



STATE OF RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
BUREAU OF ENVIRONMENTAL PROTECTION
OFFICE OF COMPLIANCE AND INSPECTION
235 Promenade Street, Suite 220
Providence, RI 02908-5767

July 6, 2022

CERTIFIED MAIL

91 7199 9991 7039 8097 3035

Brian Thibeault
20 Privilege Street, LLC
300 Gay Street
Manchester, NH 03103

Bruce D. Moger, President
CNC International, Inc.
41 High Street
Bristol, RI 02908-2010

91 7199 9991 7039 8097 3042

RE: Former CNC International
20 Privilege Street, Woonsocket, RI

Dear Mr. Thibeault and Mr. Moger

Please be advised of the following information regarding the former CNC International facility (the Site) located at 20 Privilege Street in Woonsocket:

The Department of Environmental Management (the Department) is aware that remaining on Site are approximately 100 fifty-five gallon drums as well as an unspecified number of other smaller containers (equal to approximately 8 cubic yards in total) holding products manufactured by CNC International, Inc., hazardous waste in the form of spent isopropyl alcohol, and other potentially hazardous chemicals and hazardous materials. The presence of these materials has been confirmed by Department staff during multiple site inspections.

As a result of this information, and the conditions observed at the Site, the Department requires the immediate removal of the remaining material under the Rules and Regulations for the Investigation and Remediation of Hazardous Materials Releases (the Remediation Regulations) as well as the Rules and Regulations for Hazardous Waste Management. These regulations are intended to create an integrated program requiring reporting, investigation, and remediation of contaminated sites in order to eliminate and/or control threats to human health and the environment in an efficient manner, and to minimize environmental hazards associated with the generation, transportation, treatment, storage and disposal of hazardous wastes, respectively.

The Department requires that 20 Privilege Street, LLC, as the current owner of the property, and CNC International, as former owner of the property, both Responsible Parties as defined by Part 1.4(A)(70) of the Remediation Regulations, comply with the following:

1. The Responsible Party undertaking the action shall engage a qualified environmental consulting firm to prepare a Removal Work Plan (the RWP) for the

Department's review and approval providing details of all investigations and activities to be taken to characterize chemical materials in storage onsite for offsite disposal. The RWP shall also include the characterization of the accumulation water and chemicals in the concrete sump on the first floor adjacent to former processing vessels and any materials that have been released from compromised containers. The water and chemicals in the concrete sump and any materials that have been released from compromised containers is defined as a Release by Part 1.4(A)(63) of the Remediation Regulations. The RWP shall include a Health & Safety Plan that meets all OSHA requirements including, but not limited to, air quality monitoring, hazard identifications, selection of proper personal protection equipment, medical monitoring, evacuation plan and routes, and all other applicable requirements. The report shall identify the hazardous waste transportation company and the Treatment, Storage and Disposal Facility(ies) to be used for waste disposal. This report shall be submitted to the Department in both hard copy and electronic format within thirty (30) days of receipt of this letter.

2. The Responsible Party undertaking the action shall notify RIDEM's Office of Compliance & Inspection forty-eight (48) hours prior to the commencement of the removal action so that a representative of the Department may be onsite to monitor the activity.
3. The Responsible Party undertaking the action shall implement and complete the work outlined in the approved RWP by August 30, 2022, or within 60 days of written approval by the Department, whichever comes first. The Responsible Party shall submit a detailed closure report within ten (10) days of the completion of the removal activity documenting all activities conducted in accordance with the RWP, including copies of analytical data reports from sampling events, hazardous waste manifests, bills of lading, and recycling certificates.

Please be advised that 20 Privilege Street, LLC, as the owner of record, and CNC International, as the former owner and generator, are responsible for proper characterization and disposal of the drums and containers containing potentially hazardous materials at this Site.

Please be advised that if you do not fully comply with the aforementioned requirements, the Department will initiate the appropriate enforcement actions, or request assistance from the US EPA Removals Program under CERCLA.

If you have any questions regarding this letter or would like an opportunity to meet with Department personnel, please contact me by telephone at (401) 222-1360, ext. 2777411 or by email at sean.carney@dem.ri.gov.

Sincerely,



Sean R. Carney
Hazardous Waste Compliance
Office of Compliance and Inspection

Cc: David Chopy, RIDEM
Susan Forcier, Esq., RIDEM
Rachel Simpson, RIDEM
Sherry Banks, USEPA
William Lovely, USEPA
Maximilian Boal, USEPA Region I, Senior Enforcement Counsel

