, 1:1



**LEGEND**

- SITE BOUNDARY (APPROXIMATE)
- PARCEL BOUNDARIES (APPROXIMATE)
- MONITORING WELL
- SOIL BORING (2024)

Source:  
Hancock Associates, Monitoring Well Plan,  
Sheet: 1, Date: 12/23/24.

<b>Soil Sample Location Map</b>	
Town of Westerly Potter Hill Mill 198 Potter Hill Road Westerly, Rhode Island	
Drawn E.V. Designed H.P. Approved	Date 09/23/25 Figure 4
Scale In Feet 	
 <small>Groundwater &amp; Environmental Services, Inc.</small>	



## Appendix A – Remedial Decision Letter

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## RHODE ISLAND

### DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT

235 Promenade Street, Providence, Rhode Island 02908

#### REMEDIAL DECISION LETTER

File No. SR-38-1074

July 10, 2025

Shawn Lacey, Town Manager  
Town of Westerly  
45 Broad Street  
Westerly, RI 02891

RE: Pawcatuck Woolen Mill (Potter Hill Mill)  
198 Potter Hill Road  
Westerly, Rhode Island  
Plat Map 8 / Lot 23

Dear Mr. Lacey:

On April 22, 2020, the Rhode Island Department of Environmental Management's (the Department) Office of Land Revitalization and Sustainable Materials Management (LRSMM) enacted the codified 250-RICR-140-30-1, Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations). Following periodic refiling, the active Rule became effective on January 4, 2022. 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. A Remedial Decision Letter (RDL) is a formal, written communication from the Department that approves a site investigation, identifies the preferred remedial alternative and authorizes the development of a Remedial Action Work Plan (RAWP) in order to achieve the objectives of the environmental clean-up.

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 in response to the reported release at the Site:

1. Access Agreement, executed by the Town of Westerly on February 16, 2024 and by the Department on February 20, 2024;
2. Phase I Environmental Site Assessment (ESA), received by the Department on July 31, 2024, and prepared by Groundwater & Environmental Services, Inc. (GES);
3. Site-Specific Quality Assurance Project Plan (SS-QAPP), received by the Department on October 31, 2024, and prepared by GES;
4. Pre-Site Investigation Public Notice, received by the Department on November 13, 2024, and prepared by GES;

5. Hazardous Materials Release Notification Form, received by the Department on January 10, 2025, and prepared by GES;
6. Phase II ESA, received by the Department on May 20, 2025, and prepared by GES; and
7. Post-Site Investigation Public Notice, received by the Department on June 13, 2025, and prepared by GES.

Collectively, these documents define “Existing contamination” at the Site and fulfill the requirements of a Site Investigation Report (SIR) as described in Section 1.8.8 of the Remediation Regulations. In addition, according to our records, public notice was conducted to all abutting property owners, tenants, easement holders, and the municipality, regarding the substantive findings of the completed investigation in accordance with Sections 1.8.7(A)(2) and 1.8.9 of the Remediation Regulations. The opportunity for public review and comment on the technical feasibility of the proposed remedial alternatives commenced on June 24, 2025 and the period closed on July 8, 2025. No comments were received.

The preferred remedial alternative, as stated in the SIR, consists of the following conceptual measures:

- 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);
- Monitored natural attenuation (MNA) of groundwater monitoring wells MW-105, MW-106, and MW-107, impacted by arsenic, until such a time that the GA Groundwater Objectives are achieved for three (3) quarterly consecutive rounds of sampling; and
- An Environmental Land Usage Restriction shall be recorded on the deed for the entire property (Plat Map 8 / Lot 23). The ELUR shall require the performance of annual inspections to document the status of the ELUR and the conditions of the engineered controls. The ELUR shall include a Department-approved post remediation soil management plan (SMP) which shall address any future activities that may disturb Site soils. The ELUR shall be recorded on the deed for the Site in the Land Evidence Records for the Town of Westerly and a recorded copy forwarded back to the Department within fifteen (15) days of recording.

