

January 13, 2026

Ashley L. Blauvelt, P.E.  
Environmental Engineer IV  
RIDEM Office of LRSMM  
235 Promenade Street  
Providence, RI 02908

RE: RAWP Addendum 2/Response to Department Comments Letter (December 9, 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. Blauvelt:

This correspondence is provided as the Remedial Action Work Plan (RAWP) Addendum 2 requested in the Department's December 9, 2025 comments regarding the Rhode Island Recycled Metals (RIRM) facility prepared by Lake Shore Environmental (LSE<sup>1</sup>) and dated August 13, 2025. Department comments shown below are in italics.

**1. Engineered Controls**

- a. *The Response to RAWP Comments notes that "specific designs related to ... the engineered barriers will be provided and stamped in forthcoming DiPrete Engineering submittal to RIDEM? And "Further details regarding the cap designs will be provided by DiPrete Engineering as part of the stormwater permit submittals and will be stamped by a licensed P.E. when they become available." The specifications for the engineered controls must be supported by a design engineering report that details the Site-specific considerations that are incorporated. The Remedial Action Work Plan cannot be considered for approval without the supporting engineering report.*

The planned concrete and asphalt surfaces that will serve as a cap have been designed as part of the stormwater improvements that will incorporate Site-specific Geotech evaluations, processing equipment, and metal stockpile loads as well as grading to achieve overland flow of stormwater to a collection basin and stormwater treatment. Attached to this RIDEM comment response ([Attachment A](#)) is the design engineering report and PE-

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<sup>1</sup> Note: LSE prepared the initial RAWP and subsequent addendums before merging with CMG Environmental on August 1, 2025.

tamped cross sections of the engineered controls (i.e., caps) prepared by DiPrete Engineering.

- b. *Please update the “Cap Specifications” detail drawings (Attachment C) to be consistent with the above-referenced engineering report. Ensure that all potential engineered barriers are included and that the drawings are prepared under the supervision of and stamped by a Rhode Island Registered Professional Engineer, in accordance with § 10.10.10(A)(5) of the Remediation Regulations.*

The updated detail drawings are included herein as Attachment A and include the asphalt caps, concrete caps, and the stormwater basin area.

- c. *Section 3.3 of the Construction Soil Management Plan (C-SMP) states “Existing concrete and building foundations that are in good condition will remain in place to serve as an impervious engineered barrier.” Unless existing concrete pads meet the minimum specifications for new concrete cover, it must be replaced in accordance with the approved engineered controls. Existing building foundations may remain as is as long as the structure atop a foundation remains. Please revise all statements throughout the RAWP which state or indicate that current or existing concrete slabs will/may serve as a cap for portions of the Site, to state instead that:*

*“Existing concrete pads which do not meet the minimum specifications for new concrete cover, must be replaced in accordance with the approved engineered controls. Existing building foundations may remain as is as long as the structure atop a foundation remains.”*

Existing concrete and building foundations that are in good condition and meet standard requirements for engineered controls (e.g. min. 4” concrete slab) and which are beneath an existing structure will serve as an adequate engineered barrier. RIRM has confirmed that the existing concrete slab thicknesses beneath both on-site tents meet the above minimum requirements for engineered controls. These existing concrete slabs and building foundations that meet these requirements will not be subject to heavy loads/activities that would otherwise necessitate and greater concrete thickness.

- d. *Repeated references are made to “Department Presumptive Remedies” for engineered controls. For clarity, the Department does not have formal “Presumptive Remedies.” There is a set of minimum encapsulation specifications often referred to as “two feet of clean soil or equivalent” that can apply to most site remediation sites, though not all. It is important to understand that due to the heavy industrial use of this Site and the materials handled every day, there is a need for a more durable cap to protect the underlying soils and groundwater from a potential future release and to ensure that the underlying soils remain in place, secured by a cap constructed to withstand long-term heavy use on a coastal property. The common capping specifications or “presumptive remedies” do not apply to this Site due to the inherent increased risk of a future release common of scrap metal recycling and the challenges associated with coastal erosion. As such, please ensure that the revised and final Remedial Action Work Plan contains no mentions or references to “presumptive remedies.”*

Any mention of the “presumptive remedies” will be removed in the finalized version of the RAWP and replaced with *minimum encapsulation specifications*.

