

SOLID WASTE BENEFICIAL USE DETERMINATION (BUD)

CONDITIONS FOR RE-USE OF SPENT FOUNDRY SAND CUMBERLAND FOUNDRY

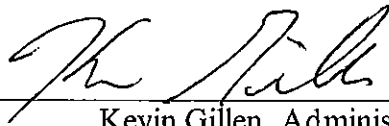
June 2025

Cumberland Foundry is a cast iron foundry that uses the sand molding process to produce iron castings for many different types of industries. The sand molds are a mixture of silica sand, bentonite clay and water. The spent foundry sand from the molds are the unusable byproduct generated by the metal-casting industry. Spent foundry sand that is just allowed to continue to accumulate, with no ultimate management plan, is collectively regulated as a solid waste in Rhode Island. Cumberland Foundry has submitted for approval a BUD request for re-use of the spent foundry sand produced and accumulated at their facility at 310 West Wrentham Road in Cumberland, Rhode Island. Based upon the representations made in the application, the RIDEM Office of LRSMM hereby grants approval for the reuse of this waste under the following conditions:

1. The spent foundry sand must be handled and processed in accordance with this approval, the original BUD applications and the renewal BUD application submitted by ENVi Environmental, LLC on behalf of Cumberland Foundry and received by RIDEM on August 19, 2020, and January 20, 2025, amended
2. A maximum of 600 tons of spent foundry sand shall be stored on site, at the designated area according to Appendix C, of the original BUD application, at any time for future processing.
3. Erosion and Stormwater control shall be conducted according to Section 6(j) of the original BUD application, with the use of a vegetative cover, silt fences and filter socks/berms.
4. RIDEM approves of the reuse of the spent foundry sand for agricultural blending with loam and construction and general fill applications as discussed in Section 10 of the application. This approval does not include being used in a product labeled as compost.
5. According to Section 6(d) of the original BUD application, Cumberland Foundry shall pass the excess sand through a screening machine to remove any foreign matter, metal and debris.
6. The facility shall provide the Department, its authorized officers, employees, and representatives, and all other persons under Department oversight, an irrevocable right of access to the facility at all reasonable times for the purposes of performing inspections, investigations, testing, and examining records. The Department or other authorized designated personnel shall have the right to access the facility at all reasonable times for the above-stated purposes without prior notice. Refusal to permit reasonable inspections, tests and investigations shall constitute valid grounds for denial, revocation or suspension of this BUD approval; and/or issuance of a Notice of Violation with Administrative

Penalty.

7. This approval expires on May 31, 2026. Cumberland Foundry may request an annual renewal of this approval that may be granted with the approval of RIDEM's Director.
8. RIDEM's granting of this approval does not affect the responsibility of Cumberland Foundry to meet all zoning and other local ordinances and comply with any other State or Federal requirements or approvals.
9. This approval may be modified, amended, suspended, or revoked at the discretion of RIDEM.
10. The facility shall collect the following data on a yearly basis:
 - a. Bi-annual samples for the total metals listed in the Remediation Regulation's Table 1 for Direct Exposure Criteria, as well as TPH. Sampling of the spent foundry sand stockpile shall use an approved sampling method as described in Table 1.16 of the Remediation Regulations. The sampling protocol shall follow the description as provided in Section 11 of the application.
 - b. Records of the physical description of the final product and the potential reuse, as well as the company buying the product, their address, and the tonnage sold.
11. Cumberland Foundry shall keep all records and data as discussed in number 10 of this Approval for a period of at least 1 year. All records shall be made available to representatives of the Office of LRSMM upon request. Upon renewal of this BUD permit, an electronic copy of the previous year's records and data shall be included in the application.



Kevin Gillen, Administrator
Office of Land Revitalization and Sustainable Materials Management

6/16/25

Date