The Department hereby approves the SIR, with the above identified preferred remedial alternative, and requires a RAWP be submitted for review and approval, and implemented, to achieve the objectives of the environmental clean-up, in accordance with the following conditions:

1. In accordance with Sections 1.9 and 1.10 of the Remediation Regulations, a RAWP shall be submitted for Department review and approval within sixty (60) days from the date of this letter. The RAWP shall describe all of the technical details, engineer design elements,

and schedules associated with the implementation of the proposed remedy. All of the subsections outlined in Section 1.10 of the Remediation Regulations must be included in order to facilitate the review and approval of the RAWP. If an item is not applicable to this Site, simply state that it is not applicable and provide an explanation in the RAWP.

2. Pursuant to Section 1.11.2 of the Remediation Regulations, an application fee for Remedial Action Approvals in the amount of one thousand (\$1,000.00) dollars shall be made payable to the State of Rhode Island General Treasurer and remitted to the Office of LRSMM with the attached Remedial Action Approval Application Fee Form. Receipt of this Remedial Action Approval Application Fee is required prior to the Department's RAWP review.
3. Once the Department reviews the RAWP for consistency with Sections 1.9 and 1.10 of the Remediation Regulations, any written comments generated and forwarded as a result of the review(s) shall be incorporated forthwith into a RAWP Addendum, to be submitted for final approval.
4. Upon finalization of the RAWP, the Department will issue a Remedial Approval Letter (RAL), signifying Department approval. All remedial measures required by the Department shall be implemented, in accordance with the approved schedule, to ensure all applicable exposure pathways at the site are appropriately addressed.

**Please be advised that the Department reserves the right to require additional actions under the aforementioned Remediation Regulations at the Property should any of the following occur:**

- Conditions at the Site previously unknown to the Department are discovered;
- Information previously unknown to the Department becomes available;
- Policy and/or regulatory requirements change; and/or
- Failure by the Town of Westerly or any future holder of any interest in the Property to adhere to the terms and conditions of the Department approved RAWP, schedule, RAL, ELUR, and/or SMP for the Property.

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) 537-4362, or by E-mail at Rachel.simpson@dem.ri.gov.

Sincerely,



Rachel T. Simpson  
Environmental Scientist III  
Office of Land Revitalization &

Sustainable Materials Management

cc: Kelly J. Owens, RIDEM/LRSMM  
Dale Faulkner, Town of Westerly  
Edward Kontos., GES  
Hannah Pallein, GES  
Amy Jean McKeown, EPA Region 1

Attachment: Remedial Action Approval Application Fee Form



## RHODE ISLAND

### DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT  
235 Promenade Street, Providence, Rhode Island 02908

#### REMEDIAL ACTION APPROVAL APPLICATION FEE FORM

Rule 1.11.2 of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, requires an application fee for Remedial Action Approvals in the amount of one thousand (\$1,000) dollars. Please submit this form and check, made payable to the State of Rhode Island General Treasurer, directly to:

**R.I. Department of Environmental Management  
Office of Land Revitalization & Sustainable Materials Management - Rm 380  
235 Promenade Street  
Providence, RI 02908-5767**

Please complete this page and attach it to the check or money order. This information must be provided to coordinate your fee with the application submitted.

Site Name: Pawcatuck Woolen Mill (Potter Hill Mill)

Address: 198 Potter Hill Road

Town/City: Westerly

File Number: SR-38-1074

Contact Person: \_\_\_\_\_

Phone No: \_\_\_\_\_

RIDEM Project Manager: Rachel Simpson

**FOR RIDEM OFFICE USE ONLY:**

Fee Amount Received: \_\_\_\_\_

Date Received: \_\_\_\_\_

Check#: \_\_\_\_\_

Receipt Account:

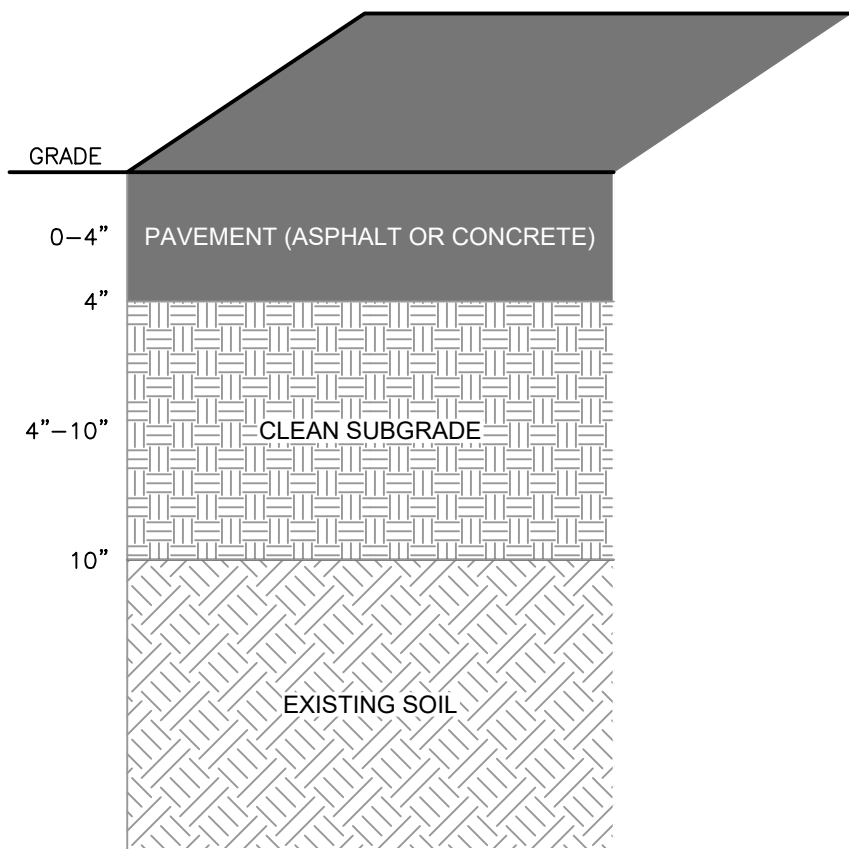
10.074.3765103.03.461043

cc:74:3481 Leg.17-18-841



## Appendix B – Typical Engineered Control Cross-Section Detail

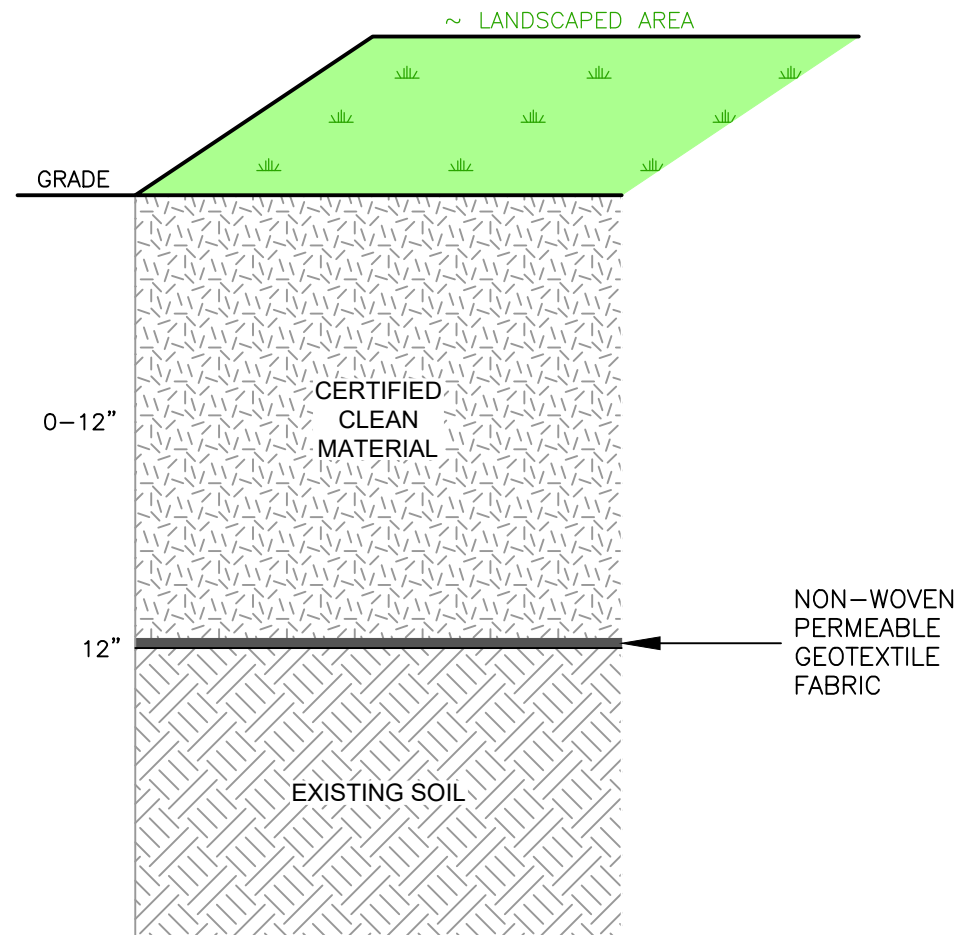
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**CROSS-SECTION A:**

