November 3, 2025

Kelly Owens, Deputy Administrator
RIDEM Office of LRSMM
235 Promenade Street
Providence, RI 02908

RE: RAWP Addendum/Response to Department Comments Letter (October 1, 2025)
Rhode Island Recycled Metals
434 Allen's Avenue
Providence, Rhode Island
Plat Map 47 / Lot 601 & Plat Map 55, Lot 10
RIDEM File No. SR-28-0143

Dear Ms. Owens:

This correspondence is provided as the Remedial Action Work Plan (RAWP) Addendum requested in the Department's October 1, 2025 comments regarding the Rhode Island Recycled Metals RIRM prepared by Lake Shore Environmental (LSE) and dated August 13, 2025. Department comments shown below are in italics.

1. General

Please include a section in the responsive RAWP Addendum that summarizes the current status of the interim controls at the Site, including the crushed stone construction entrance, the asphalt berm surrounding the front of the shoreline trench, the recycled asphalt layer in the operating area, and maintenance of the two soil piles toward the eastern end of the property. While we appreciate that RIRM's representatives have provided periodic updates to Department personnel, the RAWP itself needs to have a section memorializing the status of these interim measures.

According to RIRM representatives, all interim controls remain in place and are compliant as confirmed by the Special Master's weekly visits to the Site. The crushed stone at the construction entrance is intact and remains functional in mitigating vehicle track-out of soil/mud. The ground asphalt berm surrounding the front of the shoreline\trench, which prevents the discharge of stormwater to the abutting Providence River, is still in place and functional. The silt sock that surrounds the Property also remains functional in preventing stormwater runoff. The ground (recycled) asphalt layer present throughout the operating areas of the Site remains in place and is periodically supplemented/graded as needed. The soil piles derived from the shoreline trench remain protected beneath a tarp with tires holding it in place. The tarp and tires mitigate erosion and maintain the stability of the piles, while also precluding possible public contact with the soil piles.

2. RAWP Section 3.4: Limited Design Investigation

Please provide a copy of the geotechnical evaluation completed by DiPrete Engineering that is the basis for the engineered cap designs, including the post-remediation facility operation details the evaluation considered.

Based on our understanding, DiPrete utilized a geotechnical Engineering report completed in 2012 by Coneco Engineering as the basis for the engineered controls at the Site. Specific designs related to stormwater controls and the engineered barriers will be provided and stamped in forthcoming DipPrete Engineering submittal to RIDEM. The Coneco geotechnical evaluation used as the basis for engineered barrier/stormwater design by DiPrete Engineering is attached to this RAWP Addendum as Attachment A.

3. Cap Loading

Please provide details pertaining to machinery, metal and material piles, and operations that will take place post-remediation at the site, to include square footage, weight & operating weight, uses, type of cap beneath each machine, its location, and any other details potentially relevant to the long-term maintenance of the engineered controls at the Site.

The engineered controls consisting of concrete pads will be used primarily for storage, sorting and loading of salvaged metal including heavy iron, light iron and non-ferrous metals and to provide a clean working area for equipment operators. The movement of heavy equipment used to process the metal stockpiles will be largely confined to these concrete pads. Customer vehicles/trucks will off-load their materials to these pads under supervision of RIRM inspectors. As necessary, rubber-tire skid steer and front-end loaders will push the material into piles to keep the area clean and confined to the concrete pads. RIRM personnel do not anticipate more than a thousand tons of recycled metal on any one pad at a single time, with less on pads used for heavy iron and non-ferrous metal.

The machines that are anticipated to be used onsite post-remediation as well as their approximate weights are listed below. The equipment weights below and the metal stockpiles referenced above represent the total weight loads the pads will be subjected to:

- Skid-steer: 3 tons
- Front-end loader: 13 tons
- Material handler: 45 tons
- Excavator (on tracks, not including the weight of a shear or grapple): 50 tons
- Tractor trailers (which will remove material from Site): 40 tons

4. RAWP Section 3.5.1: Points of Compliance in Soil

The RAWP states: "The Direct Exposure Criteria (DEC) are applicable to all soil within 2 feet of grade." Please specify either Industrial/Commercial or Residential DEC. Further, because the DEC applies to all soils regardless of depth, please update the RAWP to delete all words in this sentence after the word "applicable."

Noted. Because the proposed remedy will include the recording of a deed restriction that will restrict future Site use to industrial/commercial actiovity, the Industrial/Commercial DEC (I/C-DEC) apply and are therefore applicable to all soils at the subject Site.

5. Soil Management

a. *Please prepare an submit the Site-Specific Construction Soil Management Plan that outlines how soils are to be handled by those working at the Site, the appropriate level of PPE, how soil will be managed and secured on Site, procedures for off-Site disposal of Site soils, sampling protocol for imported soil and exported soils, etc.*
b. *As part of the Soil Management Plan, please provide a detailed dust mitigation and erosion control plan that outlines procedures and protocols to be employed to ensure Hazardous Substances do not leave the Site through fugitive dust/particulate matter, surface water run-off, soil erosion, construction vehicle trackout, etc.*

Understood; a Site-Specific Construction Soil Management Plan (SMP) has been prepared and is attached to this C-SMP as Attachment B. The C-SMP includes a detailed dust mitigation and erosion control plan.

6. RAWP Section 3.6: Proposed Schedule for Construction and Remediation

a. *A schedule for implementing the RAWP, following Department approval is required in accordance with § 1.10.7 of the Remediation Regulations. Please propose a timeframe to implement the RAWP.*
b. *The construction of the engineered cap must be completed at one time – implementing the RAWP in "phases over time" will not be approved. Due to the inherent risk for a release of Hazardous Substances to occur during the scrap metal recycling process, operations must cease during the construction of the engineered controls in order to prevent further releases of Hazardous Substances to subsurface. Moreover, the court order of January 10, 2025, requires closure during capping. Specifically, it provides: "Within thirty (30) days after final approval of the Plan by RIDEM and other required environmental regulatory agencies (including RIRM's application for a RIPDES permit), RIRM shall terminate operations at the Premises, and shall thereafter commence implementation of approved plans."*

The timeframe required to manage and implement a construction project of this magnitude is not possible to accurately predict and is dependent upon many factors including the time required for preparation of contractor bid specifications, contractor selection and contract negotiations, season of year construction begins, availability of equipment and construction supplies, and the contractor schedule. However, the following provides a preliminary estimate of the project implementation time-frame.

Planning for implementation of the remedy described in the RAWP will begin following the Department's issuance of a Remedial Decision Letter. And because the planned stormwater controls will include construction of Site-wide impervious surfaces that will also function as engineered barriers to underlying contaminants in soil, the pending RIPDES permit must be approved by the Office of Water Resources before construction can begin. Once all permits and approval are in place, construction can begin. The *estimated* time frame associated with major construction milestones is shown below. Note that work on some of these tasks could be completed simultaneously with others.

	Task	Duration
•	Prepare Contractor bid packages	2 weeks
	Contractor Selection	2 weeks
•	Planning and Mobilization	4 weeks
•	Construct the Waterfront Bulkhead or restore shoreline to pre-trench condition	8 weeks
•	Backfill the shoreline trench Using Existing Soil Stockpiles	1 week
•	Site-Wide Grading/Compaction	4 weeks
•	Form & Pour Concrete Slabs	8 weeks
•	Asphalt Paving	4 weeks
•	Construct Stormwater Basin	4 weeks
•	Deliver and Install Stormwater Treatment Equipment	6 weeks
•	Stormwater System Startup and Shakedown	4 weeks

Comment No. 6.b. to the RAWP states that construction of the engineered cap must be completed at one time to avoid possible releases of Hazardous Substances. However, the materials currently handled by RIRM do not include Hazardous Substances and are not in liquid form so further releases are not likely whether before, during or after cap construction. Every incoming load of metal to be recycled is inspected by RIRM before being accepted in order to prevent importing hazardous materials at the Site. Therefore, there is no incremental risk of a hazardous material release if ongoing metal recycling activities occur concurrently with construction but at separate areas of the Site.

Construction is routinely completed in stages at operating facilities and roadways since it is infeasible for businesses or government agencies undergoing construction to terminate operations for extended time periods. Notwithstanding any current court orders, RIRM proposes to complete construction of engineered controls over half of the Site while the other half remains operational. Once completed, the new cap areas will be put into service for recycling while the remainder of earthwork at the Site is completed. Throughout the period of construction, related activities will be completed as expeditiously as possible so that RIRM can return to full scale operation.

Ultimately, the potential for phasing of construction at the RIRM Site will be resolved under jurisdiction of the courts and the RAWP will be amended if required or as applicable.

7. RAWP Section 3.8: Site Plan and Figure 2 Site Plan

a. *Please submit Site Figures that are drawn-to-scale, and, at a minimum, contain a scale, a north arrow, property lines, and a populated legend.*
b. *Please provide one or more site plans that depicts all current and existing site features and details such as lot lines, property entrances & exits, ground surface type, defines all structures and their primary use(s), scrap piles and contents, hazardous materials storage and handling areas, loading and unloading areas, locations of air monitoring, details regarding the bulkhead, soil piles, vehicle decontamination stations, etc.*
c. *Please provide one or more site plans, drawn-to-scale, that depicts the locations of all post-remediation site features including, structures, caps and specification, specific operation areas, scrap piles and contents, hazardous materials storage and handling areas, loading and unloading areas, crushing machinery, vehicle traffic pattern, where specific sorting operations take place, vehicle scale, decontamination stations, trackout emissions prevention, barriers of any type, etc.*
d. *Please specify on the site plans any areas that will be accessible to customers or the public.*

Understood. An updated site plan depicting the current and existing features, drawn-to-scale with a scale, north arrow, property lines, and populated legend is included as Figure 2. An additional site plan depicting planned post-remediation conditions, drawn-to-scale with a north arrow, property lines, and a populated legend is included as Figure 3. Areas accessible to the public both currently and in the post-remediation plan are depicted in both figures.