## 2. ***Hazardous Material & Substance Management***

- a. *The response provided in the Response to RAWP Comments to Department Comment 6.b. states that:*

*“... 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 ...”*

*On separate Site visits in 2024 (April and July), Department personnel documented the presence of oil sheening at the Site as well as improper storage/disposal of regulated materials (lead-acid batteries, used-oil filter). This demonstrates that it is impractical to rely on a plan based solely on preventing the import of hazardous materials. It is imperative that the Remedial Action Work Plan and its Construction Soil Management Plan account for all fate and transport mechanisms, identifying the potential sources for on-going and/or new releases before and during construction.*

Acknowledged. Preventing the inadvertent import of oil & hazardous materials (OHM) in the first place should be the initial step in an OHM release prevention plan. Here, the RAWP and Construction Soil Management Plan will account for potential OHM release mechanisms and will identify the potential sources for on-going and/or new releases. Following the approval of the RIPDES permit and stormwater design, the RAWP will be implemented during the remedial construction phase, during which time RIRM operations will be ceased, negating operational OHM release mechanisms. Following the effective period of the RAWP, the planned stormwater system will be implemented, which is designed to contain and treat any potential OHM releases in addition to stormwater. In addition, the RIRM operations and management plans will be implemented post-RAWP to account for potential OHM releases associated with metal salvage operations.

- b. *Handling liquid wastes – whether intentionally or not – is not the only means of a potential hazardous material release. Fugitive dust that consists, in part, of particulate matter generated from jurisdictional surficial soils may result in an accidental release of hazardous material. This can occur during soil disturbance, wind generated dust, soil inadvertently transported by vehicles/equipment improperly decontaminated prior to leaving the Site, and/or unforeseen events such as fires and severe weather events. If sources and methods of potential hazardous material releases are not acknowledged or understood, it may be difficult to identify and respond to an accidental release in a timely manner when one occurs.*

We acknowledge there is the potential to mobilize existing hazardous materials in soil during the period of construction. Such OHM releases could be associated with an airborne release such as dust during exceedingly dry conditions concurrently occurring with a wind

storm. Implementing dust mitigation techniques, including the use of a water truck, will serve to maintain minimum moisture level in soil and preclude such arid conditions. A torrential rain event could also trigger runoff containing OHM and therefore, sedimentation and erosion controls will be installed throughout the period of construction. Vehicles leaving the Site will be inspected to remove any adhered mud or soil and will be required to exit through a rip-rap construction pad to preclude tracking of debris off of the Site. Since the occurrence of the more recent fires, temperature monitoring devices are in place providing real-time alerts to RIRM management which will address the potential for such unforeseen events.

- c. *Based on the above comment response, the Department cannot consider or approve a plan that involves implementing the Remedial Action Work Plan while the metals recycling business operates at the same time.*

RIRM will remain in compliance with all current and future decisions made by the Superior Court.

### **3. RAWP Schedule**

*The Response to RAWP Comments states “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.” The January 10, 2025 Providence Superior Court Order mandates that:*

*“Within thirty (30) days after final approval of the {stormwater?} 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 Remedial Action Work Plan must be implemented in accordance with the Superior Court Order, otherwise, it cannot be approved by the Department.*

The schedule and procedures for the stormwater system & cap construction will align with the final Superior Court decision.

### **4. Construction Operating and Monitoring Logs**

- a. *The Response to RAWP Comments states “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.” The Court Order only pertains to the Interim Measures and does not limit the Department’s regulatory authority under § 1.11.1(D) of the Remediation Regulations to “issue conditions to the Remedial Action Approval when the Director finds that those conditions are necessary to protect human health and the environment.” The data reported, and frequency of reporting outlined in the Court Order is not appropriate for active construction, particularly at a*

*Site in which soil/material containing Hazardous Materials will be disturbed and managed.*

Acknowledged.

