May 19, 2023

Ms. Kelly Owens
Rhode Island Department of Environmental Management
Office of Land Revitalization & Sustainable Materials Management
235 Promenade Street
Providence, RI 02905

RE: Site Investigation Report – Work Plan
Rhode Island Recycled Metals, LLC Site
434 Allens Avenue, Providence, RI
LSE Project No. 09050H10

Dear Ms. Owens:

The following is a brief work plan describing proposed subsurface investigations at the subject Site in Providence, Rhode Island that is identified as AP 47, Lot 601 and AP 55, Lot 10. We understand that the Rhode Island Department of Environmental Management {(RIDEM), i.e. the Department)} has requested that a Site Investigation Report be completed in accordance with Section 1.8 of the Remediation Regulations. This request was stated in a draft Consent Agreement between the Department, the RI Attorney General and the owners of the Property (Rhode Island Recycled Metals).

**Background**

The subject Site was previously owned and occupied by Mapleville Main, Inc. (MMI; formerly known as Metech International, Inc.) and during those former activities, polychlorinated biphenyls (PCBs) were released causing impacts to surficial soil. MMI completed limited excavation/off-site disposal of PCB hot spots and capped the Site with 8,000 cubic yards of imported soil that was covered with a vegetative layer. This cleanup was documented in a report entitled: PCB Cleanup Verification Report (April 1998, revised February 1999). The report documents the collection of over 250 surficial soil samples collected for cleanup verification. None of the verification samples contained PCBs at a concentration greater than 10 parts per million (ppm). Part of the remedy for the Site included the recording of an environmental land use restriction (ELUR) on February 2, 2003.

We understand that Rhode Island Recycled Metals, LLC (RIRM) subsequently entered a lease/purchase agreement to utilize the referenced Site for automotive/metal recycling operations. In addition to MMI's construction of a Site-wide engineered barrier and recording of an ELUR at the Property, seven groundwater monitoring wells were also installed by MMI as part of corrective actions at the Site. In order to allow RIRM to establish a baseline of groundwater quality before initiation of their own metal recycling operations at the Site, a groundwater monitoring event was completed by LSE in August 2009 and a second monitoring event was completed in October 2011. Analytical results from both events confirmed that groundwater quality at the Site has been minimally impaired by historic and ongoing Site

activities and no constituent concentrations were found to exceed GB Groundwater Objectives. LSE also collected 12 soil samples from two soil stockpiles excavated in 2015 to create a ramp to facilitate vessel salvage activities. Analytical results indicated that PCB concentrations in the stockpiles ranged from the reporting limit of 0.1 mg/kg to 0.92 mg/kg and none of the detected PCB concentrations exceeded RIDEM's Method 1 direct exposure criteria or leachability criteria of 10 ppm (mg/kg). The highest total PCB concentration detected was 1.78 ppm in one of twelve samples tested.

## SIR Objectives

The objective of this SIR is to assess the nature and extent of current impacts in surficial soil and subsoil at the Site. Site groundwater does pose a threat to human receptors as it is classified GB, is not in a potable water resource area and is likely to contain impacts from surrounding industrial properties along Allens Avenue.

Due to the wide range of contaminants previously present in Site soil and in automotive fluids associated with former RIRM operations, each soil sample will be analyzed for the full suite of contaminates listed in Table 1 of the Remediation Regulations. These will include:

- Total Petroleum Hydrocarbons (TPH)
- Volatile Organic Compounds (VOCs)
- Semi-VOCs
- PCBs, and
- Priority Pollutant 13 Metals

Sample locations will be selected to be spatially representative of the Site and sampling depths will include samples from 1.5 feet below grade and samples from 7 feet below grade (i.e. two soil samples from each boring).

## SIR Scope

The SIR scope will be consistent with that listed in Section 1.8.3 of the Remediation Regulations. A total of six soil borings will be advanced at approximate locations shown in the attached Site plan. The borings will be advanced using direct-push equipment and soil samples (12 total) will be collected with a five-foot long Macrocore sample barrel. The borings will be advanced to a maximum depth of 10 feet below grade.

In addition to the soil boring samples, two composite soil samples will be collected from each existing soil stockpile (four total) and submitted for analysis of the same full analyte suite as listed above. Each submitted sample will be collected from 4 discrete samples of the pile.

All drilling activities will be overseen by a licensed professional geologist. All soil samples will be field screened for VOCs using a photo-ionization detector (PID) equipped with a 10.6 eV lamp and calibrated to 100 ppm by volume as isobutylene. Soil samples from the preselected

depths will be collected in laboratory provided bottles and kept chilled until delivered to New England Testing Laboratory under chain of custody. All analytical data will be tabulated and compared to applicable DEC and Leachability Criteria.

Based on the SIR Findings, a minimum of two remediation alternatives will be evaluated in accordance with Section 1.8.4 and the preferred remedy will be selected. The SIR will be certified as required in Section 1.8.5.

