



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT
235 Promenade Street, Providence, Rhode Island 02908

RESPONSE TO PUBLIC COMMENTS File No. SR-28-0143

November 26, 2024

RE: Response to PIP Public Comments
Rhode Island Recycled Metals, LLC
434 Allens Avenue, Providence, RI
Plat Map 47 / Lot 601 and Plat Map 55 / Lot 10

On April 22, 2020, the Rhode Island Department of Environmental Management's (the Department) Office of Land Revitalization and Sustainable Materials Management (LRSMM) enacted the codified 250-RICR-140-30-1, Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations). The purpose of these regulations is to create an integrated program requiring reporting, investigation, and remediation of contaminated sites in order to eliminate and/or control threats to human health and the environment.

In the matter of the above-referenced property (the Site), the Department's Office of LRSMM is in receipt of the document entitled Public Comments Regarding the Public Meeting for the Public Involvement Plan, which was submitted on November 4, 2024, and prepared and submitted by Lake Shore Environmental, Inc. (LSE). The Department has reviewed the Public Comments Regarding the Public Meeting for the Public Involvement Plan containing responses by RIRM to comments and questions received regarding the Public Involvement Plan (PIP) and the PIP Public Meeting held August 6, 2024. Public comments received and the respective responses by RIRM and supplemental responses by the Department are attached to this letter.

Please note that a second PIP public meeting has been scheduled for Tuesday, December 3, 2024, at 6:00 pm, at the West End Community Center located at 109 Bucklin Street, Providence. A fourteen (14) day comment period will commence immediately following the public meeting, ending on December 19, 2024. All comments must be made in writing and may be submitted via email to ashley.blauvelt@dem.ri.gov or by mail to RIDEM, Office of LRSMM, Attn: Ashley Blauvelt, 235 Promenade Street, Providence, RI 02861.

Sincerely,

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

Public Involvement Plan (PIP) Public Comments & Responses
Rhode Island Recycled Metals (RIRM)
434 Allens Avenue, Providence

1. **Comment:** *“The DEM/RIRM URL contains links to 131 documents dated from 02/23/1988 to 07/12/2024. It is worth nothing that there is a 9-year gap in the timeline of documents contained on the DEM/RIRM URL. This nine-year gap begins with the link to a “05/20/2015 Memo to File – Field Inspection Notes” and ends with the link to a “03/30/3023 Meeting Minutes – DEM, RIDEM.” To provide a complete set of comments on the Draft PIP, it is imperative that the written record of Rhode Island’s regulatory oversight activities regarding the Site during this 9-year period be publicly provided and a new Community Meeting be scheduled and conducted as recommended below.”*

Department Response: The list of documents on the Site Remediation webpage for Rhode Island Recycled Metals (RIRM) contains the entirety of the Site Remediation file for the Site. The Department’s Office of LRSMM had very recently learned of a “Phase II Subsurface Investigation Report” dated March 8, 2016, completed by Coneco Engineers & Scientists. It appears to have been completed for a local bank (Rockland Trust). The report has since been posted to the webpage and the direct link to the document is <https://dem.ri.gov/sites/g/files/xkgbur861/files/2024-10/SR-28-0143%20-%202016.03.08%20-%20Phase%20II%20Subsurface%20Investigation%20Report%20%28Coneco%29.pdf>.

That March 8, 2016 report is the only document dealing with the Site Remediation program specifically during the time period between May 20, 2015 though March 30, 2023. During this time period, the matter was in extensive litigation in Superior Court focusing on the removal of the vessels. While there are numerous court records during this period, those records do not address the Site Remediation process.

2. **Comment:** *“Following the April 10 – 11, 2024, fire at the RIRM Site, RIDEM required additional site soil sampling at the RIRM Site.¹ LSE carried out this additional site soil sampling, and the results are reflected in the Site Investigation Report Addendum, dated June 17, 2024.² The results of this sampling were referenced during the Community Meeting. However, another fire at the RIRM Site occurred on July 10, 2024³ (2 days before the Public Notice for the PIP was published).⁴ For similar reasons that RIDEM required additional site soil sampling after the April 2024 fire, additional site soil sampling of the RIRM Site should have been conducted following the July 10, 2024, fire. Such additional sampling would have been reflected in another addendum to the Site Investigation Report and discussed during the Community Meeting. Without being presented with any*

¹ Post-Fire Sampling Required – Letter, April 22, 2024; <https://dem.ri.gov/sites/g/files/xkgbur861/files/2024-04/SR-28-0143%20-%202024.04.22%20-%20Letter%20Requiring%20Post%20Fire%20Sampling.pdf>.