8. RAWP Section 3.1.4: Air Objectives and 3.9.1 Air Specifications

a. *Section 3.1.4 of the RAWP states that continuous dust monitoring is employed along the property line and that, "thus far have not recorded any exceedances of EPA standards of the daily average concentrations due to Site Activities." If this statement is to remain in the RAWP, an appendix of the data upon which it is based must also be included in the RAWP Addendum.*
b. *In accordance with § 1.10.3(A)(3) of the Remediation Regulations, the Department is requiring that air monitoring data for particulate matter ($PM_{2.5}$ and PM_{10}) be submitted to the department for the duration of all construction activities, i.e., the period during which any soils at the Site are exposed uncovered and/or being disturbed. Upon approval of the RAWP, fence line air monitoring (upwind and downwind) data shall, at a minimum, contain the average air concentrations of PM_1, $PM_{2.5}$, and PM_{10} for every hour, 24 hours per day, until the construction of the engineered controls are completed in full. This comment does not require a revision to the RAWP but please be advised that the Remedial Approval Letter will include these conditions.*

Understood; the dust monitoring data is collected at DEM approved fence line locations via the monitoring devices on a continuous basis, and PM_1, $PM_{2.5}$, and PM_{10} values are recorded approximately every minute, 24 hours a day. Throughout the period of construction, RIRM

Management will continue to collect dust monitoring data and report the data to the Special Master on a monthly basis as required by the Court Order.

9. RAWP Section 3.9.3 Soil Specifications

a. *In accordance with § 1.10.10 of the Remediation Regulations and as required by the Remedial Decision Letter, please provide specifications for each cap design which shall include materials, construction specification, and drawings for each, stamped and signed by the Profession Engineer responsible for the design.*

   Cap specifications in the form of cross sections are included as Attachment C. Further details regarding the cap designs will be provided by DiPrete Engineering as part of stormwater permit submittals and will be stamped by a licensed P.E. when they become available.

b. *Please make a correction to the last of the three bullet points where a space appears between numbers 4 and 6.*

   A copy of the page from the RAWP with the correction depicted is attached to this document as Attachment D.

10. RAWP Section 3.12 Contingency Plan

In accordance with § 1.10.13 of the Remediation Regulations, the RAWP shall include a Contingency Plan. Please prepare and submit a Site-Specific Contingency Plan.

Understood, a Site-Specific Contingency Plan is attached to this document as Attachment E.

11. *In accordance with § 1.12.5 of the Remediation Regulations, the Department will require weekly progress reports containing the daily operating logs, photos (during cap construction), air monitoring data, daily watering logs, weather, and summary of work completed, etc. This comment does not require a revision to the RAWP but please be advised that the Remedial Approval Letter will include these conditions.*

CMG will coordinate with the RIRM facility to ensure that standard operating logs are maintained during cap construction and sent to the Department as necessary during the remedy implementation process.

12. Best Management Practices

a. *Please provide details pertaining to the prevention of future hazardous material releases at the Site due to scrap metal operations. How will it be ensured that all metal piles remain on concrete caps given what appears to be relatively small areas of concrete? Will there be a contingency plan, or new SOPs incorporated into future daily operations that instruct*

personnel to limit all scrap piles to concrete slabs and to make a new pile in the event that the base of the scrap pile exceeds the boundaries of the underlying concrete slab?

As noted above in response to comment No. 3, RIRM will unload, sort, process and load out salvaged metal from the six concrete slabs planned for the facility. RIRM will endeavor to keep salvaged metal material on the concrete pad and will continually push the material onto the pad that may have extended onto surrounding heavy duty bituminous concrete pavement. No hazardous material releases will occur if salvaged metal (light and heavy iron) temporarily extends off the concrete surfaces as no liquids are involved. The objective of keeping the salvaged material on the concrete pads is sufficiently straight forward such that an SOP is not required.

b. *Where will liquid wastes such as antifreeze, gasoline, used oil, solvents, brake fluid be stored and how they will be managed at the site to reduce the potential of a future release? Additionally, where lead acid batteries will be stored and what procedures for proper management and storage of leaking/damaged batteries will be in place?*

Once all stormwater controls are in place and no pervious surfaces remain anywhere on the Property, RIRM may return to processing automobiles. The existing unused former auto salvage tent will be where active auto processing will occur and the planned concrete pad adjacent to this processing tent is where cars awaiting processing will be stored. The car crusher with integral spill containment will also be staged on this pad. The SOPs developed by RIRM in 2012 specifically for addressing the proper management of automotive fluids and oil and hazardous material spill response (both attached as Attachment F) will be followed.

c. *Please outline the specific equipment that will be used for breaking, cutting, processing, sorting, and moving recycled materials at the site. Identify whether the use of compactors, balers, briquette machine, etc. are proposed. Vehicle compaction activities must be performed withing secondary containment to prevent a release of Hazardous Substances.*

The Site-specific equipment used by RIRM was described above in the response to Comment No. 3 but is shown again below.

- Skid-steer
- Front-end loader
- Material handler
- Excavator equipped with a shear or grapple attachment
- Tractor trailers (which will remove material from Site)

As needed, cutting torches are used to cut heavy iron. The use of compactors, balers, briquette machines is not anticipated for use by RIRM in the future but business conditions will determine the long-term needs for specialized equipment. At the time when auto salvage operations continue, the automotive processing will be completed on an Enviro-Rack frame where all automotive fluids are drained for storage pending off-site disposal or recycling. The car crusher is equipped with a fluid collection trough that directs fluids to collection containers at each end of the trough. RIRM anticipates that all collected automotive fluids will be stored within the auto processing test and periodically collected for off-site disposal by a licensed waste hauler.

13. *Please submit a RAWP addendum that addresses the abovementioned comments on or before November 3, 2025.*

This Response to Department Comments document and associated attachments will serve as the requested RAWP Addendum document. Please call the undersigned at 774-241-0901 if you have questions or comments.

Sincerely,
CMG ENVIRONMENTAL, INC.

David J. Hazebrouck, LSP/LEP
Senior Project Manager

Isabella Giacomo
Environmental Scientist

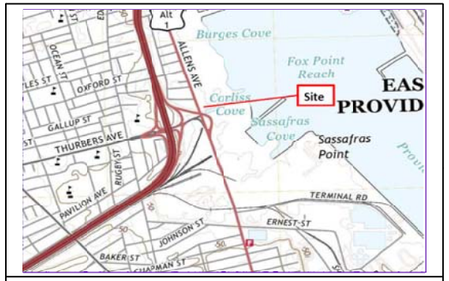
cc: Richard Nicholson, Nicholson & Associates, LLC

S:\2025 Job Files\2025-301 434 Allens Avenue, Providence, RI\RI DEM\RAWP Addendum.docx

FIGURES

Notes:

* Aerial Image from 10/2025 Google Earth Diprete Engineering



Locus

Legend:

Ground Asphalt Cap Throughout

SCALE:	As Shown
DATE:	10/29/25
PROJNO.	09050H10
CLIENT:	RIRM
SITE:	434 Allens Avenue, Providence, RI
DRAWNBY:	DJH
CHECKEDBY:	IG

CMG EST. 2002

TITLE: Site Plan Showing Current Features & Conditions

DRAWINGNO. FIGURE 2

REV. A

Property Line

Approximate Possible Future Bulkhead Location

Providence River

Concrete Slabs

Maintenance Shed

Existing Soil Stockpiles

Shoreline Trench

FEMA Boundary

Potential Future Rail Spur

Lined Stormwater Basin

Stormwater Treatment Equipment

Limited Public ASccess Areas

Existing Shoreline

Pavement Caps Throughout

Existing Rail Spur

Vehicle Scale

Inactive Auto Salvage Shed

Construction Entrance/Exit

RIRM Offices

SCALE

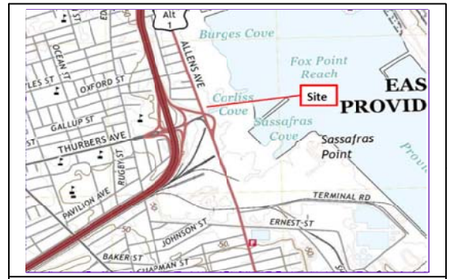
50.0'

25.0'

100.0'

Notes:

* Base map & Stormwater details provided by Diprete Engineering



Locus

Legend:

Concrete Cap
(6' (min) 4,000 PSI Concrete Over 8" (Min) Imported Compacted Sub-Base)

Asphalt Cap
(1.5' Bituminous Concrete Wearing Course Over 3'Bituminous ConcreteBinder Course Over 1.3' Imported Compacted Sub-Base)

Landscape Cap
(1' Clean Imported Sand Over Impervious Liner

SCALE:	As Shown
DATE:	10/29/25
PROJNO.	09050H10
CLIENT:	RIRM
SITE:	434 Allens Avenue, Providence, RI
DRAWNBY:	DJH
CHECKEDBY:	IG

CMG EST. 2002

TITLE: Site Plan Showing Post-Remediation Engineered Controls

DRAWINGNO. FIGURE 3

REV. A

ATTACHMENT A

COMMENT #2 – GEOTECHNICAL EVALUATION

GEOTECHNICAL ENGINEERING REPORT
RHODE ISLAND RECYCLED METALS, INC.
434 ALLENS AVENUE
PROVIDENCE, RHODE ISLAND

SUBMITTED TO:

Mr. Edward Sciaba
Rhode Island Recycled Metals, Inc.
434 Allens Avenue
Providence, Rhode Island 02905

PREPARED BY:

CONECO
Engineers, Scientists & Surveyors

4 First Street
Bridgewater, Massachusetts 02324
(508) 697-3191

September 25, 2012
Coneco Project No. 7400.1

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FIGURES

APPENDICES

1.0 EXECUTIVE SUMMARY

Coneco Engineers & Scientists, Incorporated (Coneco), in conjunction with GeoLogic-Earth Exploration, Incorporated (GeoLogic), has completed Soil Investigations for the proposed building structure (the project) to be located at 434 Allens Avenue, Providence, Rhode Island, hereinafter referred to as the "Site." The Soil Investigation scope of work included advancing two soil borings, analyzing the data collected in the field, and preparing a geotechnical engineering report with boring logs. The following is a brief description of the results of the soil investigation effort.

