



**PUBLIC INVOLVEMENT PLAN  
FORMER TIDEWATER FACILITY AND  
FORMER POWER PLANT  
TIDEWATER AND MERRY STREETS  
PAWTUCKET, RHODE ISLAND**

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## **EXHIBITS**

### **[EXHIBIT I](#)**

COPIES OF THE NOTIFICATION PACKAGES AND LANGUAGE INCLUDED ON THE SIGNS POSTED AT THE SITE ENTRANCE GATES

### **[EXHIBIT II](#)**

CONTACT LIST

### **[EXHIBIT III](#)**

RESPONSES TO SITE-SPECIFIC COMMENTS FROM COMMUNITY INTERVIEWS

### **[EXHIBIT IV](#)**

MARCH 22, 2013 RESPONSE TO PUBLIC COMMENTS RECEIVED IN REGARDS TO PUBLIC INVOLVEMENT PLAN SUMMARY OF FINAL RIDEM-APPROVED CHANGES TO THE PUBLIC INVOLVEMENT PLAN

### **[EXHIBIT V](#)**

AUGUST 1, 2013 NOTIFICATION FROM RIDEM TO NATIONAL GRID

### **[EXHIBIT VI](#)**

AUGUST 1, 2013 NOTIFICATION FROM RIDEM TO NATIONAL GRID

### **[EXHIBIT VII](#)**

OCTOBER 15, 2013 UPDATED RESPONSE TO PUBLIC COMMENTS RECEIVED IN REGARDS TO PUBLIC INVOLVEMENT PLAN



## KEY THINGS TO REMEMBER

### WHERE TO FIND MORE INFORMATION:

- **Publicly Accessible Site File**

Files related to the former Tidewater Site are maintained at RIDEM's Office of Waste Management filed under Former Tidewater Coal Gasification Plant (Pawtucket), RIDEM Case No. 95-022. Appointments to view the files can be made by contacting RIDEM, Department of Technical and Customer Assistance, 235 Promenade Street, Providence, Rhode Island (telephone: 401-222-4700 extension 7307, <http://www.dem.ri.gov/topics/filerevw.htm>).

- **Publicly Accessible Informational Websites:**

- **RIDEM Document Listing Website:**

<http://www.dem.ri.gov/programs/benviron/waste/tide.htm>

Certain documents related to the investigation and remediation of the Former Tidewater Site are maintained at the website operated by RIDEM. The website contains publicly available submittals pertaining to the Site dating back to 2007 and documentation will continue to be posted there.

- **National Grid Document Listing and Informational Website:**

[www.tidewatersite.com](http://www.tidewatersite.com)

This website provides updates on current and proposed activities at the Site. In addition, this website includes information on the nature and history of MGPs, history of the Tidewater facility, description of the Tidewater Site and regulatory background, access to key project documents and relevant correspondence, copies of public notices about the Site, public announcements, status update archive, frequently asked questions and Site contacts.

- **Local Informational Repository—Pawtucket Public Library**

The local information repository at the Pawtucket Public Library contains copies of submittals included on the RIDEM website listed above. Electronic copies of these submittals are sent to the repository on a monthly basis. Upon request, National Grid will provide hard copies of the material for inclusion in this repository. Pawtucket Public Library hours are Monday through Thursday, 9 a.m. to 8:45 p.m.; and Friday and Saturday, 9 a.m. to 4:45 p.m. The Pawtucket Public Library is located at 13 Summer Street, Pawtucket, Rhode Island (telephone: 401-725-3714).

- **Bulletin Boards**

National Grid has installed informational bulletin boards at the end of Tidewater Street and at the end of Bowles Court. Weekly updates during the work that are submitted to RIDEM will be posted to the bulletin boards, as well as how to find all submitted documents and how to receive more information about the Site. Site contact information is also posted on the bulletin boards. During active earth disturbing activities, air monitoring data will be posted on the bulletin boards. Additionally, on a daily basis during earth disturbing activities, a color coded system will be used to indicate whether any active excavation is occurring.







**HOW TO JOIN:**

• **Mailing List**

National Grid established a mailing list for the former Tidewater Site. The list includes abutting property owners, tenants, easement holders, municipalities and any community well suppliers associated with any well head protection areas that encircle the Site, as well as people who have previously provided their mailing address to National Grid. Interested persons can be added to this list via an email request to Michele Leone at National Grid ([Michele.Leone@nationalgrid.com](mailto:Michele.Leone@nationalgrid.com)) with your name and address or by calling Michele Leone at 1-781-907-3651. National Grid will use the mailing list to announce upcoming public meetings and distribute fact sheets and other information about the Site. In addition, National Grid will use the list to distribute information regarding reports and other documents added to the repository.

• **Email Distribution List**

Interested parties have the option to receive information via email. National Grid will also email the distribution list when significant field activities begin and as planned field activities may change. Interested persons can be added to the email list through National Grid's Tidewater website or by emailing a request to Michele Leone at National Grid ([Michele.Leone@nationalgrid.com](mailto:Michele.Leone@nationalgrid.com)) with your name and email address or call Michele Leone of National at 1-781-907-3651.

• **Phone Message Network**

National Grid has established a phone message network to distribute time-sensitive information to interested parties on air monitoring results during periods of active earth disturbing activities at the Site. Sign up for the phone message alert system can be made by emailing a request to Michele Leone of National Grid ([Michele.Leone@nationalgrid.com](mailto:Michele.Leone@nationalgrid.com)) or by calling Michele Leone at 781-907-3651 with your name and phone number.

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## ACRONYMS



AST	Above-ground Storage Tank
A.P.	Assessor's Plat
AES	Atlantic Environmental Services, Inc.
AQMP	Air Quality Monitoring Plan
BVEC	Blackstone Valley Electric Company
<a href="#">DNAPL</a>	Dense Non-Aqueous Phase Liquid
EJ Focus Area	Environmental Justice Focus Area
FGPA	Former Gas Plant Area
FPPA	Former Power Plant Area
GZA	GZA GeoEnvironmental, Inc.
ICS	International Charter School
<a href="#">LNAPL</a>	Light Non-Aqueous Phase Liquid
LOR	Letter of Responsibility
MGP	Manufactured Gas Plant
<a href="#">MNA</a>	Monitored Natural Attenuation
<a href="#">NAPL</a>	Non-Aqueous Phase Liquid
National Grid	Narragansett Electric Company d/b/a National Grid
NEGC	New England Gas Company
NFA	North Fill Area
<a href="#">PAHs</a>	Polycyclic Aromatic Hydrocarbons
<a href="#">PCB</a>	Polychlorinated Biphenyls
<a href="#">PIP</a>	Public Involvement Plan
<a href="#">RAA</a>	Remedial Action Alternative
<a href="#">RAL</a>	Remedial Approval Letter
RAE	Remedial Alternative Evaluation Report
<a href="#">RDL</a>	Remedial Decision Letter
<a href="#">RAWP</a>	Remedial Action Work Plan
<a href="#">Remediation Regulations</a>	Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases
RIDEM	Rhode Island Department of Environmental Management
SFA	South Fill Area
SIDR	Site Investigation Data Report
<a href="#">SIR</a>	Site Investigation Report
SSIWP	Supplemental Site Investigation Work Plan
STRAP	Short Term Response Action Plan
<a href="#">TPH</a>	Total Petroleum Hydrocarbons
<a href="#">UCL</a>	Upper Concentration Limit
UST	Underground Storage Tank
VGC	Valley Gas Company
VHB	Vanasse Hangen Brustlin, Inc.
<a href="#">VOCs</a>	Volatile Organic Compounds
Weston	Roy F. Weston, Inc.

## GLOSSARY AND HELPFUL TERMS

Electric switching station and substation

Substations are needed wherever electricity must be converted from one voltage to another. Transmission lines carrying a high voltage come into the substation where equipment reduces (or switches) the voltage to a level suitable for local distribution.

Engineered Cap

An engineered cap is a ground surface cover (liner, pavement, clay, soil, or another engineered material) designed to limit exposure to impacted material below. Engineered caps are either impermeable or permeable.

Impermeable Engineered Cap: An impermeable engineered cap is a specific type of cap that limits water (e.g., rain, snow melt) from entering the ground. The type of cap is typically made of clay or plastic liner.

Permeable Engineered Cap: A permeable engineered cap is a specific type of cap that allows water (e.g., rain) to enter the ground beneath it. This type of cap is typically constructed using clean soil and a fabric material.

Monitored Natural Attenuation (MNA)

Monitored Natural Attenuation (MNA) refers to the reliance on natural attenuation processes to reduce contaminant levels in soil and/or groundwater to achieve site-specific remediation objectives. Natural attenuation is the process that breaks down certain compounds into different compounds by biological or chemical activity.

Natural gas regulating station

Regulating stations are used for natural gas distribution and are designed to reliably control system pressures and maintain the continuity of gas supply to the community during normal and critical demand periods.

Non-Aqueous Phase Liquid (NAPL)

Non-aqueous phase liquid (NAPL) refers to a compound present at a concentration such that it exists as a separate phase when placed in water. This definition may apply to Light Non-Aqueous Phase Liquids (LNAPL) and/or Dense Non-Aqueous Phase Liquids (DNAPL). DNAPL is denser than water and sinks below water; DNAPL is sometimes called “sinker”. Maple syrup is an example of a DNAPL. LNAPL is lighter than water and floats above water; LNAPL is sometimes called “floaters”. Examples of LNAPL are vegetable oil or paint thinner.



## GLOSSARY AND HELPFUL TERMS

Physical Containment	Physical containment refers to the installation of a subsurface barrier which is used to contain impacted groundwater and/or <a href="#">NAPL</a> . Examples of subsurface barriers include an excavated trench filled with relatively impermeable material or a sheet pile wall driven into the ground.
Polycyclic Aromatic Hydrocarbons (PAHs)	A class of chemicals substance formed by burning coal, gas, oils, and tobacco. PAHs are typically detected in shallow soils, particularly in urban environments. Sources of PAHs include burning of wood, vehicle exhaust, grilled foods, cigarette smoke, asphalt roads, and roofing products.
Polychlorinated Biphenyls (PCBs)	A manufactured chemical substance that had many uses in industrial processes and construction materials. PCBs are typically found at many former power plants and current electric substations due to their use in electrical equipment. PCBs are also commonly detected in caulk, paints, inks, dyes, grout, floor finishes, and adhesives.
Program Letter	A Program Letter is issued by RIDEM to formally put the findings of the <a href="#">Site Investigation Report (SIR)</a> out for a public comment period.
Public Involvement Plan (PIP)	A Public Involvement Plan (PIP) is an agreement between the party conducting response actions and the public about how they will share information moving forward, and how the public will be able to comment on plans for assessment and cleanup of the site. PIPs are tailored to the specific conditions presented by individual sites. The party responsible for conducting response actions at a site is also responsible for conducting public involvement activities at the site and carrying out the activities listed in the PIP during the site cleanup process. A PIP is a living document and can be amended to reflect additional issues or challenges that may arise during the site cleanup process.
Remedial Action Alternative (RAA)	A Remedial Action Alternative (RAA) is a remedial strategy that has been evaluated to potentially address soil and/or groundwater impacts at a Site. Typically, several RAAs are evaluated for a Site using comparison criteria, including cost, effectiveness, reliability and implementability. At the conclusion of the evaluation, one RAA is identified as the preferred RAA or the best fit for the final remedy (also known as “Remedial Action”).
Remedial Approval Letter (RAL)	The Remedial Approval Letter (RAL) is a formal written communication issued by RIDEM to formally approve the <a href="#">Remedial Action Work Plan (RAWP)</a> and to initiate the remedial work.



## GLOSSARY AND HELPFUL TERMS

Remedial Action Work Plan (RAWP)	A document submitted to RIDEM for review and approval which describes how the selected remedial alternative for the Site will be implemented.
Remedial Decision Letter (RDL)	The Remedial Decision Letter is a formal written communication issued by RIDEM to formally agree with the findings of <a href="#">the Site Investigation Report (SIR)</a> after a public comment period.
Remediation Regulations	Refers to the RIDEM “Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases”
Short Term Response Actions (STRA)	Any activities undertaken immediately following the discovery of a release of hazardous material in order to completely or partially contain, clean up or treat the released material and/or remove an imminent hazard if it exists.
Site Investigation Report (SIR)	A document submitted to RIDEM for review and approval which presents the history of a Site and investigation activities, describes the nature and extent of impacts based on the findings of the investigations and identifies the preferred <a href="#">Remedial Action Alternative (RAA)</a> .
Source Removal	Refers to the removal of subsurface material which may be acting a source for continued impact to soil and/or groundwater.
Source Stabilization	Refers to a remedial approach where impacts are physically bound or “stabilized” within a mass to limit further migration. An example of stabilization would be the addition of a cement-like material to soil which would lead to a “hardened” matrix and would limit the migration of impacts from that material.
Total Petroleum Hydrocarbons (TPH)	Term used to describe a large family of several hundred chemical compounds that originally come from crude oil. Crude oil is used to make petroleum products. Measurements of these compounds in soil and groundwater is commonly expressed as TPH. TPH is commonly detected in industrial/commercial areas with sources including gasoline, motor oils, and asphalt.
Upper Concentration Limit (UCL)	An upper concentration limit (UCL) is when a compound exceeds a defined numerical concentration as set forth in the <a href="#">Remediation Regulations</a> or is found in the environment as <a href="#">NAPL</a> .
Volatile Organic Compounds (VOC)	Volatile organic compounds (VOCs) are typical compounds found at MGP sites and other sites where coal, oil, refined products and other hydrocarbons were burned or used. VOCs are also found in gasoline, paint thinner and cleaning products.



## 1.00 INTRODUCTION

GZA GeoEnvironmental, Inc. (GZA), on behalf of the Narragansett Electric Company d/b/a National Grid (National Grid), has prepared this [Public Involvement Plan \(PIP\)](#) for the Former Tidewater facility located at terminus of Tidewater and Merry streets in Pawtucket, Rhode Island (herein referred to as the “Site”).



