



February 1, 2024

Jeffrey Crawford, Environmental Scientist III
RIDEM Office of LRSMM
235 Promenade Street
Providence, RI 02908

RE: Response to Department Comments Letter
Public Involvement Plan (PIP - January 11, 2024)
434 Allen's Avenue
Providence, Rhode Island
Plat Map 47 / Lot 601 & Plat Map 55, Lot 10
RIDEM File No. SR-28-0143

Dear Mr. Crawford:

This correspondence is provided in response to the Department's January 11, 2024 comments regarding Lake Shore Environmental's (LSE) Draft Public Involvement Plan (PIP) for the referenced Site dated December 28, 2023. Department comments shown below are in italics.

1. Public Access to Electronic Files

The Department has created the following link for the Site to maintain public access to site remediation documentation: <https://dem.ri.gov/node/22871>. Please replace the "Plover" links in the draft PIP with the provided URL. In addition, the QR code at the end of this letter can be used to access the site files posted on the Department's website. The Department recommends including the QR code on future public notices.

LSE acknowledges and accepts this recommendation. As the list of Site documents linked to this URL significantly predates RIRM's involvement, a short note was included after the QR code to provide chronological context to the documentation listing.

2. The property description in the PIP needs to match the property description in the Site Investigation Report (SIR). The SIR states that the "13-acre subject Site is identified as Assessors Plat 47, Lot 601 and Plat 55, Lot 10." However, the stated property description in the draft PIP is written as 11.7 acres and only lists Plat 47, Lot 601 (omitting Plat 55, Lot 10). Please update the PIP to match the SIR.

The PIP has been updated to include the same reference to the Property as is made in the SIR.

3. *The PIP states “RIRM will submit a written summary of all public meetings to RIDEM in hard copy and electronic format within 72 hours of the meeting or as soon as possible thereafter.” That deadline can be clarified and extended. The Department will require that the written summary be submitted to the Department “as soon as possible but no later than 30 days after the public meeting.”*

LSE accepts the extended timeline for submitting written summaries for all public meetings and the change is shown in the updated PIP.

4. *Please delete the last paragraph under “Project Background” (discussing RIRM’s preferred remedy) and replace it with “At this time, RIDEM is still evaluating proposed remedial alternatives and has not issued any approvals.”*

The Remedial Alternatives Section of the SIR is an integral part of the SIR and should not be removed entirely from the PIP. Accordingly, LSE has replaced the last paragraph in the Background Section of the PIP with the following:

- **Considering that the prior remedy for the Site included a combination of engineered and institutional controls, it is appropriate to implement a similar/improved remedy that incorporates provisions for a stormwater management system. At this time, RIDEM is still evaluating proposed remedial alternatives and has not issued any approvals.**

5. *Please delete all text in the “Project Background” after the sentence: “As documented in the Site Investigation Report (SIR) prepared in December 2023, impacts to soil were detected at concentrations that represent RIDEM Method 1 exceedances as defined in the Remediation Regulations.” Replace with a section that specifically lists out all exceedances of the I/C DEC criteria in bullet format, without additional characterizations, interpretations, or narratives.*

Simply listing all exceedances of the I/C-DEC identified in the SIR would misrepresent our actual findings as there would be no context, especially for the lay person with no technical background. Therefore, we do not agree that this text, which is factual and provides context, should be removed

6. *The October 20, 2023, pre-SI public notice was also sent to the below-imaged list of interested parties. Please add in “and other interested parties as directed by RIDEM” when discussing the parties to which pre-SI notice was issued to under “Prior Public Involvement.” Additionally, when discussing the creation of the mailing list regarding all future notices under “Public Notice,” it should be clear that these interested parties are also part of the future mailing list.*

Section 3.0 of the PIP has been revised as requested to read as follows:

This notification included mailing public notices on October 20, 2023 to all abutting property owners, tenants, easement holders, municipalities and other interested parties as directed by RIDEM which detailed information regarding the nature and timing of the proposed field activities.

Section 5.0 of the PIP has been revised as requested to read as follows:

RIRM has established a mailing list for the Site previously used for distributing Pre-SIR Public Notice and individuals on this same list will receive future Public Notice information.

If you have any questions regarding these responses to Department comments or the project in general, please feel free to contact the undersigned.

Sincerely,



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

Attachments

C: Richard Nicholson, Nicholson & Associates, LLC