- b. *As stated previously, construction operating and monitoring logs shall be submitted to the Department as part of weekly progress reports. Progress reports should include air monitoring data, daily watering logs, weather, and summary of work completed that day.*

Acknowledged. A draft of the daily operating logs that will contain the requested information and be completed by the construction manager is included as Attachment B.

- c. *During implementation of the RAWP, air monitoring data shall be submitted as previously specified by the Department:*

*“In accordance with § 1.10.3(A)(3) of the Remediation Regulations, the Department is requiring that air monitoring data for particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>) 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<sub>1</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> for every hour, 24 hours per day, until the construction of the engineered controls are completed in full.”*

CMG acknowledges that ambient air monitoring frequencies will comply with the above schedule. The draft reporting format for air monitoring is included with the above daily operating logs.

## 5. ***Soil Management Procedures***

- a. *There are several instances in the C-SMP referring to “.. procedures for managing jurisdictional soil in the unlikely event that excess soil requires off-site disposal or reuse.” Please delete the words “or reuse” in all instances in which it appears as the offsite reuse of jurisdictional soil is prohibited. All soil at the site is presumed jurisdictional.*

The term "reuse" in this instance is not directed at the Site but instead pertains to the disposal facility "reusing" the soil for capping, shaping or daily cover. CMG will clarify this definition in the C-SMP.

- b. *Section 3.2 of the C-SMP states:*

*“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.”*

*Please revise this statement to state that “**All stockpiles of any volume must be covered with 6-millimeter polyethylene sheeting at the end of every workday** to prevent the erosion*

*of the pile and mitigate the possibility of fugitive dust.” Please also revise the statement in Section 3.4 of the C-SMP that instructs jurisdictional soil “be secured with caution tape or snow fence” to make clear it must be covered with 6-mil poly cover.*

The management of soil stockpiles will be revised in the C-SMP to clarify stockpile covering requirements. The revised C-SMP is attached to this RAWP Addendum 2 as Attachment C.

## **6. Contingency Plan**

- a. *The “Site-Specific Contingency Plan” submitted as Attachment E is not sufficient. The Remedial Action Work Plan is being prepared under 250-RICR-150-30-1, the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, not OSHA. § 1.10.13(A) of the Remediation Regulations states that:*

*“The Remedial Action Work Plan shall include a Contingency Plan which clearly explains the procedures to be followed and the Persons to be notified in the event of an unexpected incident involving Hazardous Materials at the Contaminated-Site.”*

*A Site-Specific Contingency Plan is required with or without the presence of Hazardous Waste as soils at the Site contain jurisdictional concentrations of Hazardous Materials. Such material, as defined by § 1.4(A)(33) of the Remediation Regulations, require strict management for the protection of human health and the environment, and likewise, emergency protocols are necessary during construction when the risk of exposure to soils containing Hazards Materials is the greatest. The Department will not approve a Remedial Action Work Plan without a sufficient Site-Specific Contingency Plan.*

The existing Site-Specific Contingency Plan has been amended to explain the procedures to be followed and the persons to be notified in the event of an unexpected incident involving Hazardous Materials at the Site.

- b. *Emergency Phone Numbers: Add State and/or local government emergency contacts such as the RIDEM Office of Emergency Response.*

Emergency numbers for RIDEM Emergency Response, as well as the Providence Fire Department and Police Department, have been added to the Site-Specific Contingency Plan.

- c. *Standard safety measures and procedures should be outlined, including, but not limited to, immediate and subsequent notifications and actions in the event Site personnel/workers identify potential/suspected hazardous waste, presence of unexpected visual and/or odors, ensure all personnel onsite are informed to avoid direct contact with Site soils and dust and skin, perform basic handwashing prior to eating, drinking, smoking, or leaving the Site, outline decontamination procedures for worker PPE and all construction equipment and vehicles to prevent the off-Site migration of jurisdiction material, etc.*

Additional health and safety procedures have been added to the updated Contingency Plan. The updated Site-Specific Contingency Plan is attached to this RAWP Addendum 2 as Attachment D.

