

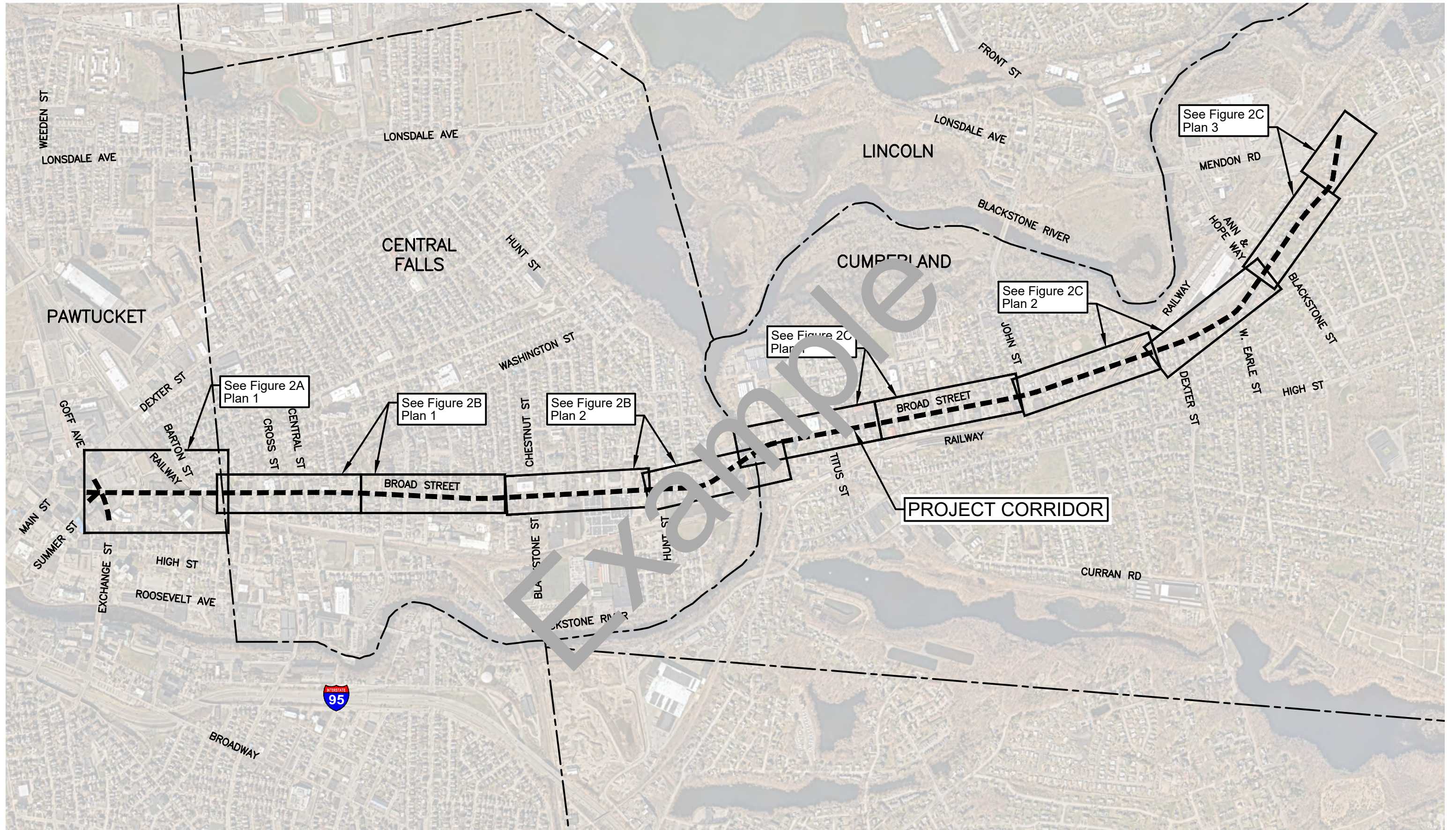
This example ELUR Exhibit A contains 5 essential elements.

