



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

August 23, 2024

Lake Shore Environmental, Inc.
Attn: David J. Hazebrouck
Via email: dhazebrouck@lakeshoreenvironmentalri.com

RE: Remedial Design Comment
Rhode Island Recycled Metals, LLC
434 Allen's Avenue, Providence, R.I.
Plat 47, Lot 601
Plat 55, Lot 10

Dear Mr. Hazebrouck:

The Department of Environmental Management (the Department), Office of Land Revitalization & Sustainable Materials Management (LRSMM) has reviewed the letter submitted by Lake Shore Environmental dated July 9, 2024 entitled "*Response to Request for Additional Detail – Conceptual Remedy for On-site Encapsulation of Regulated Soil at RIRM Site,*" for the above referenced property (the Site) in accordance with 250-RICR-140-30-1, Section 1.8 of the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations).

The Department is requiring a response to the following comment by **September 20, 2024**.

It is the Department's understanding that, following the completion of remedial work, the intention is to continue metals recycling operations, requiring the regular use of heavy equipment, some of which weigh over 125 tons as noted in the July 9, 2024 *Response to Request for Additional Detail – Conceptual Remedy for On-site Encapsulation of Regulated Soil at RIRM Site*. As such, it is important that the remedial specifications are based not only on preventing direct exposure of jurisdictional soils to humans working at the Site, but also on preventing potential future releases from migrating to sub-surface by taking into consideration the potential for degradation of the capping materials that can be expected as a result of the daily operations and the use of heavy equipment and loaded trucks.

To ensure that the proposed remedial encapsulation (e.g., concrete, asphalt, aggregate subbase layers) remains effective long-term, the Department is requiring that the RAWP include a separate report, prepared and stamped by a Rhode Island registered professional structural engineer, that includes minimum specifications for all capping scenarios and materials (e.g., grade, thickness, rebar, etc.). The structural engineer's report should include

all Site-specific information and assumptions used in determining the recommended specifications.

The Program Letter can be issued for the Site if the preferred remedial alternative removes the specifications pertaining to encapsulation thicknesses and states that the exact specifications for each capping scenario will be determined in consultation with a registered professional structural engineer and presented as part of the Remedial Action Work Plan.

If you have any questions regarding this letter or would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 537-4039 or by E-mail at ashley.blauvelt@dem.ri.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Ashley Blauvelt", with a long horizontal flourish extending to the right.

Ashley L. Blauvelt, P.E.
Environmental Engineer IV
Office of Land Revitalization &
Sustainable Materials Management