

RI Recycled Metals, LLC

May 20, 2015

434 Allens Avenue,

Providence, Rhode Island

SR-28-0143

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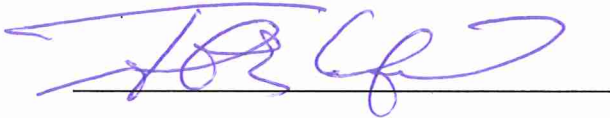
I went to the abovementioned facility with Jill Eastman of the Department's Emergency Response Section to conduct a visual inspection of the compliance status of the site remediation cap which was installed in 2002 followed by an Environmental Land Usage Restriction (ELUR) and Soil Management Plan (SMP) being recorded in the Land Evidence Records for the City of Providence on February 5, 2003[Book 5580, Pages 6-25].

We arrived at the facility at approximately 9:00 am, parked next to the weigh station, and entered the facility. No one came out to speak to us and it appeared that no one was actively working around the property (see photos). From my first observations it was clear that the surface and subsurface soils have been disturbed greatly in areas from the use of heavy equipment. There were pieces of scrap metal, car parts, auto fluff, barge foam, metal objects, rubber, wood and other debris scattered about the property along with areas of dark colored soils where it appeared that unknown fluids (possibly diesel fuel and other petroleum materials, antifreeze and other hazardous materials) had spilled and have been driven through multiple times. There does not appear to be any clean capping soils covering the site and the surface of the property is not uniform potentially allowing for storm water or other precipitation to infiltrate into the ground soils. Some scrap metals have been segregated into piles of different types and a pile of old 55 gallon drums were present.

In the waterfront area, obvious excavation below the surface has occurred and two piles of contaminated soils/sediments are stockpiled and covered with blue tarps from waterfront excavation activities. Hay bales with black silk screen are present in a portion of the area to stop direct runoff into Narragansett Bay, however, in my opinion heavy precipitation (rainfall) will easily flush contaminants past the barrier of hay and silt fence. Some waste materials are present in the vertical face of the

excavation along with several barges, a submarine hull and what appears to be a sunken ship (see photos).

At approximately 9:30am we departed the site and returned to the Office. In my opinion the site is out of compliance with the ELUR and the activities of the operation have jeopardized the integrity of the cap. The property needs to be completely cleaned of all solid waste and recycled materials and then completely investigated for hazardous material releases to soils, groundwater and the river sediment. After completion of the Site Investigation, remedial alternatives need to be proposed to address all site contamination in soils, groundwater and sediments which will permanently remove all contamination from the site for proper disposal or permanently encapsulate the contamination with long term site monitoring of groundwater, site surface water controls and waterfront sediment and surface water.



Jeffrey Crawford

Principal Environmental Scientist

Office of Waste Management-Site Remediation Section