

RI DEM RAWP Comment:

1. Section 3.2 (Proposed Remedy) indicates *"The engineered controls include placement of a geotextile fabric overlain with 1-foot of clean soil/crushed stone, placement of two (2) feet of clean fill material (optional as needed), placement of one 1-foot of clean fill with a 4-inch asphalt cover, in addition to the final building footprint, asphalt pavement and concrete walkways will prevent access to the impacted soils."* The standard Department approved engineered control should provide a level of protection equivalent to two (2) feet of clean fill. Please clarify the proposed final design thickness dimensions for the asphalt pavement and concrete walkway caps. Also, Figure 4 (Building Plan) and Figure 5 (Site Capping Plan) seem to identify several other alternative engineered control capping components that are not otherwise defined in the RAWP. Please provide the proposed final design thickness dimensions of each of the engineered control caps which include the lawn, patio, pervious pavers, stone dust path, stabilized gravel drive and landscaping for tree planting areas.

The proposed capping provides for the standard department approved engineered controls at a level of protection equivalent to two (2) feet of clean fill. The asphalt and concrete walkways design thickness at a minimum will be one (1) foot of clean fill and four (4) inches of asphalt or concrete. Design thickness of the lawn, patio, pervious pavers, stone dust path, stabilized gravel drive and landscaping for trees and gardens is geotextile fabric and one (1) foot of clean soil with the aforementioned cover above.

2. The draft RAWP indicates in several locations that any excess excavated soils will be stockpiled and covered with 6-mil plastic. The draft Soil Management Plan (SMP) indicates regarding excess soil, that *"The soil must be placed on and covered with polyethylene/plastic sheeting during the entire duration of its staging and secured with appropriate controls to limit the loss of the cover and protect against storm-water and / or wind erosion (e.g. hay bales, silt fencing, rocks, etc)."* Placement of impacted excavated soil both on and under poly sheets is consistent with Department policy and should be consistently followed during this project. Where impacted soils will be excavated or otherwise disturbed to varying degrees, the excavated soils must be stockpiled on and covered with 6-mil plastic until such time as reused as backfill onsite under a cap or properly disposed of offsite. Stockpiles shall be securely covered when not actively adding newly excavated soil or borrowing soil for backfilling, and shall be checked to insure adequacy of the cover at the end of each workday before leaving the Site.

Grenier acknowledge the standard department protocols for stockpiling contaminated soils and will be following the abovementioned standard of care during the implementation of the RAWP.

3. Regarding Section 3.2 (Proposed Remedy), Step 6 (Utility Installation), indicates that following utility trench backfilling and capping all the excavation and disturbance of contaminated soils will be complete, and the Site will be fully capped with geotextile fabric and 1-foot of stone and/or clean fill. It is further indicated that AQM equipment will no

longer be needed as disturbance of the impacted soil will have been completed. Please be reminded that before the AQM equipment is shut down and removed from the Site, all excess stockpiled impacted soils (if any remain) should be removed from the Site for proper disposal at an appropriately licensed facility since disturbance of the residual stockpile (i.e. moving, loading, loss of cover material) could still result in the generation of impacted dust.

Grenier acknowledge the comment and it is understood that all stockpiled contaminated soil (if any) will be removed prior to shutting down the AQM equipment.

4. Regarding Section 3.4 (Limited Design Investigation), in the event that concentrations of total petroleum hydrocarbons (TPH) in the soil sample at the location identified as #2 exceed the applicable Department criteria, the extent of petroleum impacts must be assessed.

Grenier acknowledge that if TPH soils are discovered above regulatory standards applicable to the Site, the TPH soils will be further assessed and remediation discussed with the Department.

5. Regarding Section 3.5 (Points of Compliance) with regard to clean fill material brought to the Site, please be reminded that while the OLRSM no longer requires the submittal of analytical data prior to clean fill being brought to a Site, it remains the sole responsibility of the Performing Party and their consultant to analyze the material, certify that the material meets the Department's Residential Direct Exposure Criteria (RDEC), as defined by the Remediation Regulations, for all constituents, and is suitable for use on the Site.

