



Meeting Minutes

Rhode Island Recycled Metals, Providence

Meeting held at the Department of Environmental Management, Conference Room 300 on May 9, 2024.

Meeting Participants

See attached attendance sheets.

Purpose of the Meeting

The purpose of the meeting was to review the 75% Stormwater Plan submission, the Site Investigation Report and April 30, 2024 review letter, and the need for additional site testing as a result of the recent metal pile fire (April 10, 2024).

Meeting Minutes

- The representatives from Rhode island Recycled Metals (RIRM) noted that the location of the metal pile that had burned was not accurately depicted. The required testing location for TPH, VOCs and PAHs should be revised to be consistent with the location of the metal pile and the location of the fire fighting activities. DEM agreed to a site meeting to determine the correct area for further site investigation and testing.
- RIRM requested an extension to the June 1 deadline for a response to the DEM April 30, 2024 letter to June 17. DEM agreed to the extension.
- A Public Involvement Plan (PIP) is required as part of the Site Remediation review and approval process (Rule 1.8.7 E). The purpose of the PIP is to inform the public and to allow participation in cleanup planning. RIRM indicated that they would prefer that DEM issue the Program Letter prior to the PIP meeting to answer SIR questions that may be asked by the public. DEM indicated that due to the time elapsed since the petition was initially submitted, the public meeting to discuss the draft PIP must be held prior to the issuance of the Program Letter. DEM indicated it would be present at the meeting

and can provide a transcript from a previous PIP meeting for guidance on how the PIP meeting should be conducted. While the purpose of the PIP meeting is to present and solicit feedback on the draft PIP, it is advisable to also provide an update during the meeting regarding the status of the ongoing environmental investigation. Site Remediation files are public record and questions regarding the environmental investigation are likely to be brought up by members of the community.

- The 75% Stormwater Management Plan prepared for compliance with the RIPDES Multi-Sector General Permit Associated with Industrial Activity was reviewed. The plan notes that stormwater will be concentrated to one underground BMP for storage treatment and discharge from one outfall to the Providence River. The plan also noted a gravel area adjacent to the river for a proposed ship and vessel breaking operation. Stormwater runoff from this area is proposed to remain untreated.
- DEM indicated that the proposal for ship breaking activities is not eligible for coverage under the Multi-Sector General Permit and application for an Individual Permit would be required. DEM noted that this type of activity would require a significant submission and review of information and would include a public notice requirement. The issuance of an individual permit would take approximately 6 months to develop a draft permit, which is not guaranteed to be approved. DEM noted that a more detailed plan for the ship breaking operations would be required to indicate locations of processing equipment, torch cutting, shearing and shredding equipment that will or may be used. DEM offered to provide a draft permit for a previous proposal that was not pursued and noted that additional monitoring and other conditions may be included. (The draft permit was provided shortly after the meeting.) DEM indicated that a separate pre-application meeting should be scheduled for this proposal if it is decided to include this activity at the facility.
- RIRM indicated that it would consider limiting its ship breaking activities to barges and similar vessels that range from 25 to 135 feet in length. The vessels would not include engines or equipment that could contain petroleum products or other related liquids. DEM noted that this would still be considered ship breaking and could not be covered under the Multi-Sector General Permit.
- It was suggested that permitting for the facility could be conducted in two phases; one application under the Multi-Sector General Permit may be pursued initially for the recycling operations. The issuance process for a Multi-Sector General Permit would take less than 30 days if a complete Notice of Intent is submitted. Later the applicant may want to apply for an Individual RIPDES Permit prior to undertaking any proposed ship breaking activities at the site. Per Part I.G.2 of the 2019 RIPDES MSGP when an

individual permit is issued to a permittee authorization to discharge under the RIPDES MSGP would be terminated on the effective date of the individual permit. As a result, the RIPDES individual permit application would need to address all activities at the site (i.e., recycling and ship breaking).

- DEM noted that the facility will also require a permit from the Coastal Resources Management Council (CRMC).

To facilitate review of the permit applications, please include a copy of these notes with your application submittal. This meeting summary does not relieve the property owner from his/her obligation to obtain any local, state, or federal approvals or permits required by ordinance or law.

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF TECHNICAL & CUSTOMER ASSISTANCE
 MEETING SIGN IN SHEET

Site Project Name: BIRM
 Site Address:
 Meeting Date: MAY 9 2024

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