² SIR Addendum - Post-Fire Sampling, June 17, 2024; <https://dem.ri.gov/sites/g/files/xkgbur861/files/2024-06/SR-28-0143%20-%202024.06.17%20-%20SIR%20Addendum%20%28Post-Fire%29.pdf>.

³ AG seeks court order to shut down South Providence scrapyards after blaze, Rhode Island Current, July 10, 2024; <https://rhodeislandcurrent.com/2024/07/10/ag-seeks-court-order-to-shut-down-south-providence-scrapyard-after-blaze/>.

⁴ See footnote 3.

information regarding the environmental effect of the July 10, 2024, fire on the RIRM Site, the current public process of the PIP is not in compliance with Section 1.8.7 of the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (“Rules and Regulations”).⁵ Accordingly, the PIP process should be suspended until such time as additional, appropriate site soil sampling of the RIRM Site is completed and such results are publicly made available in an addendum to the Site Investigation Report on the DEM/RIRM URL.”

Department Response: The main contaminants of concern following a fire are generally polycyclic aromatic hydrocarbons (PAHs). In the case of RIRM, the additional concerns included the assertion that arson was suspected and that it was not immediately known how well scrapped goods were drained of various fluids prior to their placement in the piles on-site. Following the April fire, soil samples were analyzed for PAHs and total petroleum hydrocarbons (TPH), and field screened for volatile organic compounds (VOCs). Locations for soil sampling were determined while DEM personnel were on site. The results of the soil analysis demonstrated concentrations of PAHs and TPH in soil consistent with that of which was already present. As such, the impact the fire had on site soils did not change the risk the soils posed to human health and the environment and factors that impact the selection of the most appropriate remedial approach also did not change.

In the case of the July 10, 2024, fire at RIRM, personnel from the Department’s Office of Compliance Inspection (OC&I) were onsite once the fire was extinguished and able to conduct an immediate site inspection. The inspection noted a small area of potential sheening on the northern part of the property; however, no other sheening was observed and there was not an indication of any oil-sheening in run off from the area of the fire. The sampling that occurred after the April fire did show the presence of elevated concentrations of total petroleum hydrocarbons (TPH) in soils, but not at levels higher than the site soils were already known to contain throughout the site previously. Based on the inspection by OC&I personnel and the sampling data collected after the April fire, the Department concluded that additional soil sampling conducted solely in response to the July fire would be unlikely to yield results considerably different than that of which is already present and therefore, a proposed remedial plan for the site would not change.

3. **Comment:** *“Section 1.8.7(E) of the Rules and Regulations requires a PIP to be prepared for the RIRM Site and that the PIP “shall address all relevant and applicable requirements of [sections] 1.8.7(A) through (D)” of the Rules and Regulations. Section 1.8.7(C) requires Community Meetings. As set forth in Section 1.8.7(C):*

“The purpose of the meeting is to:

- a. *Disseminate information about the Department’s Site Remediation program and the specific Contaminated-Site of interest;*

⁵ Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases; <https://rules.sos.ri.gov/regulations/part/250-140-30-1>.

- b. Document community comments and concerns about the investigation, clean-up, and reuse of the Contaminated-Site; and
- c. Engage in a dialogue with the public about the Contaminated-Site.”