Redwood will laboratory analyze a representative sample of the 'clean' fill being brought to the Site. Only soil meeting the RDEC standard will be used on Site.

6. Section 3.9 (Design Standards and Technical Specification) discusses the general design of the tire wash station. Please clarify plans to decommission and cap the former tire wash station location once it is no longer needed. Also, Section 3.11 (Effluent Disposal) indicates that "Decontaminated water from the wash station will be properly disposed off-Site as needed. Sludge generated by the washing will be re-used as backfill." Please clarify how water and sludge are proposed to be collected and managed.

The wash station is basically an excavation in the ground filled with rock aggregate. As trucks leave the Site and the tires washed, the wash water will filter through the rocks and infiltrate into the soils beneath. Soil sediment will collect at the bottom of the excavation. The sediments (sludge) will remain at depth during decommissioning while the rock aggregate will be removed, washed and used on Site. Excess soil from the Site will be used to fill the excavation and the area will be capped with geotextile fabric and one (1) foot of clean fill or if in the entrance way of the Site, capped with one (1) foot of clean fill and asphalt, concrete or crushed stone. The RAWP erroneously stated that wash water was to be collected and disposed of off-site.

7. Regarding Section 3.9.1 (Air Specifications) and wherever Air Quality Monitoring (AQM) is discussed, no specific AQM Action Level has been proposed. The OLRSM suggests a risk based AQM Action Level for Particulate Matter less than 10 µm (PM10) of 150 µg/m³, which has been approved for several other Site Remediation projects where

concerns about potential fugitive dust impacts to the local community were raised. Also, there are no specific proposed responses to exceedances of the Action Levels. The RAWP does indicate on page 7 that “Should the AQM results suggest contaminated fugitive dust has been generated, a reassessment of best management practices (BMPs) to suppress the dust will be performed.” If a sustained (i.e. greater than 5 consecutive minutes) exceedance of the dust AQM Action Level is detected, at a minimum all work causing the exceedance should be immediately halted until the dust generation can be controlled. Means to control the generation of fugitive dust (i.e. water truck, tank or direct water line hookup) should be available for periodic usage as appropriate at the Site during all construction activities with potential to generate dust from impacted soils.

Grenier acknowledges the AQM Particulate Matter standard as stated above and at such time the sustained (i.e. greater than 5 consecutive minutes) exceedance of the dust AQM Action Level is detected, at a minimum all work causing the exceedance will be immediately halted until the dust generation can be controlled. Means to control the generation of fugitive dust (i.e. water truck, tank or direct water line hookup) will be available for periodic usage as appropriate at the Site during all construction activities with potential to generate dust from impacted soils.

8. Due to the level of interest and concern raised by area community members during the public participation portion of the regulatory process, the Department is requiring that a pre-construction meeting be held with appropriate Site representatives and DEM staff to make sure that everyone is familiar with the dust control and soil management requirements for the project, and to establish specific on site points of contact in case neighbors or members of the community contact the Department to report problems or concerns about remediation/construction related activities.

A pre-construction meeting will be set prior to the beginning of the earth disturbance portion of the project.

9. The Department has been made aware of the potential pending transfer of the subject property.

a. Since the proposed remedy is integrated into the redevelopment of the property, please clarify if the proposed remedy remains consistent as proposed in the draft RAWP, and accounting for any changes to address the above listed Department comments, or if the new ownership may propose changes to the currently proposed redevelopment and remedy.

b. Please clarify if the roles of the parties identified in Section 3.7 (Contractors/ Consultants) remain the same, and if not, who will be responsible for implementing the final approved remedy moving forward, and who will be directly overseeing the daily work to insure that the soil management and dust control requirements are being adhered to.

Grenier has not notified the Department of any pending transfer of the subject property.

10. Please submit a RAWP Addendum that addresses the abovementioned comments on or before October 18, 2021.

The submittal of this Addendum satisfies the date commitment above.