TYPICAL CAP SECTION AT PAVEMENT AREA.

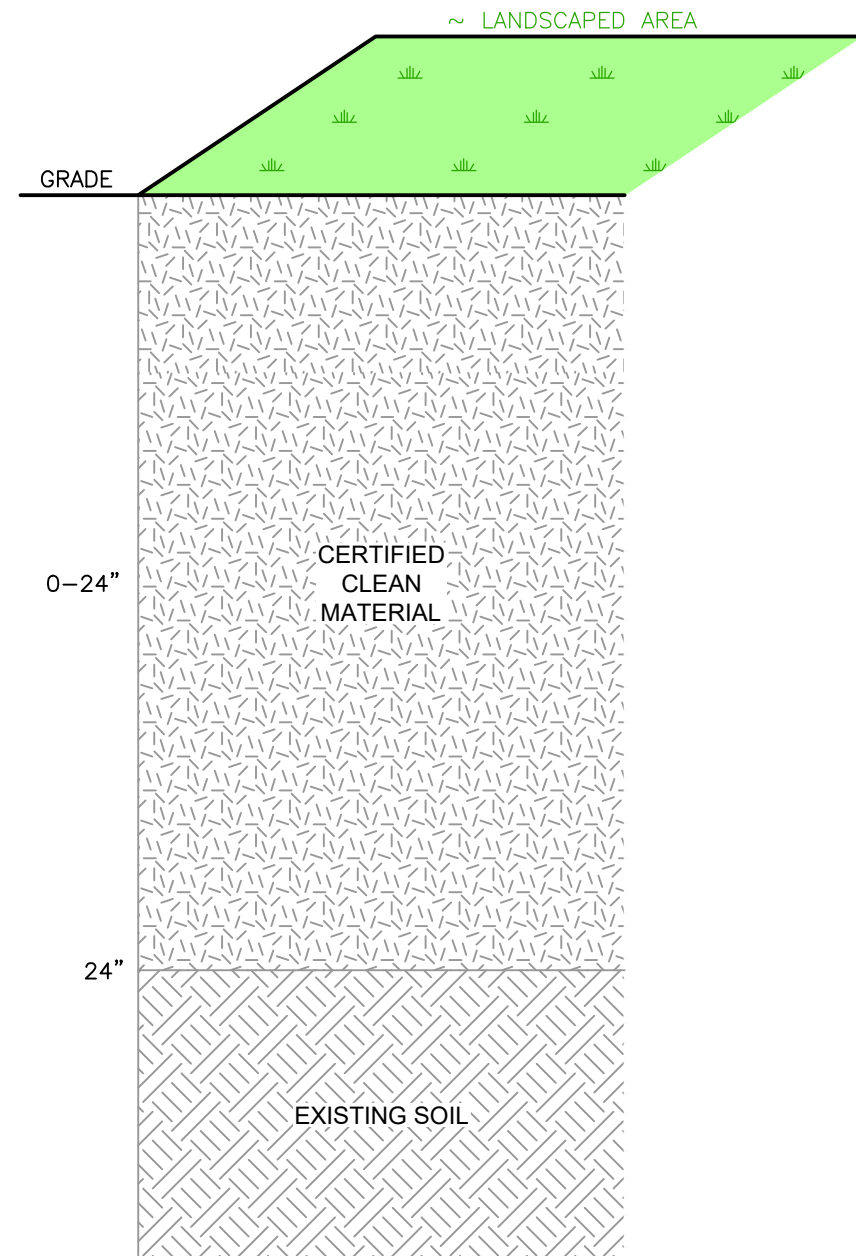
FOUR (4) INCHES OF PAVEMENT (ASPHALT OR CONCRETE) ABOVE SIX (6) INCHES OF CLEAN SUBGRADE, OR EQUIVALENT.