7. *Once all pieces of the Remedial Action Work Plan have been submitted, Department comments addressed, and revisions completed, the Department will request that a final version of the revised Remedial Action Work Plan shall be submitted to the Department for approval.*

Understood.

8. *Please submit a RAWP addendum that addresses the abovementioned comments on or before January 13, 2026.*

This Response to Department Comments and associated attachments serves as the requested RAWP Addendum 2 document.

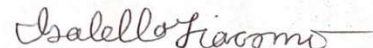
Note that upon submission of the finalized RAWP, CMG will be including each finalized Attachment that has been in the RAWP Addendum 1 and/or 2, except for Attachment F from the November 3, 2025 RAWP Addendum. Attachment F included Standard Procedure for a spill response and automotive waste management that is applicable to active automotive salvage yard activities and not construction activities associated with this RAWP.

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

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## **ATTACHMENT A**

### **COMMENT #1a – DESIGN ENGINEERING REPORT & CAP SPECIFICATIONS**

January 9, 2026

Ms. Ashley L. Blauvelt, P.E.  
 RI Department of Environmental Management  
 Office of Land Revitalization & Sustainable Materials Management  
 235 Promenade Street  
 Providence, RI 02908

RE: Design Engineering Report  
 Rhode Island Recycled Metals, Providence, RI  
 Project # 3543-001, RIDEM File No. SR-28-0143

Dear Ms. Blauvelt:

DiPrete Engineering has prepared this letter to serve as a design engineering report in support of the specifications for the engineered controls proposed for the Rhode Island Recycled Metals site on Allens Avenue in Providence, RI. This letter details the site-specific considerations that are incorporated in the Remedial Action Work Plan prepared by CMG, Environmental.

DiPrete Engineering has reviewed the geotechnical report "Geotechnical Engineering Report, Rhode Island Recycled Metals, Inc., 434 Allens Avenue, Providence, Rhode Island" prepared by Coneco Engineering, dated September 25, 2012. The report states that two soil borings were completed during this investigation. Section 4.2 describes the soil bearing capacity determined as a result of the borings and shows a bearing capacity of the first 0 to 7-9 ft as 1,000 – 12,000+ pounds per square foot (psf). Looking closer at Section 4.4 (tables below), which breaks down the soil profile further, a minimum bearing capacity of 4,250 psf within the first 6-7 feet below grade was provided.

<b>Soil Properties – Boring B-1</b>						
<b>Depth (ft)</b>	<b>Stratum</b>	<b>Angle (deg)</b>	<b>Weight (pcf)</b>	<b>Bearing (psf)</b>	<b>Compressive Skin Friction (psf)</b>	<b>Tensile Skin Friction (psf)</b>
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

<b>Soil Properties – Boring B-2</b>						
<b>Depth (ft)</b>	<b>Stratum</b>	<b>Angle (deg)</b>	<b>Weight (pcf)</b>	<b>Bearing (psf)</b>	<b>Compressive Skin Friction (psf)</b>	<b>Tensile Skin Friction (psf)</b>
0-2	Fill	38	140	10,500	700	125
5-7	Fill	40	140	12,000+	800	140

Tables above are extracted from Section 4.4 of the Geotechnical Engineering Report by Coneco.

The proposed engineered controls (cap) cross sections have been specified based on the Geotechnical report prepared by Coneco, that provides the bearing capacity of the onsite soils, compared to the anticipated equipment to be utilized on the site on a daily basis. The operator of the site has provided the product specification "cut sheets" for the primary equipment that is either already on site or expected to be during future operations. These cut sheets can be found attached to this letter. A summary of the on-site equipment is as follows:

