



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT

235 Promenade Street, Providence, Rhode Island 02908

RAWP COMMENT LETTER
File No. SR-09-1958

August 17, 2021

Mr. Tim Grenier
Grenier Properties, LLC
3 Cole Circle
East Greenwich, RI 02818

RE: Grenier Properties, LLC
33 Exchange Street
East Greenwich, Rhode Island
Plat Map 85/1 / Lot 382

Dear Mr. Grenier:

The Rhode Island Department of Environmental Management's (the Department) Office of Land Revitalization and Sustainable Materials Management (OLRSMM) has reviewed the Remedial Action Work Plan, Residential Property 33 Exchange Street, Plat 85/1, Lots 87 & 382, East Greenwich, Rhode Island (RAWP) for the above referenced property (the Site), which was submitted on June 23, 2021, by Redwood Environmental Group, LLC (REG) in accordance with 250-RICR-140-30-1, Section 1.10 of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations).

After careful review of the RAWP, the Department requires a response to the attached comments, questions, and concerns about the submittal, which must be fully addressed in writing to receive a Remedial Approval Letter (RAL).

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. 77109, or by E-mail at joseph.martella@dem.ri.gov.

Sincerely,

Joseph T. Martella II
Environmental Engineer III

Office of Land Revitalization &
Sustainable Materials Management

cc: Kelly J. Owens, RIDEM/OLRSMM

Susan Forcier, Esq., RIDEM/OLS
Nicholas Pisani, RIDEM/OWR
Greg Swift, RIDEM/OWR
Lisa Bourbonnais, East Greenwich Town Planner
Mark Schwager, President, East Greenwich Town Council
Gary S. Kaufman, REG
Tom & Kelly Clayton, Kelly Clayton Living/Touchdown Realty Group

DEPARTMENT COMMENTS

August 17, 2021

Remedial Action Work Plan (RAWP), dated May 2021, Received June 23, 2021

Grenier Properties, LLC
East Greenwich, Rhode Island

1. Section 3.2 (Proposed Remedy) indicates *"The engineered controls include placement of a geotextile fabric overlain with 1-foot of clean soil/crushed stone, placement of two (2) feet of clean fill material (optional as needed), placement of one 1-foot of clean fill with a 4-inch asphalt cover, in addition to the final building footprint, asphalt pavement and concrete walkways will prevent access to the impacted soils."* The standard Department approved engineered control should provide a level of protection equivalent to two (2) feet of clean fill. Please clarify the proposed final design thickness dimensions for the asphalt pavement and concrete walkway caps. Also, Figure 4 (Building Plan) and Figure 5 (Site Capping Plan) seem to identify several other alternative engineered control capping components that are not otherwise defined in the RAWP. Please provide the proposed final design thickness dimensions of each of the engineered control caps which include the lawn, patio, pervious pavers, stone dust path, stabilized gravel drive and landscaping for tree planting areas.
2. The draft RAWP indicates in several locations that any excess excavated soils will be stockpiled and covered with 6-mil plastic. The draft Soil Management Plan (SMP) indicates regarding excess soil, that *"The soil must be placed on and covered with polyethylene/plastic sheeting during the entire duration of its staging and secured with appropriate controls to limit the loss of the cover and protect against storm-water and / or wind erosion (e.g. hay bales, silt fencing, rocks, etc)."* Placement of impacted excavated soil both on and under poly sheets is consistent with Department policy and should be consistently followed during this project. Where impacted soils will be excavated or otherwise disturbed to varying degrees, the excavated soils must be stockpiled on and covered with 6-mil plastic until such time as reused as backfill onsite under a cap or properly disposed of offsite. Stockpiles shall be securely covered when not actively adding newly excavated soil or borrowing soil for backfilling, and shall be checked to insure adequacy of the cover at the end of each workday before leaving the Site.
3. Regarding Section 3.2 (Proposed Remedy), Step 6 (Utility Installation), indicates that following utility trench backfilling and capping all the excavation and disturbance of contaminated soils will be complete, and the Site will be fully capped with geotextile fabric and 1-foot of stone and/or clean fill. It is further indicated that AQM equipment will no longer be needed as disturbance of the impacted soil will have been completed. Please be reminded that before the AQM equipment is shut down and removed from the Site, all excess stockpiled impacted soils (if any remain) should be removed from the Site for proper disposal at an appropriately licensed facility since disturbance of the residual stockpile (i.e. moving, loading, loss of cover material) could still result in the generation of impacted dust.

4. Regarding Section 3.4 (Limited Design Investigation), in the event that concentrations of total petroleum hydrocarbons (TPH) in the soil sample at the location identified as #2 exceed the applicable Department criteria, the extent of petroleum impacts must be assessed.
5. Regarding Section 3.5 (Points of Compliance) with regard to clean fill material brought to the Site, please be reminded that while the OLRSM no longer requires the submittal of analytical data prior to clean fill being brought to a Site, it remains the sole responsibility of the Performing Party and their consultant to analyze the material, certify that the material meets the Department's Residential Direct Exposure Criteria (RDEC), as defined by the Remediation Regulations, for all constituents, and is suitable for use on the Site.
6. Section 3.9 (Design Standards and Technical Specification) discusses the general design of the tire wash station. Please clarify plans to decommission and cap the former tire wash station location once it is no longer needed. Also, Section 3.11 (Effluent Disposal) indicates that *"Decontaminated water from the wash station will be properly disposed off-Site as needed. Sludge generated by the washing will be re-used as backfill."* Please clarify how water and sludge are proposed to be collected and managed.
7. Regarding Section 3.9.1 (Air Specifications) and wherever Air Quality Monitoring (AQM) is discussed, no specific AQM Action Level has been proposed. The OLRSM suggests a risk based AQM Action Level for Particulate Matter less than 10 μm (PM10) of 150 $\mu\text{g}/\text{m}^3$, which has been approved for several other Site Remediation projects where concerns about potential fugitive dust impacts to the local community were raised. Also, there are no specific proposed responses to exceedances of the Action Levels. The RAWP does indicate on page 7 that *"Should the AQM results suggest contaminated fugitive dust has been generated, a reassessment of best management practices (BMPs) to suppress the dust will be performed."* If a sustained (i.e. greater than 5 consecutive minutes) exceedance of the dust AQM Action Level is detected, at a minimum all work causing the exceedance should be immediately halted until the dust generation can be controlled. Means to control the generation of fugitive dust (i.e. water truck, tank or direct water line hookup) should be available for periodic usage as appropriate at the Site during all construction activities with potential to generate dust from impacted soils.
8. Due to the level of interest and concern raised by area community members during the public participation portion of the regulatory process, the Department is requiring that a pre-construction meeting be held with appropriate Site representatives and DEM staff to make sure that everyone is familiar with the dust control and soil management requirements for the project, and to establish specific on site points of contact in case neighbors or members of the community contact the Department to report problems or concerns about remediation/construction related activities.
9. The Department has been made aware of the potential pending transfer of the subject property.

- a. Since the proposed remedy is integrated into the redevelopment of the property, please clarify if the proposed remedy remains consistent as proposed in the draft RAWP, and accounting for any changes to address the above listed Department comments, or if the new ownership may propose changes to the currently proposed redevelopment and remedy.
 - b. Please clarify if the roles of the parties identified in Section 3.7 (Contractors/Consultants) remain the same, and if not, who will be responsible for implementing the final approved remedy moving forward, and who will be directly overseeing the daily work to insure that the soil management and dust control requirements are being adhered to.
10. Please submit a RAWP Addendum that addresses the abovementioned comments on or before October 18, 2021.