**CROSS-SECTION B:**

TYPICAL CAP SECTION AT LANDSCAPED AREA (1- FOOT CAP WITH GEOTEXTILE FABRIC LINER).

ONE (1) FOOT OF CLEAN FILL UNDERLAIN WITH A GEOTEXTILE FABRIC.



**CROSS-SECTION C:**

TYPICAL CAP SECTION AT LANDSCAPED AREA (2-FOOT CAP).

TWO (2) FEET OF CLEAN FILL.

Typical Engineered Control Cross-Section Detail

Town of Westerly  
Potter Hill Mill  
198 Potter Hill Road  
Westerly, Rhode Island

Drawn  
E.V.  
Designed  
H.P.  
Approved

Date  
09/23/25  
Figure

Not to Scale



Groundwater & Environmental Services, Inc.



## **Appendix C – Operating Log and Supplemental Forms**

---



**CALIBRATION TABLE**

**Date:** \_\_\_\_\_

**Client:** \_\_\_\_\_

**Recorded By:** \_\_\_\_\_

**Location:** \_\_\_\_\_

**Site Number:** \_\_\_\_\_

<b>Zero Air Calibration (0 ppm)</b>	<b>Span Air Calibration (100 ppm isobutylene, balance air)</b>	<b>Trial Reading with Isobutylene (53 ppm)</b>

**LEL Serial No:** \_\_\_\_\_

<b>Zero Air Calibration (0 ppm)</b>	<b>Span Air Calibration (50% LEL, methane)</b>	<b>Trial Reading (50%)</b>

4-gas meters should be Industrial Scientific models only.

Calibration mixture should include Pentane gas.

# PROJECT CHECKLIST

## Status

Satisfactory

Unsatisfactory

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

I.

### GENERAL SITE CONDITIONS

1. Site is clean and free of debris
2. If system is operational, noise levels are not a nuisance

II.

### PAVING

1. Pavement is in good condition (no significant cracks or settling)
2. Pavement does not create a tripping hazard
3. Pavement follows the gradient of pre-existing pavement and does not cause water to pool

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

III.

### LANDSCAPING

1. Disturbed landscaped areas have been replaced to their original condition
2. Grassy areas have been fine graded and seeded or sod has been replaced