The attached [Figure 1](#) shows a Site *Locus Plan*. On March 23, 2012, the Rhode Island Department of Environmental Management (RIDEM or the “Department”) informed National Grid that the Department received a request that a formal process be set up for public participation in cleanup planning for the Site. GZA prepared this *PIP* based on the requirements of Rule 7.07 A, B, C and D of the [Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases \(Remediation Regulations, <http://www.dem.ri.gov/pubs/regs/regs/waste/remreg11.pdf>\)](#). Per Rule 7.07 (Public Involvement), this *PIP* addresses the following primary elements: 1) Public Notice, 2) Fact Sheets and Enhanced Communication, 3) Community Meetings, and 4) Information Repositories. In preparing this *PIP*, GZA considered information and comments provided to National Grid by RIDEM, members of the Tidewater Shareholders’ Group and the public. National Grid conducted interviews in June 2012 to solicit input from the community, which were used in the development of this plan. Interview questions and responses are summarized in the attached [Exhibit III](#). On November 26, 2012, a notice detailing the availability of the Draft *PIP* was distributed to abutters and interested parties to solicit public comments. On January 29, 2013, National Grid held a public meeting to discuss public comments on the Draft *PIP*. Written public comments were provided to National Grid by RIDEM via a February 21, 2013 notification letter. This September 2013 final version of the *PIP* was revised in response to comments received at the January 29, 2013 public meeting, the written public comments received in February 2013 and an email received on March 6, 2013. A notification letter dated August 1, 2013 was provided by the RIDEM concurring with National Grid’s Response to Public Comments Letter dated March 22, 2013. RIDEM requested the Response to Public Comments letter be revised for recent updates on public involvement activities at the Tidewater Site and that the *PIP* be finalized.

A [Public Involvement Plan \(PIP\)](#) is an agreement between the party conducting response actions (in this case, National Grid) and the public about how they will share information moving forward, and how the public will be able to comment on plans for assessment and cleanup of the Site. PIPs are tailored to the specific conditions presented by individual sites. The public involvement activities proposed at each site by the party conducting the response actions should reflect the needs of the community. The party responsible for conducting response actions at a site is also responsible for conducting public involvement activities at the site and carrying out the activities listed in the *PIP* during the site cleanup process. A *PIP* is a “living” document and can be amended to reflect additional issues or challenges that may arise during the site cleanup process.



This *PIP* addresses activities related to the investigation and cleanup of the Tidewater Site that are under the jurisdiction of RIDEM only, per the Remediation Regulations. This plan is not intended to cover Site activities relative to the day-to-day operations, including repair and maintenance of the natural gas regulating facility and electrical substation involving minor soil disturbances (i.e., fence post installation) or other uses of the property by National Grid. Activities at these facilities involving excavations of soils with the potential to create volatile emissions are covered by this *PIP*. In the event of a facilities emergency requiring immediate soil excavation (utility repair, etc.), National Grid will follow the soil management procedures prepared for the previous natural gas station regulator and electrical substation work (i.e., April 2011 *Materials Management Plan* and November 2012 *Soil Management Plan*, respectively). In addition, air monitoring will be completed during these emergency events in accordance with the September 28, 2012 air monitoring summary memorandum submitted to RIDEM to the extent practical.

The *PIP* is organized as follows:

- [Section 1.00](#) contains this introduction;
- [Section 2.00](#) includes a summary of relevant Site background information and current Site regulatory status;
- [Section 3.00](#) summarizes historic and current public involvement;
- [Section 4.00](#) describes the elements of the *PIP*; and
- [Section 5.00](#) explains how the *PIP* may be revised in the future; and
- [Section 6.00](#) describes information regarding roles and responsibilities for implementing public involvement activities; and
- [Section 7.00](#) presents a schedule for planned public involvement activities.

## 2.00 SITE DESCRIPTION

The following sections present a brief description of the Site, including historic and current uses; the Site's regulatory history and current status; an overview of investigation and remediation activities performed to date; and a description of planned remedial actions.<sup>1</sup> More details can be found on RIDEM's website (<http://www.dem.ri.gov/programs/benviron/waste/tide.htm>), National Grid's website ([www.tidewatersite.com](http://www.tidewatersite.com)), through RIDEM's Site files located at their offices or at the Pawtucket Public Library (see [Section 4.40](#) for details).

### 2.10 SITE DESCRIPTION, HISTORY, AND CURRENT USE

The Site was the location of the former Tidewater [Manufactured Gas Plant \(MGP\)](#) and the former Pawtucket No. 1 Power Station. It is listed as a "State Site" under RIDEM's

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<sup>1</sup> Note that the planned remedial activities are subject to RIDEM review and approvals.





Remediation Regulations (RIDEM Case No. 95-022). It is now largely vacant with the exception of an active [natural gas regulating station](#) located on the western portion and an [electric substation](#) on the central portion. In addition, portions of the former Power Plant are used as an [active switching station](#). A locked perimeter chain-link fence secures the Site.

The Site is situated between Taft Street, an extension of Tidewater and Thornton streets to the west, and the Seekonk River to the east, and consists of approximately 23 acres across seven separate lots. This area of Pawtucket meets the U.S. Environmental Protection Agency's definition of an Environmental Justice (EJ) Focus Area and, therefore, per the Remediation Regulations, certain enhanced communications have been included as part of this *PIP* (see [Section 4.20](#)).

The Site has been subdivided into four areas, as described below and shown in Figures 2A, Exploration Location Plan for the North Fill Area (NFA) and Former Gas Plant Area (FGPA), and 2B, Former Power Plant Area (FPPA) and South Fill Area (SFA).

- North Fill Area (NFA) (northern portions of Assessor's Plat (A.P.) 54B Lot 826) – [Figure 2A](#);
- Former Gas Plant Area (FGPA) (southern portions of A.P. 54B Lot 826 and A.P. 65B Lot 662) – [Figure 2A](#);
- Former Power Plant Area (FPPA) (A.P. 65B Lot 645) – [Figure 2B](#); and
- South Fill Area (SFA) (A.P. 65B Lots 647 and 649, portions of Lot 648 and portions of A.P. 67B Lot 11) – [Figure 2B](#).

National Grid owns the entirety of the NFA, FGPA and FPPA, as well as portions of the SFA (A.P. 65B Lots 647 and 649). The City of Pawtucket owns additional portions of the SFA (A.P. 65B Lot 648 and A.P. 67B Lot 11). The current Site layout, key features and previous exploration locations are shown in Figures 2A and 2B.

The Site is bounded to the west and northwest by residential properties (A.P. 65B Lots 613, 614, 615 and 616), the International Charter School, the Blackstone Academy Charter School, and the George W. Smith and Son, Inc. Construction Company (A.P. 54B Lot 497). It is bound to the east by the tidally-influenced Seekonk River, to the south and southwest by the Francis J. Varieur School (A.P. 65B Lot 644) and the Max Read Athletic Field (A.P. 65B Lots 646, 650 and 564 and A.P. 67B Lot 21), and to the north by undeveloped property owned by the city of Pawtucket (A.P. 54B Lot 827).

RIDEM classifies the groundwater underlying the Site as a GB resource. Groundwater classified as GB refers to groundwater resources that RIDEM has designated as not suitable for public or private drinking water use. The Site is located approximately 1.4 miles from the nearest GA-designated area, which has drinking water that RIDEM designated as suitable for public or private drinking water use. This GA-designated area is east of the Site, near Slater Park, on the opposite side of the Seekonk River. Municipal





drinking water services the Site and its surrounding area. There are no documented public drinking water supplies within a one-mile radius of the Site. The closest designated wellhead protection area is located approximately 1.2 miles north of the Site.

The Pawtucket Gas Company commenced building the Tidewater [MGP](#) in the 1880s on the northern portion of the Site. The MGP operated from the 1880s to 1968. From the 1880s until 1954, the MGP generated gas using the coal and coke. These raw materials were barged to storage areas at the Site positioned along the Seekonk River. In later years (1954 until the late-1960s), operation of the MGP was limited to producing gas to supplement natural gas during high demand periods. In 1968, the MGP facility was decommissioned. Based on available information, it appears that the majority of the above ground MGP structures and tanks were razed at that time or before. The last of the two remaining gasholders on the Site (Nos. 7 and 8) were decommissioned and removed from the Site by National Grid in 2010. A gas regulator station remains on the former gas plant portion of the Site.

In regard to the electric generation portion of the Site, in 1890, the Pawtucket Gas Company commenced building the Pawtucket No. 1 Station for power generation purposes. The No. 1 Station operated on the Site from the early-1890s until 1975. The station used coal, petroleum based products, and residual by-product tars from the MGP for electricity generation. Petroleum products were historically stored in three large (approximately 900,000 gallons each) aboveground storage tanks (AST) formerly located on the southern portion of the Site. These ASTs were removed in the 1970s. The electrical transmission towers, transformer yard, and former engine room building (which currently contains the active switching station) remain on the former power plant portion of the Site.

## 2.20 REGULATORY HISTORY

RIDEM issued a *Letter of Responsibility* (LOR) dated September 12, 1995 to Blackstone Valley Electric Company (BVEC), a predecessor of National Grid. The Site was listed as State Site #95-022 following the issuance of the LOR. Since that time, several rounds of investigation and remedial actions have been performed at the Site.

## 2.30 SITE INVESTIGATION AND REMEDIATION STATUS

Environmental investigations have been performed on the Site since 1986. These Site environmental activities have been documented in reports submitted to RIDEM. The following is a listing of the primary Site reports prepared and submitted to RIDEM. Some of these reports can be accessed on the RIDEM website (<http://www.dem.ri.gov/programs/benviron/waste/tide.htm>) or on the Tidewater/ National Grid website ([www.tidewatersite.com](http://www.tidewatersite.com)). All reports are publicly available by request and by appointment through RIDEM's site files (refer to [Section 4.40](#) and "[Key Things to Remember](#)").



- December 1986 *Work Study Plan* prepared by GZA on behalf of Valley Gas Company (VGC);
- February 1989 *Field Investigation Report* prepared by RIDEM;
- May 1988 *Investigation at the No. 1 Station Site* prepared by Roy J. Weston, Inc. (Weston) on behalf of BVEC;
- May 1991 *Underground Storage Tank Closure Completion Report*, prepared by Metcalf and Eddy, Inc. on behalf of BVEC;
- February 1993 *Site Inspection Report*, prepared by RIDEM;
- August 1995 *UST Closure Assessment*, prepared by E.R. Pickett Co., Inc. on behalf of BVEC;
- December 1996 *Remedial Investigation at the Tidewater Site, Pawtucket, RI* prepared by Atlantic Environmental Services, Inc. (AES) on behalf of BVE and VGC;
- June 1997 *Additional Background Surface-Soil Sampling, Pawtucket, RI* prepared by AES on behalf of BVEC and VGC;
- January 1998 *Tidewater Site Application for Variance, Pawtucket, RI* prepared by AES on behalf of BVEC and VGC;
- January 1998 *Addendum to Tidewater Site Additional Background Surface-Soil Sampling* prepared by AES on behalf of BVEC and VGC;
- June 2005 *Short Term Response Action Report, Tidewater Former MGP, Pawtucket, RI* prepared by Vanasse Hangen Brustlin, Inc. (VHB) on behalf of New England Gas Company (NEGC);
- January 2007 *Short Term Response Action Plan (STRAP)* prepared by GZA on behalf of National Grid (Roadway Cap and South Washout Areas);
- June 2008 *Sediment Investigation Work Plan* prepared by ARCADIS on behalf of National Grid;
- February 2009 *Polychlorinated Biphenyls (PCB) Investigation and Cleanup Plan – Pawtucket No. 1 Substation* prepared by VHB on behalf of National Grid;
- June 2009 *Sediment Data Report Former Tidewater Facility* prepared by ARCADIS and Anchor QEA, LLC. (ARCADIS/Anchor) on behalf of National Grid;
- November 2009 *Remedial Summary Report – Response to Stormwater Release* prepared by GZA on behalf of National Grid;
- November 2009 *Supplemental Site Investigation Work Plan (SSIWP)* prepared by GZA on behalf of National Grid;
- December 2009 *Short Term Response Action Plan (STRAP) – Sheen Outbreak* prepared by GZA on behalf of National Grid;
- February 2010 *Short Term Response Action Summary – Sheen Outbreak* prepared by GZA on behalf of National Grid;
- October 2010 *Short Term Response Action Closure Report, MGP-Residuals Roadway Remediation* prepared by GZA on behalf of National Grid;



- October 2010 *Supplemental Site Investigation Work Plan Addendum* prepared by GZA on behalf of National Grid;
- October 2010/January 2011 *Short Term Response Action Plan – Former Steel Process Pipe* prepared by GZA on behalf of National Grid;
- January 2011 *Site Investigation Data Report (SIDR)* prepared by GZA on behalf of National Grid;
- April 2011 *Evaluation of Applicability of Air Pollution Control Regulation No. 9 & Air Quality Monitoring Program (AQMP)* prepared by GZA on behalf of National Grid;
- July 2011 *Gasholder Nos. 7 and 8 Decommissioning and Demolition Completion Report* prepared by GZA on behalf of National Grid;
- July 2011 *Remedial Action Alternative Evaluation (RAE) Report* prepared by GZA on behalf of National Grid;
- August 2011 *Supplemental Site Investigation Work Plan Addendum* prepared by GZA on behalf of National Grid;
- September 2011 *Short Term Response Action Completion Report – Former Process Pipe Removal* prepared by GZA on behalf of National Grid;
- November 2011 *Completion Report Performance-Based PCB Remedial Activities Natural Gas Regulator Station Area Former Tidewater Facility* prepared by GZA on behalf of National Grid;
- September 2012 *Site Investigation Report Addendum* prepared by GZA on behalf of National Grid; and
- September 2012 *Summary of Air Quality Monitoring during Substation Earthwork* prepared by GZA on behalf of National Grid; and
- May 2013 *Supplemental Site Investigation Work Plan: Soil Gas Sampling and Analysis* prepared by GZA on behalf of National Grid; and
- October 2013 *Supplemental Site Investigation Report Addendum* prepared by GZA on behalf of National Grid.

The January 2011 *SIDR* combined with the July 2011 *RAE* served to complete the [Site Investigation Report \(SIR\)](#) consistent with Rule 7.00 of the [Remediation Regulations](#). The January 2011 *SIDR* presents a comprehensive summary of all relevant environmental investigations and data collected at the Site. Findings of the *SIDR* indicate that soil and groundwater impacts related to the former MGP and power generation operations remain in the environment at the Site. MGP residuals and petroleum hydrocarbon-related impacts were detected in both surface (between zero and two feet below grade) and subsurface (more than two feet below grade) soils. In general, subsurface soils located at/or below the water table exhibited more significant impact when compared to surface soils. This condition is commonly found at MGP sites. The primary constituents detected in Site soils included [polycyclic aromatic hydrocarbons \(PAHs\)](#), [petroleum hydrocarbons \(TPH\)](#) and certain inorganics, most notably arsenic and lead.