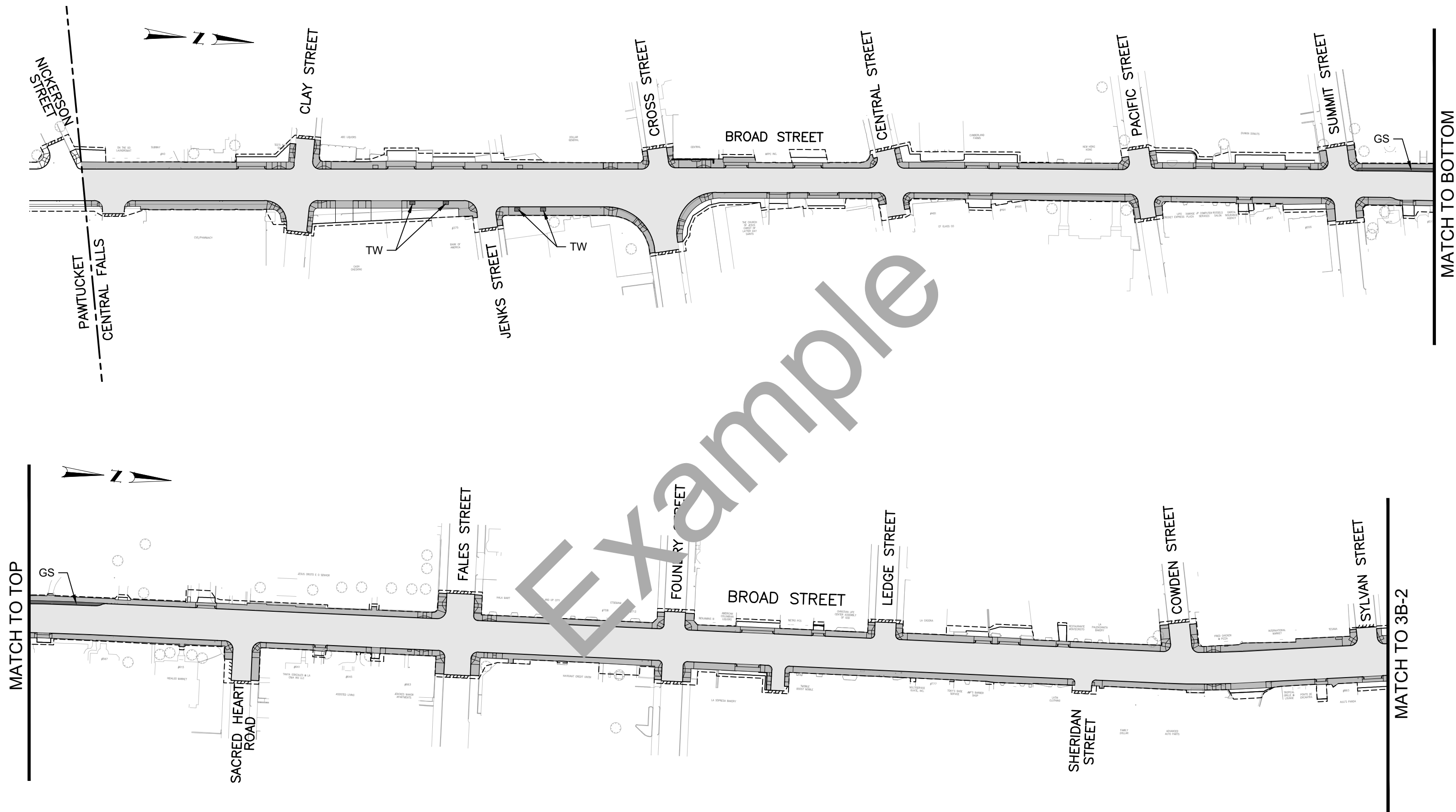
- 1- A sitemap of the ELUR (in this case it is the Broad Street Corridor)
- 2 - A description of the engineered controls
- 3 - A Soil Management Plan
- 4 - Photos of the site in completed condition
- 5- The first 2 pages of the RIDEM inspection form filled out with the specific project information

Exhibit A – Site Map

Example

Rev #	Change Date	Initials
1	2/24/2025	AR



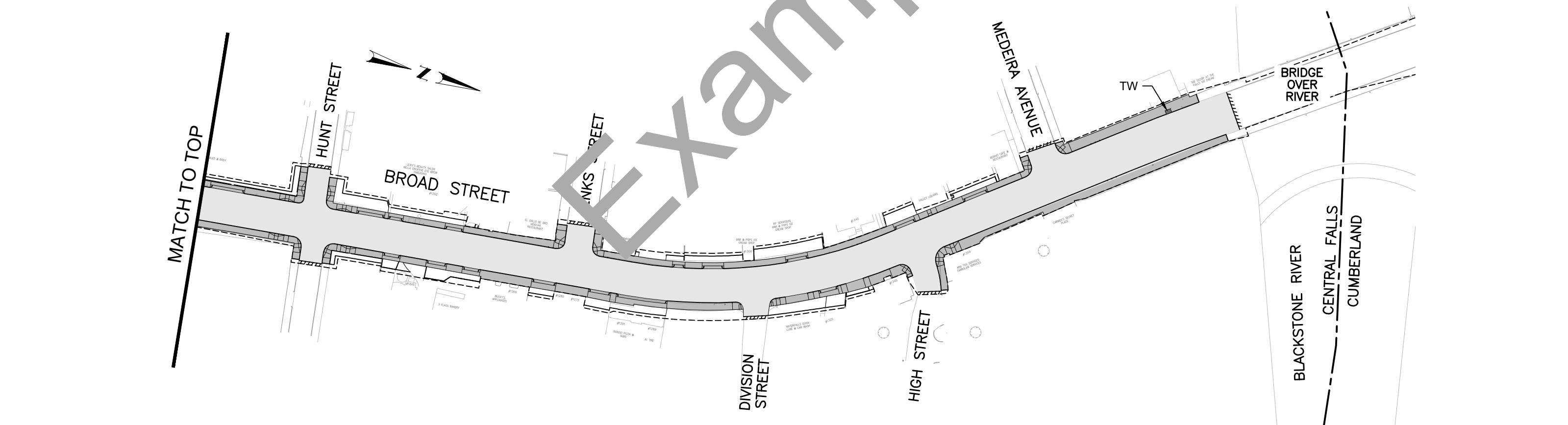
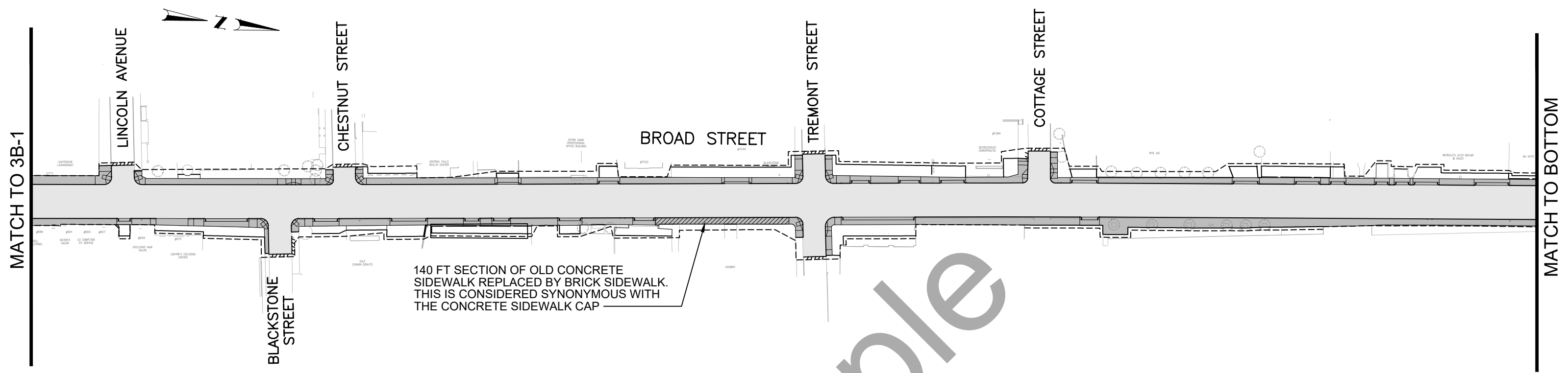