Additionally, Section 1.8.7(C) states that at community meetings “[a]n atmosphere of ‘equal participation’ among all involved should be established – avoiding panels, head tables, or auditorium presentations.” In this regard, at a May 9, 2024, meeting of representatives of RIDEM and RIRM, it was specifically noted that “the purpose of the PIP is to inform the public and to allow participation in cleanup planning.”⁶

While the Rules and Regulations do not further define such terms as “engage in a dialogue with the public” and “equal participation,” RIDEM did adopt an Environmental Justice Policy (“EJ Policy”) on September 28, 2023, which provides specific guidance concerning these matters.⁷ According to its terms, RIDEM adopted the EJ Policy “to guide all programs within [RIDEM]” and the EJ policy represents “[RIDEM’s] commitment to the inclusion of equity and justice with all programs.” The EJ Policy applies to an “Environmental Justice Focus Area” as that term is defined in the EJ Policy. The residential neighborhoods near the RIRM Site all fit the definition of Environmental Justice Focus Areas (hereinafter collectively referred to as the “EJ Community”). Accordingly, the EJ Policy requires that the EJ Community be provided with “meaningful involvement” in the PIP. The EJ Policy defines “meaningful involvement” as “engagement and collaboration to address the adverse conditions caused by harmful environmental impact,” including “prioritizing community concerns.”

The August 6th Community Meeting failed miserably in meeting many of the Rules and Regulations and the EJ Policy requirements.”

RIRM Response: “LSE approached the August 6, 2024 meeting as a way to present the EJ community with the results of the previous Site investigations conducted at the RIRM facility. Considering that the presented information was technical in nature, LSE was of the opinion that a presentation followed by questions and answers was a manner of meaningful involvement and would provide an informed foundation to the EJ community’s participation in cleanup planning. Given that the meeting ultimately required more time for the “Disseminate information about the Department’s Site Remediation Program and the specific Contaminated-Site of interest” than was available, future meetings will allow for more time establishing a dialogue with the attendees. If the technical presentation was interrupted for each question, the full scope of the presentation would never have been completed in a reasonable period of time.”

Department Response: The Department has required RIRM to hold another PIP public meeting, during which community members will be provided more time to speak, without

⁶ Meeting Summary for May 9, 2024, May 21, 2024; <https://dem.ri.gov/sites/g/files/xkgbur861/files/2024-06/SR-28-0143%20-%202024.05.21%20-%20May%209%2C%202021%20Meeting%20Summary.pdf>.

⁷ RIDEM Environmental Justice Policy, Version 1.4-September 28, 2023; https://dem.ri.gov/sites/g/files/xkgbur861/files/2023-09/ridem-environmental-justice-policy_0.pdf.

interruption. The second public meeting is scheduled for Tuesday, December 3, 2024, 6:00 pm at the West End Community Center, located at 109 Bucklin Street, Providence.

4. Comment: *“The Community Meeting*

The August 6th Community Meeting was set up and conducted as an auditorium presentation with a head table monopolized by a representative of LSE and the attorney for RIRM. From the outset of the community meeting, the EJ Community participants were told to hold all questions until the end of the presentation. The presentation consisted of approximately 70 minutes of oral testimony on environmental technical terms and findings from the Site Investigation Report and its Addendum prepared by LSE. This oral testimony was supplemented by the LSE representative pointing his finger at images projected onto a screen, which the LSE representative insisted backed up LSE’s technical terms and findings. The technical jargon was regularly tempered by assurances from legal counsel for RIRM that there are no environmental violations at the RIRM Site, that RIRM runs a clean and safe operation, and that RIRM wants only to be a good neighbor to the EJ Community.

When the presentation ended, the participants were invited to ask questions of the LSE representative and attorney for RIRM but were reminded that the community meeting would end at 7:30 p.m. - leaving only 20 minutes for Q&A. Rather than using the Q&A as an opportunity to elicit EJ Community comments and concerns about the investigation, clean-up, and reuse of the RIRM Site, the attorney for RIRM treated questions and comments from the EJ Community as accusations that needed to be refuted. The Community Meeting was not structured to engage in dialogue, as Section 1.8.7(C) stipulates, but instead clearly demonstrated the power dynamics between presenter and audience. Rather than drawing out local knowledge about the RIRM Site, when one resident of the EJ Community with an advanced degree in public health expressed his disappointment with the Community Meeting structure, the PIP process, and lack of meaningful involvement, he was demeaned and his opinion openly ridiculed. The Q&A abruptly ended before all the participants with questions and comments had a chance to speak.”

