



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT

235 Promenade Street, Providence, Rhode Island 02908

3rd RAWP COMMENT LETTER

File No. SR-28-0143

May 11, 2026

Richard Land (Special Master)
Chase Ruttenburg & Freedman, LLP
1 Park Row, Suite 300
Providence, RI 02903

AARE, LLC (Owner)
c/o Richard Nicholson, Esq.
Nicholson & Associates, LLP
9 Thurbers Blvd., Suite D
Smithfield, RI 02917

Rhode Island Recycled Metals, LLC (Operator)
c/o Richard Nicholson, Esq.
Nicholson & Associates, LLP
9 Thurbers Blvd., Suite D
Smithfield, RI 02917

RE: Remedial Action Work Plan (RAWP) – 3rd Comment Letter
Rhode Island Recycled Metals, LLC
434 Allens Avenue, Providence, RI
Plat Map 47 / Lot 601
Plat Map 55 / Lot 10

Dear Attorney Land:

The Rhode Island Department of Environmental Management's (the Department) Office of Land Revitalization and Sustainable Materials Management (LRSMM) has reviewed the *RAWP Addendum 2/Response to Department Comments Letter* ("Response to RAWP Comments 2") for the above referenced property (the Site), which was submitted on January 13, 2026, by CMG Environmental, Inc., in accordance with 250-RICR-140-30-1, Section 1.10 of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations).

After careful review of the *Response to RAWP Comments 2*, the Department requires a response to the attached comments, questions, and concerns about the submittal, which must be fully addressed in writing to receive a Remedial Approval Letter. The deadline for response is July 14, 2026.

If you have any questions regarding the above requirements or would like the opportunity to meet with Department personnel, please contact Jenna Giguere, Esq.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ashley Blauvelt', followed by a long horizontal line.

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

DEPARTMENT COMMENTS

May 11, 2026

Response to RAWP Comments 2, January 2026

Rhode Island Recycled Metals

434 Allens Avenue

Providence, Rhode Island

1. As stated in the Department's previous comment letter dated December 10, 2025, existing building foundations may remain as is as long as the structure atop a foundation remains. Other than permanent structures, concrete engineered controls **must** meet the Department-approved specifications for concrete engineered controls. The **approved minimum specification for a concrete engineered control** at this Site is 6" (minimum) 4,000 PSI concrete with air entrainment of 4-6% atop a minimum of 8" bank run gravel borrow (and welded wire steel reinforcing according to design spec.) which is the **"standard"** and **"minimum"** requirement for an **"adequate"** concrete engineered control.

The final RAWP shall refrain from the use of the terms "standard requirements" and "minimum requirement" with respect to encapsulation and engineered unless clearly referring to the following approved engineered controls specifications, in strict accordance with the stamped Engineering Cross Sections (*Design Engineering Report, January 9, 2026, DiPrete Engineering Associates, Inc.*):

- Concrete: Six (6") inches (minimum) 4,000 PSI concrete with air entrainment of 4-6% atop a minimum of eight (8") inches imported compacted sub-base (with welded wire steel reinforcing according to design spec.);
- Pavement: Two (2") inches class 9.5 bituminous concrete wearing course over tack coat atop three (3") 19 bituminous concrete binder course atop a minimum of eight (8") inches gravel borrow; and
- Soil Pond (*Stormwater control area only*): Six (6") inches clean borrow atop a demarcated barrier atop an additional six (6") inches of clean borrow atop a minimum 30 mil poly liner (or equivalent protection) over one (1') foot of clean material.

The final RAWP shall make no references to engineered control specifications that are less than the those approved for this Site, as specified in the Engineered Cross Sections plan found in the Design Engineering Report by DiPrete Engineering, dated January 9, 2026.

2. Please confirm whether the material that comprises the two existing soil stockpiles located on the eastern end of the Site and covered with blue tarp will remain onsite and encapsulated or if it will be disposed of offsite to a licensed facility.
3. Please submit a third RAWP addendum that addresses the above-mentioned comments on or before July 14, 2025.