- LEGEND**
- ASPHALT CAP**
4-INCHES OF ASPHALT PAVEMENT ON TOP OF 6-INCHES OF SUBBASE
 - CONCRETE CAP**
4-INCHES OF CONCRETE ON TOP OF 6-INCHES OF SUBBASE
 - LANDSCAPE CAP (TYPE 2)**
2-FEET OF SUBBASE
 - GS** GRASS STRIP
 - TW** TREE WELL



Site Capping Location Plan 1
Broad Street Regeneration Project
Broad Street
Central Falls, Rhode Island

Figure 2B

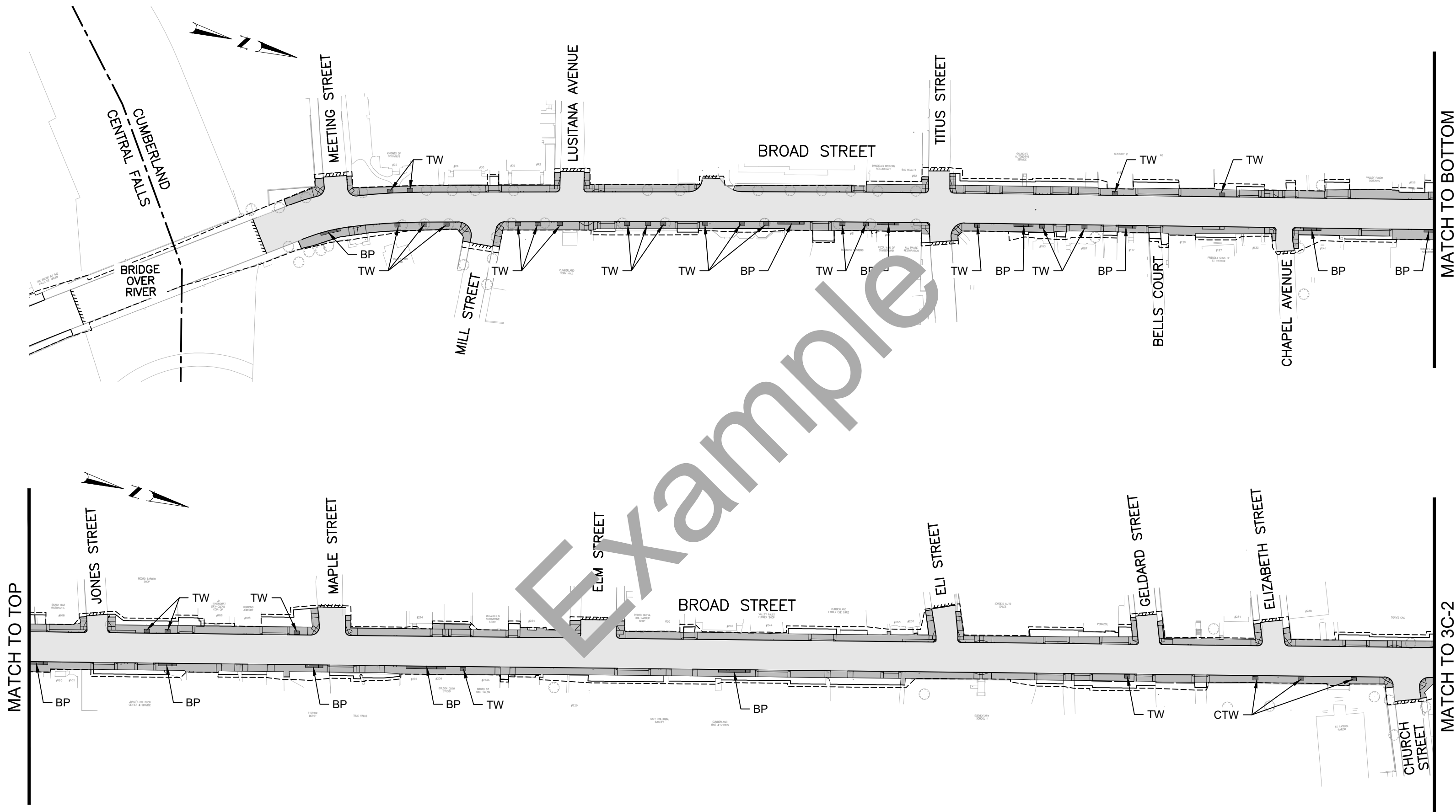


- LEGEND**
- ASPHALT CAP**
4-INCHES OF ASPHALT PAVEMENT ON TOP OF 6-INCHES OF SUBBASE
 - CONCRETE CAP**
4-INCHES OF CONCRETE ON TOP OF 6-INCHES OF SUBBASE
 - LANDSCAPE CAP (TYPE 2)**
2-FEET OF SUBBASE
 - GS** GRASS STRIP
 - TW** TREE WELL



Site Capping Location Plan 2
Broad Street Regeneration Project
Broad Street
Central Falls, Rhode Island