- Mobile material handling machine
  - Sennebogen 835M
  - Operating weight: 100,000 lb
  - Ground Pressure: approximately 4,000 psf
- Wheel Loader
  - Komatsu WA250-5
  - Operating weight: 30,424 lb
  - Ground Pressure: approximately 3,000 psf
- Car Crusher
  - OverBuilt
  - Operating weight: 60,000 lb
  - Ground Pressure: approximately 3,600 psf
- Hydraulic Excavator
  - Komatsu PC400LC-6
  - Operating weight: 99,517 lb
  - Ground Pressure: 1,600 psf

Based on the above, the largest piece of equipment is the Sennegoen material handler which exerts approximately 4,000 psf. The underlying soils that will be most impacted by the load have an in-situ bearing capacity of approximately 4,250 psf or higher. This comparison shows the existing soils have the capacity to support the anticipated equipment loads.

Additionally, the site will be capped with a combination of Portland Cement Concrete (PCC) and Bituminous Concrete / Hot Mix Asphalt (HMA) surfaces, which will further distribute equipment loads to the soils below, increasing the allowable bearing capacity of the proposed engineered controls cap. The area to receive the PCC and HMA cap will be proof rolled and compacted to 95% compaction prior to the placement of the engineered control cap. The proposed cross section for the HMA surface (5" of bituminous concrete with 8" of gravel borrow below) will reduce the stress on the underlying soils by approximately 50-70%. Similarly, the PCC cross section (6" of Portland Cement Concrete with 8" of gravel borrow below) will reduce the stress on the soils by up to 70-90%. A stress reduction of at least 50% will provide a factor of safety of more than 2 for all equipment considered in this analysis.

Furthermore, the two largest pieces of equipment (the material handler and the car crusher) will have limited movement around the site and will primarily be stationed on concrete pads. Both will only be in operation (and at full load capacity) while sitting on the concrete pads, providing the highest reduction of stress on the soils below.

Overall, given that the equipment loads will be less than the allowable bearing capacity of the subsurface soils alone, and a minimum of 50% reduction can be expected by the proposed cap thickness, settlement on the site will be negligible.

If you have any further questions on this matter, please feel free to contact us at your earliest convenience.

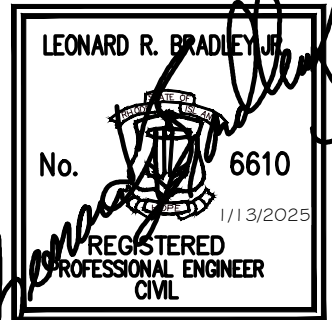
Sincerely,  
DiPrete Engineering Associates, Inc.



Leonard R. Bradley, Jr., PE  
Principal  
lbradley@diprete-eng.com



Dana Nisbet, PE  
Project Manager  
dnisbet@diprete-eng.com



*cc: Jared Sevinor, Rhode Island Recycled Metals*

*David Hazebrouck, CMG*

*Richard Nicholson, Esq., Nicholson & Associates, LLP*

*Richard Land (Special Master) & Bret W. Jedele, Chase Ruttensburg & Freedman, LLP*