In general, four soil layers were encountered at the Site. The first or top layer (from 0 to approximately 19 feet below grade) is a layer of fill primarily consisting of sand and gravel, with fine sand and silt. The lower 5 to 10 feet of this unit containing black, fine to coarse sand with traces of slag, glass, coal, and wood is believed to represent the former shoreline with the adjacent Providence Harbor. The second layer consists of a marine clay unit (encountered approximately 19 feet below grade) that is 25 to 30 feet thick. These two uppermost layers will not provide good structural support. The design of a structural foundation will require methods to improve foundation support characteristics. The third layer, which was encountered approximately 44 to 49 feet below grade, is a sand and silt unit approximately 5 to 7 feet thick with a bearing capacity of 3,250 psf (pounds per square foot). The fourth layer, encountered at approximately 51 to 54 feet below grade, is a unit of sand and gravel with a bearing capacity of 2,500 psf or greater.

The proposed structure in the vicinity of the soil boring locations consists of a concrete slab and a metal area building that will be used as a metal processing facility. The loading on the slab will include heavy wheeled moving equipment, processing equipment, and metal inventory of at least 500 tons. To support this load, Coneco recommends a foundation which obtains its bearing capacity from the lower layer below 54 feet. Possible methods include soil stabilization and pilings.

The report which follows provides an in-depth description of the results of our geotechnical investigation activities, engineering interpretations of the data collected, and recommendations to aid in the design and construction of foundations and other earth-connected phases of the project.

2.0 SITE INFORMATION

2.1 Surface Features

The Site consists of a 5.8 acre parcel of waterfront land in an urban, commercial area of Providence. Historically, the Site was part of the adjacent Providence Harbor. The Site has since been filled in and used for commercial purposes, which included lumber companies. From 1972 to 1979, the property was owned by Texaco, Inc. Refine Met International (Refine Met) acquired the property in 1979, and reportedly used the property as a resource recovery facility where scrap metal, computer parts, circuit boards, capacitors, radios, and selected electronic components were shredded. Boliden purchased the property from Refine Met in 1983 and operated the site as a resource recovery facility engaged in the reclamation of precious metals and minerals from 1983 to 1989. Scrap metals were received in bulk form, shredded, sampled, categorized, and accumulated for shipment to smelters overseas. At present, the site is operated by Rhode Island Recycled Metals, Inc. a metal recycler that performs segregation and processing of various metals on the property.

The Site is bounded by a Cumberland Farms property to the north, portions of Providence Harbor to the east and south, and Allens Avenue to the west. Site topography is relatively level. A Site Locus and Boring Location Plan are provided as Figures 1 and 2, respectively.

2.2 Flood Zone

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) number 44007C0317H dated April 18, 2011 for Providence County, Rhode Island, the entire Site, including the proposed project building area, lies within an area subject to the 100-year flood. Please refer to Figure 3 for a delineation of the flood zones in the vicinity of the Site.

3.0 FIELD INVESTIGATION

Coneco, in conjunction with GeoLogic, performed geotechnical soil investigations at the proposed building area at the Site between July 5, 2012 and July 6, 2012. Coneco and GeoLogic completed two soil borings at the Site, designated as B-1 and B-2. The number and location of the borings were determined by Allied personnel. The locations of the two borings are shown in Figure 2, and the boring logs are attached as Appendix 1.

The field investigation included soil borings and a surficial examination of the Site. Surficial reconnaissance was performed to document surface conditions for evidence of unsuitable soil conditions and previous earthwork activities that may have disturbed potential *in situ* bearing materials.

3.1 Field Procedures

GeoLogic personnel, with Coneco oversight, utilized a CME-LC60 all-terrain vehicle drill rig equipped with a 140-pound hammer to advance the soil borings to depths of up to 71 feet below surface grade. Soil borings B-1 and B-2 were advanced using cased, rotary wash methods. The 2-inch diameter split-spoon sampler was inserted and advanced into undisturbed material using a 140-pound hammer free falling a distance of 30 inches as described in ASTM D 1586. The number of blows required to drive the sampler over each of four consecutive 6-inch intervals was recorded. The sum of the blows required to drive the split-barrel sampler the second and third 6-inch interval is referred to as the Standard Penetration Test (SPT) *N-value,* which was used to estimate the allowable bearing capacity of the soil formation.

Standard Penetration Tests and split-barrel sampling were performed either continuously in 2-foot intervals or at 5-foot intervals throughout each of the borings. Soil material was recovered from the split spoon sampler at these intervals and examined to develop a lithologic profile for Site.

3.2 Soil Borings

Boring B-1 was advanced to a depth of approximately 56 feet below grade, at which point the borehole caved and was abandoned. Boring B-2 was located approximately 54 feet east of B-1. Boring B-2 was advanced to approximately 71 feet below grade. Boring B-2 exhibited a similar lithologic profile as B-1.

Soil samples obtained from the test borings were classified in the field by visual and textural examination. These classifications were later confirmed through further examination and the final boring logs were then prepared. Approximate soil boring locations are depicted in Figure 2 and the boring logs are provided in Appendix 1.

4.0 SUBSURFACE CONDITIONS

4.1 Synopsis

In general, the soil at the Site consists of about 19 feet of fill on top of a large marine clay layer. The clay layer rests on top of a sand and gravel layer. This stratigraphy is consistent with a former harbor shoreline that has been filled in.

4.2 Bearing Capacity

The first 19 feet of soil below grade consists of highly variable fill and shoreline material with bearing capacities varying from 500 psf to over 12,000 psf. (The soil density in this stratum generally decreases with depth.) Between 19 feet and 44 feet below surface grade, there is a very soft clay layer with very low bearing capacity. Beneath this, there is a 5 foot to 6.5 foot layer of loose sand and silt with a moderate bearing capacity and a smaller layer of clay. These two layers occur at different depths in the borings. From 54 feet below grade to the bottom of the borings, there is a sand and gravel stratum that appears to become denser with depth. The first layer of this stratum has a bearing capacity of 2,500 psf to 3,750 psf, and the deeper layer, which was only encountered in boring B-2, has a bearing capacity of at least 8,250 psf. The following table presents the general soil characteristics found at the soil boring locations.

General Soil Characteristics

Depth (ft)	Stratum	Bearing Capacity (psf)	Comments
0 to 7-9	Loose to Dense Fill	1,000-12,000+	NA
7-9 to 19	Loose Fill	500-1,250	NA
19 to 44	Very Soft Clay	None	NA
44 to 54	Loose Sand & Silt Clay	3,250-3,500 None	Clay layer and sand & silt layer occur at different depths
54 to 56-59	Loose Sand & Gravel	2,500-3,750	NA
56-59 to 71	Dense Sand & Gravel	8,250-11,750	Encountered only in B-2

4.3 Groundwater

Depth to groundwater measurements could not be obtained in either of the two borings due to the use of water to advance the borings. However, based on field observations and stratigraphic information presented in the boring logs, groundwater is estimated to be present approximately 6 to 12 feet below the ground surface, and is likely influenced by tidal fluctuations in the adjacent Providence Harbor.

4.4 Soil Properties

The angle of internal friction, the dry unit weight, the ultimate bearing capacity, the ultimate compressive skin friction capacity, and the ultimate tensile skin friction capacity are estimated for each stratum of the soil profile. The data below represents typical soil properties for the soil conditions encountered in the various borings and soil layers.

Soil Properties – Boring B-1

Depth (ft)	Stratum	Angle (deg)	Weight (pcf)	Bearing (psf)	Compressive Skin Friction (psf)	Tensile Skin Friction (psf)
0-2	Fill	34	135	4,250	300	60
2-4	Fill	34	138	6,250	400	80
4-6	Fill	34	135	4,250	300	60
6-8	Fill	30	120	1,000	50	0
8-10	Fill	28	100	500	0	0
10-12	Fill	29	110	750	20	0
12-14	Fill	28	100	500	0	0
14-16	Silty Sand	28	100	500	0	0
16-18	Silty Sand	30	120	1,000	50	0
18-20	Silty Sand / Clay	29	110	750	20	0
20-22	Soft Clay	28	100	0	0	0
22-24	Soft Clay	NA	NA	NA	NA	NA
24-26	Soft Clay	NA	NA	NA	NA	NA
29-31	Soft Clay	NA	NA	NA	NA	NA
34-36	Soft Clay	NA	NA	NA	NA	NA
39-41	Soft Clay	NA	NA	NA	NA	NA
44-46	Soft Clay	28	100	0	0	0
49-51	Sand & Silt	33	133	3,250	250	55
54-56	Sand & Gravel	33	134	3,750	275	55

Soil Properties – Boring B-2

Depth (ft)	Stratum	Angle (deg)	Weight (pcf)	Bearing (psf)	Compressive Skin Friction (psf)	Tensile Skin Friction (psf)
0-2	Fill	38	140	10,500	700	125
5-7	Fill	40	140	12,000+	800	140
9-11	Fill	30	122	1,250	50	20
14-16	Fill	28	100	0	0	0

Soil Properties – Boring B-2						
Depth (ft)	**Stratum**	**Angle (deg)**	**Weight (pcf)**	**Bearing (psf)**	**Compressive Skin Friction (psf)**	**Tensile Skin Friction (psf)**
19-21	Soft Clay	NA	NA	NA	NA	NA
24-26	Soft Clay	NA	NA	NA	NA	NA
29-31	Soft Clay	NA	NA	NA	NA	NA
34-36	Soft Clay	NA	NA	NA	NA	NA
39-41	Soft Clay	NA	NA	NA	NA	NA
44-46	Sand & Silt	33	134	3,500	250	55
49-51	Sand & Silt / Clay	33	134	3,500	250	55
54-56	Sand & Gravel	32	132	2,500	200	50
59-61	Sand & Gravel	36	140	8,250	500	100
64-66	Sand & Gravel	39	140	11,750	775	135
69-71	Sand & Gravel	37	140	9,500	600	115

The clay layer may provide some skin friction support for a deep foundation as the clay settles around a pile. However, the magnitude of this support cannot be estimated from the current data. Pile testing would be required.