In terms of groundwater quality, dissolved phase [volatile organic compound \(VOC\)](#) GB Groundwater Objective exceedances were observed in the eastern portion of the FGPA,



FPPA and SFA. The most prevalent compounds detected in groundwater were benzene and naphthalene, which is typical of former MGP and power plant sites. Groundwater in these areas was also impacted by [TPH](#) and cyanide, and [PAHs](#) to a lesser extent. In certain areas of the Site, sporadic [Upper Concentration Limit \(UCL\)](#) exceedances in the surface soils were identified, as well as more widespread UCL exceedances in subsurface soils, particularly in the FGPA and FPPA. In addition, Light Non-Aqueous Phase Liquid ([LNAPL](#), i.e., product floating on the groundwater surface) has been observed on the eastern portion of the FGPA and FPPA, and Dense Non-Aqueous Phase Liquid ([DNAPL](#), i.e., product that sinks to the bottom of a well) has been observed on the eastern portions of the FGPA, FPPA and SFA adjacent to the riverfront within groundwater monitoring wells. A color-coded map for the Tidewater project that illustrates areas of the Site where impacts have been identified in groundwater and soils has been provided as Figure 4. This map was presented at the Community Information Session held on March 27, 2013. This map was also posted on the National Grid website ([www.tidewatersite.com](http://www.tidewatersite.com)) and the bulletin boards.

National Grid conducted soil gas sampling in accordance with the May 2013 Supplemental Site Investigation Work Plan during July and August 2013 in the interior portion of the Tidewater Site and along the perimeter of the Tidewater Site in response to public comment. The results of the interior soil gas testing are consistent with previous soil and groundwater testing at the Tidewater Site. While certain compounds were detected at low levels, none of the perimeter soil gas readings exceeded regulatory criteria established by the Connecticut Department of Energy and Environmental Protection (CTDEEP) for both residential and industrial/commercial settings. (Rhode Island does not have regulatory criteria for soil gas quality.) The results showed the closer the samples were to the boundary of the Site, the lower the concentrations of these compounds. Overall, the test results indicate that potential migration of impacted soil gas from the Tidewater Site towards neighboring properties and structures does not pose a risk to the neighbors. National Grid provided a fact sheet/summary, a figure and analytical soil gas results to RIDEM and public stakeholders describing the soil gas sampling and preliminary results on August 28, 2013 and posted this information to the Tidewater website ([www.tidewatersite.com](http://www.tidewatersite.com)). A copy of this fact sheet is included in Exhibit I. National Grid submitted a comprehensive report describing this soil gas study and the results to RIDEM in October 2013. This comprehensive report was posted on the Tidewater website ([www.tidewatersite.com](http://www.tidewatersite.com)).

Consistent with the requirements of Rule 7.04 of the Remediation Regulations, the July 2011 *RAE* identified and evaluated four potential [Remedial Action Alternatives \(RAAs\)](#):

- 1) RAA 1: No Action with [Monitored Natural Attenuation \(MNA\)](#);
- 2) RAA 2: [Engineered Cap](#), [Physical Containment](#) and [Limited Source Removal](#);
- 3) RAA 3: Source Removal / [Stabilization](#), Localized Physical Containment and Engineered Cap; and
- 4) RAA 4: Significant Source Removal and Engineered Cap.



These alternatives were developed considering:

- the potential exposure pathways and remedial objectives established for the Site;
- the Site's hydrogeologic setting;
- characteristics and extent of detected impacts;
- practical and logistical limitations;
- current and anticipated future Site use;
- technical feasibility;
- compliance with applicable regulations; and
- public concerns.

Cost effectiveness and permanency of the remedial alternative were also considered, along with the ability to address potential risks to human health and the environment, including protection of natural resources, and addressing the presence of [UCLs](#). The four RAAs were evaluated based on the following regulatory specific criteria:

- comparative effectiveness/permanency;
- comparative compliance with Remediation Regulations; and
- comparative implementability, cost, risk, implementation risk and timeliness.

In addition, the comparative analysis included technical assessments of Site-specific hydrogeological factors and consideration of other Site-specific conditions. These Site-specific conditions include current and anticipated future Site use as well as the potential impacts both on-Site and to the surrounding community during remedial implementation.

Based on this evaluation, RAA 2 was selected as the preferred alternative for the Site. This alternative involves the following components:

- installation of an engineered permeable cap across the NFA and an impermeable cap across the remainder of the Site;
- installation of a subsurface containment wall to mitigate the migration of [NAPLs](#) from the Site along the riverside of the FGPA, FPPA and portions of the SFA; and
- targeted [source removal](#) in the NFA, FGPA and the FPPA.

This alternative was selected based on its comparative ability to achieve the remedial objectives, low degree of implementation risk and relative timeliness at achieving the remedial goals.

As indicated previously, the [SIR](#) was completed with the submittal of the *RAE* to the Department in July 2011. The Department will issue a [Program Letter](#), per Rule 7.07 of the [Remediation Regulations](#), upon its review and acceptance that the Site has been adequately assessed. Following receipt of the *Program Letter*, National Grid will notify all abutting property owners, tenants, easement holders, the city of Pawtucket and other





interested parties that the investigation is complete and that RIDEM has concurred with the recommended remedial alternative. This notification will be performed consistent with [Section 4.10](#) of this *PIP* and will include a summary of the proposed remedial actions. Subsequent to this public notification and following receipt of any public comments, the Department will issue a [Remedial Decision Letter](#) formally approving the *SIR*. Following the issuance of the *Remedial Decision Letter*, National Grid will prepare and submit a [Remedial Action Work Plan \(RAWP\)](#) consistent with Rule 9.00 of the Remediation Regulations. The Department must review and approve the *RAWP* prior to implementation of the remedy through the issuance of a [Remedial Approval Letter](#). Many of the above remedial process steps will be accompanied by public meetings and comment periods. See [Section 4.30](#) and [Table 1](#) for more public involvement details regarding these remedial process steps.

### 3.00 PUBLIC INVOLVEMENT HISTORY

Consistent with the requirements of the Remediation Regulations, as well as specific requests from RIDEM and community members, National Grid has and continues to make information relative to the investigation and remediation of the Site available to the community. To date, National Grid has conducted several meetings with members of the community to solicit public feedback, answer questions and discuss concerns regarding the Tidewater site.

Per Rule 7.07A of the [Remediation Regulations](#) and as requested by RIDEM, National Grid and/or its environmental consultants performed public notifications prior to the completion of the several rounds of field investigation activities and [Short Term Response Actions](#). National Grid also completed public notifications prior to significant upgrades to the [natural gas regulating station](#) in April 2011 and to the [electrical substation](#) upgrades in August 2012. This notification process included mailing public notices to all abutting property owners, tenants, easement holders and the city of Pawtucket, which detailed information regarding the nature and timing of the proposed field activities. In addition, as part of the notification process completed in April 2010 and prior to Site investigation activities, National Grid completed public notifications per the requirements of Rule 7.07 B of the [Remediation Regulations](#) for sites located in an EJ Focus Area. Specifically, this included distribution of the following materials:

- “What is DEM?” fact sheet (provided by RIDEM);
- “Brownfield’s, Turning Bad Spaces Into Good Ones” (provided by RIDEM); and
- a Site-specific fact sheet.

Additionally, signs were clearly posted at the entrance gates at the ends of Tidewater and Merry streets, which included important Site-specific information, such as contact information and how to obtain additional information about the Site. Per the EJ Focus Area



guidance, these materials were provided in both English and Spanish. RIDEM reviewed the information distributed per the EJ Focus Area guidance prior to mailing and posting. Copies of the notification packages, which have been submitted since 2008, and information included on the signs posted at the Site entrance gates, are included in [Exhibit I](#).

Since February 2010, National Grid has prepared monthly status reports and submitted them to RIDEM, per RIDEM's request. The reports summarize the investigations and response actions completed for the Site and anticipated future response activities and schedule. RIDEM posts these status reports to its Site-specific website (<http://www.dem.ri.gov/programs/benviron/waste/tide.htm>).

During the completion of the gasholder decommissioning and demolition activities, performed in 2010, National Grid developed a Fact Sheet and circulated it by hand to abutting property residents of the neighboring apartment complex and charter schools in September 2010. The Fact Sheet included a brief history of the Site and a summary of the major activities expected to occur during the gasholder dismantling project. A copy of this Fact Sheet is included in [Exhibit I](#). In addition, a meeting was held on November 4, 2010, at the Blackstone Academy Charter School located at 334 Pleasant Street, Pawtucket, Rhode Island. Officials of the International Charter School (ICS) and Blackstone Academy Charter School, school parents, RIDEM officials, National Grid and GZA attended the meeting. A follow-up meeting was also held at the same location on December 7, 2010. These meetings included discussions on the progress and plans to complete the gas holder decommissioning and demolition activities. Concerns raised by members of the community related to air quality monitoring, dust, noise and truck traffic were also discussed and addressed as part of project completion.

Following the November 2010 meeting, RIDEM established a link on its website's homepage ([see Section 4.40](#)) for the "Former Tidewater Coal Manufactured Gas Site (Pawtucket)". This website includes electronic copies of all recently submitted documents for the Site. Because all reports are not electronically available, the site also includes instructions on how to obtain copies of all Site-related documents.

Per RIDEM's request, on November 24, 2010, National Grid also initiated the submission of weekly project updates to RIDEM. National Grid typically submits these updates electronically to RIDEM on Fridays, summarizing anticipated investigation and response actions to be performed for the following week. RIDEM then posts these updates on its website. Since April 2012, National Grid has submitted its updates on a biweekly schedule given the current low frequency of investigation and response action activities at the Site. National Grid will increase the frequency of the updates when more active activities are undertaken at the Site.

National Grid also established a public repository in May 2011 at the Pawtucket Public Library, located at 13 Summer Street, Pawtucket, Rhode Island. On a monthly basis,



electronic copies of the documents posted on RIDEM's website are provided on CD to the library repository. National Grid included a notification about the availability of documents at the public repository in the May 27, 2011 weekly update to RIDEM.

In August 2012, GZA, on behalf of National Grid, walked the neighborhood to distribute door-knob flyers informing people how to join the mailing list. This walk included the residences within the neighborhood area, as shown in the attached [Figure 3](#) – Door-to-Door Notification Area.

In September 2012, National Grid installed informational bulletin boards at the end of Tidewater Street and at the end of Bowles Court. Weekly updates submitted to RIDEM will be posted to the bulletin boards, as well as how to find all submitted documents and how to receive more information about the Site. Site contact information is also posted to the bulletin boards. During active earth disturbing activities, air monitoring data will be posted on the bulletin boards. Additionally, on a daily basis during earth disturbing activities, a color coded system will be used to indicate whether any active excavation is occurring.

In September 2012, National Grid, RIDEM and GZA conducted a meeting with interested persons regarding public concerns about the upcoming electrical substation upgrades. As a result of this meeting, GZA prepared a summary memorandum dated September 28, 2012 describing the air quality monitoring program implemented during earthwork activities associated with the electrical substation upgrade project. The memo can be found in the Information Repositories listed in [Section 4.40](#).

In October 2012, National Grid notified recipients of the mailing list in regards to several public involvement tools that have been made available. The notification announced the availability of the National Grid website ([www.tidewatersite.com](http://www.tidewatersite.com)), phone message alert system and the bulletin boards. The notification presented how to sign up for the mailing list, emailing list and the phone message alert system.

In November 2012, National Grid notified recipients of the mailing lists that the draft *PIP* was available for review and comment. The notification also presented a tentative schedule for a public meeting to discuss the draft *PIP*.

In January 2013, National Grid notified recipients of the mailing lists that the draft *PIP* meeting would be held on January 29, 2013. The purpose of this public meeting was to discuss public comments to the draft *PIP*.

The public meeting to discuss the Draft *PIP* was held on January 29, 2013 and included a presentation by National Grid and GZA on the draft *PIP* and a summary of the public involvement components. National Grid responded to written questions received to date and then responded to questions or comments from people who attended. A summary of this meeting was submitted to RIDEM on February 15, 2013. A copy of the meeting





summary is included in Exhibit IV as an attachment to the formal Response to Comments dated March 22, 2013.

National Grid received a notification letter from RIDEM on February 21, 2013 to provide written responses to written comments received by RIDEM. A formal Response to Comments Letter was submitted to RIDEM on March 22, 2013 and is included as Exhibit IV. This response to comments also included updates to comments from the public discussed at the January 29, 2013 public meeting and responses to comments received in an email on March 6, 2013.

In March 2013, recipients of the mailing lists were notified that National Grid planned to host a Community Outreach Session to be held on March 27, 2013 at the Francis J. Varieur Elementary School. An updated Fact Sheet, dated February 2013, was also included with the notification package. National Grid provided this notification and updated fact sheet in English, Spanish and Portuguese. GZA, on behalf of National Grid, walked the neighborhood to distribute door-knob notification of the proposed Community Outreach Session and the updated Fact Sheet, all provided in English, Spanish and Portuguese. This walk included the residences within the neighborhood area, as shown in the attached [Figure 3](#) – Door-to-Door Notification Area. National Grid distributed additional copies of this notification and fact sheet to the principals at the Varieur Elementary School, Blackstone Academy Charter School and International Charter School on March 6, 2013 to be sent home with the students via backpacks. In addition, National Grid, with input from the principals of the three schools and community members, developed a flyer to announce the Community Outreach Session. This flyer was translated to Spanish and Portuguese and distributed to all three schools and posted on the bulletin boards on March 20, 2013.

National Grid held a community outreach session on March 27, 2013. The intent of this session was to present information regarding the Site in an informal poster-board type setting. Posters included:

- a description of RIDEM's Site Remediation program;
- Site history;
- details regarding Site investigations;
- details regarding utility operations at the Site;
- details regarding public involvement tools;
- nature and extent of environmental impacts, including characteristics of contamination and proposed remedial approach for the Site;
- A demonstration was conducted of air monitoring equipment used during the substation upgrade project at the Tidewater Site; and
- A slideshow was shown with photographs of various areas of the Site.

The posters were staffed by National Grid and GZA representatives who answered the public's questions on a one-on-one basis. Representatives were available from RIDEM to



answer questions on the regulatory process. This community outreach session was held at the Francis J. Varieur Elementary School.