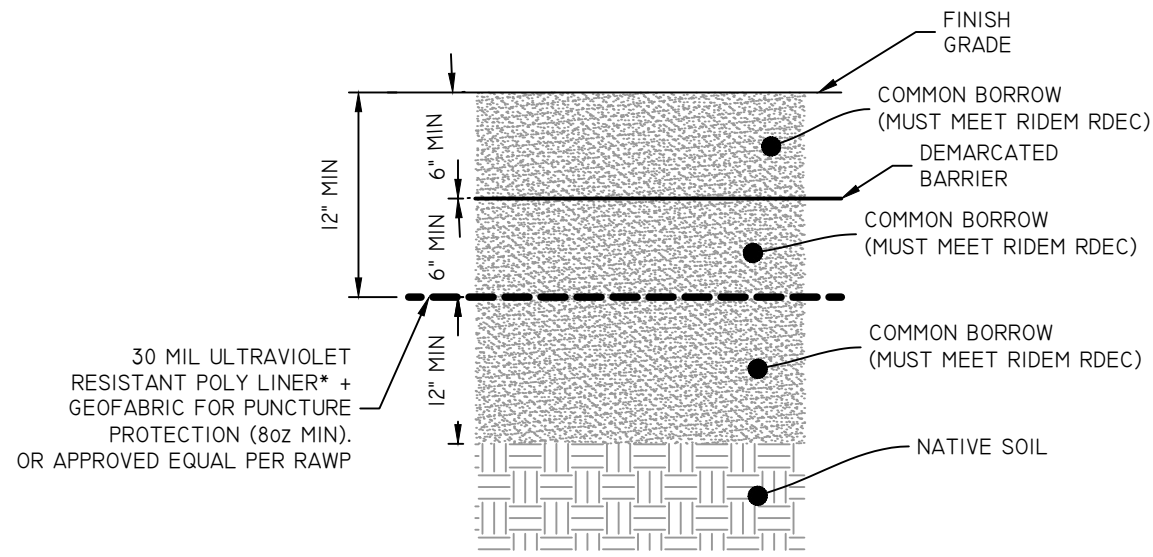
*Enclosures:*

*Engineering Controls*

*Geotechnical Engineering Report by Coneco.*

*Site Equipment Specifications*

Z:\DEMAIN\PROJECTS\3543-001 RI METALS GRIC-DEM PERMITTING\AUTOCAD DRAWINGS\3543-001-PLAN.DWG PLOTTED: 12/30/2025

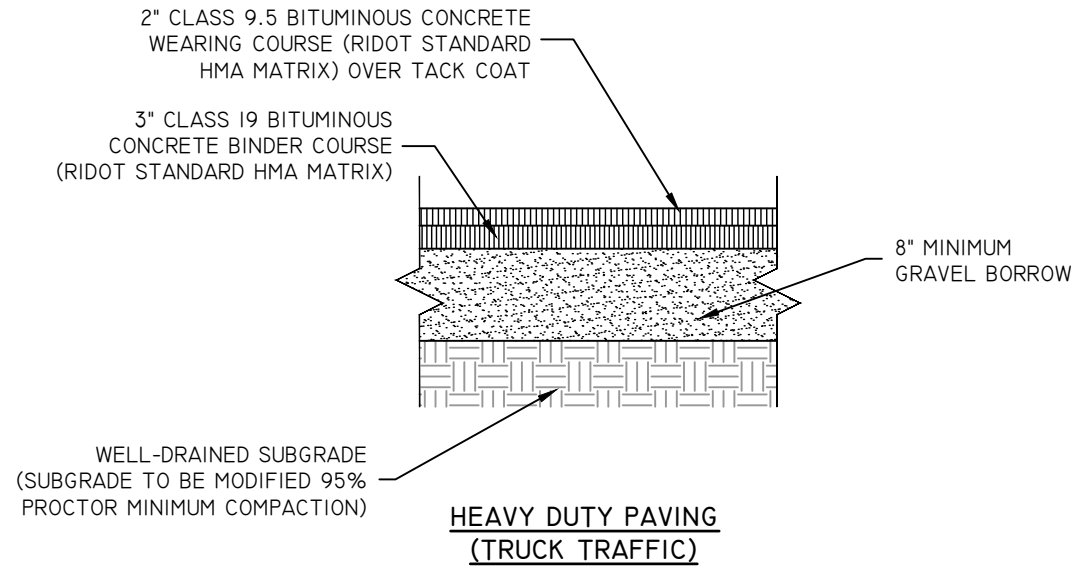


**SOIL ENCAPSULATED POND SECTION**

NOT TO SCALE

**NOTE:**

THIS PAVEMENT SECTION DETAIL REFLECTS MINIMUM REQUIREMENTS.