5.0 ENGINEERING CONSIDERATIONS

Primary geotechnical concerns for the proposed development at the Site include the following:

- There is a wet and extremely weak clay layer from 19 feet below grade to approximately 50 feet below grade. This layer has a high potential for settlement and a very low bearing capacity. In addition, pile buckling may be a concern as the weak clay will provide minimal lateral support.
- There is loose fill from approximately 7 to 9 feet below grade to 19 feet below grade. This layer has a low bearing capacity. Soils with high native bearing capacities were only found near the surface and below the clay layer.
- Surface water runoff should be prevented from entering the construction area and any excavations.

5.1 Preliminary Geotechnical Recommendations

The geotechnical design and construction recommendations presented below are based on Coneco's understanding of the proposed work and the proposed foundations. The borings were advanced in the general locations of proposed structures. Therefore, if the location and/or elevation of any proposed structures are to be substantially different, it may be necessary to reevaluate the conclusions and recommendations offered in this report and/or perform additional borings.

5.2 Frost Penetration Considerations

According to the Rhode Island State Building Code, the frost depth for Providence, Rhode Island is 40 inches. The recommended frost depth for the Site is 40 inches.

5.3 Foundations

The proposed building consists of a 100 foot by 200 foot concrete slab covered by a metal structure. With scrap metal piles, machinery, and other equipment placed on the slab, the total load will likely exceed 600 tons. Because the soils from approximately 7 feet below grade to at least 49 feet below grade are extremely weak, the slab may need to be constructed on deep foundations, such as concrete or wooden piles, in order to properly support this magnitude of load. If piles are proposed, pile load tests should be conducted in accordance with Chapter 18 of the Rhode Island State Building Code. Any wooden piles should be treated and should be situated completely in groundwater to help avoid deterioration. Additional information, including pile load tests and groundwater data, will be required to prepare a final foundation design.

5.4 Lateral Loads

The allowable passive earth pressure for a mat foundation may be calculated using the following equation:

$$P_{P(all)} = (1/2 k_P \gamma (H^2 - h^2))/FS$$

$P_{P(all)}$	=	Allowable passive earth pressure (lb/ft)
H	=	Depth to bottom of footing (ft)
h	=	Depth to top of footing (ft)
γ	=	Effective unit weight of soil (pcf)
k_P	=	$\tan^2 (45° + \varphi/2)$
FS	=	Factor of safety (assume 2 to 3)
φ	=	Angle of internal friction

A conservative factor of safety should be used due to potential variable soil conditions and the possibility that backfill around the foundation may not be as compact as undisturbed soils.

The shearing resistance between the foundation base and the soil is greatly influenced by the character of the soil. If the surface of contact between the concrete and the soil is rough, the maximum shearing strength of the soil can be assumed. Shearing resistance between the base of a mat foundation and a soil that derives most of its strength from internal friction may be taken as the normal force times a coefficient of friction. For the shallow silty sand stratum, a coefficient of friction of 0.25, having a safety factor of 2, may be used for calculating the sliding resistance.

5.5 Lateral Pressure Loads

Site retaining walls and basement or foundation walls subject to unbalanced loading conditions should be designed to resist lateral earth pressures loads using the following guidelines:

- At rest design lateral soil pressure load: 60 psf per foot of depth.
- Active design lateral soil pressure load: 30 psf per foot of depth.
- Any surcharge to the ground loads shall be added to these pressures.
- Foundation walls submerged in groundwater without drainage are subject to a pressure of 97 psf per foot of depth below groundwater elevation.

The active and above-ground water pressures assume that the walls are backfilled at least 3 feet laterally with free draining soils. These soils would be sand-gravel fill or granular fill with less than 7 percent passing the number two hundred (No. 200) sieve so that there is no hydrostatic pressure. The recommended lateral pressures assume horizontal backfill behind walls. Where the calculated earth pressure behind walls is less than 250 psf, it should be increased to 250 psf to account for stresses created by compaction within 5 feet of the wall. Where there is sloping backfill or surcharge loads, appropriate increases in design loads should be applied.

5.6 Settlement

If the proposed structure is supported by properly designed and driven deep foundations that rest in the dense sand and gravel layer (59 feet to 71 feet below grade), the anticipated post-construction shallow pad settlement for a structure is estimated to be less than 1 inch. With the presence of a large, wet, weak clay layer, any structures supported by shallow foundations are potentially susceptible to significant settlement.

5.7 Seismic Design Considerations

Seismic design criteria are based on informed judgments regarding probable earthquake ground motions in the region and probabilities of occurrence. The objectives of seismic design are to protect life safety by limiting total structural collapse. The Site is near several known faults in the earth's crust as referenced in Figure 4.

Seismic activity can have two different effects on structures. The first effects are structural forces resulting from the movement of the ground. The historic seismic forces at this site are low. As such, the probability of higher seismic forces is also low. The second potential effect on a structure is the potential for soil collapse or soil liquefaction. Based on Coneco's evaluation of the soil data, the soils encountered below 14 feet are not susceptible to liquefaction.

The maximum considered earthquake spectral response acceleration at short periods (S_s) and at 1-sec (S_1) for Providence were obtained from the Rhode Island State Building Code. Accordingly, a soil S_s-factor equal to 0.234 and S_1-factor of 0.061 can be used in the seismic analysis. Every structure, and portion thereof, including nonstructural components that are permanently attached to said structures and their supports, shall be designed and constructed in accordance with the latest Rhode Island State Building Code.

6.0 CONSTRUCTION CONSIDERATIONS

6.1 Excavation Support

Overburden soils may be excavated by conventional earth-moving equipment. The excavation sidewalls should be stepped, sloped, or braced to meet current OSHA requirements. Any unsuitable foundation material, such as loose fill, large roots, and organic soils, encountered at the elevation of the bearing surface should be removed and replaced with compacted granular fill, flowable fill, or concrete. Any soil replacement used for a bearing surface should be compacted and then inspected. The proposed pad and building size of 200 feet by 100 feet will require extensive backfilling and compaction. Coneco recommends that the site be excavated with a 35 degree side slope, the groundwater be controlled, and the excavation be ramped to allow a large road vibrating drum roller to access the floor of the excavation for compaction.

The contractor is solely responsible for construction site safety and maintaining safe and stable slopes. Depending upon the excavation depths below grade, the excavation sidewalls should be flattened or braced to meet current OSHA requirements, or those specified in local, state, and federal regulations. The contractor's responsible person, as defined in 29 CFR Part 1926, should evaluate all excavations as part of the contractor's safety procedures. Coneco is not assuming responsibility for construction site safety or the contractor's activities; such responsibility is not being implied and should not be inferred.

6.2 Groundwater Control

Seasonal variation, runoff, or seepage may cause the groundwater level at the time of construction to be higher or lower than reported herein. Depth to Site groundwater may also vary in accordance with tidal fluctuations in the adjacent Providence Harbor. Surficial runoff due to heavy rains during construction should be controlled and directed away from foundation excavations. Any bearing soils disturbed by surface water, groundwater, or frozen soils should be removed prior to placement of foundation concrete.

6.3 Structural Backfill

Backfill should consist of natural clean stone or well-graded sand and gravel and should be free of organic and/or manmade material, trash, ice, frozen soil, and other deleterious materials. The recommended gradation for granular fill should satisfy the following limits:

Granular Fill		
	Percent Finer by Weight	
U.S. Sieve Size and Number	Minimum	Maximum
2 inch	100	--
No. 4	35	100
No. 20	10	55
No. 40	5	35
No. 100	0	20
No. 200	0	7

The moisture content of the granular fill material should be adjusted prior to placement so that it is within 2 percent of the optimum moisture content. Fill should be placed in loose lifts not exceeding 9 inches in thickness and compacted with a minimum of four passes of a vibratory compactor to a dry density of at least 95 percent of the maximum dry density as determined by the laboratory test designated ASTM D 1557.

7.0 LIMITATIONS

The soil borings were monitored by Coneco personnel with the drilling contractor utilizing standard drilling and soil sampling procedures and the borings were performed to the depths indicated. To the best of the engineer's knowledge and belief, the description and classification of the soils are true descriptions of the sample recovered at the depths indicated, and the samples recovered are reasonably representative of the subsurface conditions.

The conclusions expressed by Coneco in this report are based solely on the references cited. Observations were made under the conditions stated. Information provided by federal, state, and local agencies was relied upon as complete. This report represents Coneco's opinion relative to such evidence. The purpose of this report is to describe the conditions encountered during soil borings at the Site. Unless otherwise specified in the scope of work, Coneco accepts no responsibility for client performance of recommendations as may be offered in this report. No attempt was made to investigate Site owner or operator compliance with federal, state, or local laws and regulations in connection with Site usage.

Should additional information become available concerning this Site or neighboring properties in the future, that information should be made available to Coneco for review so that the conclusions presented in this report may be assessed and modified as necessary. With specific regard to limited investigations, data obtained from soil sampling may not be wholly representative of the nature and extent of subsurface conditions at locations other than the actual locations sampled on the date the samples were obtained. If variations from the results of this effort become apparent in the future due to further sampling, analysis and/or exploration, it may be necessary to reevaluate the conclusions and/or recommendations offered in this report.

