



**RHODE ISLAND**  
**DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**OFFICE OF LEGAL SERVICES**

235 Promenade Street, Room 425  
Providence, Rhode Island 02908

February 5, 2024

*Via e-mail only to [rich@rilawcpa.com](mailto:rich@rilawcpa.com) and [rland@crflp.com](mailto:rland@crflp.com)*

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AARE, LLC (Owner)  
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Rhode Island Recycled Metals, LLC (Operator)  
c/o Richard Nicholson, Esq.  
Nicholson & Associates, LLC  
9 Thurber Blvd. Suite D  
Smithfield, RI 02917

RE: RIDEM Response to RIRM PIP Version 2.0  
Rhode Island Recycled Metals, LLC  
434 Allen's Avenue, Providence, R.I.  
Plat 47, Lot 601  
Plat 55, Lot 10

Dear Attorney Nicholson:

The Rhode Island Department of Environmental Management (RIDEM) has reviewed the Public Involvement Plan Version 2.0 (PIP) submitted by Lake Shore Environmental, Inc. (LSE) for the Rhode Island Recycled Metals LLC (RIRM) site at 434 Allens Ave in Providence, R.I. (Plat 47, Lot 601 and Plat 55, Lot 10) (the "Site") on February 1, 2024. RIDEM will approve the draft PIP to move forward to the public comment and meeting phase, with the final edits explained below. PIP Version 3.0, incorporating these final edits, is due **February 16, 2024**.

1. Correct file name for publicly accessible RIDEM files. Please revise the references to the RIDEM file name to read “RI Recycled Metals (Former Boliden).” This edit is required on Page 1, Para. 1 and Page 8, last Para.
2. Specify Industrial/Commercial or Residential when referencing soil objectives and exposure criteria. Please add a reference to Industrial/Commercial or Residential in the following references to soil objectives and exposure criteria on Page 5.
  - a. RIDEM Method 1 Soil Objectives reference in Para. 3.
  - b. RIDEM Method 1 Soil Objectives reference in Bullet 1.
  - c. DEC reference in Bullet 3.
  - d. DEC reference in Bullet 4.
  - e. DEC reference in Bullet 5.
3. Define PAH. On Page 5, Bullet 2, write out “Polycyclic Aromatic Hydrocarbons (PAH).”
4. Clarify reference to “regulatory exceedances.” Please edit the last sentence of the third Para. on Page 5 as follows:

No other ~~regulatory~~ exceedances of standards under the Remediation Regulations were detected in other environmental media.

5. Revise sentence regarding RIRM’s proposed remedial alternative. RIDEM requires the following edit to the first Bullet on Page 6:

Considering that the prior remedy for the Site included a combination of engineered and institutional controls, ~~it is appropriate~~ RIRM has proposed 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.

6. Replace Plover websites with the Site Remediation website link. Two Plover links, found on Page 9, first Para. and Page 9, second to last Para., must be replaced with the following link: <https://dem.ri.gov/node/22871>

Finally, RIDEM has two requests relating to the change in phone number for Jeff Crawford.

1. Please be sure that the new phone number is used in future public notices and fact sheets.
2. For the sign posted at the Site that contains the contact information for Mr. Crawford, please update it with the new phone number.

Sincerely,

*/s/ Jenna Giguere, Esq.*