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## PCB Technical Guidance Phase II – Remediation Plan

This Technical Guidance document outlines EPA/RIDEM requirements to complete a Remedial Action Work Plan (RAWP) / Self Implementing Cleanup Plan (SIP) for PCB Remediation at RIDOT bridge projects. EPA has developed the [PCB Facility Approval Streamlining Toolbox \(FAST\)](#) which includes useful checklists.

### STEP 1: Data Review

Review existing Notice of Release (NOR), Letter of Responsibility (LOR), Site Investigation Report (SIR), and any additional pertinent sampling and analysis documentation available for the project. PCBs have been identified at the project site at concentrations exceeding RIDEM and EPA regulatory thresholds for hazardous waste. PCB-impacted materials may include bridge joint caulking, sealants, fillers, concrete, and/or soil.

Perform an evaluation to determine if the existing information adequately and clearly describes the location and horizontal/vertical extent of the identified contamination. If the existing information is adequate and RIDEM has issued a Remedial Decision Letter (RDL) approving the SIR, proceed to Step 2.

### STEP 2: Remediation Plan

Prepare a combined RIDEM Remedial Action Work Plan (RAWP) / EPA Self Implementing Cleanup Plan (SIP) for submittal to both RIDEM and EPA. One report will be designed to satisfy the requirements of both agencies. The identified PCB-impacted materials require proper removal, handling, and disposal in accordance with RIDEM and EPA regulations. These materials will be managed during construction. The RAWP/SIP will meet the requirements of [40 CFR 761.61\(a\)\(3\)](#) to describe the project goals and the proposed means for PCB cleanup. It will also provide details regarding establishment of work zones and waste stockpile areas, removal and disposal of PCB waste, and health & safety requirements. A standard RIDOT remediation plan template is being developed and this guidance will be updated when available. The RAWP/SIP must be reviewed by the RIDOT Environmental Division. Submit to [DOT.LRSMM@dot.ri.gov](mailto:DOT.LRSMM@dot.ri.gov).

The RAWP/SIP must be prepared in accordance with Section 1.10 of RIDEM Remediation Regulations [Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases](#) and EPA regulations for management of TSCA PCB waste [40 CFR 761.61 - PCB remediation waste](#) and [40 CFR 761.62 - Disposal of PCB bulk product waste](#). Proceed to Step 3.

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### STEP 3: Public Notice

Prepare and distribute a public notice to abutters and municipal officials indicating that a RAWP/SIP for the project site has been completed. RIDEM requires that the notice includes a description of the proposed remedial alternative to clean up the site. There is a 14-calendar day public comment period during which the public may submit written comments regarding the technical feasibility of the preferred remedial alternative and the work plan.

A notification to abutters template with boiler plate language is available on RIDEM's website: [Site Remediation Program](#). Following the public comment period, including response to substantive comments, RIDEM will review the RAWP/SIP and issue a Remedial Approval Letter (RAL) if the work plan is acceptable. EPA will also review the RAWP/SIP and issue their approval in a letter via email if the work plan is acceptable. For Design-Bid-Build projects, proceed to Step 4. For Design-Build projects, proceed to RIDOT Technical Guidance Phase III – Remediation and Closure.

Submit a copy of the public notice to [DOT.LRSMM@dot.ri.gov](mailto:DOT.LRSMM@dot.ri.gov).

### STEP 4: Contract Documents (For Design-Bid-Build Projects Only)

Upon receipt of the RAL and EPA approval letter, prepare an abatement specification including the approved RAWP/SIP as an attachment to be used in the contract bid documents for construction. A standard RIDOT abatement specification template is being developed and this guidance will be updated when available. Once the construction contract is executed, all responsibility for site remediation and closure will be transferred to the Contractor.