ATTACHMENT B

COMMENT #5 – SITE-SPECIFIC CONSTRUCTION SOIL MANAGEMENT PLAN

Attachment B
Construction Soil Management Plan
Rhode Island Recycled Metals Site
434 Allens Avenue
Providence, Rhode Island

1.0 OBJECTIVE

The objectives of this Construction Soil Management Plan (SMP) are to describe soil management procedures at the 434 Allens Avenue Rhode Island Recycled Metals Site associated with earthwork during construction of the engineered barriers and stormwater BMPs. This SMP provides guidance for managing soil containing total petroleum hydrocarbons (TPH), semi-volatile organic compounds (SVOCs, e.g. PAHs), and metals that exceed RIDFEM Method I Soil Objectives in a manner that mitigates potential risks to human health and the environment. The location of the Site is depicted in Figure 1 of the Remedial Action Work Plan (RAWP).

2.0 BACKGROUND

Several environmental assessment reports including a Site Investigation Report (SIR) have been prepared for the Site. A summary of all previous investigations was provided in LSE's RAWP dated August 5, 2025. Collectively, these previous investigations characterized environmental conditions and identified the extent of contaminant impacts in site soils. Groundwater was determined to not be impacted.

Based on the technical feasibility and cost efficiency evaluation of remedial alternatives described in the SIR, the most feasible remediation plan for impacted soils at the Site (concentrations greater than the industrial/commercial direct exposure criteria (I/C-DEC)) is on-site encapsulation using impervious engineered barriers. This preferred remedy is especially applicable since the engineered barriers can be constructed as part of the required stormwater BMPs.

The Construction SMP described herein, which outlines procedures for managing contaminated soil at the site, will be adhered to during remedy implementation.

3.0 CONSTRUCTION SOIL MANAGEMENT PLAN

The Construction SMP was prepared in order to establish procedures to mitigate soil exposure risks during construction of the proposed engineered barrier. This SMP also specifies procedures for managing jurisdictional soil in the unlikely event that excess soil requires off-site disposal or reuse.

3.1 Site Development

The subject 13-acre Site has been used since 2009 by Rhode Island Recycled Metals (RIRM) and is currently improved with an office trailer, a brick non-ferrous metals storage building, two Quonset Hut-style canopy enclosures, and a weight scale. The Site is mostly unpaved with several areas containing concrete slabs associated with former operations and buildings and the remainder of the Site covered with ground asphalt. The Site abuts the Providence River to the west and is located in an industrial and commercial district of Providence with nearby properties consisting of industrial facilities, a community medical center, and commercial businesses. The planned future use of the Site will involve metals recycling and vehicle salvage.

In response to the identified TPH, SVOCs, and metals in soil, the Responsible Party intends to perform remedial activities as required in order to bring the site into compliance with the Remedial Regulations. Simultaneously, the Property owners are designing stormwater BMPs and submitting stormwater permits under RIDEM's Rhode Island Pollutant Discharge Elimination System (RIPDES). The proposed soil remedy consists of the encapsulation of impacted soil beneath engineered barriers in conjunction with recording of institutional controls to maintain a condition of no significant risk to those working at or visiting the Site and abutting property owners.

3.2 Earthwork and Soil Grading

The implementation of the proposed remedy will involve the following tasks:

- Re-establishment of a shoreline barrier (either bulkhead or riprap shoreline),
- Backfill of the shoreline trench using material stockpiles excavated to create the trench,
- Site grading,
- Installation of Site-wide impervious caps to direct stormwater to on-site treatment areas and provide a barrier to underlying soils,
- Engineered barriers will consist of
    - heavy-duty asphalt for vehicle traffic areas,
    - heavy-duty concrete for areas where metal pile staging will occur,
    - existing concrete surfaces (predominantly beneath the Quonset structures and in the northwest corner of the Site).
    - Landscaped cap associated with lined stormwater basin,
- Construction of a lined stormwater basin in the southwest corner of the Site, and
- Construction of stormwater treatment controls.

Due to the presence of contaminants in underlying soils, on-site Contractors involved with earthwork shall wear modified Level D personal protective equipment (PPE) to ensure worker safety.

During the grading process for the cap installation, small volumes of soil may be stockpiled onsite. If a stockpile exceeds 20 cubic yards in volume and will remain in place for an extended period of time (presumed to be longer than 2 weeks), that stockpile must be covered with 6-millimeter polyethylene sheeting to prevent erosion of the pile and mitigate the possibility of fugitive dust.

In the event that additional soil is required for Site grading purposes, the imported soil will be sampled and analyzed for Polychlorinated Biphenyls (PCBs), TPH, SVOCs, Volatile Organic

Compounds (VOCs), and RCRA-8 Metals at a frequency of one sample per 500 yards of soil to ensure imported soil is compliant and will not contribute to a release at the subject Site.

Prior to the disturbance of jurisdictional soils, the existing sedimentation & erosion controls consisting of a ground asphalt berm and socks will be inspected. The gravel at the construction entrance will remain in place until the remedy in implemented and will be maintained as required to remove mud/debris from truck and vehicle tires prior to leaving the site. During construction, barriers such as temporary construction fencing or snow fencing will be utilized to keep unauthorized visitors from entering active construction areas. If dry, dusty conditions are encountered during the excavation phase of the project, water will be used to control dust to the extent necessary. At no point will Site soil present within jurisdictional areas leave the site unless it is characterized in advance and documented as non-jurisdictional. Any jurisdictional soil that must be removed from the Site and is confirmed to be jurisdictional will only be transported to a licensed soil disposal facility.

3.3 Jurisdictional Soil Encapsulation

Following Site grading and earthwork, the engineered controls will be installed as depicted in Figure 3of the RAWP. The planned engineered barriers will consist of one of the following:

- Existing concrete and building foundations that are in good condition will remain in place to serve as an impervious engineered barrier. If surface elevations of existing concreter surfaces must be raised, new concrete will be poured on top of the existing concrete.

- Heavy-duty concrete will be installed in areas of the Site shown in Figure-3 of the RAWP. New Concrete pads will consist of 6-inches (min), 4,000 PSI concrete w/ air entrainment of ~6%, underlain by 8-inches (min) compacted bank run gravel or processed gravel.

- Heavy-duty bituminous concrete will be installed in all areas of the Site not surfaced by any other engineered control as shown in Figure-3 of the RAWP. Asphalt cap will consist of 1.5-inch, class 9.5 wearing course (RIDOT standard HMA Matrix) over tack coat with 3-inch, 19 bituminous concrete binder course (RIDOT standard HMA Matrix), over 16-inches (min) of compacted gravel.

- A typical landscape cap consisting of 12-inches of clean sub-soil/loam over an impervious liner will be used beneath the stormwater basin located in the southwest corner of the Site.

Additional details of the design details of the engineered controls will be provided in the stormwater design specifications to be provided by DiPrete Engineers.

3.4 Off-Site Soil Disposal

The remedy for soil will consist of on-site encapsulation and to achieve grading requirements, all existing Site soil will likely remain on Site. However, in the unlikely event that excess soil remains following grading/construction of the encapsulation areas, the contaminated soil will be characterized for off-site disposal or reuse at a licensed recycling/disposal facility.

Once accepted by the facility, the jurisdictional soil will be loaded into dump trucks/trailers and transported to the off-site soil disposal/recycling facility. The contaminated soil would be transported under a bill of lading or other appropriate shipping papers. It is anticipated that one option for off-site disposal would be the Rhode Island Resource and Recovery Corporation facility in Johnston for use as Alternative Daily Cover or Solid Waste Soil.

Any stockpiles of jurisdictional soil slated for off-site disposal will be secured with caution tape or snow fence to prevent unauthorized access. An operational log will be maintained during management of jurisdictional soil documenting:

- the volume of soil removed,
- soil quality observations,
- photographic records,
- field sketches of soil sampling/stockpiling locations,
- soil analytical results,
- waste manifests, and
- any incidents or concerns noted by the inspector during progress of the work.

Most elements of the operating log will be provided in a summary Remedial Closure Report following completion of remedial activities and construction activities at the Site.

3.5 Dust Mitigation

The RIRM facility has a water truck onsite which will be employed during construction on any day when dusty or dry conditions occur at the Site. Site surfaces/oil will be sprayed with water during these conditions to mitigate the generation of fugitive dust generated by heavy equipment or vehicles. Furthermore, dust monitoring will be employed throughout the remedy implementation process and PM levels will be checked throughout the day to monitor for any significant increases. The dust monitoring and visual observations of dusty conditions will serve as the trigger for implementing dust mitigation measures.

3.6 Erosion Control

The interim controls presently in place will continue to provide sedimentation and erosion control at the Site. The existing ground asphalt berm and silt sock that surrounds the Property will be continuously maintained throughout earthwork to mitigate stormwater runoff and mitigate potential erosion and present stormwater/sediment from reaching the abutting Providence River. The material stockpiles derived from the excavation of the vessel salvage trench will remain covered with tarps pending their reuse for onsite construction. The riprap construction entrance will remain in place and be maintained as necessary until earthwork is complete to mitigate possible vehicle track-out of soil/mud. Additional specifications for erosion and sedimentation control will be provided in the Stormwater Plan being developed by DiPrete Engineers.

