



Department of Transportation
Two Capitol Hill
Providence, RI 02903

Office 401-222-2450
Fax 401-222-3905

PCB Technical Guidance Phase III – Remediation & Closure

This Technical Guidance document outlines EPA/RIDEM requirements to complete PCB Remediation and Site Closure activities at RIDOT bridge projects.

STEP 1: Remediation

Upon approval of a Remedial Action Work Plan (RAWP) / Self Implementing Cleanup Plan (SIP) by RIDEM and EPA, conduct PCB remediation activities in accordance with the RAWP/SIP, the Approval Conditions, the contract specifications, and all applicable federal, state, and local regulations. The information contained in the RAWP/SIP and other existing site documentation must be used to guide remediation efforts during construction. The required RIDEM approval will be issued in the form of a Remedial Approval Letter (RAL) and EPA approval will be issued in the form of a letter via email.

Following completion of the proposed remediation activities, conduct confirmatory sampling and analysis of building materials and/or soil, as applicable, to determine if all PCB contamination has been removed to levels achieving project objectives. Submit sample reports to DOT.LRSMM@dot.ri.gov. Proceed to Step 2.

STEP 2: Closure Report

If all confirmatory data meets project cleanup objectives, submit a Remedial Action Closure / SIP Completion Report to RIDEM and EPA for review and approval. The Closure Report must be prepared in accordance with the RIDEM Remediation Regulations [Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases](#) and the 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](#). If the data does not meet project cleanup objectives, proceed to Step 3 before submitting the Closure Report.

STEP 3: ELUR (if needed)

If post-remediation confirmatory sampling and analysis reveals that PCB concentrations remain at levels exceeding the project objectives, a RIDEM approved Environmental Land Use Restriction (ELUR) and Post Construction Soil Management Plan (SMP) must be recorded with the local Recorder of Deeds or Land Evidence Records, as applicable, and demarcated in the [RIDEM Environmental Resource Map](#). A copy of the ELUR and a certification must be submitted to EPA under [40 CFR 761.61 - PCB remediation waste](#). ELUR and SMP templates with boiler plate language are available on RIDEM's website: [Site Remediation Program](#).