RIRM Response: “The structure of the meeting was intended to both provide the public with information regarding previous environmental investigations at the RIRM Site, as well as to allow questions from the attendees. Given the breadth of background information regarding the subject Site, this portion of the meeting ran longer. Time constraints associated with the venue’s hours were the primary driver for the limited Q&A time, and despite the fact that the meeting time communicated to attendees was 6:00pm-7:30pm, the meeting ran several minutes late to accommodate those final few questions. However, understandably, all attendees should also have ample time to ask any questions. Therefore, at future meetings, a more proportionate ratio for presentation time versus Q&A time will be scheduled.”

Department Response: The second PIP public meeting on December 3 will be moderated by the court-appointed Special Master to provide order at the meeting and ensure members

of the community are able to speak without interruption. The Department is requiring that the majority of the meeting be dedicated to allowing members of the public comment and ask questions.

5. Comment: *“On-going Fire Risk at the RIRM Site*

The members of the EJ Community at the Community Meeting were very vocal about their concerns about future fires at the RIRM Site and the EJ Community’s exposure to environmental risks from the last two fires. Rather than allay these concerns, the RIRM attorney representative claimed that there was no evidence that the EJ Community was in any way harmed by the two recent fires at the RIRM Site. Moreover, when specifically asked by members of the EJ Community to inform them of future RIRM Site security and fire risk mitigation measures, the RIRM attorney representative refused to disclose this information and stated that the EJ Community would not be involved in discussions involving such measures.

Following this display of lack of concern for both the Rules and Regulations and the EJ Community, CLF offers these recommendations:

- a. Require RIRM to conduct another Community Meeting to be hosted by a professional facilitator experienced in providing meaningful involvement of the EJ Community through engagement and collaboration in the PIP process with a goal of prioritizing EJ Community concerns.*

RIRM Response: “The goal of the initial PIP meeting was to provide a brief summary of the SIR findings and allow for questions and comments. A second PIP meeting is scheduled to occur before November 28, 2024. The requirement to allow more time in the form of an additional PIP meeting does not require the services of a professional facilitator.”

Department Response: A second meeting is scheduled for December 3, 2024, to start at 6 pm at the West End Community Center at 109 Bucklin Street, Providence. The court-appointed Special Master for the Site will moderate the meeting.

- b. This new Community Meeting must engage with the EJ Community in a dialogue about, and equal participation in, cleanup planning and development of an effective, EJ Community involved, security and fire risk management system that includes on-site, modern air monitors agreed upon by the EJ Community.*

RIRM Response: The second, planned Community Meeting will focus more on questions/concerns than the technical SIR results and therefore, should address the concerns noted in the above comment. RIRM has implemented steps for addressing possible impacts from fires at the facility including the installation of real-time infrared monitors. Dust/air sampling from within the facility has been completed and results will be shared at this next PIP meeting. Decisions on future monitoring

at the facility will be made between RIDEM (whose goal is to protect public health) and RIRM.

- c. *Post the Focused Compliance Inspection Report of the RIRM Site immediately following the July 10, 2024, fire.*

Department Response: The Focused Compliance Inspection Report completed on July 12, 2024 by personnel from the Department's Office of Compliance & Inspection is posted online on <https://dem.ri.gov/node/22871>. The direct link to the document is <https://dem.ri.gov/sites/g/files/xkgbur861/files/2024-11/SR-28-0143%20-%202024.07.12%20-%20Focused%20Compliance%20Inspection%20Report%20%28OC%26I%29.pdf>.

- d. *Require RIRM to conduct additional site soil sampling of the RIRM Site and publish the results of this sampling as an addendum to the Site Investigation Report.*

Department Response: Please refer to the Department's response to Comment 2 above.

4. **Comment:** *Thank you for the opportunity to provide written comment on Rhode Island Recycled Metals' (RIRM) Public Involvement Plan (PIP), as required by RI DEM's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (Remediation Regulations). As you know, Save The Bay has been concerned about activities taking place at RIRM's Allens Avenue property for many years, particularly as they relate to a lack of required stormwater controls, disturbances to the site-wide cap, and more than a decade of scrap and ship-breaking operations without required permits that help protect the community and Providence River from environmental threats.*

Our staff was in attendance at the public meeting held on August 6, 2024 at the Knight Memorial Library. We are concerned about RIRM's commitment to meeting the PIP stipulations as set forth in the Remediation Regulations §1.8.7 (A)-(D), and believe that further effort is warranted prior to RI DEM taking action on the applicant's Site Investigation Report or any remediation plans. Specific observations regarding RIRM's August 6 meeting include:

- a. *The results of the applicant's draft Site Investigation Report were inadequately characterized and poorly explained during the public meeting. Several technical acronyms were used without explanation, and little to no context was given for the sampling results that were shared with members of the public in attendance. The applicant and their consultants could do a better job of explaining technical information to the audience and/or pause between slides to allow for clarifying questions (instead of holding all questions until the end).*

RIRM Response: For future meetings, word banks (i.e. glossary of technical terms) will be provided in advance with definitions of acronyms. Understandably, the technical jargon is difficult to digest, especially upon first glance and given the

volume of information that was presented. However, some of the in-depth explanations were skipped in the interest of time given that questions were being saved until the end of the presentation. LSE understands that asking pertinent questions regarding a specific slide can be helpful for the understanding of some attendees. However, the primary concern was the inability to divert attention back to the presentation if time was given to ask questions; inevitably, questions/explanations for specific slides would need to be limited so the presentation could continue; as such, some questions would have to be deferred to the end of the meeting anyway. Hopefully, providing word banks and fact-sheets at future meetings will be both an efficient use of time as well as provide clarity on some of the more technical aspects of the presentation.

- b. *Of the 36 Residents/Petitioners who expressed interest in the PIP, no more than five were in attendance at the meeting. This raises serious concerns about the applicant's outreach efforts. Community members present expressed frustration with the public notice procedures. Several members indicated that they found out about the meeting only hours before, and at least three people in attendance said they did not receive email notification of the meeting (despite being on the email distribution list.) Future such meeting notices should be shared with the media well in advance of a meeting to increase the likelihood that interested community members have enough notice to attend.*

RIRM Response: Understood. All 36 residents were emailed prior to the meeting using the email address they provided to be added to the mailing list, and if emails bounced back and the resident provided a physical mailing address, a hard copy of the notice was sent to them instead. It is also possible that some of the 36 Residents/Petitioners who did not attend may have had other commitments. Unfortunately, LSE cannot control whether emails are automatically sorted into spam folders. However, the Department is also making an effort to disseminate information and public notice as a way of combatting this.

- c. *The meeting's 90-minute timeline failed to provide adequate time to answer the questions of meeting participants, and many questions that were asked were met by defensive statements by RIRM's attorney, rather than quantitative answers from the contracted environmental consultants. More time should be provided for questions and discussion, and the use of an outside meeting facilitator with experience in public meetings could be helpful.*

RIRM Response: Understood. As this was the first meeting, it was unknown whether 90 minutes would be an adequate amount of time to both present information and answer questions. Furthermore, the end of the meeting was constrained by the venue's hours. Moving forward, future meetings can allot for either more meeting time in total, or less time devoted to the presentation, so as to allow more time for the attendees to ask questions they might have. A meeting facilitator is not required to achieve these objectives.

Department Response: Please refer to the Department’s response to comment 3.

- d. *The community meeting also failed to make an effort to “draw out local knowledge about the contaminated site” (Remediation Regulations §1.8.7.C.3). Regardless, the community members in attendance were clear about their concerns about the investigation conducted, past and proposed cleanup plans, and the reuse plan. We also heard a clear request for additional community dialogue that more clearly lays out and explains the results of the SIR and makes more of an effort to include interested and impacted community members.*

RIRM Response: In future meetings, the presentation can be more heavily focused on the explanation of the SIR findings as they pertain to Department standards, so that the community can make informed requests of the proposed cleanup plans and reuse plan.

Based on our observations of the community meeting, the numerous concerns of members that went unanswered, and the ineffectiveness of the applicant’s public outreach, Save The Bay does not believe that RIRM has met the standards set forth in the Remediation Regulations for a Public Involvement Plan. We urge RI DEM to require the applicant to place additional time and effort towards meaningfully engaging the affected community through educational dialogue with an “atmosphere of equal participation” (as required by Remediation Regulations §1.8.7.C.2.) The applicant should be required to make an effort towards better understanding the needs and concerns of South Providence residents and those who wish to see the RIRM site brought into compliance with all applicable laws and regulations.

RIRM Response: The planned second PIP meeting will endeavor to address the concerns raised about the first meeting and the Special Master, appointed by Rhode Island Superior Court can serve as a moderator of the next PIP meeting.