3.7 Environmental Land Use Restriction

Since following remedy implementation, jurisdictional levels of contaminants will remain in soils that will be encapsulated, there will be a need for institutional controls on this parcel. The draft ELUR will be submitted for Department review and following applicable revisions, a Department

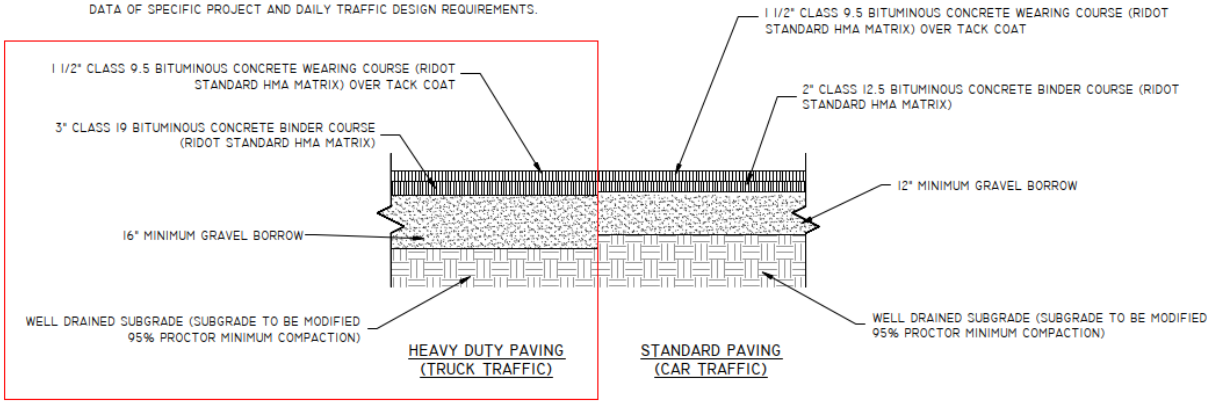
-approved ELUR will be recorded in municipal records. The ELUR will serve to require that the various engineered controls be properly maintained. The ELUR will include a Department-approved Soil Management Plan to be followed should future disturbances or repairs beneath the cap be required. Use restrictions will include limiting future Property use to commercial/industrial activities, prohibit disturbance of and require maintenance of engineered controls, and prohibit the use of groundwater at the entire Site for potable use.

Annual inspections of the engineered controls will be completed with the results summarized in a annual ELUR compliance inspection report to be submitted to the Department.

ATTACHMENT C

COMMENT #9A – CAP SPECIFICATIONS

NOTE:
THIS PAVEMENT SECTION DETAIL REFLECTS ASSUMED MINIMUM REQUIREMENTS WITHOUT GEOTECHNICAL EVALUATION. FINAL DESIGN TO BE BASED ON GEOTECHNICAL DATA OF SPECIFIC PROJECT AND DAILY TRAFFIC DESIGN REQUIREMENTS.

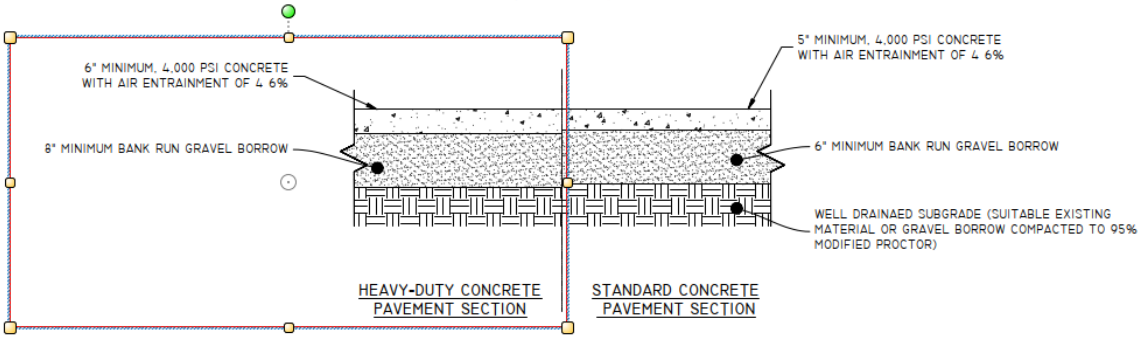


TYPICAL PAVEMENT SECTION

NOT TO SCALE

NOTE:

1. THIS PAVEMENT SECTION DETAIL REFLECTS MINIMUM REQUIREMENTS. ENGINEER TO DETERMINE DESIGN BASED ON GEOTECHNICAL DATA OF SPECIFIC PROJECT AND DAILY TRAFFIC DESIGN REQUIREMENT.
2. HEAVY DUTY CONCRETE PAVEMENT SECTION TO HAVE WELDED WIRE STEEL REINFORCING WITH A MINIMUM STEEL ARE OF 0.058 SQUARE INCHES PER FOOT IN EACH DIRECTION (5" THICKNESS: 6X6 W2.0xW2.0 WWF AND 6" THICKNESS: 6X6 W2.9xW2.9 WWF).
3. CONTROL JOINTS SHALL BE CUT IN BOTH DIRECTIONS AT A MAXIMUM SPACING OF 12' O.C. EXPANSION JOINTS SHALL BE PROVIDED AT A MAXIMUM SPACING OF 90'. THE CONTROL JOINTS SHALL BE CUT INTO THE SLABS AS SOON AS THE CONCRETE IS CAPABLE OF SUPPORTING THE CUTTING EQUIPMENT BUT IN NOT CASE MORE THAN 8 HOURS AFTER CONCRETE PLACEMENT. THE EXPANSION JOINTS SHALL HAVE SMOOTH STEEL DOWELS THAT ARE 1 1/2" Ø, 30" LONG AND LOCATED 18" O.C. THROUGHOUT THE LENGTH OF THE JOINT. ALTERNATELY, A 3/8" BY 4 1/2" DIAMOND DOWEL AT AN 18" SPACING MAYBE BE SUBSTITUTED FOR THE SMOOTH DOWEL. DO NOT EXTEND THE SLAB REINFORCEMENT THROUGH THE EXPANSION JOINT.
4. SUBBASE AND BASE COURSES SHOULD BE COMPACTED IN 1' (MAXIMUM) LIFTS TO AT LEAST 95% OF THE MAXIMUM DRY DENSITY AS DETERMINED IN ACCORDANCE WITH ASTM D 1557.
5. FILL BELOW THE SUBBASE SHOULD BE COMPACTED TO AT LEAST 95% OF THE MAXIMUM DRY DENSITY.



TYPICAL HEAVY-DUTY CONCRETE & STANDARD CONCRETE PAVEMENT SECTION

NOT TO SCALE

ATTACHMENT D

COMMENT #9B – CORRECTED PAGE

3.8 Site Plan (Section 1.10.9)

A Site Locus map is attached as Figure 1. A Site Plan showing pertinent site features and engineered controls is presented in Figure 2.

3.9 Design Standards and Technical Specification (Section 1.10.10)

The current concrete slabs and building slabs/foundations will serve as a cap for portions of the Site. The remainder of the Site will be newly encapsulated with either a heavy-duty concrete cap in the planned salvaged metal stockpile areas or a heavy-duty asphalt cap in the vehicle traffic areas. Additional details are provided below in Section 3.9.3.

3.9.1 Air Specifications

The potential for exposure to airborne contaminants at the Site is currently limited to dust since the Site is not yet paved although dust monitoring has determined that dust/particulate concentrations have not exceeded EPA standards. Dust may also be generated during earthwork for construction of the caps and therefore, dust suppression techniques will be employed during construction and earthwork. Accordingly, continuous dust monitoring will be conducted throughout remedy implementation. Once, all site-wide caps have been installed, there will be no potential for exposure to contaminants in Site soils through a dust pathway.

3.9.2 Groundwater Specifications

N/A

3.9.3 Soil Specifications

The engineered barriers selected for this Site consist of one or more of the following.

- Current concrete slabs/building foundations (minimum 4-inches of concrete over 6 inches of sub-base aggregate),
- Heavy Duty asphalt paving, consisting of 16 inches of imported gravel borrow, 3 inches of Class 19 bituminous concrete binder course, and then topped with 1.5 inches of Class 9.5 bituminous concrete wearing course over tack coat;
- Heavy Duty Concrete paving, consisting of 8 inches of imported bank run gravel borrow topped with 6 inches of 4,000 PSI concrete with air entrainment of 46%;

The above engineered controls exceed Department Presumptive Remedies for engineered controls and are considered an adequate barrier to direct contact with underlying soil. Maintenance of the various barriers will be conducted as necessary and in accordance with the soil management plan.

3.10 Set-Up Plans (Section 1.10.11)

In order to provide proper pitch for overland flow of stormwater towards the planned stormwater basin, the Site will be graded section-by-section prior to the installation of the planned engineered barriers. All soil currently at the Site will be reused for grading in addition to imported material in

ATTACHMENT E

COMMENT #10 – SITE-SPECIFIC CONTINGENCY PLAN

CONTINGENCY PLAN
SITE SAFETY INFORMATION SUMMARY

This document does not take the place of a Health and Safety Plan and does not fulfill the requirements of OSHA 1910.120. If a HASP is required for this Site then one must be completed in accordance with the requirements of 1910.120.

Negative determination of need for health and safety plan:

{The work contemplated under this project will be conducted on private property in order to construct stormwater BMPs and associated controls. These BMPs will also serve as engineered barriers required to preclude risks of direct exposure to contaminants in underlying soil associated with the Site's long-term use for metal salvage operations. The contaminants present are regulated under RIDEM"s Remediation Regulations but are not hazardous waste. As such, this site is not defined as a hazardous waste site (State or Federal) and does not require a formal HASP. However, the potential exists that while earthwork is occurring soil or groundwater which has been impacted by PAHs or metals may be encountered. As such, modified level D personal protective equipment is recommended for Site workers. This Site Safety Information Summary outlines pertinent background project information, potential risks, emergency contact information, routes to the nearest hospital and contingency procedures to be followed in the event that unexpected conditions are encountered during earthwork. If contaminants other than those previously characterized at the Site are encountered or if characteristically hazardous waste is identified on the Site, a formal HASP will be required to be prepared by the contractor in accordance with OSHA 1910.120.}

I have personally reviewed the site conditions for this project and determined that a formal Health And Safety Plan prepared in accordance with OSHA 1910.120 is not required.