Figure 2B




MATCH TO TOP





MATCH TO BOTTOM

MATCH TO 3C-2

LEGEND

 **ASPHALT CAP**
4-INCHES OF ASPHALT PAVEMENT
ON TOP OF 6-INCHES OF SUBBASE

 **CONCRETE CAP**
4-INCHES OF CONCRETE ON TOP
OF 6-INCHES OF SUBBASE

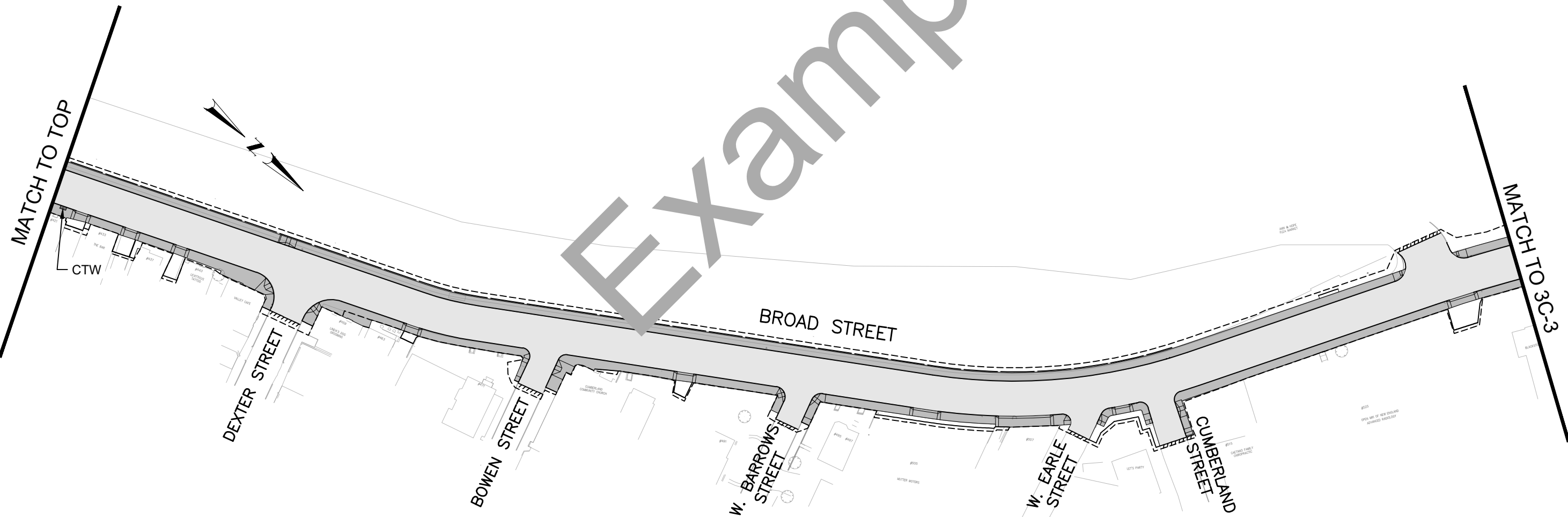
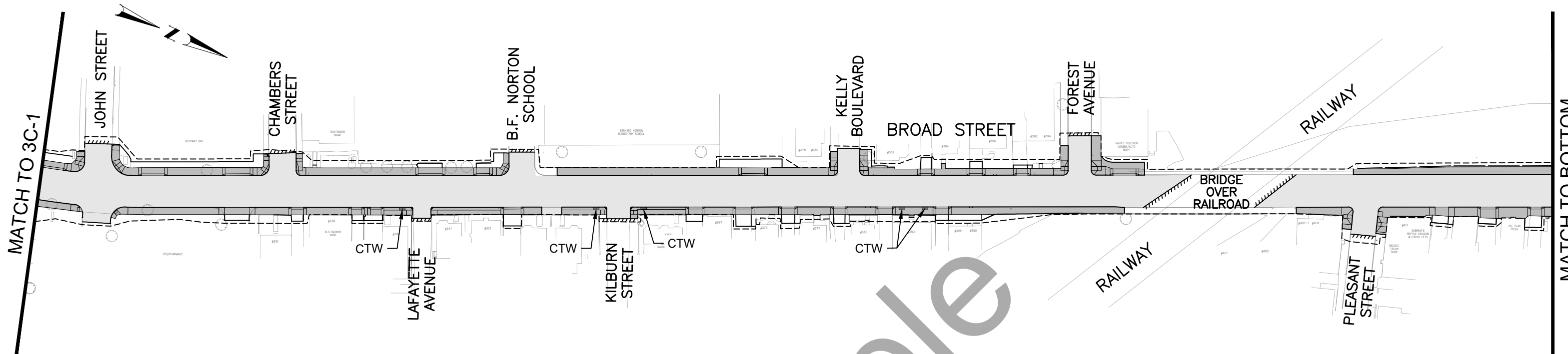
 **LANDSCAPE CAP (TYPE 2)**
2-FEET OF SUBBASE
 BIORETENTION PLANTER
 TOWN OF CUMBERLAND TREE WELL
 TREE WELL

0 100 Feet









Site Capping Location Plan 1
Broad Street Regeneration Project
Broad Street
Cumberland, Rhode Island

