



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT

235 Promenade Street, Providence, Rhode Island 02908

PUBLIC NOTIFICATION & COMMENT PERIOD EXTENSION **File No. SR-28-0143**

November 21, 2024

RE: Public Notification Information
Rhode Island Recycled Metals, LLC
434 Allens Avenue, Providence, RI
Plat Map 47 / Lot 601 & Plat Map 55 / Lot 10

In accordance with 250-RICR-140-30-1, the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations), the Rhode Island Department of Environmental Management's (the Department) has received and approved a request to extend the Post-Site Investigation Comment Period by 30 days. The Post-Site Investigation Comment Period regarding the conceptual remedy that has been proposed for the Site is extended to December 23, 2024.

As a matter of clarification, there are two public information and comment periods that are occurring simultaneously regarding Rhode Island Recycled Metals (RIRM). The first is the ongoing Public Information Plan (PIP) Process soliciting comments on the PIP. The second is the Post-Site Investigation Comment Period soliciting feedback on the technical feasibility of the conceptual remedy that has been proposed.

The preferred conceptual remedy under consideration proposes:

- The encapsulation of all site soils such that:
 - direct exposure to jurisdictional soils is eliminated;
 - site soils cannot leave the site through wind, stormwater, or vehicle traffic; and
 - infiltration of stormwater through site soils is prevented.

The specifications (materials, design, thickness, etc.) shall be determined in consultation with a Rhode Island registered Professional Engineer specializing in structural engineering. The structural engineer must provide recommended site-specific encapsulation specifications for a site-wide impervious cap(s) that will provide the above protections and withstand the machinery, loads, and daily traffic and operations for as many years practicable. In addition, erosion due to the coastal location of the property must be considered as part of the cap design. The encapsulation specifications shall be submitted for Department review as part of the Remedial Action Work Plan (RAWP). The cap design shall be subject to review by the Rhode Island Coastal Resources Management Council (RI CRMC) and the Department's Office of Water Resources (OWR).

- The maintenance and monitoring of the engineered controls through the recording of an institutional control in the form of a Department approved Environmental Land Usage Restriction (ELUR). The ELUR shall be recorded on the deed for the entire property (Plat Map 47 / Lot 601 and Plat Map 55 / Lot 10). The ELUR shall require the performance of annual inspections to document the status of the ELUR and the condition of the engineered controls. The ELUR shall also include a Department-approved post remediation soil management plan (SMP) which will address any future activities that may disturb on-Site soils. The ELUR shall be recorded for the entire Property in the Land Evidence Records for the City of Providence.

The documents from the Site Remediation file for RIRM that contain the information most helpful in considering the proposed remedial approach to address the environmental concerns characterized in the environmental site investigation include the following:

- 2023 December 12 – [Site Investigation Report \(SIR\)](#)
- 2024 January 12 – [Response to RIDEM SIR Comments](#)
- 2024 April 1 – [RIRM Proposed Conceptual Remedy](#)
- 2024 May 21 – [Meeting Summary for May 9, 2024](#)
- 2024 June 17 – [SIR Addendum – Post-Fire Sampling](#)
- 2024 July 11 – [RIRM Response to Remedy Comments](#)
- 2024 August 23 – [Remedial Design Comment Letter](#)
- 2024 August 29 – [Remedial Design Comment Response](#)
- 2024 September 11 – [Remedial Design Comment Letter Clarification](#)
- 2024 September 20 – [Remedial Design Comment Response 2](#), and;
- 2024 October 8 – [Program Letter](#) (halfway down page 3).

The entire Site Remediation file for RIRM, including the above listed documents, can be found on the Department’s website at <https://dem.ri.gov/node/22871> or by scanning the QR code shown on the right.



The Site Investigation does not receive final Departmental approval until the public comment period ends and public comments are responded to. Comments must be submitted in writing, either via email (Ashley.blauvelt@dem.ri.gov) or by mail to or dropping off to RI Dept. of Environmental Management, Attn: Ashley Blauvelt, 235 Promenade Street, Providence, RI 02908.

Regarding the ongoing PIP process noted above:

1. The Department is finalizing the Response to PIP Public Comments document that will contain RIRM’s and the Department’s responses to the comments received following the first PIP meeting in August. That document will be emailed to the email list and posted on the DEM webpage containing all RIRM documents.
2. A second PIP public meeting has been scheduled for December 3, 2024. Based on public comments received, the Department required this second meeting to allow community

members more time to speak freely and uninterrupted. A written comment period will be open immediately following the meeting. The Department is especially seeking feedback on the draft PIP itself but will respond to all questions and comments received.

If you have any questions regarding this notice, please contact me by telephone at (401) 537-4309, 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