Health and Safety Director: David J. Hauschildt 11/3/2025
Signature Date

Project Manager: Isabella Iacono 11/3/2025
Signature Date

SITE NAME: Rhode Island Recycled Metals Facility

SITE ADDRESS: 434 Allen's Avenue, Providence, RI

CMG JOB NO.: 2025-301

DATE: November 3, 2025

PROJECT PERSONNEL AND EMERGENCY PHONE NUMBERS

CMG PROJECT DIRECTOR:

NAME: Dave Hazebrouck
WORK PHONE: (774) 241-0901
HOME PHONE: NA
CELL PHONE: (401) 338-3286

CMG PROJECT MANAGER:

NAME: Isabella Giacomo
WORK PHONE: Same
HOME PHONE: NA
CELL PHONE: (571) 255-0837

SITE/PORTIJECT CONTACT

NAME: Jared Sevinor
WORK PHONE: (617)-592-1752
CELL PHONE: Same as above

OTHER AUTHORIZED ON-SITE PERSONNEL

NAME: Jason
WORK PHONE: (401) 461-9700
CELL PHONE: (617)-556-7030

EMERGENCY RESPONSE COORDINATOR

NAME: Same as Proj. Director
WORK PHONE:
HOME PHONE:

CALL-**B**EFORE-YO**U**-**D**IG: 811

GOVERNMENT OFFICIALS

NAME: National Emergency Response Center PHONE: 1-800-424-8802

EMERGENCY PHONE NUMBERS

POLICE: 911 OR
FIRE DEPARTMENT: 911 OR
RESCUE SQUAD: 911 OR

NEAREST HOSPITAL: Hospital Phone: (401) 444-4000
Rhode Island Hospital
593 Eddy Street, Providence, RI 02903 US

DIRECTIONS TO HOSPITAL: FROM SITE

1.	Start out going North on Allens Avenue toward Eddy St.	1.0 miles
2:	Turn LEFT onto Blackstone St.	0.1 miles
3:	Turn RIGHT onto Eddy St.	0.1 miles
11:	End at 593 Eddy St Providence RI	

Total Est. Time: 5 minutes Total Est. Distance: 1.2 miles

A. SITE LOCATION

434 Allens Avenue, Providence, RI

B. SITE HISTORY

Site soils have been characterized as part of an ongoing remedial procedure through the Rhode Island Department of Environmental Management (RIDEM). Soils at the Site contain semi-volatile organic compounds (SVOCs), total petroleum hydrocarbons (TPH), and metals at concentrations which exceed the RIDEM's Direct Exposure Criteria (DEC) and are therefore jurisdictional. RIDEM has agreed that the soil has been adequately characterized and therefore requested details for the upcoming earthwork involved in the implementation of the proposed remedy, which includes the implementation of a Site-wide cap which will be occurring concurrently with the installation of an onsite stormwater infiltration system.

C. FIELD ACTIVITIES TO BE CONDUCTED

The services that are the subject of this project are related to the potential for encountering impacted soil during earthwork, grading, and the installation of the caps that would require management in accordance with RIDEM regulations.

D. AREAS OF POTENTIAL OR ACTUAL CONTAMINATION

Site workers should presume that all soil generated at the Site is jurisdictional and therefore contaminated and should be handled per RIDEM Regulations.

E. SITE EVACUATION MEETING LOCATION

Although the need for evacuation is extremely unlikely, if a centralized meeting place is needed, all pertinent parties will meet at the parking lot for the Providence Community Health Center.

F. PERSONAL PROTECTIVE EQUIPMENT

Hard hats, coveralls, gloves and steel-toed boots (Level D).

ATTACHMENT F

COMMENT #12 – SITE-SPECIFIC SOPs

STANDARD OPERATING PROCEDURE
RI Recycled Metals, Inc.
434 Allens Avenue
Providence, RI

Oil & Hazardous Material Spill Response

Objective: The objective of this Standard Operating Procedure (SOP) is to provide RIRM employees with guidelines for properly responding to soils and releases of automotive fluids wherever they may occur at the MMI facility. Responses to such releases will involve containment, notification, and proper disposal of any spilled liquids. Proper response and cleanup of spilled material will protect soil, groundwater and the Narragansett Bay from adverse impacts from these sometimes toxic materials.

Affected Areas: This SOP applies to all areas of the facility. Most spills occur when automotive fluids are drained from large equipment in the yard that doesn't fit within the EnviroRack enclosure. Other spills may occur at the car crusher, the engine block processing area, EnviroRack enclosure non-ferrous processing area, equipment maintenance areas, or the marine salvage areas along the shoreline.

Spilled Materials: These automotive fluids include waste motor oil, gas (good & bad), diesel, hydraulic oil, transmission oil, axel oil, antifreeze and break fluid. A release (spill) of any of these materials requires an immediate response.

Required Materials: In order to have the proper materials on hand to respond to a spill of oil or hazardous materials, some basic materials should always be kept on hand at sufficient quantities. These include speedi-dry (10 bags min.), oil adsorbent containment booms (75 feet), and oil adsorbent pads (a.k.a. diapers). These spill response materials will be stored within the auto-processing tent. A designated stockpile of clean fill that is of low permeability would be good to have on hand. This could be a 10 yard pile of sandy silt (typically referred to as "washings" from a sand and gravel plant such as Material Sand & Stone).

Spill Response/Notification: Small Spills: Any spill of any of the above described materials that causes a stain on the ground surface must be cleaned up immediately. Small spills can be collected manually with shovel and transferred with a 5 gallon bucket or similar container to the designated drum storage area

located at the car processing tent. Any spill caused or observed that are greater than 1 foot diameter and/or is greater than ½-gallon in volume must be reported immediately to Ken Hanley. Contaminated soil resulting from a spill or release of any automotive fluid that results in filling more than half of a 55-gallon drum must be reported to the Rhode Island Department of Environmental Management (RIDEM). Larger spills can be cleaned up under Ken's supervision using the facilities' bobcat or similar heavy equipment.

Large Spills: Spills that result in large standing puddles of automotive fluid present additional threats to surface water and groundwater. Large spills will also likely require more extensive cleanup than can be accomplished with a bobcat & shovel. In these cases, in conjunction with immediately notifying Ken Hanley & the RIDEM, the person that first discovers the spill must assess the potential for the spilled liquid to reach open waters of the Bay or adjoining waterways. **Immediate Action is Vital!!!!** If the fluid is continuing to move or if the release is uncontained, an oil adsorbent boom and mounds of low-permeability soil should be positioned to contain the release and prohibit it from entering the nearby waterways. Speedi-dry should also be used to contain and/or adsorb the spilled liquid.

Contact Information:

RIRM Office: 401-461-9700
Jared Sevinor (Cell): 401-529-0208

David Hazebrouck (cell)
CMG 401-338-3286

RIDEM Emergency
Response Program: (401) 222-1360 (normal business hours)

RIDEM Environ Police: (401) 222-3070 (24-hour hotline)

STANDARD OPERATING PROCEDURE
RI Recycled Metals, Inc.
434 Allens Avenue
Providence, RI

February 15, 2012

Automotive Fluid – Characterization, Management & Disposal/Recycling

Objective:

The objective of this Standard Operating Procedure (SOP) is to describe the various automotive waste streams generated from the automotive scrapping process and document the rational for how they are managed and disposed or recycled. This SOP is also intended to be used by RIRM employees that are responsible for waste management and to be provided to regulatory agencies upon request to support the waste management procedures followed by RIRM. Note that this SOP does not cover Universal Wastes removed from cars as the associated procedure is covered under a separate SOP for Universal Waste.

Listing of Automotive Fluids:

Automotive Fluid	Management Procedure
Used Oil – Includes: *Motor Oil *Transmission Fluid *Hydraulic Oil Rear Axle Fluid Power Steering Fluid Break Fluid	Of these petroleum compounds, only the fluids mark with an (*) are currently collected on the EnviroRack. and stored in the integral above ground storage tank (AST) and transferred to a nearby AST in the auto processing tent. These mixed fluids may also be stored and/or shipped within 55-gallon drums. The petroleum-based fluids are managed in accordance with Rule 15.0 "Used Oil Management Standards" of RIDEM's Rule and Regulations for Hazardous Waste Management (amend. June 2010). Additional management detailed are provided below in Parr. 1. Excerpts of the pertinent Haz Wst Regs are included in Append A.
Windshield Washer Fluid	Collection of this fluid is not currently considered by RIDEM to be mandatory although collection of it is considered to be a BMP. Future management should include collection and free distribution of this fluid to employees or other benefactors.
Gasoline / Diesel	These fluids are removed on the EnviroRack and are managed as good or bad (off-spec) fuel. Good fuel is stored in a 275-gallon AST in the auto processing tent and is distributed to employees. Fuel containing water or which is considered

	degraded is stored in an AST or 55-gallon drums. These fluids have been determined to be non-hazardous and are managed as such since they are sent to a facility that burns it for energy recovery and therefore qualifies for the exemption in 40 CFR 261.2. Additional management details are provided below in Parr. 2.
Hydraulic Oil	This fluid is generally drained from heavy equipment outside of the auto processing tent and transferred to 55-gallon drums stored inside the tent for reuse. If contaminated hydraulic oil is produced, it is mixed with the other "used oil".
Anti-Freeze	This fluid is collected by RIRM on the Envirorack and drained into integral ASTs or 55-gallon drums for storage. Periodically and as necessary, Western Oil is called to pump out the anti-freeze where is is ultimately recycled off-site and resold.
Freon	As of January 1, 2012, RIRM does not collect Freon from automotive air conditioning units. However, This material is regulated by the EPAS and must be properly removed prior to sending cars to the crusher. Freon removal can only be completed by EPA-Certified technicians using EPA-Approved equipment. RIRM has made the decision to properly train its employees and purchase the proper equipment to recover Freon.
Crusher Residuals	The crusher has been moved onto a covered concrete pad along the northern property line and due to frequent spills and inadequate capture of residual liquids, the crusher was recently upgraded to include a more effective collection trough and dedicated collection buckets at each end of the trough. Liquid waste resulting from crusher operations is contained in 55-gallon drum(s) on the crusher pad as a satellite accumulation area and waste is shipped off-site as a hazardous waste. Additional details of the management and disposal of the crusher waste are provided in Parr 3 below.
EnviroRack Catwalk Containment Trays	The floor of the Enviro-Rack has two separate containment sections. Cars are always placed onto the Enviro-rack in the same direction with the gas tank to the right and the engine to the left. At each end of the Enviro-rack there is a drainage plug. When facing the rack, the plug in the right side is to drain gasoline that has spilled onto the right half of the Enviro-rack platform; the plug on the left is to drain motor oil. Periodically or when the spill containment sections become full, the oil portion of the platform is drained into the waste oil tank and any gasoline that has accumulated is drained into a 55-gallon drum for future pickup by Cyn Environmental as off-spec fuel.

