

EXHIBIT C

**Post Remediation Soil Management Plan
3070 Post Road
Warwick, RI,
AP 245, Lot 315**

This Soil Management Plan (SMP) has been prepared to establish procedures that will be followed should future construction/maintenance activities at the 3070 Post Road, AP 245, Lot 315 Warwick, RI property require the need to manage soils excavated from the subsurface or when existing site surfaces (asphalt, concrete, landscaping and/or foundations) 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, located at 3070 Post Road, AP 245, Lot 315 Warwick, RI has been historically developed with a Commercial/Industrial use. More recently, during a site investigation performed at the property for a real estate transaction the property was found to contain Total Petroleum Hydrocarbons (TPH) in excess of Residential Direct Exposure Criteria. The Department approved remedy included restricting the property to its existing commercial/industrial zoned use. The regulated site soils are covered with engineered controls, consisting of building foundations, asphalt pavement, and landscaping in order to prevent direct exposure to regulated soils and/or infiltration through soils which exceed the Department's Method 1 GB Leachability Criteria.

Applicable Area

This SMP and affiliated ELUR, which restricts the property to **Industrial/Commercial** use, pertains to the **entire** Property in accordance with, the legal description of the property, as contained in Exhibit A.

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.

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 Of Environmental Management Office of Waste Management, except for minor inspections, maintenance, and landscaping activities that do not disturb the contaminated soil at 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.

Groundwater Management

TPH was not detected in groundwater samples.

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 Waste 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.