**SIR Schedule**

Following Department approval of this SIR Work Plan, LSE will obtain a dig-safe ticket, schedule the drilling task, and mobilize for field sampling. We anticipate that the SIR field tasks will be completed within 4-6 weeks of Department approval. The Report will be prepared and submitted within 4 weeks of completing all field sampling tasks.

Feel free to contact the undersigned if you have questions or comments regarding this proposed SIR Work Plan.

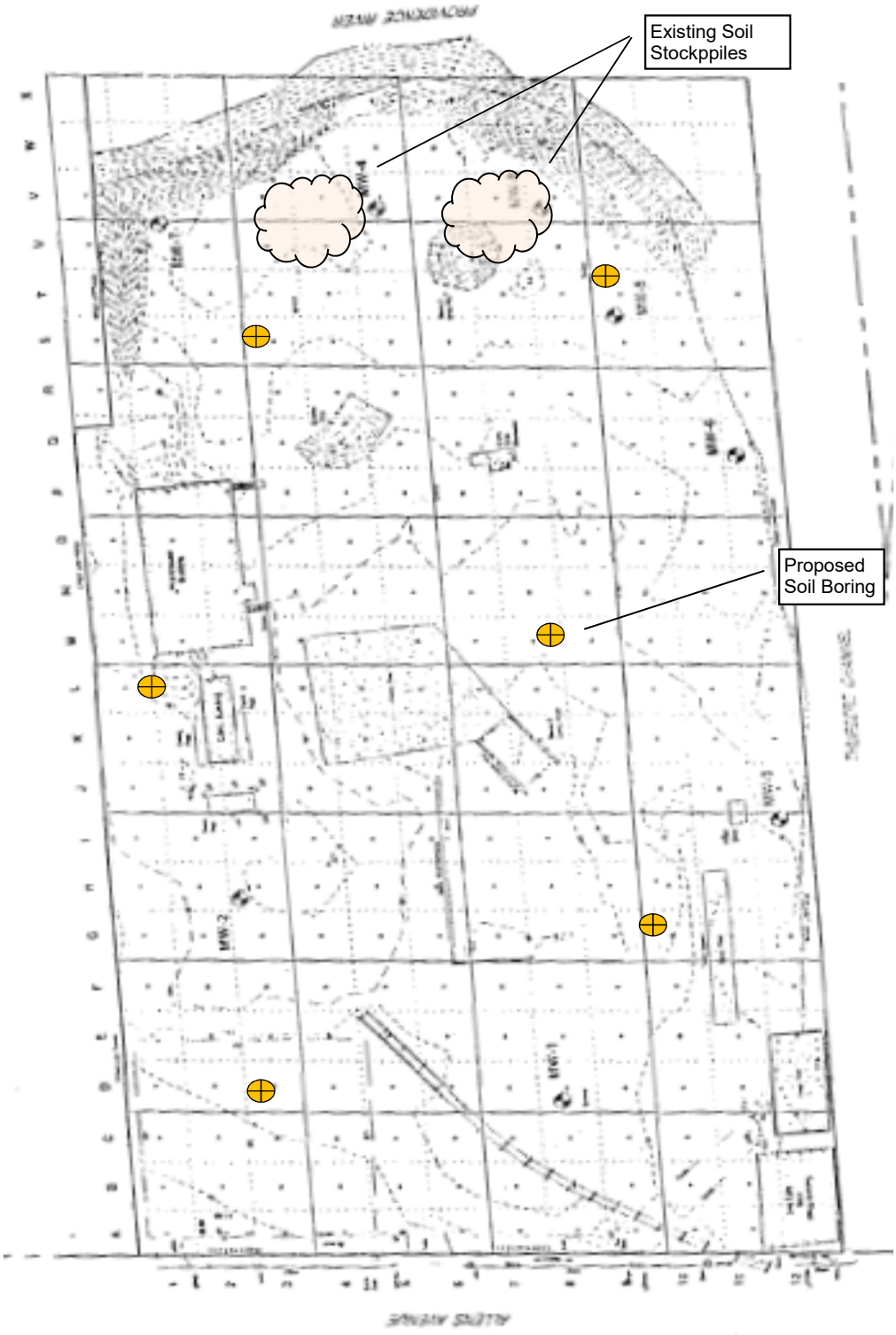
Sincerely,

**Lake Shore Environmental, Inc.**

David J. Hazebrouck

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

Attachments

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|---|---|
| *Figure No.* | **1** |
| *Drawing Title:* | Soil Boring plan<br>434 Allens Avenue<br>Providence, RI |
| *Date Prepared* : 5/20/2023 | *Prepared By:* DJH |
| *Approxomate Scale:* | NTS |
| *LSE Proj. No.* 09050H10 | |

Source: Map Dimensions taken from Google Earth.