Figure 2C



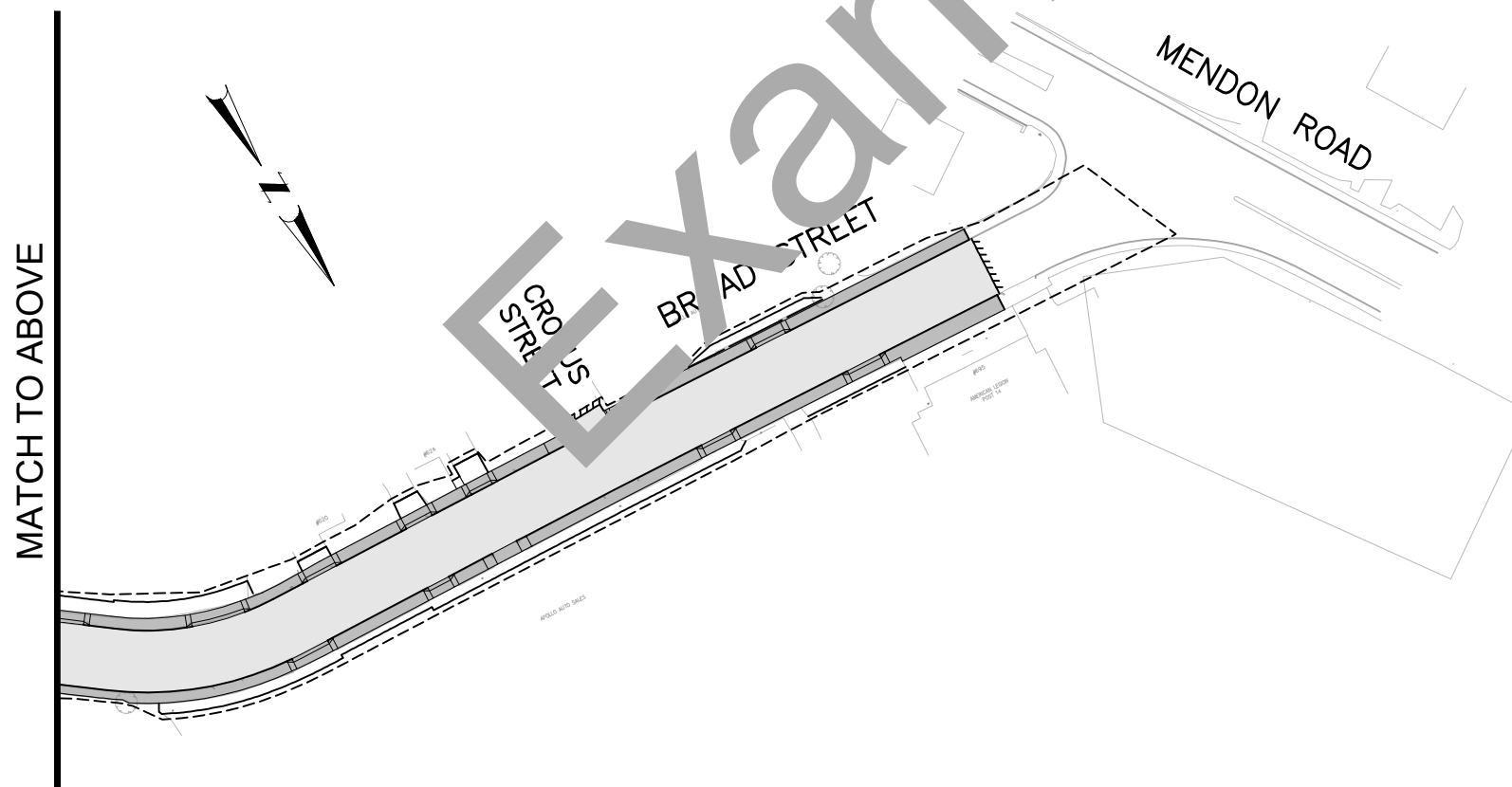
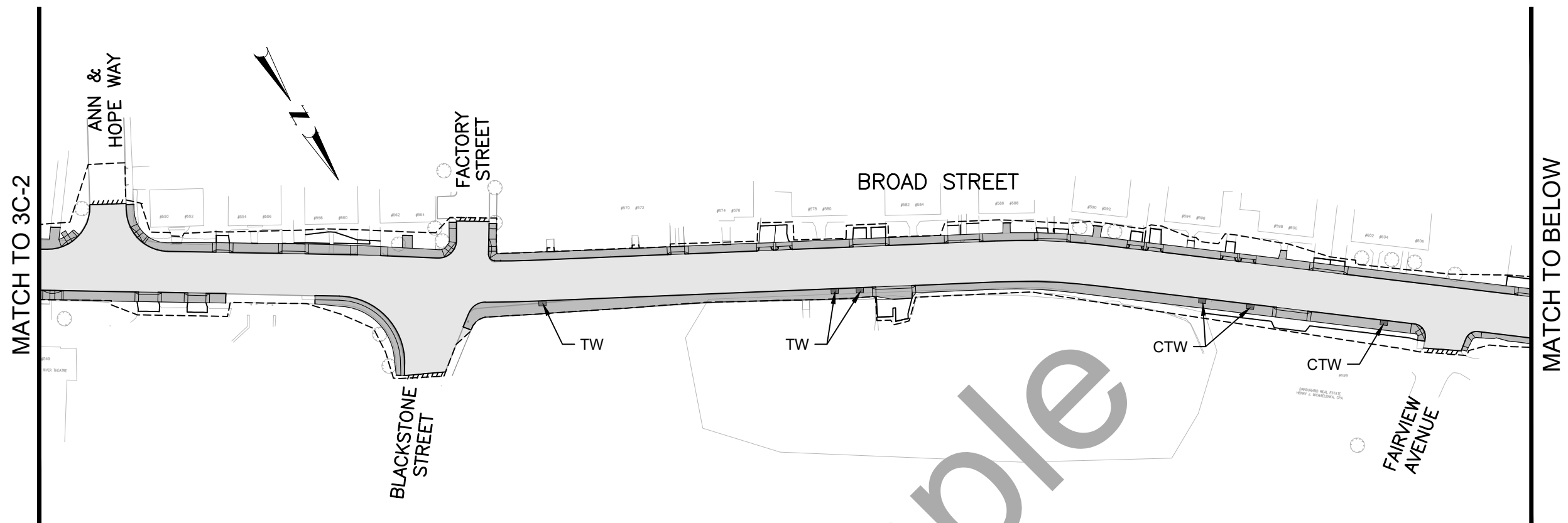
Example

