



May 4, 2020

Project 201942

Mr. Joseph Martella II  
Rhode Island Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, RI 02908

RE: SIR Addendum  
32 & 33 Exchange Street  
Plat 85/1, Lots 87 & 382  
East Greenwich, Rhode Island 02818

Dear Mr. Martella II:

Redwood Environmental Group, LLC (Redwood), on behalf of Grenier Properties, Inc., has prepared this SIR Addendum as requested in your SIR Comment Letter dated April 15, 2020.

If you have any questions regarding this submittal, please call me at (401) 270-7000.

Sincerely,

REDWOOD ENVIRONMENTAL GROUP, LLC

A handwritten signature in black ink that reads "Gary S. Kaufman". The signature is written in a cursive style.

Gary S. Kaufman  
Principal

RI DEM SIR Comment:

**1. Section 1.8.4 (Development of Remedial Alternatives) of the Remediation Regulations, in summary, requires that the Site Investigation Report (SIR) contain a minimum of two remedial alternatives other than the no action/natural attenuation alternative, and that it should be clear which of these alternatives is most preferable. The SIR presents the two required remedial alternatives but does not indicate which of the two is proposed as the Preferred Remedial Alternative. Please clarify which remedial alternative is the proposed Preferred Remedial Alternative.**

Redwood is proposing to use **both** remedial alternatives as stated in the SIR to complete the remediation at the Site. Here are the two remedial alternatives besides Natural Attenuation that will be implemented.

#### Remedial Alternative No.1—Excavation and Off-Site Disposal of Lead Impacted Soils

Excavation and off-site disposal of Lead impacted soils is an effective way to reduce the contamination thus reducing the potential for direct exposure. This alternative is a cost-effective alternative at this time. The area represents approximately 1,500 cubic yards (CY) of soil to be disposed. This alternative is both technically and financially feasible.

##### A. Risk Management

By removing the contaminated soil from the Site, the long-term risks to human health and the environmental at the Site would be mitigated. However, during excavation and transportation of soil there would be potential short-term high-intensity direct exposure risks to human health. Upon completion of the remedial activity, the regulated material would no longer pose a risk to Site users.

##### B. Technical Feasibility

Implementation of the excavation and off-Site disposal of Lead impacted soil as a remedial alternative is technically feasible with normal excavation equipment and trucking.

##### C. Compliance with State and Local Laws or Other Public Concerns

Implementation of excavation and off-Site disposal of contaminated soil as a remedial alternative would comply with the Remediation Regulations, as well as other applicable state and local laws.

##### D. Financial Feasibility

The property will be developed as condominiums in 2020. As part of the construction process the soil removal activity and disposal off-Site will be performed. The equipment and disposal costs along with confirmation soil sampling costs are reasonable and this approach is financially feasible to complete.

#### Remedial Alternative No.2--Engineered and Institutional Controls

Lead contamination has been identified across the Site in surface soils. Capping of these soils with a combination of geotextile fabric and 1-foot of clean soil, 2-feet of clean fill and/or 1-foot of clean fill with an asphalt cover would mitigate direct exposure to Site soils by creating a physical barrier to the soil.

The cap would also mitigate risks posed by entrainment of dust and soil erosion by securing regulated soil beneath the cap. The cap would be an effective way to prevent human contact with the impacted soils. This alternative is both technically and financially feasible. In addition to an engineered cap, an Environmental Land Use Restriction (ELUR) would be recorded in the East Greenwich Land Evidence Records describing the extent of the cap and would include a site-specific Soil management Plan (SMP). The SMP would provide instructions for future cap inspections and the proper measures to take in the event of any construction or cap disturbances, including RI DEM notification (if necessary) and proper soil handling procedures.

#### A. Risk Management

This remedial alternative utilizing an engineered cap would prevent the potential for Site users to be exposed to the soils containing SVOCs, PAHs and metals above regulatory standards.

An ELUR mandates that future users of the Site maintain the engineered cap and further require that future soil disturbances be conducted in accordance with a Soil Management Plan should soils be disturbed at the impacted level. The ELUR would require annual inspections and certifications that the cap continues to be maintained adequately.

#### B. Technical Feasibility

The Site is proposed for redevelopment as condominiums. Surface soils will be stockpiled for later use below the capping. Should excess impacted soils be determined, these soils will be disposed of off-site at a regulated disposal facility.

#### C. Compliance with State and Local Laws or Other Public Concerns

Implementation of capping in conjunction with the filing of an ELUR would comply with the Remediation Regulations as well as other applicable state and local laws.

#### D. Financial Feasibility

This remedial alternative is considered a cost-effective remedial alternative as the engineered control can be implemented during the redevelopment of the Site. Careful planning prior to construction will keep the overall cost of this capping alternative to a minimum. The ELUR and SMP will be prepared and should not add significant cost to the project.

***2. Due to the Site's location in a dense residential area with occupied residential dwellings abutting the property, please be advised that any final Department approved remedy must include suitably aggressive dust control measures to insure that dust generation is minimized, and that migration of dust from the property is prevented to the maximum extent practicable.***

Grenier Properties is prepared to provide dust control measures during the excavation of the contaminated soils. These measures will ensure dust generation is minimized and migration of dust from the Site is prevented, to the extent possible.

***3. Please submit an SIR Addendum that addresses the abovementioned comments on or before May 15, 2020.***

This submission has met the requirement of #3.