

SIR Addendum No. 2  
RI DEM File - SR-09-1958  
Grenier Properties, LLC  
November 9, 2020

The following SIR Addendum No. 2 acknowledges the Rhode Island Department of Environmental Management (RI DEM) request associated with the RI DEM Letter Response to SIR Public Comments Letter dated August 24, 2020:

- 1. Per 5.a and 6.a - The final Department approved RAWP and SMP must include best management practices for controlling and preventing dust generation and managing dust migration from the property during work activities, including at a minimum maintaining a water supply (e.g. water truck) onsite to keep excavations and soil piles wetted, securely covering all soil piles when not actively adding or removing soil and at the end of each work day, installation of a temporary security construction fence around the Site with appropriate dust proof covering, providing appropriate sedimentation and erosion controls (i.e. hay bales lining the inside base of the construction fence), securely covering all trucks removing soil from the property to prevent potential releases of dust, providing appropriate decontamination of all equipment used on site, constructing a temporary lined decontamination pad where trucks are cleaned before leaving the site and including provisions to collect excess decontamination water to prevent infiltration or runoff, and documentation and certification that the required remedial measures were properly followed and work was performed in accordance with all approvals and requirements*

Grenier Properties, LLC (Grenier) acknowledges that Best Management Practices (BMPs) will be used for controlling and preventing dust generation and management dust migration from the property during work activities. The BMPs include:

- Wetting down excavations and excavation stockpile soils either by water truck or other on-Site source of water
  - Securing all soil pile was not adding or removing soils and at the end of each work day
  - A temporary security fence will surround the work Site along with appropriate fabric covering to limit lateral dust migration
  - Hay bales will be placed interior of the fence to provide appropriate sedimentation and erosion controls
  - All trucks leaving the Site with contaminated soil will be properly covered
  - All trucks leaving the Site will be properly washed of contaminated soil at a decontamination pad (wash station) prior to leaving the Site
  - Appropriate provisions will be made to collect the decontamination water to prevent infiltration or runoff
  - Grenier will document and certify that the required remediation measures are properly followed, and work will be performed in accordance with all approvals and requirements.
- 2. Per 7.a - The final Department approved RAWP and SMP must include the performance of Air Quality Monitoring for dust at the downwind property perimeter during all activities involving the disturbance of regulated soil. The selected dust monitoring device should be capable of calibration, setting a threshold action level alarm for particulate dust concentrations, and continuous logging of data for documentation and reporting purposes. A summary of all air monitoring results suitable for posting to the Department's dedicated site web page shall be prepared and submitted to the Department on a weekly basis. The summary shall include an indication of any detected exceedances of any action levels during the monitoring period and a complete description of how any detected exceedances were responded to and how the causes were controlled or resolved.*

Grenier will provide proper Air Quality Monitoring for dust at the downwind property perimeter during all activities involving the disturbance of regulated soil. The selected dust monitoring device will be capable of calibration, setting a threshold action level alarm for particulate dust concentrations, and continuous logging of data for documentation and reporting purposes. A summary of all air monitoring results suitable for posting to the Department's dedicated site web page shall be prepared and submitted to the Department on a weekly basis. The summary shall include an indication of any detected exceedances of any action levels during the monitoring period and a complete description of how any detected exceedances were responded to and how the causes were controlled or resolved.

3. *Acknowledgement by Redwood that Department policy requires that soil on a regulated Site that has not been analyzed or otherwise characterized is presumed to be impacted until it has been demonstrated through sampling and analysis to not be impacted, and must therefore be managed in accordance with the final Department approved RAWP and SMP.*

Grenier and Redwood acknowledge the aforementioned statement and all soils not previously analyzed on the regulated Site will be presumed to be impacted until it has been demonstrated through sampling and analysis to not be impacted, and must therefore be managed in accordance with the final Department approved RAWP and SMP.

4. *Per 16.a – Acknowledgement by Redwood that they and any subcontractors operating at the Site, will follow the final Department approved RAWP and SMP as approved, with the understanding that intentional or unintentional failure to follow the requirements could result in potential temporary work stoppages, violations and administrative penalties or fines.*

Grenier and Redwood acknowledge that any subcontractors operating at the Site, will follow the final Department approved RAWP and SMP as approved, with the understanding that intentional or unintentional failure to follow the requirements could result in potential temporary work stoppages, violations and administrative penalties or fines.

5. *Per 18.a – Inclusion of a Limited Design Investigation in the RAWP with collection of an additional soil sample at the location identified as #2 where gasoline was allegedly poured on the ground, at a depth of greater than 2 feet below ground surface and analyzed for total petroleum hydrocarbons.*

Grenier will as part of the RAWP include a Limited Design Investigation and collect additional soil sample at the location identified as #2 where gasoline was allegedly poured on the ground, at a depth of greater than 2 feet below ground surface and analyzed for total petroleum hydrocarbons.

This SIR Addendum No. 2 should satisfy the request by RI DEM in the RI DEM Letter Response to SIR Public Comments Letter dated August 24, 2020 and have all the required documentation to issue a Remedial Decision Letter.