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_



# Photograph Log

**Project/Site Title**  
Address  
City, ST

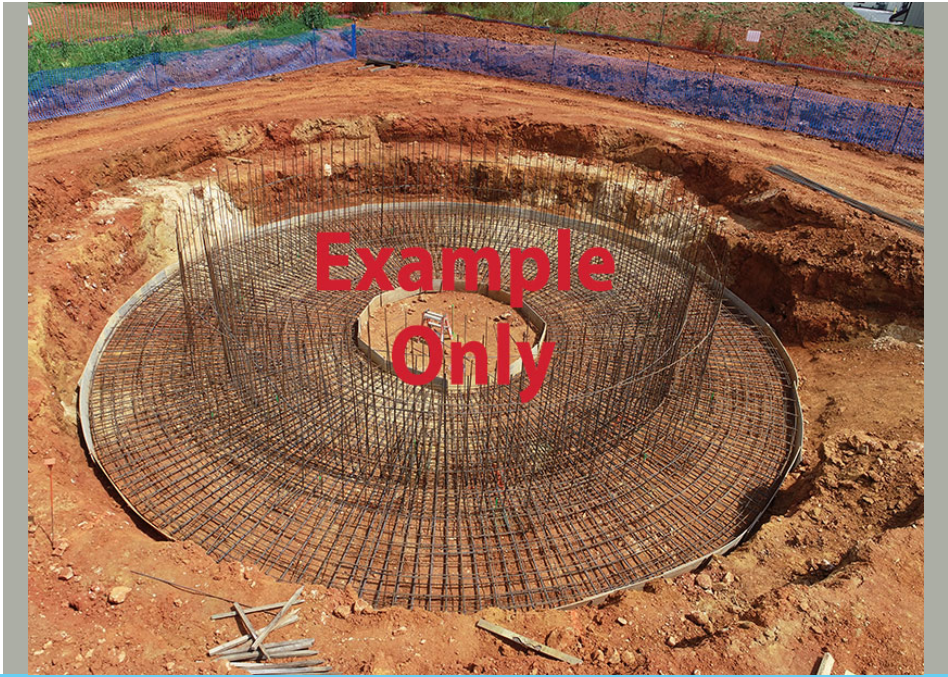
Project No.: #####

**Description:**  
[Insert text to describe image depicted on the right]

**Direction of View:**  
[Insert info (e.g. East)]

**Date Taken:**  
MM/DD/YYYY

**File Name:**  
[filename.jpg]



**Description:**  
[Insert text to describe image depicted on the right]

**Direction of View:**  
[Insert info (e.g. East)]

**Date Taken:**  
MM/DD/YYYY

**File Name:**  
[filename.jpg]







## Appendix D – Certification Letters

---

*Town of Westerly*  
*Rhode Island*

OFFICE OF THE TOWN MANAGER  
Shawn M. Lacey, Town Manager



Town Hall  
45 Broad Street  
Westerly, RI 02891  
TEL: (401) 348-2530  
www.WesterlyRI.gov

September 25, 2025

Ms. Rachel Simpson  
Rhode Island Department of Environmental Management  
Office of Land Revitalization and Sustainable Materials Management  
235 Promenade Street  
Providence, Rhode Island 02908-5767

**Re: Certification of Remedial Action Work Plan**  
**Former Potter Hill Mill**  
**198 Potter Hill Road**  
**Westerly, Rhode Island 02891**  
**Grant No. 4B-00A00985**  
**RIDEM File No. SR-38-1074**

Dear Ms. Simpson:

In accordance with Section 1.10.19 of the Rhode Island Department of Environmental Management (RIDEM) *Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases* (Remediation Regulations), the Town of Westerly, Rhode Island is providing certification that the *Remedial Action Work Plan* for the above-referenced facility is complete and accurate to the best of my knowledge, and based on information provided by Groundwater & Environmental Services, Inc. (GES).

Certification of the report by the environmental consultant, Groundwater & Environmental Services, Inc. (GES) is provided in a separate letter included with the Remedial Action Work Plan. If you have any questions regarding the subject property, you may contact me at (401) 348-2530, or GES at (800) 220-6119.

Sincerely,  
**Town of Westerly**

Shawn M. Lacey  
Town Manager



Groundwater & Environmental Services, Inc.

100 Sebeth Drive, Unit A8  
Cromwell, Connecticut 06416

T. 800.220.6119

September 29, 2025

Ms. Rachel Simpson  
Rhode Island Department of Environmental Management  
Office of Land Revitalization and Sustainable Materials Management  
235 Promenade Street  
Providence, Rhode Island 02908

**Re: Remedial Action Work Plan Certification**

Potter Hill Mill  
198 Potter Hill Road  
Westerly, Rhode Island  
Grant No. 4B-00A00985  
RIDEM File No. SR-38-1074

Dear Ms. Simpson:

In accordance with Section 1.10.19 of the Rhode Island Department of Environmental Management (RIDEM) *Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases* (Remediation Regulations), Groundwater and Environmental Services, Inc. (GES) is providing certification of the accuracy of the information contained in the *Remedial Action Work Plan* for the above-referenced facility.

Preparation of the *Remedial Action Work Plan* was performed by GES staff under my supervision and was also based on information provided by the Town of Westerly, Rhode Island.

Certification of the report by the Town of Westerly, Rhode Island, is provided in a separate letter included with the *Remedial Action Work Plan*. If you have any questions regarding the content of the report, please contact the undersigned at 800-220-6119, ext. 3616 or Mr. Shawn Lacey of the Town of Westerly at 401-348-2530.

Respectfully submitted,  
**Groundwater & Environmental Services, Inc.**

A handwritten signature in blue ink, appearing to read 'Joel Walcott', is written over a light blue horizontal line.

Joel Walcott, RIPE #11660  
Principal Engineer