- LEGEND**
-  **ASPHALT CAP**
4-INCHES OF ASPHALT PAVEMENT ON TOP OF 6-INCHES OF SUBBASE
 -  **CONCRETE CAP**
4-INCHES OF CONCRETE ON TOP OF 6-INCHES OF SUBBASE
 -  **LANDSCAPE CAP (TYPE 2)**
2-FEET OF SUBBASE
 -  **BP** BIORETENTION PLANTER
 -  **CTW** TOWN OF CUMBERLAND TREE WELL
 -  **TW** TREE WELL









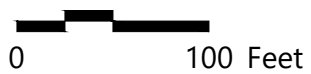
Site Capping Location Plan 2
Broad Street Regeneration Project
Broad Street
Cumberland, Rhode Island

Figure 2C



LEGEND

- | | | |
|--|--|--|
| <p> ASPHALT CAP
4-INCHES OF ASPHALT PAVEMENT
ON TOP OF 6-INCHES OF SUBBASE</p> | <p> CONCRETE CAP
4-INCHES OF CONCRETE ON TOP
OF 6-INCHES OF SUBBASE</p> | <p> LANDSCAPE CAP (TYPE 2)
2-FEET OF SUBBASE</p> <p> BP BIORETENTION PLANTER</p> <p> CTW TOWN OF CUMBERLAND TREE WELL</p> <p> TW TREE WELL</p> |
|--|--|--|



Site Capping Location Plan 3
Broad Street Regeneration Project
Broad Street
Cumberland, Rhode Island

Figure 2C

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Exhibit B – Soil Management Plan

Example

Post Remediation Soil Management Plan Broad Street Regeneration

Broad Street Cumberland, Central Falls and Pawtucket, Rhode Island

This Soil Management Plan (SMP) has been prepared to establish procedures that will be followed should future construction/maintenance activities within the Broad Street Regeneration-area require the need to manage soils excavated from the subsurface or when existing Site surfaces/Department approved engineered controls (asphalt roadway, concrete sidewalks and landscaping) are disturbed. The plan serves to supplement, and will be initiated by, the RIDEM notification requirement established by the Environmental Land Use Restriction (ELUR) for the property.

Background

The Property, defined as an approximately 2.9-mile segment of Broad Street, from Exchange Street in Pawtucket to just before Mendon Road in Cumberland, Rhode Island, hereinafter referred to as “the Site.” Current land use in the vicinity of the Site is primarily commercial and also includes a mix of residential and industrial uses. Broad Street consists of State-owned roadway in Cumberland and Central Falls and city owned in Pawtucket, Rhode Island.

The Site was found to contain exceedances of TPH, metals (arsenic, lead) and PAHs consisting of benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(g,h,i)perylene, chrysene, dibenzo(a,h)anthracene, fluoranthene, indeno(1,2,3-cd)pyrene and pyrene above the RIDEM Residential Direct Exposure Criteria (RDEC) and/or RIDEM Industrial/Commercial Direct Exposure Criteria (I/CDEC) at the Site. The laboratory data was also compared to either GA or GB Leachability Criteria (LC), as applicable based upon the location where the soil samples were collected. No exceedances of the applicable GALC or GBLC were reported in the laboratory analytical data.

The Department approved remedial objective (for this Site was to eliminate direct exposure to impacted soils at the Site through a combination of limited soil excavation and removal, installation of engineered barriers, and a property restriction in the form of an Environmental Land Usage Restriction (ELUR) to prevent direct exposure to impacted soils at the Site. Some jurisdictional soils were planned to be re-interred under the cap or remain in place where existing paved areas were proposed to be left undisturbed. The majority of Broad Street was proposed for milling and overlay, therefore underlying soils were proposed to be left undisturbed except for areas where the installation of drainage structures or other intrusive work was scheduled to occur within the roadway.

The regulated Site soils are covered with Department approved engineered controls, consisting of a 4-inches of asphalt pavement, 4-inches of concrete (for sidewalks) and 24-inches of clean fill (for landscaping) in order to prevent direct exposure to regulated soils.

Applicable Area

This SMP and affiliated ELUR, which restricts the property to **Industrial/Commercial** use, pertains to the entire Property. See attached **Site figures** and **Site photographs**.

Soil Management

The direct exposure pathway is the primary concern at the site. Individuals engaged in activities at the site may be exposed through incidental ingestion, dermal contact, or inhalation of vapors or entrained soil particles if proper precautions are not taken. Therefore, the following procedures will be followed to minimize the potential of exposure.

During site work, the appropriate precautions will be taken to restrict unauthorized access to the property.

During all site/earth work, dust suppression (e.g. watering, etc) techniques must be employed at all times. If it is anticipated due to the nature of the contaminants of concern that odors may be generated during site activities, air monitoring and means to control odors will be utilized, as appropriate (e.g. odor-suppressing foam, etc).

In the event that an unexpected observation or situation arises during site work, such activities will immediately stop. Workers will not attempt to handle the situation themselves but will contact the appropriate authority for further direction.

In the event that certain soils on site were not previously characterized, these soils are presumed to be regulated until such time that it is determined by the Department, through sampling and laboratory analysis that they are not regulated. (For example, presumptive remedies or locations of previously inaccessible soil.)

If excess soil is generated / excavated from the Property, the soil is to remain on-site for analytical testing, to be performed by an environmental professional, in order to determine the appropriate disposal and/or management options. 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 stormwater and / or wind erosion (e.g. hay bales, silt fencing, rocks, etc).

Excavated soils will be staged and temporarily stored in a designated area of the property. Within reason, the storage location will be selected to limit the unauthorized access to the materials (e.g., away from public roadways/walkways). No regulated soil will be stockpiled on-site for greater than 60 days without prior Department approval.