In June 2013, National Grid notified recipients of the mailing lists that a supplemental investigation work plan was available for review and comment. The work plan was developed to investigate soil gas quality in both the interior portion of the Site and along the perimeter of the Site in response to comments received by the public. The notification also presented a tentative schedule for sampling.

National Grid received a notification letter from RIDEM on August 1, 2013 to update and finalize the PIP and to update the formal response to comments that was provided to RIDEM on May 22, 2013.

#### **4.00 PUBLIC INVOLVEMENT PLAN**

This section describes the elements of the [PIP](#) to be implemented for the Site that were developed based on the applicable requirements of Rule 7.07 A, B, C and D of the [Remediation Regulations](#). This *PIP* has been prepared to establish procedures for formal public and community communications relative to the implementation of planned investigations and remedial efforts at the Site. This *PIP* is considered to be a “living” document and may be revised or amended whenever necessary during the course of the remedial process.

A contact list for National Grid, GZA and RIDEM personnel associated with the Site is presented in [Exhibit II](#), in the “[Key Things to Remember](#)” portion of this *PIP* and on the title page.

##### 4.10 PUBLIC NOTICE

Rule 7.07A of the [Remediation Regulations](#) requires public notice at two points during the Site Investigation process:

1. Prior to conducting Site Investigation field activities at a known contaminated site; and
2. Prior to the formal departmental approval of the [SIR](#) (in the form of the [Remedial Decision Letter](#)).

As described in [Section 3.00](#), National Grid provided public notice in the form of letter mailings prior to performing Site investigation activities in 2008. With respect to the second notification step, upon receipt of a [Program Letter](#) from the Department, National Grid will provide written notification to all abutting property owners, tenants, easement holders and the City of Pawtucket. This written notification will include a brief summary



of investigation findings, a description of the proposed Site remedy, and information on where the public can access and review the [SIR](#). As part of this post-*SIR* notification process, there is a 14-day public comment period, commencing with the date of delivery of the public notice, during which the public may review RIDEM records pertaining to the Site and submit written comments regarding the technical feasibility of the preferred remedial alternative. Since the Site is located in an EJ Focus Area, this public notice will be prepared and provided in English, Spanish and Portuguese with a translation header in multiple languages stating: “This is an important notice. Please have it translated.”

National Grid established a mailing list for the former Tidewater Site. The list includes, as described in Rule 7.07A of the [Remediation Regulations](#), abutting property owners, tenants, easement holders, municipalities and any community well suppliers associated with any well head protection areas that encircle the contaminated Site. In addition, this mailing list includes members of the Tidewater Stakeholders Group, the Pawtucket Development Office and other interested parties, as well as the principals of the neighboring schools (charter schools and public school) for dissemination to teachers and parents. Interested parents can go to the Tidewater/National Grid website ([www.tidewatersite.com](http://www.tidewatersite.com)) to sign up for updates. National Grid will use the mailing list to announce upcoming public meetings and distribute fact sheets and other information about the Site. In addition, National Grid will use the list to distribute information regarding reports and other documents added to the repository. National Grid also developed a “Tidewater Environmental Project” mailing label to clearly identify correspondence related to the project.

Members of the mailing list, as well as other interested parties, have the option to receive information via email. In addition, status updates will be posted to the informational bulletin boards ([refer to Section 4.20](#)) when they are placed in the repository. National Grid will also email the distribution list when significant field activities begin and as planned field activities may change.

All written public comments related to documents submitted to RIDEM, as well as National Grid’s response, will be documented in written form. A copy of responses will be placed in the Information Repositories ([see Section 4.40](#)). In addition, GZA will send a notice announcing the availability of the summary to the Site’s mailing and email recipient lists.

#### 4.20 FACT SHEETS AND ENHANCED COMMUNICATIONS

As indicated in [Section 3.00](#), National Grid previously prepared and distributed fact sheets prior to both the Site investigation activities and initiation of the former gasholder decommissioning effort, which was completed in 2011. In addition, National Grid distributed facts sheets about the planned electrical substation upgrade project, scheduled to begin in mid-October 2012. Since the Site is located in an EJ Focus Area, these fact sheets were provided in both English and Spanish. Copies of these fact sheets are provided in [Exhibit I](#).



More recently, and consistent with the requirements of Rule 7.07B of the [Remediation Regulations](#), National Grid prepared and distributed an updated Site-specific fact sheet in March 2013. This fact sheet includes the known history of the Site, the contamination characterized at the Site (based on historical uses and existing environmental information), information about public involvement activities, the Site's status in the regulatory process and the expected path forward, and the National Grid project manager's contact information. This fact sheet was provided in English, Spanish and Portuguese; a copy is included in Exhibit I. National Grid will update this fact sheet in the event new information is developed and/or significant project milestones are achieved. These milestones will include receipt of the [Program Letter](#) from the Department, receipt of a [Remedial Decision Letter](#) from the Department, Department approval of the [RAWP](#) with a [Remedial Approval Letter](#), initiation of Site remediation and remedy completion. These fact sheets will be disseminated to those on the mailing/emailing list. Going forward, these fact sheets will continue to be provided in English, Spanish and Portuguese.

In addition, informational bulletin boards have been installed at the end of Tidewater Street and at the end of Bowles Court. The bulletin boards will include certain information distributed through the mailing list, as well as weekly updates during remedial work. National Grid will also use the bulletin boards to announce public meetings, distribute fact sheets and communicate availability of reports. Additionally, on a daily basis during earth disturbing activities, a color coded system will be used to indicate whether any active excavation is occurring. Please note that if significant vandalism to the bulletin boards occurs, National Grid will look into alternative ways to share information.

National Grid has also established a phone message network to distribute time-sensitive information to interested parties. For example, National Grid will notify members of the phone message network if there are sustained exceedances of the monitored air compounds during active earth disturbing activities.

#### 4.30 COMMUNITY MEETINGS

Per Rule 7.07C of the [Remediation Regulations](#), an Initial Community Meeting will be held. The objective of the meeting will be to:

- disseminate information regarding the Site and RIDEM's Site Remediation program;
- document public comments and concern about the investigation and remediation of the Site; and
- engage in a dialogue with the community about the Site.

It is anticipated that the initial community meeting will be held after receipt of the Department's review comments on the [SIR](#). We currently anticipate this initial community meeting will be held at the Francis J. Varieur Elementary School, located at 486 Pleasant

Street in Pawtucket, Rhode Island, or the Blackstone Valley Visitors Center Theatre, located at 175 Main Street, in Pawtucket, Rhode Island. To accommodate participants, National Grid will schedule this meeting in the evening. Per Rule 7.07C, National Grid encourages equal participation by all to create an atmosphere of constructive, open dialogue.



National Grid is also planning to arrange for a limited tour of the Site prior to the start of remediation. Given the active utility operations, such as the electrical substation and natural gas regulating station on the property, portions of the site will not be accessible to the public due to safety concerns.

In addition to the initial community meeting, National Grid will schedule subsequent community meetings in conjunction with the following project milestones:

- Preparation of the draft [\*Remedial Action Work Plan\*](#) (RAWP);
- prior to remedy implementation; and
- remedy completion.

In addition, community meetings will be held during remedy implementation. The frequency of these meetings will be determined after the final remediation schedule has been developed and approved by RIDEM. At all public meetings, translation assistance will be provided for non-English speaking individuals, upon request.

National Grid will submit a written summary of all public meetings to RIDEM in hard copy and electronic format within 20 days of the meeting. In accordance with Section 7.07C, the meeting summaries will include:

- identification of the main issues of concern to the community;
- document requests by the public for a continued dialogue (including form and frequency); and
- proposed responses to the identified community issues through action items and schedules.



**Table 1 Anticipated Public Meetings**

<b>Meeting</b>	<b>Objective</b>
Initial Community Meeting	Present the results of the <a href="#">Site Investigation Report (SIR)</a> to the public and solicit public comments in regards to the Site Investigation
Public Meeting on draft <a href="#">RAWP</a>	Solicit public comments and questions on draft <a href="#">RAWP</a>
Public Meeting prior to initiation of remedy	Solicit public questions or concerns regarding the remedy
Public Meetings on an As-Needed Basis during remedial activities	Keep the public informed and discuss any questions or concerns, and present a meeting schedule for discussion.
Public Meeting upon completion of the remedy	Solicit public questions or concerns following completion of remedial activities

#### 4.40 INFORMATION REPOSITORIES

National Grid will provide Site-specific information to the public by establishing information repositories; developing and maintaining a mailing list to distribute information about the Site; providing advance notification to the Site mailing list about Site activities; and providing and updating fact sheets. The following describes the methods by which National Grid will make Site-related investigation and remediation information available to the community. See [Table 2](#) – Communication Tools for more information.

Publicly Accessible Site File: Files related to the former Tidewater Site are maintained at RIDEM’s Office of Waste Management filed under Former Tidewater Coal Gasification Plant (Pawtucket), RIDEM Case No. 95-022. The files contain all documents pertaining to the Site. Appointments to view the files can be made by contacting RIDEM, Department of Technical and Customer Assistance, 235 Promenade Street, Providence, Rhode Island (telephone: 401-222-4700 extension 7307). Additional information regarding file reviews at RIDEM can be found at <http://www.dem.ri.gov/topics/filerevw.htm>.



Publicly Accessible Document Listing Website(s): Certain documents related to the investigation and remediation of the Former Tidewater Site are maintained at the website operated by the RIDEM. The document listing website contains publicly available submittals pertaining to the Site dating back to 2007. RIDEM-required regulatory submittals will be sent to RIDEM for subsequent posting to the website, including:

- work plans;
- sampling and field testing plans;
- technical reports and documents summarizing results and recommendations;
- relevant correspondence;
- press releases;
- public information materials;
- updates to the PIP;
- public meeting summaries;
- summaries of responses to comments received; and
- copies of public notices about the Site.

In the future, National Grid will provide simple executive summaries for major reports that are submitted to RIDEM for subsequent posting to the website. The website is accessible at <http://www.dem.ri.gov/programs/benviron/waste/tide.htm>. National Grid also submits electronic copies of documents posted on this website to the Local Information Repository on a monthly basis.

In addition to the RIDEM website, National Grid has established a website for the Site ([www.tidewatersite.com](http://www.tidewatersite.com)). This website provides the public with timely updates on current and proposed activities at the Site. The following information is included (or will be included as it is developed):

- the nature and history of MGPs;
- history of the Tidewater facility;
- description of the Tidewater Site and regulatory background;
- access to key project documents (e.g., major reports; work plans; sampling and field testing plans; technical reports; documents summarizing results and recommendations; and simple executive summaries of major reports);
- relevant correspondence;
- press releases;
- updates to the PIP;
- public meeting summaries;
- summaries of responses to comments received;
- copies of public notices about the Site;
- public announcements;
- status update archive; and
- Site contacts.





Availability of the website will be posted on RIDEM's website, on signage at the Site and disseminated through the Site mailing list. When applicable, such as during active work times and remediation activities, summaries of certain air monitoring data (e.g., total volatile organic compound screening data, dust monitoring data and analytical data) will be posted on the Tidewater/National Grid website on a weekly basis.

Local Information Repository: To provide the community with easy access to information relevant to the Site cleanup process, a local repository has been established at the following location:

Pawtucket Public Library, 13 Summer Street, Pawtucket, Rhode Island (telephone: 401-725-3714)

The local information repository contains copies of those submittals included on the RIDEM website listed above. As previously indicated, electronic copies (on a CD) of these submittals are sent to the repository on a monthly basis. National Grid provides all submittals to the repository in electronic form only. Upon request, National Grid will provide hard copies of the material for inclusion in this repository.

Pawtucket Public Library hours are Monday through Thursday, 9 a.m. to 8:45 p.m.; and Friday and Saturday, 9 a.m. to 4:45 p.m.

In addition, certain information will also be posted on the bulletin boards, including the location of the repositories, site updates and site contact information.





**Table 2 Communication Tools**

<b>COMMUNICATION TOOLS</b>		
Information Repositories	Pawtucket Public Library	13 Summer Street, Pawtucket, RI The local information repository at the Pawtucket Public Library contains copies of submittals included on the RIDEM website. Electronic copies of these submittals are sent to the repository on a monthly basis.
	National Grid Tidewater Website	<a href="http://www.tidewatersite.com">www.tidewatersite.com</a> The website provides the public with timely updates on current and proposed activities at the Site. In addition, this website includes information about the Tidewater site and a document archive for the Site.
	RIDEM Tidewater Website	<a href="http://www.dem.ri.gov/programs/benviron/waste/tide.htm">http://www.dem.ri.gov/programs/benviron/waste/tide.htm</a> Certain documents related to the investigation and remediation of the Former Tidewater Site are maintained at the website operated by RIDEM.
	RIDEM File Review	235 Promenade Street, Providence, RI Files related to the former Tidewater Site are maintained at RIDEM's Office of Waste Management filed under Former Tidewater Coal Gasification Plant (Pawtucket), RIDEM Case No. 95-022 and are available upon request.
Distribution Lists	Email List	Interested parties have the option to receive information via email. National Grid will use the email list to announce upcoming public meetings, distribute fact sheets, availability of reports and other information about the Site. National Grid will also email the distribution list when significant field activities begin and as planned field activities may change.
	Mailing List	National Grid established a mailing list for the former Tidewater Site. The list includes abutting property owners, tenants, easement holders, municipalities and any community well suppliers associated with any well head protection areas that encircle the Site, as well as parties who have previously provided their mailing address to National Grid. National Grid will use the mailing list to announce upcoming public meetings, distribute fact sheets, availability of reports and other information about the Site.
	Phone Message Alert System	National Grid has established a phone message network to distribute time-sensitive information to interested parties.
Bulletin Boards	National Grid has installed informational bulletin boards at the end of Tidewater Street and at the end of Bowles Court. Weekly updates submitted to RIDEM will be posted to the bulletin boards, as well as how to find all submitted documents and how to receive more information about the Site. Site contact information is also posted to the bulletin boards. During active earth disturbing activities, air monitoring data will be posted on the bulletin boards. Additionally, on a daily basis during earth disturbing activities, a color coded system will be used to indicate whether any active excavation is occurring.	

See the [“KEY THINGS TO REMEMBER”](#) portion of this document to find out more about these communication tools.