Department Response: Please refer to the Department’s response to Comment 2. In addition, the draft PIP has not yet been approved as final by the Department and the comment period for the PIP following the second public meeting will be open until December 19, 2024. The community is encouraged to provide comment on the PIP itself and request edits or additions to the public involvement plan.

Comments from the PIP Public Meeting Transcript

6. *LSE: “And, in addition, we analyzed for 13 metals, heavy metals.”*
VOICE: “What are they?”

RIRM Response: The 13 metals are part of the listed Priority Pollutant 13 Metals, and include Antimony, Arsenic, Beryllium, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Selenium, Silver, Thallium, and Zinc.

7. *VOICE: "So I have a couple of questions. Just to go back. I know that you mentioned there were 13 metals that went under lab analysis. What are those metals, and then were those metals tested both for the soil and water samples? I didn't see nothing for a water sample slide."*

RIRM Response: The prior response includes the list of the 13 metals that constitute the Priority Pollutant-13 Metals analysis. Groundwater, per the Department's request based on prior contaminants of concern as well as the groundwater classification at the Site, was analyzed for Volatile Organic Compounds (VOCs), Polychlorinated Biphenyls (PCBs), a primary contaminant of concern at the Site resulting from prior activities unrelated to RIRM that were identified during former Site investigations, and Total Petroleum Hydrocarbons (TPH). Groundwater at the Site was not sampled for metals since there are no RIDEM standards for groundwater in GB-Classified areas.

Department-Issued Comments Regarding the Meeting

8. Risk Communication

Comment: *During the public meeting, LSE and the Attorney for RIRM made the following statements regarding risk to the public:*

"So, essentially, you know, the outcome of the investigation determined that the regulated contaminants in the soil are what is typically found in an urban area and, as I mentioned, coal ash, wood ash, asphalt, and they're not mobile generally in soil and ground. They're not volatile, so if they're kept in place, they generally do not -- they don't pose a risk. And for that reason, those contaminants don't present a risk to the surrounding community."

"What I will say is that as a result of these tests, it demonstrates that this site does not pose a risk to the community. The environmental tests and the results therefrom are pretty clear. The community is not at risk. Air quality, land, water not a threat as a result of RIRM, my client, operating on the site."

"There's been a lot of information that's been disseminated, and you hear second-hand and third-hand, and there's a lot of information out there that candidly is just not accurate. But you now have access to the report that DEM has reviewed with satisfaction, and we are happy to report this site does not pose a threat of risk to the community."

None of these statements pertaining to risk are accurate. Please refrain from making sweeping generalizations or presenting inaccuracies, particularly to the community. Soils containing contaminants above the Department's Direct Exposure Criteria at the Site are not encapsulated and there are not any dust control measures employed or vehicle decontamination occurring before vehicles leave the Site. As a result, contaminated soils are leaving the Site boundaries thereby posing a risk to the surrounding community.

RIRM Response: Agreed, over-generalization of the potential risks posed by the RIRM should be avoided. The conclusion that should have been better qualified/explained is that although some RIDEM Method 1 Standards were exceeded, the typical exposure pathways of direct contact, migration and/or ingestion of contaminants at the RIRM Site are not complete pathways other than for potential on-site receptors. However, RIRM is planning to install a rip/rap construction entrance and reroute the truck traffic pattern within the facility to remove mud from vehicles before they leave the premises. In addition, personal dust monitoring has been used to collect dust samples and Property-line dust monitoring is also planned.

9. Opportunity for Public Participation at Public Meeting

Comment: During the public meeting, it was evident that the public was not provided enough time to speak and comment, without interruption. This is supported by the meeting transcript and the public comments submitted to the Department following the meeting. As such, the Department is requiring a second PIP public meeting be held in the community during which all attendees may speak, if they wish, without interruption. The objective of this public meeting shall be to listen and make note of all public concerns and/or comments, particularly with respect to site remediation and the draft PIP. This public meeting shall be held no later than November 18, 2024. **(Department Update: The second PIP public meeting has been scheduled for Tuesday, December 3, 2024, 6 pm, at the West End Community Center, located at 109 Bucklin Street, Providence.)**