In the event that stockpiled soils pose a risk or threat of leaching hazardous materials, a proper leak-proof container (e.g. drum or lined roll-off) or secondary containment will be utilized.

Soils excavated from the site may not be re-used as fill on residential property. Excavated fill material shall not be re-used as fill on commercial or industrial properties unless it meets the Department's Method 1 Residential Direct Exposure Criteria for all constituents listed in Table 1 of the Rules and Regulations for the Investigation and Remediation of Hazardous Material

Releases (Remediation Regulations). Copies of the laboratory analysis results shall be maintained by the site owner and included in the annual inspection report for the site, or the closure report if applicable. In the event that the soil does not meet any of these criteria, the material must be properly managed and disposed of off-site at a licensed facility.

Site soils, which are to be disposed of off-site, must be done so at a licensed facility in accordance with all local, state, and federal laws. Copies of the material shipping records associated with the disposal of the material shall be maintained by the site owner and included in the annual inspection report for the site.

Best soil management practices should be employed at all times and regulated soils should be segregated into separate piles (or cells or containers) as appropriate based upon the results of analytical testing, when multiple reuse options are planned (e.g. reuse on-site, reuse at a Department approved Industrial/Commercial property, or disposal at a Department approved licensed facility).

All non-disposable equipment used during the soil disturbance activities will be properly decontaminated as appropriate prior to removal from the site. All disposable equipment used during the soil disturbance activities will be properly contained and disposed of following completion of the work. All vehicles utilized during the work shall be properly decontaminated as appropriate prior to leaving the site.

At the completion of site work, all exposed soils are required to be recapped with Department approved engineered controls (2 ft of clean fill or equivalent: building foundations, 4 inches of pavement/concrete underlain with 6 inches of clean fill, and/or 1 foot of clean fill underlain with a geotextile liner) consistent or better than the site surface conditions prior to the work that took place. These measures must also be consistent with the Department approved ELUR recorded on the property. Any clean fill material brought on site is required to meet the Department's Method 1 Residential Direct Exposure Criteria or be designated by an Environmental Professional as Non-Jurisdictional under the Remediation Regulations. The Annual Inspection Report for the site, or Closure Report if applicable, should include either analytical sampling results from the fill demonstrating compliance or alternatively include written certification by an Environmental Professional that the fill is not jurisdictional.

Worker Health and Safety

To ensure the health and safety of on-Site workers, persons involved in the excavation and handling of the material on Site are required to wear a minimum of Level D personal protection equipment, including gloves, work boots and eye protection. Workers are also required to wash their hands with soap and water prior to eating, drinking, smoking, or leaving the Site.

Department Approval

In accordance with Section A iii of the ELUR, no soil at the property is to be disturbed in any manner without prior written permission of the Department's Office of Land Revitalization & Sustainable Materials Management, except for minor inspections, maintenance, and landscaping activities that do not disturb the contaminated soil at the Site. As part of the notification process, the site owner shall provide a brief written description of the anticipated site activity involving

soil excavation. The notification should be submitted to the Department no later than 60 days prior to the proposed initiation of the start of site activities. The description shall include an estimate of the volume of soil to be excavated, a list of the known and anticipated contaminants of concern, a site figure clearly identifying the proposed areas to be excavated/disturbed, the duration of the project and the proposed disposal location of the soil.

Following written Notification, the Department will determine the post closure reporting requirements. Significant disturbances of regulated soil will require submission of a Closure Report for Department review and approval documenting that the activities were performed in accordance with this SMP and the Department approved ELUR. Minor disturbances of regulated soil may be documented through the annual certification submitted in accordance with Section H (Inspection & Non-Compliance) of the Department approved ELUR. The Department will also make a determination regarding the necessity of performing Public Notice to abutting property owners/tenants concerning the proposed activities. Work associated with the Notification will not commence until written Department approval has been issued. Once Department approval has been issued, the Department will be notified a minimum of two (2) days prior to the start of activities at the site. Shall any significant alterations to the Department approved plan be necessary, a written description of the proposed deviation, will be submitted to the Department for review and approval prior to initiating such changes.

The area subject to the ELUR, which includes the engineered barrier across the entire Site, will be inspected on a yearly basis to document the long-term integrity of the cap. The inspection will be documented in a written report, which will be forwarded to the Department's OLR&SSM on a yearly basis. The annual written report will include an **ELUR Compliance Evaluation Form**, a copy of which is **attached**. The first annual ELUR compliance report is expected to be submitted to RIDEM OLR&SSM approximately one year from the date the ELUR is recorded in the Cumberland, Central Falls and Pawtucket Land Evidence Records.

<p>Photo #1:</p> 	<p>April 26, 2024</p> <p><u>CENTRAL FALLS (proximate to Madeira St):</u></p> <p>After completing asphalt milling, the road was paved with a 3-inch base course. After raising utility heads, the second stage of asphalt paving was completed with a surface course ranging in thickness from 1.5-inch to 2.0-inches.</p> <p>As such, the new asphalt layer (greater than 4-inch thickness) combined with the existing undisturbed pavement and underlying subbase serves as an "Asphalt Cap-In-Place".</p>
<p>Photo #2:</p> 	<p>April 26, 2024</p> <p><u>CENTRAL FALLS (proximate to Nickerson St):</u></p> <p>New sidewalk constructed alongside Broad Street. The sidewalk is a concrete cap consisting of at least 4-inches of concrete above subbase material consisting of reuse soil generated during Site activities. When reuse soil was unavailable, imported certified as clean was used as a subbase.</p> <p>The landscaped area, opposite the road is not part of the Site and is not capped.</p>
<p>Photo #3:</p> 	<p>April 26, 2024</p> <p><u>CENTRAL FALLS (proximate to City Hall):</u></p> <p>New sidewalk constructed alongside Broad Street. The sidewalk is a concrete cap consisting of at least 4-inches of concrete above typical subbase material (see above).</p> <p>The grass strip has a Landscape Cap (Type 2) consisting of a minimum of 4-inches of clean imported loam placed on top of a minimum of 20-inches of imported processed gravel.</p>