## **5.00 FUTURE PLAN REVIEW AND AMENDMENTS**



National Grid may revise this [PIP](#) whenever necessary during the course of the remediation process. All revisions will be subject to review and approval by the Department and members of the public. If revisions are proposed, National Grid will prepare a draft revised *PIP* for review and approval by the Department and members of the public. A final revised *PIP* will then be placed in the information repositories and a notice of its availability will be sent to the Site’s mailing and email lists. A summary sheet of all RIDEM-approved changes to the *PIP* is provided as Exhibit V.

## **6.00 RESPONSIBILITIES FOR IMPLEMENTING PUBLIC INVOLVEMENT ACTIVITIES**

In accordance with the [Remediation Regulations](#), implementation of public involvement activities as described herein is the responsibility of National Grid. GZA will be conducting public involvement activities in support of National Grid. These activities are generally those designed to provide the public with information regarding remedial response actions. They include providing copies of reports to local officials and information repositories, mailing notices of meetings and the availability of Site reports, notifying local officials and residents of any proposed environmental work on the Site and providing an update on the status of the Site to local officials and residents. GZA will also assist National Grid in obtaining and responding to public comments on proposed remedial response actions.

Joseph Martella of RIDEM is responsible for addressing situations in which RIDEM receives complaints from the community members about the manner in which the [PIP](#) activities are being conducted.

## **7.00 SCHEDULE OF PIP ACTIVITIES**

The [PIP](#) specifies the milestones during remedial response activities when public involvement activities will be conducted. [Table 3](#) provides a schedule for public involvement activities.



**Table 3 Schedule of Public Involvement Activities**

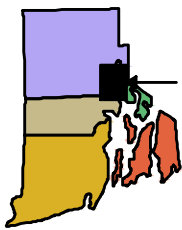
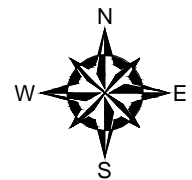
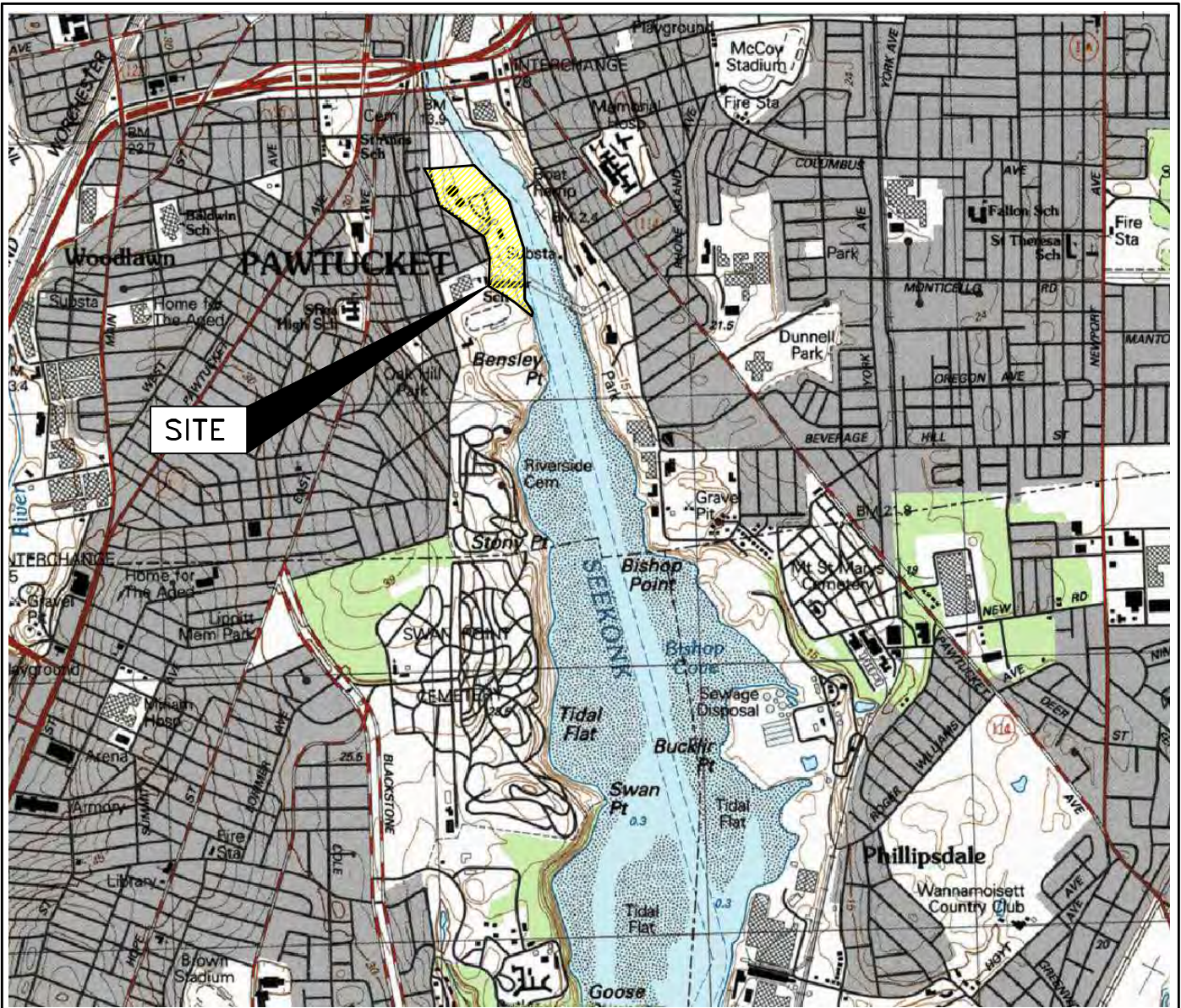
ACTIVITY	TIME PERIOD
Initial Community Meeting	Within 60 days of receipt of <a href="#">Program Letter</a> – during <a href="#">SIR</a> Public Comment Period
Public Meeting on DRAFT <a href="#">RAWP</a>	Within 12 months of receipt of <a href="#">Remedial Decision Letter</a>
Submit <a href="#">RAWP</a> for RIDEM Approval	Within 6 months of DRAFT RAWP Meeting
Public Meeting prior to initiation of remedy	Minimum of 30 days prior to start of remediation
Public Meetings during remediation	Meeting schedule to be presented for discussion purposes once remedial schedule is developed and approved by RIDEM
Public Meeting upon completion of the remedy	Within 30 days following completion of remediation



## **FIGURES**



© 2013 - GZA GeoEnvironmental, Inc. GZA-J:\ENV\43654.msk\CADD\GZA DWGS\43654 LOCUS PLAN.dwg [1] September 19, 2013 - 1:38pm scott.burton



QUADRANGLE LOCATION

SOURCE:

**BASE MAP FROM THE FOLLOWING USGS QUADRANGLE MAP:  
PROVIDENCE, RHODE ISLAND (1987)**

DIGITAL TOPOGRAPHIC MAPS PROVIDED BY MAPTECH. INC.

CONTOUR ELEVATIONS REFERENCE NGVD 29,  
CONTOURS ARE SHOWN IN METERS AT 3 METER INTERVALS

UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF GZA GEOENVIRONMENTAL, INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY GZA'S CLIENT OR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY THE CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA.

TIDEWATER FACILITY  
PAWTUCKET, RHODE ISLAND

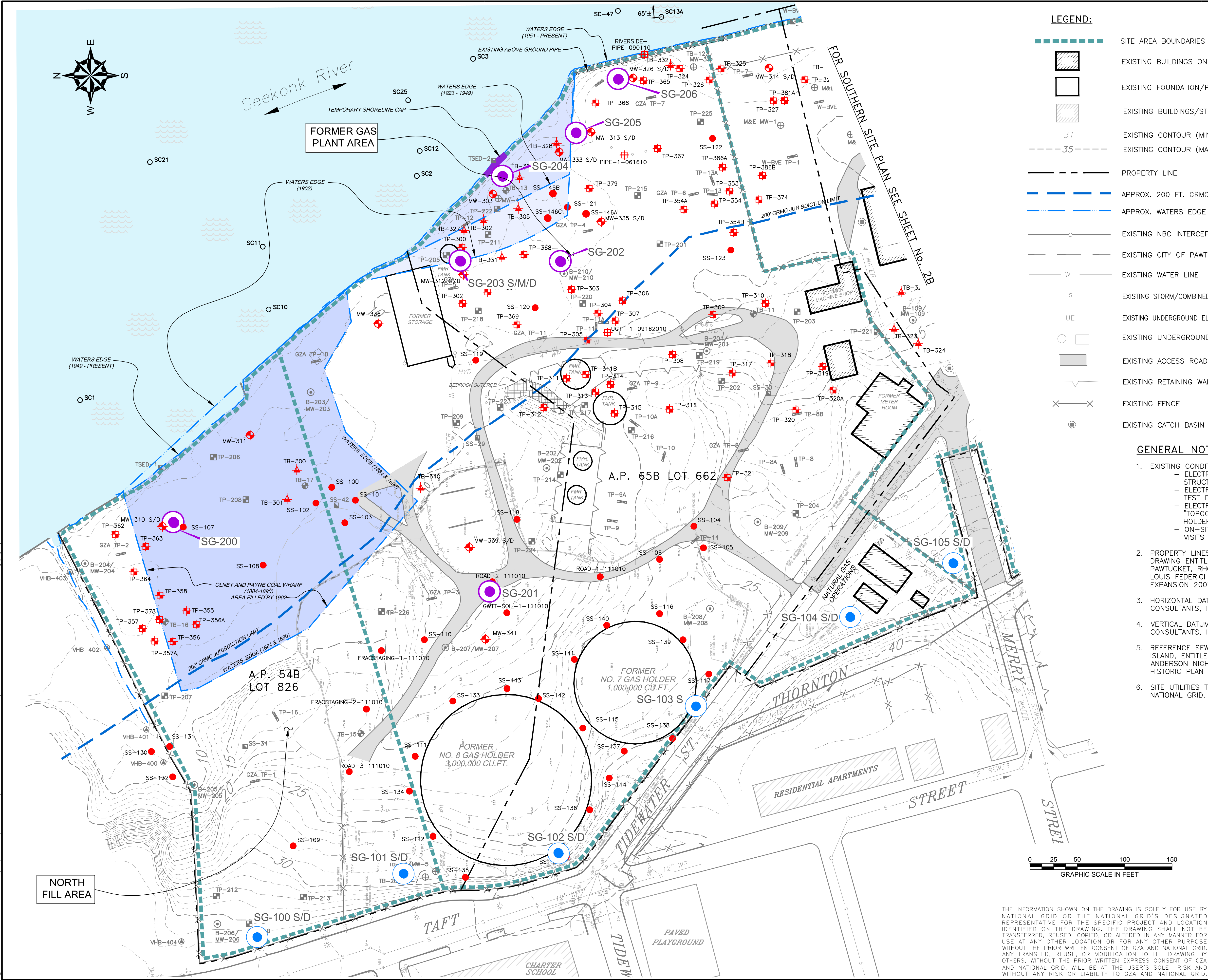
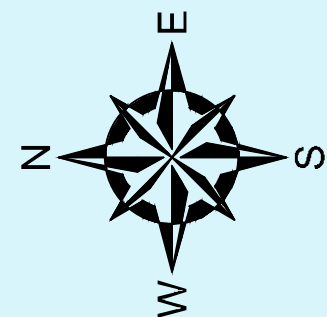
PREPARED BY:  
 **GZA GeoEnvironmental, Inc.**  
Engineers and Scientists  
www.gza.com

PREPARED FOR:  
NATIONAL GRID

LOCUS PLAN

PROJ MGR: MSK	REVIEWED BY: MSK	CHECKED BY: JJC	FIGURE <b>1</b> SHEET NO. 1 OF 5
DESIGNED BY: SDN	DRAWN BY: CRD	SCALE: AS NOTED	
DATE: 2013	PROJECT NO. 43654.20	REVISION NO. 0	





LEGEND:

- SITE AREA BOUNDARIES
- EXISTING BUILDINGS ON-SITE
- EXISTING FOUNDATION/PAD ON-SITE
- EXISTING BUILDINGS/STRUCTURES OFF-SITE
- EXISTING CONTOUR (MINOR 1 FOOT INTERVAL)
- EXISTING CONTOUR (MAJOR 5 FOOT INTERVAL)
- PROPERTY LINE
- APPROX. 200 FT. CRMC JURISDICTION LIMIT
- APPROX. WATERS EDGE
- EXISTING NBC INTERCEPTOR SANITARY SEWER
- EXISTING CITY OF PAWTUCKET STORM DRAIN
- EXISTING WATER LINE
- EXISTING STORM/COMBINED SAN. SEWER OVERFLOW
- EXISTING UNDERGROUND ELECTRIC CABLE IN CONDUIT
- EXISTING UNDERGROUND ELECTRIC MH/STRUCTURE
- EXISTING ACCESS ROAD
- EXISTING RETAINING WALLS
- EXISTING FENCE
- EXISTING CATCH BASIN LOCATIONS

SAMPLE LEGEND

- ATLANTIC SURFACE SOIL SAMPLE LOCATION
- ATLANTIC SEDIMENT SAMPLE LOCATION
- WESTON/BLACKSTONE VALLEY ELECTRIC SEDIMENT SAMPLE LOCATION
- RIDEM SURFACE SOIL SAMPLE LOCATION
- MONITORING WELL/BORING (VHB) SURVEYED
- ATLANTIC TEST PIT LOCATION
- WESTON/BLACKSTONE VALLEY ELECTRIC TEST PIT LOCATION
- GZA/VALLEY GAS TEST PIT LOCATION
- ATLANTIC SOIL BORING LOCATION
- ATLANTIC MONITORING WELL LOCATION
- METCALF & EDDY MONITORING WELL LOCATION
- VHB SURFACE SOIL SAMPLE LOCATION NON-SURVEYED
- VHB TEST PIT (2006)
- GZA TEST PIT (2009)
- GZA TEST BORING LOCATION (2010)
- GZA MONITORING WELL LOCATION (2010)
- GZA TEST PIT LOCATION (2010)
- GZA SURFACE SOIL SAMPLE LOCATION (2010)
- ARCADIS SEDIMENT SAMPLE LOCATION (2008)
- GZA RESIDUAL MATERIAL SAMPLE (2010)
- GZA TEST BORING LOCATION (2011)
- PERIMETER SOIL GAS SAMPLING LOCATION
- INTERIOR SOIL GAS SAMPLING LOCATION

GENERAL NOTES:

1. EXISTING CONDITIONS BASE MAP DEVELOPED FROM THE FOLLOWING:
  - ELECTRONIC FILES FROM GEI CONSULTANTS, INC. (FORMERLY AES) ENTITLED "HISTORIC STRUCTURES AND SAMPLE LOCATIONS", ORIGINAL SCALE 1"=80', DATED JULY 1999
  - ELECTRONIC FILES FROM VANASSE HANGEN BRUSTLIN, INC. ENTITLED "SOIL BORING, TEST PIT AND MONITOR WELL LOCATIONS", SCALE: 1"=60', UNDATED
  - ELECTRONIC FILES FROM WELSH ASSOCIATES LAND SURVEYORS, INC. ENTITLED "TOPOGRAPHIC SURVEY (AS-BUILT), FORMER TIDEWATER FACILITY, DEMOLITION OF GAS HOLDERS NOS. 7 & 8", DATED DECEMBER 17, 2010
  - ON-SITE INVESTIGATIONS AND SURVEYS BY GZA PERSONNEL DURING VARIOUS SITE VISITS DURING 2009 AND 2010.
2. PROPERTY LINES AND LOT INFORMATION ESTABLISHED FROM INFORMATION PROVIDED ON A DRAWING ENTITLED "PERIMETER SURVEY OF LAND AT THE TIDEWATER FORMER MGP SITE IN PAWTUCKET, RHODE ISLAND FOR ATLANTIC ENVIRONMENTAL SERVICES INC." DEVELOPED BY LOUIS FEDERICI AND ASSOCIATES AND AN AUTO CAD FILE ENTITLED "MAX READ FIELD TRACK EXPANSION 2007" PROVIDED BY THE CITY OF PAWTUCKET.
3. HORIZONTAL DATUM IS BASED ON NAD 1983 FROM BASE MAPPING PROVIDED BY GEI CONSULTANTS, INC.
4. VERTICAL DATUM IS BASED ON NGVD 1929 (MSL) FROM BASE MAPPING PROVIDED BY GEI CONSULTANTS, INC.
5. REFERENCE SEWER DATA FROM SCANNED IMAGE PROVIDED BY THE CITY OF PAWTUCKET, RHODE ISLAND, ENTITLED "STUDY OF SEWERAGE FACILITIES" BY WATERMAN ENGINEERING CO. & ANDERSON NICHOLS CO. DATED NOV. 1975, ORIGINAL SCALE 1"=400' & SCANNED IMAGES OF HISTORIC PLAN & PROFILE DRAWINGS PROVIDED BY THE CITY OF PAWTUCKET, RHODE ISLAND.
6. SITE UTILITIES TAKEN FROM 1984 SANBORN MAP AND HISTORIC FIGURES PROVIDED BY NATIONAL GRID. ALL UTILITY LOCATIONS ARE APPROXIMATE AND SHOWN FOR REFERENCE ONLY.

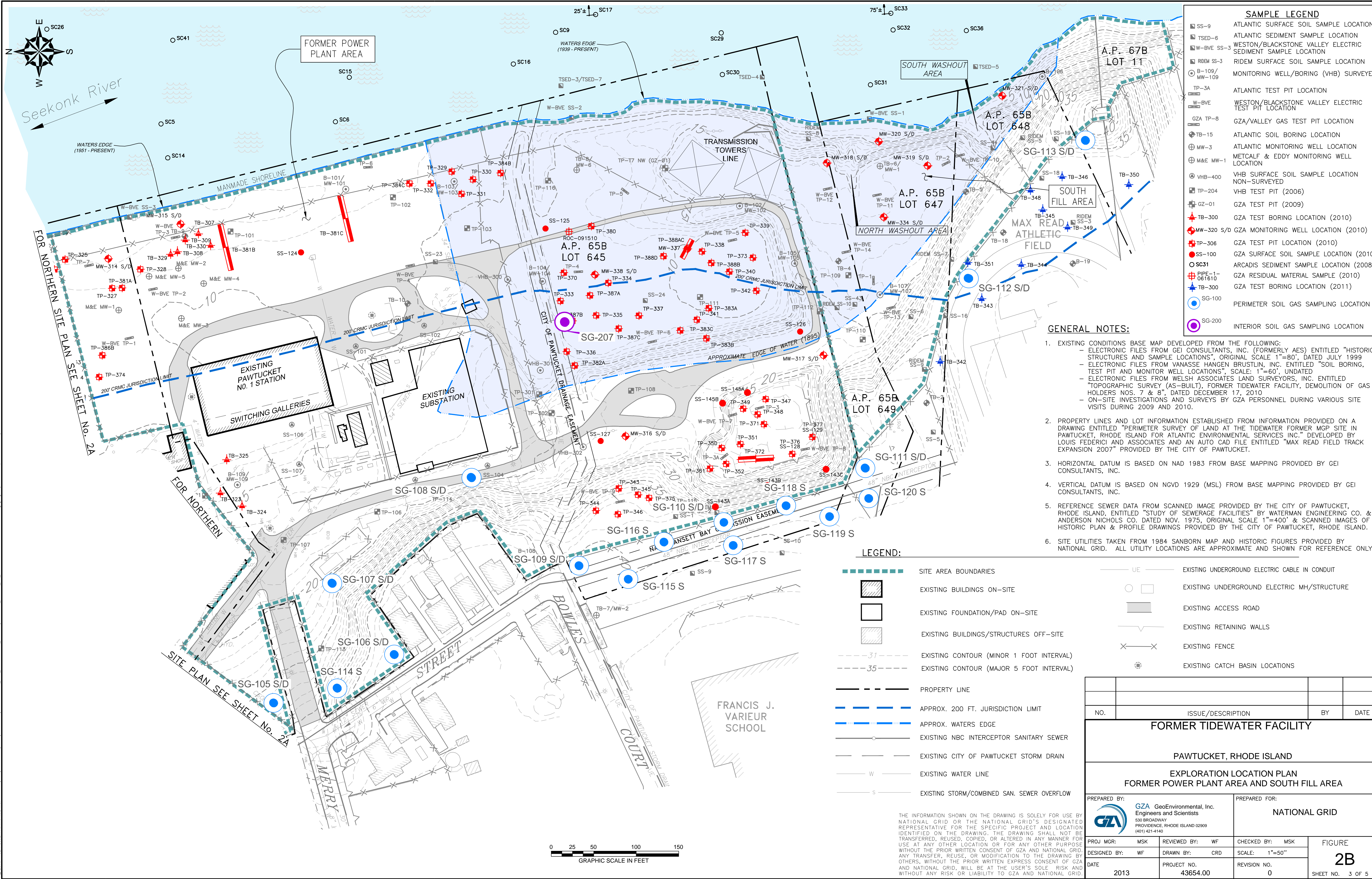


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NO.	ISSUE/DESCRIPTION	BY	DATE
<b>FORMER TIDEWATER FACILITY</b>			
PAWTUCKET, RHODE ISLAND			
EXPLORATION LOCATION PLAN NORTH FILL AREA AND FORMER GAS PLANT AREA			
PREPARED BY:		PREPARED FOR:	
GZA GeoEnvironmental, Inc. Engineers and Scientists 530 BROADWAY PROVIDENCE, RHODE ISLAND 02909 (401) 421-4140		NATIONAL GRID	
PROJ MGR:	MSK	REVIEWED BY:	WF
DESIGNED BY:	WF	DRAWN BY:	CRD
DATE:	2013	CHECKED BY:	MSK
		SCALE:	1"=50"
		REVISION NO.:	0
		PROJECT NO.:	43654.20
		FIGURE:	2A
		SHEET NO.:	2 OF 5

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**SAMPLE LEGEND**

- SS-9 ATLANTIC SURFACE SOIL SAMPLE LOCATION
- TSED-6 ATLANTIC SEDIMENT SAMPLE LOCATION
- W-BVE SS-3 WESTON/BLACKSTONE VALLEY ELECTRIC SEDIMENT SAMPLE LOCATION
- RIDEM SS-3 RIDEM SURFACE SOIL SAMPLE LOCATION
- B-109/MW-109 MONITORING WELL/BORING (VHB) SURVEYED
- TP-3A ATLANTIC TEST PIT LOCATION
- W-BVE WESTON/BLACKSTONE VALLEY ELECTRIC TEST PIT LOCATION
- GZA TP-8 GZA/VALLEY GAS TEST PIT LOCATION
- TB-15 ATLANTIC SOIL BORING LOCATION
- MW-3 ATLANTIC MONITORING WELL LOCATION
- M&E MW-1 METCALF & EDDY MONITORING WELL LOCATION
- VHB-400 VHB SURFACE SOIL SAMPLE LOCATION NON-SURVEYED
- TP-204 VHB TEST PIT (2006)
- GZ-01 GZA TEST PIT (2009)
- TB-300 GZA TEST BORING LOCATION (2010)
- MW-320 S/D GZA MONITORING WELL LOCATION (2010)
- TP-306 GZA TEST PIT LOCATION (2010)
- SS-106 GZA SURFACE SOIL SAMPLE LOCATION (2010)
- SC31 ARCADIS SEDIMENT SAMPLE LOCATION (2008)
- PIPE-1-061610 GZA RESIDUAL MATERIAL SAMPLE (2010)
- TB-300 GZA TEST BORING LOCATION (2011)
- SG-100 PERIMETER SOIL GAS SAMPLING LOCATION
- SG-200 INTERIOR SOIL GAS SAMPLING LOCATION

- GENERAL NOTES:**
1. EXISTING CONDITIONS BASE MAP DEVELOPED FROM THE FOLLOWING:
    - ELECTRONIC FILES FROM GEI CONSULTANTS, INC. (FORMERLY AES) ENTITLED "HISTORIC STRUCTURES AND SAMPLE LOCATIONS", ORIGINAL SCALE 1"=80', DATED JULY 1999
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    - ELECTRONIC FILES FROM WELSH ASSOCIATES LAND SURVEYORS, INC. ENTITLED "TOPOGRAPHIC SURVEY (AS-BUILT), FORMER TIDEWATER FACILITY, DEMOLITION OF GAS HOLDERS NOS. 7 & 8", DATED DECEMBER 17, 2010
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  6. SITE UTILITIES TAKEN FROM 1984 SANBORN MAP AND HISTORIC FIGURES PROVIDED BY NATIONAL GRID. ALL UTILITY LOCATIONS ARE APPROXIMATE AND SHOWN FOR REFERENCE ONLY.

**LEGEND:**

	SITE AREA BOUNDARIES		EXISTING UNDERGROUND ELECTRIC CABLE IN CONDUIT
	EXISTING BUILDINGS ON-SITE		EXISTING UNDERGROUND ELECTRIC MH/STRUCTURE
	EXISTING FOUNDATION/PAD ON-SITE		EXISTING ACCESS ROAD
	EXISTING BUILDINGS/STRUCTURES OFF-SITE		EXISTING RETAINING WALLS
	EXISTING CONTOUR (MINOR 1 FOOT INTERVAL)		EXISTING FENCE
	EXISTING CONTOUR (MAJOR 5 FOOT INTERVAL)		EXISTING CATCH BASIN LOCATIONS
	PROPERTY LINE		
	APPROX. 200 FT. JURISDICTION LIMIT		
	APPROX. WATERS EDGE		
	EXISTING NBC INTERCEPTOR SANITARY SEWER		
	EXISTING CITY OF PAWTUCKET STORM DRAIN		
	EXISTING WATER LINE		
	EXISTING STORM/COMBINED SAN. SEWER OVERFLOW		

NO.	ISSUE/DESCRIPTION	BY	DATE
<b>FORMER TIDEWATER FACILITY</b>			
PAWTUCKET, RHODE ISLAND			
EXPLORATION LOCATION PLAN FORMER POWER PLANT AREA AND SOUTH FILL AREA			
PREPARED BY:	GZA GeoEnvironmental, Inc. Engineers and Scientists 530 BROADWAY PROVIDENCE, RHODE ISLAND 02909 (401) 421-4140		PREPARED FOR:
	NATIONAL GRID		
PROJ MGR:	MSK	REVIEWED BY:	WF
DESIGNED BY:	WF	DRAWN BY:	CRD
DATE:	2013	CHECKED BY:	MSK
	PROJECT NO.	SCALE:	1"=50'
	43654.00	REVISION NO.	0
			FIGURE
			<b>2B</b>
			SHEET NO. 3 OF 5



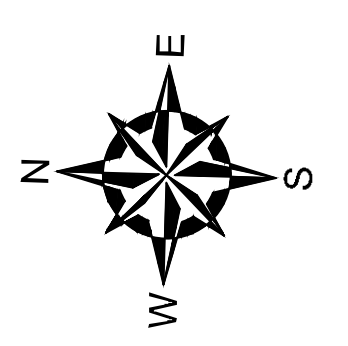
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NOTIFICATION AREA

TIDEWATER SITE

- NOTE:**
1. AERIAL IMAGES OBTAINED FROM RIGIS ON AUGUST 20, 2012.
  2. THE OAK HILL NURSING HOME LOCATED AT 577 PLEASANT STREET WAS ADDED TO THE DOOR TO DOOR NOTIFICATION AREA IN MARCH 2013.



THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY NATIONAL GRID OR THE NATIONAL GRID'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA AND NATIONAL GRID. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA AND NATIONAL GRID, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA AND NATIONAL GRID.

NO.	ISSUE/DESCRIPTION	BY	DATE

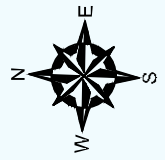
UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF GZA GEOENVIRONMENTAL, INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY GZA'S CLIENT OR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY THE CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA.

