



October 27, 2010

Ronald Gagnon, P.E.
Rhode Island Department of Environmental Management
Office of Technical and Customer Assistance
235 Promenade Street
Providence, RI 02917

**RE: RIPDES Application Number RIR50N009
434 & 444 Allens Avenue, Providence**

Dear Mr. Gagnon:

This correspondence is being written in response to your request for additional information for the above noted application. The following items correspond with the respective comments for Section 1, Water Quality and Dredging. Section 2, RIPDES Multi Sector Permit, will be addressed in a separate document by Mr. Paul Duarte of Garofalo Associates.

1) **Material Collection and Removal** – It is the intent of the applicant to only purchase vessels that have been fully decommissioned off-site. As part of the purchasing agreement between the applicant and the vessel's seller, there will be a contractual obligation for the seller to decommission each vessel in full before delivery to the site. Prior to the applicant taking possession of the vessel, a licensed Marine Chemist and Marine Surveyor will inspect the vessel to verify that the vessel has been properly decommissioned and no longer contains hazardous materials. The off-site decommission process will include removal of the following in accordance with all applicable requirements:

- a. oils/fuels/lubricants, including:
 - i. Structural and non-structural tanks
 - ii. Mercury thermometers and pressure measuring devices
 - iii. Combustion engines*
 - iv. Non-combustion engines*
 - v. Steering gear*
 - vi. Auxiliary machinery*
 - vii. Hydraulics
 - viii. Grease
 - ix. Oil/grease film on decks and floor coverings
 - x. Oil/grease on bulkheads and deckheads
- b. Asbestos & asbestos containing material (ACM)
- c. PCB's
- d. Bilge and ballast water
- e. Paint
- f. Other material of environmental concern

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* On occasion, vessels may be accepted with engines, steering gear, and auxiliary machinery which have not been removed or decommissioned. In such instances, these components will be decommissioned using the following procedures:

1. All fluids will be drained from the primary component and any associated lines.
2. The component and lines will be flushed using an approved cleaning detergent.
3. Component mounts will be removed. This will be achieved using hand tools. If needed, a pneumatic wrench will be employed. In cases where the mounts cannot be removed by hand or by pneumatic wrench, the mounts will be cut using a torch.
4. The detached component will then be affixed to an upland based crane and removed to the concrete work pad.
5. The removed components will then be sold for scrap.

Once the vessel has been satisfactorily decommissioned, the applicant will take possession and transport the clean vessel to the project site. Following off-site decommission and acceptance of the vessel to the project site, the metal cutting process will then commence in accordance with the following procedure.

The dismantling of the decommissioned vessel will begin with the installation of an in water full containment boom. The boom will be secured around the vessel during all in-water dismantling activities. Once the boom is in place, the pilot house will be removed. This portion of the process will be conducted using hand held torch rigs. Portions of the pilot house will be cut into manageable pieces, secured to a crane, and transferred to the upland work/storage pad. Once all above deck portions are removed, the whole hull is then lifted out of the water by a 200-ton crane and placed upon the work pad. Once on the pad, the hull will be processed using mechanical sheering equipment. Processed metal will be temporarily stored in appropriate containers located on the upland work/storage pad. The metal will be transported to an upland recycling facility for further processing and recycling.

- 2) **Site Plans** – Per your request, Coastline Consulting & Development, LLC has enclosed a full size site plan that depicts all aspects of the proposed project.
- 3) **Railway** – The railway is not intended as part of this application and has thus been removed from the plans. The label “Proposed Bulkhead Under Separate Application” was noted on Figure 3 of 4 dated November 30, 2009 as part of the Sediment Sampling Work Plan contained in the back of the application. This Figure is not part of the Assent Application figure set. The Assent application figures (1 – 14) dated February 10, 2010 show both the proposed bulkhead and dredging projects as being part of the same submittal.

- 4) **Construction Methodology** – Per your request, Coastline Consulting & Development, LLC has revised pages 2 & 3 of the application narrative (see enclosed) to describe the construction methodology of the proposed infiltration trench.
- 5) **Office of Waste Management Approval** – Per your request, Coastline Consulting & Development, LLC has obtained documentation of approval (see enclosed) from the Office of Waste Management for the proposed bulkhead and associated infiltration trench.
- 6) **Upland Excavation** – Following a discussion with Mr. Dan Goulet from the Coastal Resource Management Commission on January 21, 2010, it was determined that the upland area should first be excavated to the MHW elevation of +4.4' MLW datum. Approximately 500 cubic yards of material will be removed as part of the upland excavation.
- 7) **Sediment Sampling Protocol Form** – Per your request, Coastline Consulting & Development, LLC has enclosed the completed sediment sampling protocol form and a depiction of the proposed sampling locations. All sampling will be taken to the proposed dredge depth and will conform to protocols as outlined in the Inland Testing Manual and Rule 7 of the Dredging Regulations.

I hope the enclosed information will allow you to complete your full application review. Should you have any further questions, please contact me at 203/245-8138.

Sincerely,



David R. Provencher
Project Manager
Coastline Consulting & Development, LLC

Enclosures:
Project Plans (Full Size)
Application Narrative (Revised)
Correspondence from Office of Waste Management
Sediment Sampling Protocol Form
Sediment Sampling Plan

cc:
Dan Goulet, CRMC
Ross Singer, OWM
Eddie Sciaba

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FULL SIZE PROJECT PLAN