



RECEIVED
D.E.M. / O.W.M.

2011 SEP 26 P 2:52

September 19, 2011

Mr. Eddie Sciaba
Rhode Island Recycled Metals, LLC
434 Allens Avenue
Providence, RI 02905

RE: 2011 Annual ELUR Inspection for Property at 434 Allens Avenue
Providence, Rhode Island

Dear Mr. Sciaba:

In accordance with your request, Lake Shore Environmental, Inc. (LSE) has completed an annual inspection of the referenced property and the associated clean-fill soil cap. The Soil Management Plan (SMP) for the property dated January 29, 2003 describes the requirements for an annual inspection in accordance with provisions outlined in the Environmental Land Use Restriction (ELUR) which was recorded in the City of Providence Land Evidence Records by Mapleville Main, Inc. (MMI) on February 3, 2003. The Property is located at 434 Allens Avenue and is identified as Plat 47, Lot 601 and Plat 55, Lot 10. The previous ELUR report submitted to RIDEM was dated October 23, 2007.

The objective of the annual inspection was to assess the current condition of the soil cap and verify that:

1. No residential use of the Property has occurred,
2. No groundwater at the Property is used as a potable water supply,
3. Soil at the site is not disturbed without written permission from the Rhode Island Department of Environmental Management's (RIDEM), and
4. Soils at the property are properly maintained in accordance with the Department-Approved SMP in order to prevent human exposure to soils containing hazardous substances at concentrations exceeding the applicable Direct Exposure Criteria pursuant to the Remediation Regulations.

Brief Summary

After remaining a vacant parcel since the Site was capped with clean fill in 1999, Rhode Island Recycled Metals (RIRM) enter onto a lease to use the property to conduct a metal salvage business and began salvage operations in 2010. RIRM's metal salvage operations involve the decommissioning and salvage of ferrous and non-ferrous metal derived from marine and automotive sources. Salvage activities with the potential to damage the soil cap include stockpiling of scrap metal and cars and movement of heavy equipment across the Site.

Modifications to the Site that have been authorized by RIDEM and implemented by RIRM include:

- Excavation within the Soil Cap for buried electrical repairs (RIDEM acknowledgment of requested electrical repairs on March 29, 2010),
- Excavation within the Soil Cap for emergency water line repairs during the winter months,
- Excavation within the Soil Cap for construction of a sewer line.

In addition, RIRM submitted an application to the RIDEM for construction of a waterfront bulkhead. RIDEM acknowledged the application on May 6, 2010 and requested that a Closure report be completed at the conclusion of construction. On June 22, 2010, RIRM also submitted to RIDEM a Stormwater Pollution Prevention Plan (SWPPP) and notice of intent to discharge stormwater associated with industrial activity under the RI Pollutant Discharge Elimination System (RIPDES) Multi-Section General Permit.

Based on LSE's inspection of the property, we have confirmed that no residential use of the property has occurred and no potable use of groundwater at the property has occurred. With the addition of the ground asphalt armored base, the underlying soil cap will remain adequately protected as long as inadvertent damage to the base is immediately repaired. Any remaining areas of the Site not yet covered with the armored base should be covered in the near future.

Site Inspection

On August 26, 2011, Mr. David Hazebrouck of LSE visited the six-acre site with the intent of inspecting the parcel for compliance with conditions specified in the recorded ELUR for the property.

The entire property remains enclosed within a chain link fence and entry to the property was gained through a locked gate bordering Allens Avenue in the southwest corner of the site. Entry gates are also present at the northwestern side of the property (adjoining Allens Avenue) and along the northeast site boundary.

The site conditions were significantly different than those observed by LSE in 2005 during a previous ELUR inspection of the parcel. The garage buildings near the entrance to the property on Allens Avenue are still present and two office trailers and a scale are now located near the southwest property line. Near the western side of the property are numerous roll off containers, two rail cars and several semi-truck trailers. A temporary structure located east of the office trailers provides cover over the vehicle under carriage stripping area. Numerous piles of unprocessed and crushed cars are present primarily along the southern half of the property. The eastern edge of the property adjacent to the Providence River is used for storage of marine-related scrap and the northern sides of the property are used for stockpiles of steel and aluminum. The concrete foundation of former structures located near the northern property line still remain in place.

The majority of the central, southern and western sides of the property are adequately covered either with former concrete slabs or have been covered by RIRM with compacted ground asphalt which provides a durable armored surface that appears to resist disturbance by heavy equipment. However, the marine salvage areas near the Providence River have not yet been covered with the ground asphalt and therefore, mounds and depressions of disturbed soil cap material up to a foot or more in height difference were observed in this area. Another area where significant soil cap disturbance was observed is on the north side of the concrete foundations located near the northern property line. Based on conversations with RIRM representatives, RIRM plans to eventually cover the entire property with the compacted ground asphalt.

The stockpile of soil excavated during a wintertime emergency water line repair that was observed by RIDEM during their July 14, 2011 Site inspection was reportedly returned to the excavation. No evidence of this excavation or stockpile was observed during LSE's site visit.

Recommendations

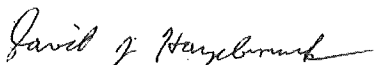
In general, current Site activities and uses are dramatically different from those in 2005 although the Site is well suited to the metal salvage operations currently conducted by RIRM. The current salvage operations involve stockpiling of metal debris and the movement of heavy equipment across all areas of the property with the associated potential for damage to the existing soil cap.

Approximately 65 to 70 percent of the land surface has been covered with compacted ground asphalt which serves as an armored base to protect the underlying soil cap. Areas that have not yet been covered with this material show signs of disturbance to the soil cap so it is imperative that the ground asphalt be extended to include all areas of the Site. In addition, any inadvertent damage to the armored base should be immediately repaired.

As required by the existing SMP, any planned excavations through the soil cap should first be presented to RIDEM for approval/comment and any disturbed soil media should be returned to the excavation or transported off-site to a licensed facility for disposal. Under separate cover, a schedule for implementing planned construction of the waterfront bulkhead and other anticipated modifications to the soil cap will be submitted to RIDEM in the form of a Corrective Action Plan.

If you have any questions regarding this correspondence or this site, please feel free to contact the undersigned.

Sincerely,



David J. Hazebrouck, P.G., LSP, LEP
Principal

Attachments: Site Photographs

SITE PHOTOGRAPHS



Central portion of the RIRM site looking east



View looking southeast of ground asphalt armored base



Area of soil cap disturbance along Providence River



Area of disturbed soil cap along northern property line