



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT

235 Promenade Street, Providence, Rhode Island 02908

SIR COMMENT LETTER

File No. SR-28-0143

(Formerly Case No. 99-060)

December 27, 2023

David J. Hazebrouck, P.G., LSP, LEP
Principal
Lake Shore Environmental, Inc.
359 Putnam Pike, Suite 105
Smithfield, R.I. 02917

RE: Site Investigation Report
Rhode Island Recycled Metals, LLC
434 Allen's Avenue
Providence, R.I.
Plat 47, Lot 601
Plat 55, Lot 10

Dear Mr. Hazebrouck:

The Rhode Island Department of Environmental Management's (the Department) Office of Land Revitalization and Sustainable Materials Management (LRSMM) has reviewed the Site Investigation Report (SIR) for the above referenced property (the Site), which was submitted on December 13, 2023, by Lake Shore Environmental, Inc. in accordance with 250-RICR-140-30-1, Section 1.8 of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations).

After careful review of the SIR, 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 Program Letter. You are hereby directed to provide the necessary responses to supplement the SIR (including providing the additional testing results) by **January 15, 2024**.

Sincerely,

Jeffrey Crawford, Project Manager
Environmental Scientist III
Office of Land Revitalization &
Sustainable Materials Management

Site Investigation Report, received December 13, 2023
Prepared by Lake Shore Environmental, Inc.
Rhode Island Recycled Metals, LLC
434 Allen's Avenue
Providence, Rhode Island

1. Soil Gas Sampling

- a. Sections 2.11 and 2.12.1 of the SIR refers to “concentrations of contaminants in soil gas.” The response to this Comment Letter should acknowledge that exact concentrations of VOCs in soil gas were not obtained but rather field screening via jar headspace method with a photo ionization detector (PID) was utilized.
- b. In one portion of the report, LSE states that Soil Gas samples were collected in plastic bags, allowed to equilibrate for 5 minutes, and then sampled. In another portion of the report, LSE states that Soil Gas samples were collected in jars, allowed to stabilize, then sampled. Please explain the discrepancy in the sample collection method description. Also describe any additional details with regard to sample collection such as outdoor temperature, how long samples were allowed to equilibrate and where, etc.
- c. LSE states that “elevated readings” were not recorded. Explain this in detail.

2. Chain of Custody

In the Chain of Custody provided in the SIR Report, it appears that surface soils and groundwater samples were obtained on 11/8/2023, delivered to the laboratory on 11/9/2023, analyzed between 11/10/2023-11/14/2023, and reported out by the lab in a Report dated 11/16/2023. However, the report states that the Metals were analyzed on 11/16/2023. Please explain.

3. Analytical Results: Soil Boring Samples

- a. The SIR states that of “two of the samples, detected lead concentrations exceeded the I/C-DEC.” The surficial sampling (“SS-“ series) detected two additional locations where lead exceeds the I/C DEC, bringing the total number of locations containing lead above the I/C DEC to four. The response to this Comment Letter should provide a summary that addresses the results from all sampling collectively.
- b. Please have soil samples containing the highest concentrations of total lead analyzed for TCLP-Lead via EPA Method 1311. Samples should include, but not be limited to, B1-S2, B7-S1, SS-9, and SS10. In the event that the lab no longer has possession of these samples, please submit a plan for Department approval to collect new soil samples to be analyzed for TCLP-Lead.

- c. Several metals were detected in Site soils at totals concentrations above their respective “20 times” concentration, at which TCLP analysis is recommended to determine if the material is characteristically Hazardous Waste. In addition to the TCLP-lead analysis mentioned in the previous comment, the Department is requiring that the following samples, based on the results of the total metals analysis, be analyzed via TCLP for the respective metals listed:
 - i. B3-S2 – TCLP Mercury (total mercury – 4.07 mg/kg)
 - ii. B4-S1 – TCLP Selenium (total selenium – 56.7 mg/kg)
 - iii. B7-S1 – TCLP Chromium (total chromium – 284 mg/kg)

4. Remedial Alternatives

LSE has identified Alternative #1 as their client’s preferred remedial alternative. The Department finds Alternative #1 will not properly remediate the Site. In order to protect the site soils and groundwater, a permanent impermeable cap with a storm water treatment/collection system that meets all applicable Federal and State Rules and Regulations is warranted, in addition to prior removal and disposal of the two soil piles. In order to avoid the need to modify the stormwater collection and treatment system, it should be designed based on consideration of future site uses, which may be subject to industrial stormwater permitting requirements under the Rhode Island Pollutant Discharge Elimination System (RIPDES) Program and/or the Coastal Resources Management Council (CRMC).

The identified exceedances of the Industrial/Commercial in soil are the drivers for requiring a permanent impermeable cap.¹ VOCs were identified in the soils and groundwater in low concentrations (constituents of gasoline, Trichlorofluoromethane (Freon 11), 1,2,2 Trichloro propane (degreasing solvent), and total petroleum hydrocarbons), along with SVOC’s, Inorganic Metals, PCBs, and TPH. Although LSE identified low concentrations of VOCs, their presence along with SVOCs, Metals, and TPH in surface soils and subsurface soils at concentrations above the industrial/commercial criteria from the surface to approximately eight feet in depth must be factored into the selection of a remedy that will prevent contaminants from actually and potentially impacting soil and groundwater.

¹ Pursuant to Section 1.9.7 of the Remediation Regulations, “Upper Concentration Limits are not cleanup standards.”