NATIONAL GRID  
TIDEWATER FACILITY  
PAWTUCKET, RHODE ISLAND

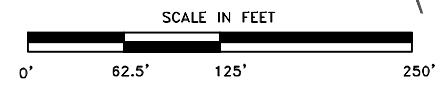
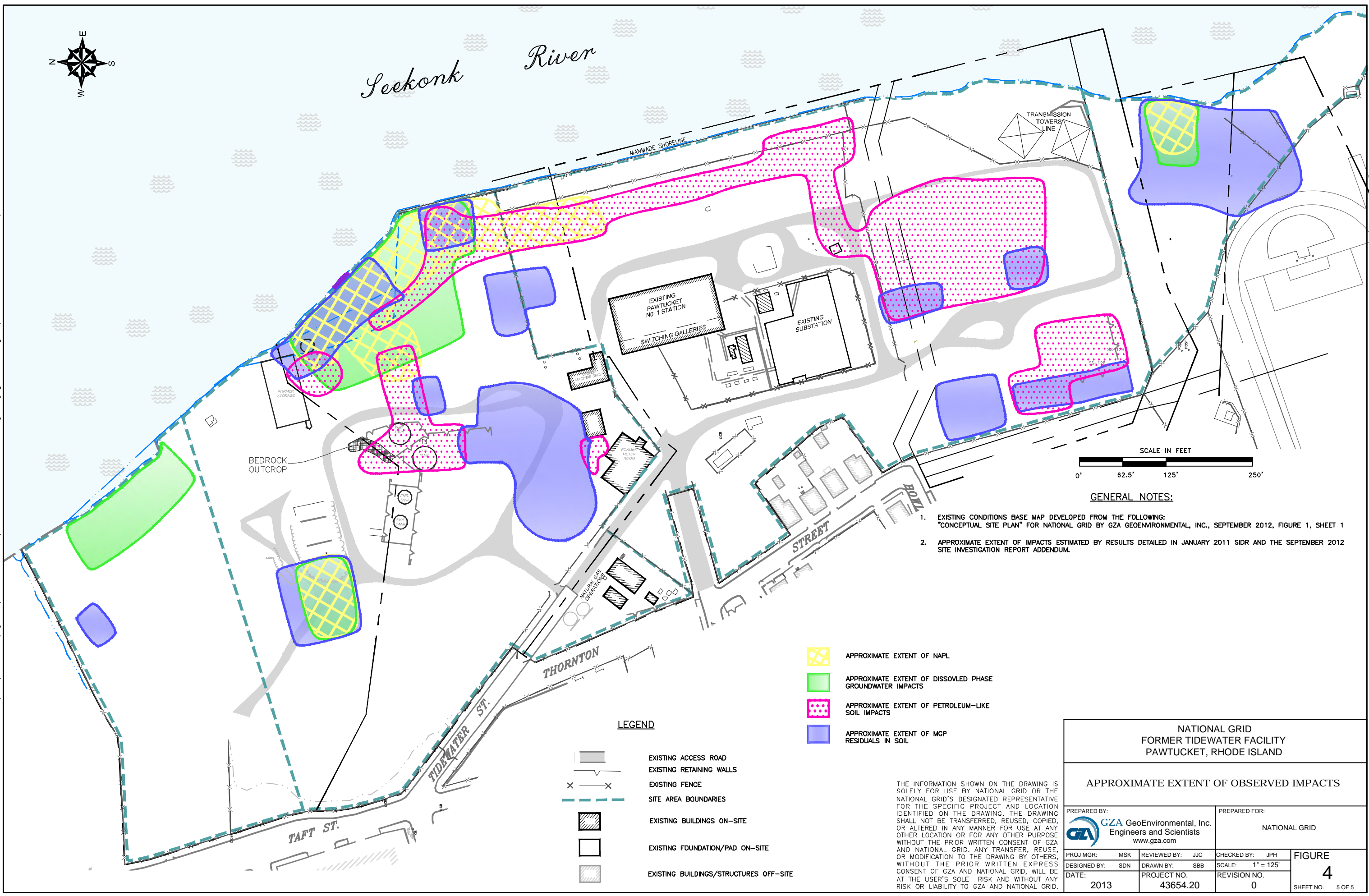
PUBLIC INVOLVEMENT PLAN  
AERIAL IMAGE  
DOOR-TO-DOOR NOTIFICATION

PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com	PREPARED FOR: nationalgrid
PROJ MGR: MK DESIGNED BY: SDN DATE: 2013	CHECKED BY: JJC SCALE: 1" = 100' REVISION NO.: 0 FIGURE <b>3</b> SHEET NO. 4 OF 5





Seekonk River



**GENERAL NOTES:**

1. EXISTING CONDITIONS BASE MAP DEVELOPED FROM THE FOLLOWING:  
"CONCEPTUAL SITE PLAN" FOR NATIONAL GRID BY GZA GEOENVIRONMENTAL, INC., SEPTEMBER 2012, FIGURE 1, SHEET 1
2. APPROXIMATE EXTENT OF IMPACTS ESTIMATED BY RESULTS DETAILED IN JANUARY 2011 SIDR AND THE SEPTEMBER 2012 SITE INVESTIGATION REPORT ADDENDUM.

- APPROXIMATE EXTENT OF NAPL
- APPROXIMATE EXTENT OF DISSOLVED PHASE GROUNDWATER IMPACTS
- APPROXIMATE EXTENT OF PETROLEUM-LIKE SOIL IMPACTS
- APPROXIMATE EXTENT OF MGP RESIDUALS IN SOIL

**LEGEND**

- EXISTING ACCESS ROAD
- EXISTING RETAINING WALLS
- EXISTING FENCE
- SITE AREA BOUNDARIES
- EXISTING BUILDINGS ON-SITE
- EXISTING FOUNDATION/PAD ON-SITE
- EXISTING BUILDINGS/STRUCTURES OFF-SITE

THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY NATIONAL GRID OR THE NATIONAL GRID'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA AND NATIONAL GRID. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA AND NATIONAL GRID, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA AND NATIONAL GRID.

<b>NATIONAL GRID FORMER TIDEWATER FACILITY PAWTUCKET, RHODE ISLAND</b>			
<b>APPROXIMATE EXTENT OF OBSERVED IMPACTS</b>			
PREPARED BY: <b>GZA GeoEnvironmental, Inc.</b> Engineers and Scientists www.gza.com		PREPARED FOR:  NATIONAL GRID	
PROJ MGR: MSK	REVIEWED BY: JJC	CHECKED BY: JPH	<b>FIGURE 4</b>
DESIGNED BY: SDN	DRAWN BY: SBB	SCALE: 1" = 125'	
DATE: 2013	PROJECT NO. 43654.20	REVISION NO. 0	SHEET NO. 5 OF 5



## **EXHIBIT I**

**COPIES OF THE NOTIFICATION PACKAGES AND LANGUAGE INCLUDED ON THE  
SIGNS POSTED AT THE SITE ENTRANCE GATES**

# NOTICE

This property is being investigated and managed in accordance with the  
Rhode Island Department of Environmental Management (RIDEM)  
Regulations

If You Have Any Questions, Please Contact:

Joseph Martella

R.I. Department of Environment Management

(Office of Waste Management)

235 Promenade Street

Providence, RI 02908-5767

Arrangement to Review RIDEM Records

May be Made by Calling

401-222-2797 ext. 7109

# AVISO

Esta Caracteristica Se Esta Investigando Y Se Esta Manejando De Acuerdo Con El Departamento De Gestion Ambientalde Rhode Island (RIDEM)

Si Usted Tiene Culquier Pregunta

Satislace El Contacto:

Joseph Martella

Departamento De Gestion

Ambientalde Rhode Island

(Oficina De La Gestion De Desechnos)

235 Promenade Street

Providence, RI 02908-5767

Las Medidas A Los Expedientes De La Revision

RIDEM Pueden Ser Tomadas Liamando

401-222-2797 ext. 7102



Mr. Raymond P. Adam Jr.  
20 Thornton Street  
Pawtucket, Rhode Island 02860

ARCADIS  
100 Cummings Center  
Suite 135-P  
Beverly  
Massachusetts 01915  
Tel 978.921.0442  
Fax 978.921.0939  
[www.arcadis-us.com](http://www.arcadis-us.com)

Subject:

Notice to Abutter  
Sediment Sampling  
Tidewater Manufactured Gas Plant (MGP)  
& Pawtucket No. 1 Power Station Site  
Pawtucket, Rhode Island  
RIDEM Case No. 95-022

INDUSTRIAL

Date:  
June 30, 2008

Dear Abutter:

Contact:  
Mark Mahoney

The purpose of this is to notify you that The Narragansett Electric Company d/b/a National Grid (National Grid) will be conducting sediment coring in the Seekonk River adjacent to the former Tidewater Manufactured Gas Plant (MGP) and the Pawtucket No. 1 Power Station Site located at the ends of Tidewater and Merry Streets in Pawtucket, Rhode Island. This notice is being provided to abutting property owners and tenants in accordance with requirements established in the Rhode Island Department of Environmental Management's (RIDEM) Rules and Regulation for the Investigation and Remediation of Hazardous Materials (Remediation Regulations). Should you be an owner of property that is leased, we request that you provide a copy of this letter to your tenants.

Phone:  
978.921.0042

Email:  
Mark.Mahoney@Arcadis-US.com

Our ref:  
B000036697

The purpose of the upcoming sampling is to investigate sediment conditions along the Seekonk River which may have been impacted by the historical operation of the adjacent Site as a manufactured gas plant. The proposed work is projected to take 2 to 3 weeks, with an estimated start date of July 7, 2008. These investigation activities will be conducted in accordance with RIDEM's Remediation Regulations and will be performed by ARCADIS on behalf of National Grid.

Imagine the result

If you would like more information, please contact Michele Leone of National Grid at 508-389-4296.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark T. Mahoney". The signature is fluid and cursive, with a long horizontal stroke at the bottom.

Mark T. Mahoney  
Vice President

Copies:

Michele Leone, National Grid  
Joseph Martella, RIDEM

This is an important notice. Please have it translated.

Este é um aviso importante. Queira mandá-lo traduzir.  
Este es un aviso importante. Sírvase mandarlo traducir.  
Avis important. Veuillez traduire immédiatement.

ĐÂY LÀ MỘT BẢN THÔNG CÁO QUAN TRỌNG  
XIN VUI LÒNG CHO DỊCH LẠI THÔNG CÁO ẤY  
Questa è un' informazione importante,  
si prega di tradurla.

Это очень важное сообщение.  
Пожалуйста, попросите чтобы  
вам его перевели.

April 16, 2009  
File No. 05.0043654.00-C



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

«AddressBlock»

Re: Notice to Abutter  
Environmental Site Investigation  
Former Tidewater Facility  
Pawtucket, Rhode Island  
RIDEM Case No. 95-022

Dear Abutter:

The purpose of this letter is to notify you that The Narragansett Electric Company d/b/a National Grid (National Grid) will be conducting environmental investigation activities at the former Tidewater Manufactured Gas Plant (MGP) and the former Pawtucket No. 1 Power Station Site located at the ends of Tidewater and Merry Streets in Pawtucket, Rhode Island. This notice is being provided to abutting property owners and tenants in accordance with requirements established in the Rhode Island Department of Environmental Management's (RIDEM) *Rules and Regulation for the Investigation and Remediation of Hazardous Materials* (Remediation Regulations). Should you be an owner of property that is leased, we request that you provide a copy of this letter to your tenants.

The purpose of the upcoming investigation is to further investigate impacts associated with the historical use of the Site. The investigation will include surface soil sampling, subsurface soil sampling (via soil borings and test pits) and groundwater sampling (via monitoring wells). The field activities are scheduled to commence on or about May 3, 2010, and will occur over an approximate 2 to 3 month period. These investigation activities will be conducted in accordance with RIDEM's Remediation Regulations and will be performed by GZA GeoEnvironmental, Inc. (GZA) on behalf of National Grid.

If you would like more information or have any questions, please contact Michele Leone of National Grid at 781-907-3651.

Very truly yours,

GZA GeoEnvironmental, Inc.

Margaret S. Kilpatrick  
Senior Project Manager

cc: Joe Martella, RIDEM  
Michele Leone, National Grid



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Пожалуйста, попросите чтобы  
вам его перевели.



16 de abril de 2010  
No. del archivo. 05.0043654.00-C

«AddressBlock»

Re: Aviso al los vecinos  
Investigación ambiental del sitio  
de la Antigua Planta de Gas Tidewater  
Pawtucket, Rhode Island  
No. del caso de RIDEM. 95-022

530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Estimado vecino:

El propósito de esta carta es notificarle que la Compañía Eléctrica Narragansett, haciendo negocios bajo el nombre National Grid, realizará actividades de investigación ambiental en la planta anteriormente llamada Tidewater Manufactured Gas Plant (MGP) como así también en la planta anteriormente llamada Pawtucket. No. 1 Power Station Site, ambas situadas al final de las calles Tidewater y Merry en Pawtucket, Rhode Island. Conforme con los requisitos establecidos en las Reglas y Regulaciones para la Investigación y la Remediación de Materiales Peligrosos (Regulaciones sobre la Remediación) (Rhode Island Department of Environmental Management's (RIDEM) Rules and Regulation for the Investigation and Remediation of Hazardous Materials), este aviso se proporciona a los dueños y a los arrendatarios de propiedades linderas. Si usted es el dueño de una propiedad que está siendo arrendada le solicitamos que proporcione una copia de esta carta a sus arrendatarios.

El propósito de la investigación a realizarse próximamente es investigar más detalladamente los impactos asociados al uso histórico del lugar. La investigación incluirá el muestreo superficial del suelo, el muestreo subsuperficie del suelo (por medio de perforaciones del suelo y trincheras de prueba) y el muestreo del agua subterránea (vía la supervisión de pozos). Las actividades de campo están programadas para comenzar aproximadamente el 3 de mayo de 2010, y transcurrirán en un período aproximado de 2 a 3 meses. Estas actividades de investigación serán conducidas de acuerdo con las regulaciones de la remediación de RIDEM y realizadas por GZA GeoEnvironmental, Inc. (GZA) en nombre de National Grid.

Si usted necesita más información o tiene preguntas, por favor contacte a Michele Leone de la National Grid en 781-907-3651.

Sinceramente suya,

GZA GeoEnvironmental, Inc.

Margaret S. Kilpatrick  
Directora Principal de Proyecto

cc: Joe Martella, RIDEM  
Michele Leone, National Grid

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вам его перевели.

## **Tidewater Site Fact Sheet; March 2010**

### **Former Tidewater MGP and Electric Generation Site**

#### **Background**

From the 1880's through roughly the 1970's, a manufactured gas plant (MGP) and electric generation facility operated adjacent to the Seekonk River at the end of Merry and Tidewater streets in Pawtucket, Rhode Island. The Tidewater MGP used industrial processes to produce gas from coal and oil. The gas was used primarily for the same purposes that natural gas is used today. MGPs, which were common throughout the northeast before the region's natural gas pipelines were built, often yielded by-products of the gas production process such as tars, sludges and oils. The Tidewater electric generation facility used coal, oil, tar and other substances to produce electricity. Some of these substances have remained in the environment at facilities such as these after they were closed down.