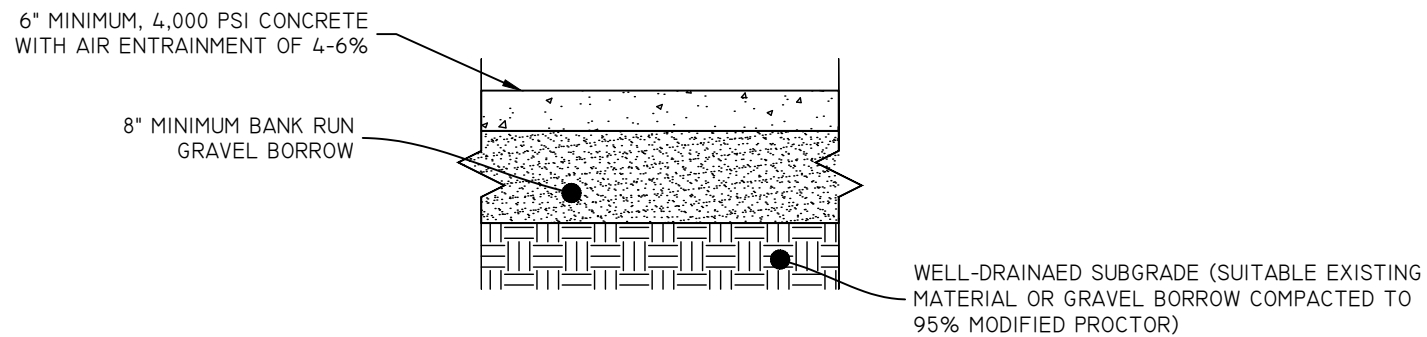


**SOIL ENCAPSULATED PAVEMENT SECTION**

NOT TO SCALE

**NOTE:**

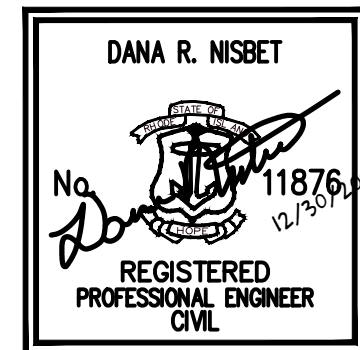
1. THIS PAVEMENT SECTION DETAIL REFLECTS MINIMUM REQUIREMENTS.
2. HEAVY-DUTY CONCRETE PAVEMENT SECTION TO HAVE WELDED WIRE STEEL REINFORCING WITH A MINIMUM STEEL AREA OF 0.058 SQUARE INCHES PER FOOT IN EACH DIRECTION (5" THICKNESS: 6X6-W2.0xW2.0 WWF AND 6" THICKNESS: 6X6-W2.9xW2.9 WWF).
3. CONTROL JOINTS 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 NO 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.



**HEAVY-DUTY CONCRETE PAVEMENT SECTION**

**SOIL ENCAPSULATED CONCRETE SECTION**

NOT TO SCALE



## **ATTACHMENT B**

### **COMMENT #4b – WEEKLY & DAILY OPERATING LOGS**

# WEEKLY PROGRESS REPORTS

## RHODE ISLAND RECYCLED METALS FACILITY

Date:

Inspector (Print Name):

Signature:

### WEEKLY ACTIVITIES CHECKLIST

Was a Daily Operations Log completed for each day?  Yes  No  N/A

If no, please explain why:

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Were activities suspended at any point?  Yes  No  N/A

If yes, please explain why:

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Was excess soil stockpiled at any point?  Yes  No

If yes, was it covered?  Yes  No

If yes, what is the estimated volume of stockpiled soil? \_\_\_\_\_ cubic yards

# DAILY OPERATIONS LOG

## RHODE ISLAND RECYCLED METALS FACILITY

Date:

Weather (e.g.: sunny, 70s):

Wind:

Inspector (Print Name):

Signature:

### DAILY ACTIVITIES CHECKLIST

#### ARRIVAL ON SITE

- Was the Site secure upon arrival?  Yes  No  N/A Comments \_\_\_\_\_
- Was any evidence of trespass noted?  Yes  No  N/A Comments \_\_\_\_\_
- Was any evidence of a release of potentially hazardous materials to the environment observed?  Yes  No  N/A Comments \_\_\_\_\_
- Was the daily safety briefing performed?  Yes  No  N/A Comments \_\_\_\_\_
- Were erosion control measures inspected and cleaned/repaired?  Yes  No  N/A Comments \_\_\_\_\_