Additional Details:

Parr 1 – Used Oil Used oil is drained from cars on the Envirorack and stored in one or more AST or in 55-gallon drums in the processing tent. RIRM's procedure for managing used oil was developed in accordance with Rule 5.4 "Used Oil Generator Standards" of RIDEM's Rule and Regulations for Hazardous Waste Management (amend. June 2010).

- All ASTs used for used oil storage are permanently labeled as such. The maximum amount of used oil stored on Site in any combination of drums/tanks at any one time is **1,320 gallons** (equivalent to twenty-four, 55-gallon drums).

- Any tank or container used for used oil storage will be in good condition and be clearly marked with the words: **"Used Oil"**. **Do not** label used oil drums with hazardous waste labels.

- All containers of used oil will be stored on a concrete pad under cover such that they are not exposed to precipitation.

- All containers for used oil will remain closed at all times unless they are being filled or drained.

- All ASTs greater than 500 gallons in capacity will be registered with the RIDEM and will be equipped with secondary containment able to contain 110 percent of the tank capacity in the event of a spill.

- Use of ASTs for used oil storage shall also comply with RIDEM's Oil Pollution Control Regulations,

Used Oil generated at/by RIRM will eventually be burned on-Site in a waste oil burner of less than 500,000 BTU/Hr capacity in accordance with Rule 15.3 of RIDEM's Rule and Regulations for Hazardous Waste Management (amend. June 2010) However, until such time that the waste oil furnace is operational, used oil will be picked up by a licensed used oil transporter in accordance with Rules 15.7 and 6.0.

Currently, the following used oil vendor removes used oil from the RIRM facility:

Cyn Environmental
100 Tosca Drive
Stoughton, MA 02072
781-341-1777

EMERGENCY RESPONSE (24/7) 800-622-6365

- Used oil will be transported by drum or in bulk under a Bill-of-Lading. Hazardous waste Manifests are not required to transport used oil.

Parr 2 – Gasoline & Diesel Fuel Currently, reuseable or off-spec fuel is drained from vehicles on the Envirorack and stored in one or more AST or in 55-gallon drums in the processing tent. Occasionally, if vehicles can not be brought into the processing tent, they will be drained of fuel on a concrete pad adjacent to the processing tent and the fuel is transported to the tent in covered 30-gallon drums and transferred to storage tanks or 55-gallon drums. Because vehicle fuel tanks are only drained and not removed, it is critical that gasoline be completely drained from fuel tanks to minimize explosion/fire hazards and to eliminate releases of fuels at the crusher. All draining, transfers and storage of fuel should be completed in accordance with NFPA and Providence Fire Department regulations.

Based on a visual and olfactory (sniff test) evaluation of the drained fuel RIRM determines if the drained fuel is reusable or off-spec.

Drained fuel determine to be reusable is stored in a 275-gallon AST, prominently labeled as "Reusable Gasoline" or "Reusable Diesel". Reusable gasoline is offered to employees or certain preferred vendors for use in their vehicles. Reusable diesel is reused in the various heavy equipment vehicles on Site.

- Any tank or container used for good or bad fuel storage will be in good condition and be clearly marked with the words: **"Reusable Gasoline", Reusable Diesel" or Off-Spec Gasoline or Diesel"**.

- All containers of off-spec fuel will be stored on a concrete pad under cover such that they are not exposed to precipitation.

- All containers for off-spec fuel will remain closed at all times unless they are being filled or drained.

- All ASTs greater than 500 gallons in capacity will be registered with the RIDEM and will be equipped with secondary containment able to contain 110 percent of the tank capacity in the event of a spill.

Waste fuel is a D-listed characteristically hazardous waste due to its capacity for ignitability. Up until December 2011, off-spec fuel was managed on-site by RIRM as hazardous waste under EPA ID# RIR000509497 even though the fuel was transported on Bill-of-Lading and recycled as non-hazardous waste. This discrepancy created confusion with respect to RIRM's waste management procedures and created the potential for non-compliance with RIDEM Regulations.

After reviewing RIRM's waste management practices and their vendor's policies, it was determined that RIRM is eligible for an exemption to the hazardous waste regulations outlined in 40 CFR 261.2(c)(ii) for off-spec fuel that is ultimately burned for energy recovery. Since the off-spec fuel mixtures generated at RIRM are recycled, they are not considered a waste and therefore are not required to be managed as hazardous waste.

Off-spec fuel is picked up periodically by the following vendor and transported under a Bill-of-Lading:

Cyn Environmental Services
100 Tosca Drive
Stoughton, MA 02072
781-341-1777
Acct Rep: Mike Mazzeo

EMERGENCY RESPONSE (24/7) 800-622-6365

According to Cyn, drums of off-spec fuel are shipped to Enpro Services of Williston, Vt. and bulk pump-outs of off-spec fuel are shipped to Environmental Products and Services of Williston, Vt. Both facilities separate water and fuel and blend the product into recycled fuel which is resold (i.e. burned for energy). Separated water is treated and discharged. A detailed description of the procedures followed by these vendors that quality RIRM for the 40 CFR 261.2(c)(ii) exemption are provided in an Email in Appendix B. Documentation from each of the waste recyclers that accept RIRM's off-spec fuel for energy recovery is also provided in Appendix B.

Parr 3 – Crusher Waste Residual liquid resulting from car crushing operations consists of a mixture of water, oil, gasoline and any other automotive fluid which is captured in 2-gallon buckets positioned at each end of the crusher collection trough. The crusher pad was covered in early 2012 to deflect precipitation and minimize contact of the equipment with stormwater. The monitoring of crushing operations and liquid levels is the responsibility of the loader operator that transports cars from the processing tent or engine block processing area to the crusher. When the buckets are ¾ full, the contents are drained into a 55-gallon drum positioned on the crusher pad. The drum is stored under the crusher roof such that it is not exposed to stormwater. Liquid transfers from the buckets are completed using a funnel to minimize spills while being handled. The drums should be labeled as "Crusher Residuals".

Crusher liquid residuals are not a listed hazardous waste but could be characteristically hazardous. A sample of the liquid from the crusher was

collected on December 13, 2011 and submitted for laboratory analysis of the characteristics of hazardous waste. A clean 8-ounch sample container was dipped into one of the trough buckets and used to fill a 1-liter amber wide-mouth and two 40-milliliter VOA vials preserved with hydrochloric acid. Analytical results included in Appendix C indicate that the characteristic of ignitability (i.e. flash point less than 140°F) exceeded the associated RCRA hazardous waste threshold. In order to confirm that the crusher residual sample did not reflect an isolated, unusually high gasoline content, a second sample of the crusher residuals was collected on January 6, 2012 and submitted for laboratory analysis. The characteristic of ignitability was again exceeded and therefore, as of February 2012, the crusher residuals will be managed as a hazardous waste. Under the current procedures for managing crusher waste, the accumulated liquid on the crusher trough will be sampled and analyzed for flash point quarterly for 1 year and the results will be reviewed to determine its future waste characterization status. Once plans for installing a new Seda rack at the facility are implemented, the percentage of gasoline in the waste should be significantly reduced. At that time, crusher waste will be resampled to determine if it is no longer characteristically hazardous.

The 55-gallon drums of crusher residuals will be picked up within 3 days of being filled to capacity by the following vendor and transported off-site for disposal under a Uniform Hazardous Waste Manifest.

Cyn Environmental Services
100 Tosca Drive
Stoughton, MA 02072
781-341-1777
Acct Rep: Mike Mazzeo

EMERGENCY RESPONSE (24/7) 800-622-6365

Drums of crusher residuals are managed as a satellite accumulation area and therefore, the following labeling, storage and management requirements apply to the crusher operation:

- All drums of crusher residuals will be stored on the crusher concrete pad (at the point of generation) under a portion of the equipment or roof that provides protection from precipitation.

- The drums containing crusher residuals will be under the control of the crusher operator and handled/stored so as to not cause a rupture or leak.

- The crusher drum(s) will be in good condition and will always remain closed at all times unless they are being filled or drained.

- Any person causing or witnessing a spill or releases from the crusher area including crusher drums will responded in accordance with RIRM's Spill Response SOP. Although not required, drums of crusher residuals will be placed on a spill containment pallet and spill response materials will be readily available.

- No incompatible wastes will be stored in close proximity to the crusher residuals drum.

- Any container used for crusher waste will be labeled as Hazardous Waste and clearly marked with the words: **"Crusher Residuals"**.

- When the drum is full, mark the date on the drum and arrange to have the drum picked up for off-site disposal within 3 days. At the point when the drum is picked up, provide this additional information on the label:

    - Company Name (RIRM),
    - RIRM address
    - DOT shipping name: Class 3 Flammable Liquid
    - EPA Waste Code: D001

Contact Information:

RIRM Office: 401-461-9700
Jared Sevinor (Cell): 401-529-0208

David Hazebrouck (cell)
Lake Shore Environ. 401-338-3286

APPENDIX A

Excerpts from Rule 15.0 "Used Oil Management Standards" of RIDEM's Rules and Regulations for Hazardous Waste Management (amend. June 2010).

APPENDIX B

Rational for Management of Off-Spec Fuel