<p>Photo #4:</p> 	<p>April 26, 2024</p> <p><u>CUMBERLAND (south of Titus St):</u></p> <p>New sidewalk constructed alongside Broad Street. The sidewalk is a concrete cap consisting of at least 4-inches of concrete above typical subbase material (see earlier).</p> <p>The tree well (foreground) has a Landscape Cap (Type 2) consisting of a minimum of 24-inches of clean imported loam used to backfill around the root ball. The bioretention curb inlet planter (background) was constructed with a cap consisting of a minimum of 24-inches of clean bioretention soil.</p>
<p>Photo #5:</p> 	<p>April 26, 2024</p> <p><u>CUMBERLAND (proximate to Titus St):</u></p> <p>New sidewalk constructed alongside Broad Street. The sidewalk is a concrete cap consisting of at least 4-inches of concrete above typical subbase material (see earlier).</p> <p>The bioretention curb inlet planter was constructed with a cap consisting of a minimum of 24-inches of clean bioretention soil. The sediment forebay has a grouted stone base on top of clean imported gravel.</p>
<p>Photo #6:</p> 	<p>April 26, 2024</p> <p><u>CUMBERLAND (north of Blackstone St):</u></p> <p>New sidewalk constructed alongside Broad Street. The sidewalk is a concrete cap consisting of at least 4-inches of concrete above typical subbase material (see earlier).</p> <p>The tree well has a Landscape Cap (Type 2) consisting of a minimum of 24-inches of clean imported loam used to backfill around the root ball.</p>

<p>Photo #7:</p> 	<p>April 26, 2024</p> <p><u>CUMBERLAND (proximate to City Hall):</u></p> <p>A portion of the new drainage system was installed along this section of Broad Street. Temporary asphalt patch (after backfilling) was replaced with full depth reconstruction/paving which contained a subbase that was either screened reuse soil generated during Site activities or if reuse soil was unavailable, imported fill certified as clean was used.</p> <p>The asphalt was later milled along with the rest of the road which was then paved with a new asphalt layer (greater than 4-inch thickness). This pavement serves as a "New Asphalt Cap".</p>
<p>Photo #8:</p> 	<p>April 26, 2024</p> <p><u>CUMBERLAND (proximate to Eli St):</u></p> <p>New sidewalk constructed alongside Broad Street. The sidewalk is a concrete cap consisting of at least 4-inches of concrete above typical subbase material (see earlier).</p> <p>The paved "cut & match" strip opposite the road is not part of the Site and is not considered a capped area.</p>
<p>Photo #9</p> 	<p>April 26, 2024</p> <p><u>CUMBERLAND (proximate to Menden Rd):</u></p> <p>North end of the new sidewalk constructed alongside Broad Street.</p> <p>The sidewalk is a concrete cap consisting of at least 4-inches of concrete above subbase material consisting of reuse soil generated during Site activities. When reuse soil was unavailable, imported fill certified as clean was used as a subbase.</p>

**RI Department of Environmental Management
Office of Land Revitalization & Sustainable Materials Management
Environmental Land Usage Restriction (ELUR)
Annual ELUR Self-Inspection Form**

Site Name: _____ Property Owner: _____
RIDEM File No.: _____ Owner Mailing Address: _____
RIDEM Project Manager: _____
ELUR Recording Date: _____ Inspection Date: _____
Owner Telephone Number: _____ Owner E-Mail: _____

This Annual ELUR Self-Inspection Form is intended for use by property owners and/or their designees. This Self-Inspection Form is not appropriate for the inspection of active remediation systems (e.g., active SSDS, ongoing air or groundwater monitoring, treatment systems, etc.) unless explicit, written permission has been granted by the Department.

1. Site Description

a. Site Address:

b. Plat: _____ Lot(s): _____

c. Is the ELUR applicable to the entire site?

Yes No

If no, please describe the portion of the property subject to the ELUR:

d. What does the ELUR restrict? (Select all that apply)

Residential Uses

Groundwater Use

Exposure to Site Soils

Infiltration of Water

Subsurface Structures

Requires a Passive Sub-Slab Depressurization System (SSDS)

Other (Please Explain):

2. Groundwater

a. Are there any known or observed groundwater wells present?

Yes No

b. Are these well(s) used for drinking water?

Yes No Not Applicable

If no, please state what they are used for (i.e. irrigation, cooling, etc.):

c. Are there environmental monitoring wells present?

Yes No

3. Engineered Controls (e.g. asphalt, concrete, building foundations, landscaped areas, etc.)

a. What are the engineered controls required on the Site? (Check all that apply)

Two feet of clean fill

One foot of clean fill over geotextile liner

Asphalt (minimum four inches asphalt over six inches of clean fill)

Concrete (minimum four inches concrete over six inches of clean fill)

Building Foundation(s)

Fencing

Restricted/Controlled Access

Impermeable cover (to prevent infiltration)

Passive Sub-Slab Depressurization System (SSDS) or Sub-Slab Ventilation System (SSVS)

Vapor Barrier

Other; Please describe:

b. Overall Condition of Engineered Control(s)

Good

Acceptable

Non-compliant

Not Applicable (Sites where only groundwater is restricted)

c. Are there any areas on the property that have broken concrete, cracked asphalt, potholes, eroded landscaping, etc.?
Yes No

If yes, please provide a description of the area(s) of concern:

Can stormwater infiltrate through these areas into underlying contaminated soils?

Yes No N/A; Infiltration Not Restricted