#### DUST SUPPRESSION

Did dust conditions onsite warrant watering?  Yes  No If yes, estimated volume of water used: \_\_\_\_\_ (gal)

#### ISSUES

Did any issues occur during the day?  Yes  No

If yes, please explain below:

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#### SUMMARY

Please provide a summary of work completed this day:

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# DAILY OPERATIONS LOG

## RHODE ISLAND RECYCLED METALS FACILITY

Date: \_\_\_\_\_

Weather: \_\_\_\_\_

Wind: \_\_\_\_\_

Inspector (Print Name): \_\_\_\_\_

Signature: \_\_\_\_\_

### AIR MONITORING DATA

Instrument Serial #: \_\_\_\_\_

Instrument Serial #: \_\_\_\_\_

Upwind or Downwind: \_\_\_\_\_

Upwind or Downwind: \_\_\_\_\_

Average Values (in  $\mu\text{m}$ )

Average Values (in  $\mu\text{m}$ )

PM1      PM2.5      PM10

PM1      PM2.5      PM10

0:00

0:00

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## **ATTACHMENT C**

### **COMMENT #5 – CONSTRUCTION SOIL MANAGEMENT PLAN**

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**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.

### **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. All stockpiles of any volume must be covered with 6-millimeter polyethylene sheeting at the end of every workday to prevent the 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 is 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 3 of 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 concrete 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/reuse at a licensed recycling/disposal facility. Reuse at the licensed facility would include capping, shaping, or daily cover at the disposal facility's discretion.

given the characterization data included in the application for transportation of the material to the 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 covered with 6-millimeter polyethylene sheeting and 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 prevent 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 D**

### **COMMENT #6 – 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:		<u>1/6/2026</u>
	Signature	Date
Project Manager:		<u>1/6/2026</u>
	Signature	Date

SITE NAME: Rhode Island Recycled Metals Facility

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

CMG JOB NO.: 2025-301

DATE: January 6, 2026

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/PROJECT CONTACT**

NAME: Jared Sevinor WORK PHONE: (617)-592-1752  
CELL PHONE: (401)-529-0208

**OTHER AUTHORIZED ON-SITE PERSONNEL**

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

**EMERGENCY RESPONSE COORDINATOR**

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

**CALL-BEFORE-YOU-DIG: 811**

**GOVERNMENT OFFICIALS**

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

NAME: RIDEM Office of Emergency Response PHONE: 401-537-4533

**EMERGENCY PHONE NUMBERS**

POLICE: 911 OR 401-272-3121  
FIRE DEPARTMENT: 911 OR 401-243-6050

**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. NOTIFICATION PROCEDURES IN THE EVENT OF A RELEASE

In the event of unexpected visual or olfactory evidence of soil impacts and/or a release, the following steps should be employed:

1. Stop work immediately
2. Impacted material must be contained. For example, if a release of a fluid occurs over exposed Site soils, immediately apply absorbent pads to the impacted area to mitigate further migration
3. Contact CMG personnel who will contact the appropriate Emergency Response agency. All efforts will be made to minimize the duration of work stoppage.

F. 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.

G. PERSONAL PROTECTIVE EQUIPMENT

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

- H. AVOIDANCE TECHNIQUES FOR WORKER EXPOSURE TO OHM  
All Site soils should be presumed to be impacted. Avoid direct contact with soil, dust, and water at the Site. Avoid inhalation of wind-blown dust.
- I. ONSITE PERSONAL HYGIENE  
Prior to any activities that could result in ingestion or inhalation of OHM (e.g. eating, smoking, drinking, etc.), thorough hand washing should be employed. Hand washing should additionally be employed before leaving the Site.
- J. EQUIPMENT DECONTAMINATION  
Equipment will be dedicated to the Site to the extent possible. Before leaving, all construction equipment that has been in contact with Site soil must be cleaned of all loose soil / debris. All vehicles entering and exiting the Site will pass over a riprap construction entrance.