The gas manufacturing and electric generating operations at the Tidewater facility were terminated in 1968 and 1975, respectively. Today, National Grid continues to operate a natural gas regulating and interchange station on the north portion of the property and an electrical substation and switch house on the south portion of the property.

#### **Site Evaluation**

National Grid has previously conducted environmental assessment activities at the former Tidewater Site and surrounding properties, including the Francis J. Varieur School and Max Read Field. The assessment included evaluating soil, groundwater and sediments for MGP and electric generation by-products. The evaluation indicated that residuals are present and are mainly detected on National Grid property and a portion of a fenced, wooded City-owned property located south of the National Grid property.

Data from the previous assessments indicate that the substances detected on the school and surrounding properties are below the Rhode Island Department of Environmental Management's (RIDEM's) residential standards and/or are representative of background concentrations found in the Pawtucket area. A limited area with an exceedance of RIDEM's standards was found below more than two feet of clean fill on the far eastern portion of Max Read Field. This area poses no risk to the general public. All other portions of the school and athletic fields were not impacted by the former MGP and electric generation operations.

#### **Next Steps**

National Grid is working with GZA GeoEnvironmental, Inc. (GZA), an environmental consulting firm from Providence, Rhode Island, and RIDEM on an environmental assessment and remediation program for the Tidewater Site. National Grid plans to perform additional environmental assessment activities this spring to gather sufficient data to develop remedial alternatives at the Site. The activities to be conducted this spring will include the collection of surface and subsurface soil samples via test pits and soil borings, the installation of groundwater monitoring wells, and the collection of groundwater samples. The test pits will be excavated using a rubber-tired backhoe and the soil borings will be advanced using a truck-mounted drill rig. All activities will be limited to the National Grid properties, will take place during normal working hours, and should have no impact beyond the Site property boundaries. Air monitoring of the work areas will be conducted during these activities.

In addition, National Grid will begin activities related to the demolition of the two former gas holder structures this spring. The initial activities will include removal and treatment of water from the holders. Following the dewatering activities, National Grid anticipates demolishing the holder structures in the summer and fall of 2010.

#### **Schedule**

These assessment activities are anticipated to begin in April and will likely take two to three months to complete. The holder demolition activities are anticipated to begin in the summer of 2010 and take approximately 4 months to complete.

#### **Questions and Comments**

If you would like more information on National Grid's activities at the site, please contact Michele Leone from National Grid at 781-907-3651.

## **Sitio del las antiguas planta de gas (MGP) y planta de generación eléctrica**

### **Antecedentes**

Desde 1880 hasta aproximadamente 1970 operaron en la vecindad del río Seekonk, al final de las calles Merry y Tidewater en Pawtucket, Rhode Island, una planta de gas y una planta de generación eléctrica. La planta de gas Tidewater, mediante procesos industriales, producía gas usando carbón y petróleo. Este gas se utilizaba para los mismos propósitos que el gas natural se usa en la actualidad. Las plantas de gas, o MGP, las que eran comunes en la región noroeste antes de la construcción de las redes de gas, frecuentemente producían subproductos tales como alquitrán, fangos y aceites. La planta de generación eléctrica Tidewater utilizaba carbón, petróleo, alquitrán y otras sustancias para producir electricidad. Algunas de estas sustancias han quedado en el medio ambiente, lo que es típico en este tipo de plantas y posteriormente a su desactivación.

La planta de generación de gas dejó de operar en 1968, mientras que la planta generadora de electricidad dejó de operar en 1975. En la actualidad, National Grid continúa operando una estación de intercambio y regulación de gas, en la parte norte de la propiedad, mientras que en la parte sur de la propiedad opera una sub-estación eléctrica y una estación interruptora.

### **Evaluación del sitio**

National Grid condujo previamente actividades de evaluación ambiental en el sitio anteriormente ocupado por Tidewater y en las propiedades linderas, incluyendo la Escuela Francis J. Varieur y el Campo de Deportes Max Read. Estas actividades incluyeron evaluaciones del suelo, del agua subterránea y de sedimentos, en busca de sub-productos generados por la MGP y la generación de electricidad. La evaluación indica la presencia de residuos, mayormente en el terreno perteneciente National Grid y en una porción de la propiedad arbolada y alambrada que pertenece a la Ciudad y que está situada al sur del terreno perteneciente a National Grid.

Información recolectada en la evaluación ambiental previamente realizada indica que las sustancias detectadas en la Escuela y las propiedades linderas están por debajo de los valores estándares para zonas residenciales del Departamento de Manejo Ambiental de Rhode Island (Rhode Island Department of Environmental Management, RIDEM) y/o son representativas de las concentraciones normales características de la zona de Pawtucket. Un área limitada, con valores que exceden los valores estándares de RIDEM, se encontró a una profundidad de más de dos pies, bajo una capa de suelo de relleno no contaminado, en la porción más alejada de la zona este del Campo de Deportes Max Read. Esta zona no posee riesgo para el público general. Las zonas restantes de la Escuela y del Campos de Deporte no han sido impactadas por las antiguas planta de gas MGP y planta de generación eléctrica.

### **Próximos Pasos**

National Grid está trabajando conjuntamente con GZA GeoEnvironmental, Inc. (GZA), una consultora ambiental localizada en Providence, Rhode Island y RIDEM, en un asesoramiento ambiental y un programa de remediación para el sitio de Tidewater. Esta primavera, National Grid planea realizar estudios ambientales adicionales con el objetivo de obtener datos suficientes para desarrollar alternativas de remediación en el lugar. Las actividades a ser realizadas esta primavera incluirán muestreos superficiales y sub-superficiales del suelo usando perforaciones del suelo y trincheras de prueba, la instalación de pozos de monitoreo de agua subterránea, y la colección de muestras de agua subterránea. Las trincheras de prueba serán excavadas usando una retroexcavadora, mientras que las perforaciones del suelo serán realizadas usando una excavadora montada en un camión. Todas estas actividades serán realizadas dentro de la propiedad de National Grid, tomarán lugar en horarios de trabajo normales, y no deberían tener impacto fuera de los límites del lugar. Durante estas actividades se realizaran monitoreos de la calidad del aire.

Adicionalmente, esta primavera, National Grid comenzará a demoler dos antiguos contenedores de gas. Las actividades iniciales incluirán el tratamiento y remoción del agua de los contenedores. Seguidamente de las actividades relacionadas con la remoción del agua, National Grid anticipa que la demolición de las estructuras de los contenedores de gas será realizada en el verano del 2010.

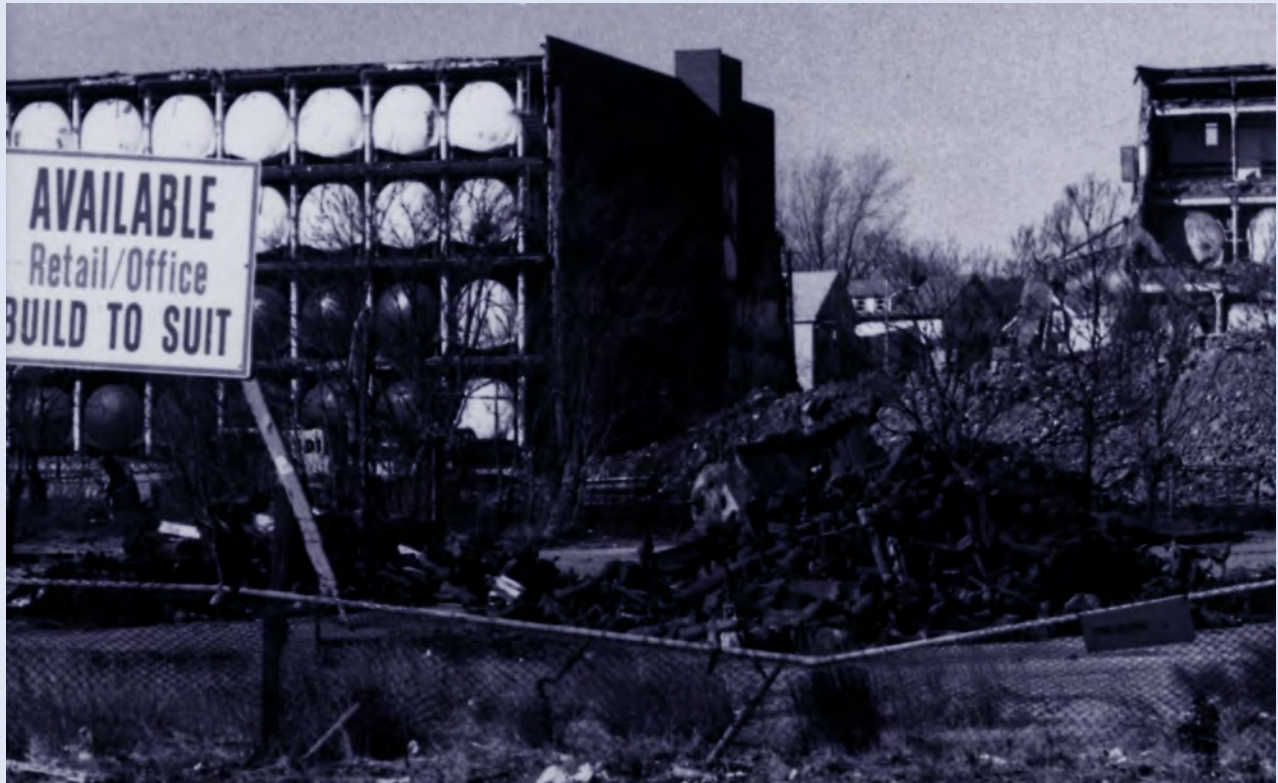
### **Programa de Actividades**

Se anticipa que estas actividades de evaluación comenzarán en abril y probablemente se completarán en el transcurso de dos hasta tres meses. Se anticipa que las actividades relacionadas con la demolición de los contenedores de gas comenzaran en el verano del 2010 y se completaran en aproximadamente 4 meses.

### **Preguntas y Comentarios**

Si usted necesita más información con respecto a las actividades de National Grid en el Sitio, por favor contacte a Michele Leone de la National Grid en 781-907-3651.

# B R O W N F I E L D S :



Turning  
**bad** spaces  
into  
**good** ones

How  
**communities**  
can get  
involved

---

# What is inside this booklet:



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# What is a Brownfield?

This booklet is about unused or abandoned (*a BAN dund*) buildings and places called **Brownfields**. They are dirty, sometimes dangerous places in neighborhoods. Usually Brownfields are places where old factories or other businesses were. Many times they are very messy and trashy places.

Brownfields can have all kinds of dangers – mess, falling down buildings and even dangerous, **toxic** (*Tok sick*) chemicals. Toxic means these chemicals are dangerous to human health. When a Brownfield is cleaned up, neighborhoods are better places in so many ways.

All around the country Brownfields are being cleaned

up and **redeveloped** (*re da VEL upt*) – turned into better, cleaner places – new businesses, parks and other uses. This booklet will explain what you need to know to get involved and ask good questions about Brownfield **reuse and redevelopment**.

The more you know about a Brownfield site then the more you can take part in planning. For example, let's say a Brownfield site is going to be redeveloped into a school with a community playground. Residents can get involved to help decide:



- **Is this plan for redevelopment and reuse good for the neighborhood?**
- **Is the new place going to be safe for neighborhood people?**



## Why can Brownfields be dangerous places?

### #1 Dangers you can see

There are two kinds of dangers or **risks** at Brownfield sites – things you can see, and things you can't see. Things you can see, like broken windows and glass, rotted wood floors, rusty nails and pipes, and old barrels, are a problem. All of these things are dangerous. Children playing

at an old Brownfield site have the most risk to get hurt. They can find old underground storage tanks, and they can fall in.

### #2 Dangers you can't see

Chemicals can be at a Brownfield and you can't see them. **Some chemicals can be dangerous to human health.** They can be toxic. Toxic chemicals can make people sick if they eat them, breathe them or get them on their skin.

# Chemicals

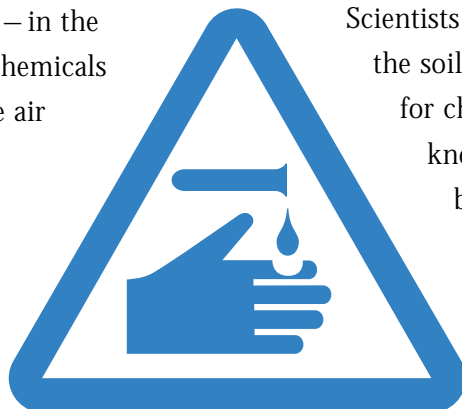
## Where did the chemicals come from?

Sometimes when factories or businesses left a place, they left chemicals in pipes, barrels and buried oil tanks. These can leak. When they leak (or *leach*) into the ground, the chemicals can get into the soil and into well water and river water. Scientists test to see if the soil and water are safe.

## When is a chemical dangerous?

Think of this: **chemicals are everywhere and in everything we eat and drink.** Our own bodies are made up of chemicals. And most chemicals are natural and safe. **But some chemicals, in the right amounts, can be dangerous.**

Old businesses can leave behind dangerous chemicals. For example, an old dry cleaning business can leave dangerous **VOCs**—volatile (*vo la TILE*) organic compounds—in the ground. VOCs are chemicals that can get into the air that we breathe.



Understanding chemicals		
Chemical Tested	Everyday/Household Use	Business/Industry Use
Pesticides . . . . .	. . .Roach powder . . . . . Rat poison	. . Farming or chemical company
VOC's . . . . .	. . .Gasoline . . . . . Dry cleaners Moth balls	. . Oil refinery
Semi-volatiles . . . . .	. . .Soot . . . . .	. . Incinerators
Metals . . . . .	. . .Batteries . . . . . Thermometers	. . Jewelry or plating company

▲ This chart shows some of the kinds of chemicals that may be at a Brownfield site. In the *left* column is the name of the chemical. In the *middle* column you see how we use that chemical everyday, even at home. The *right* column shows what kinds of big businesses use these chemicals. This chart shows that there are many ways to use chemicals.

## Testing chemical levels—how much do they find?

If chemicals are in everything, how do the experts know what to test for?

Scientists often will test the soil and the water for chemicals. If they know what type of business was

there before, this will help scientists decide what to test for. Some of these tests are **very expensive**. So, they do the basic tests first. They may do more tests after they look at the first results.

To do the tests scientists dig holes, or **test wells**, into the ground and take samples of the water in the ground.



# Standards for chemicals: how much is too much?

When scientists test a Brownfield site (the ground or the water) they want to find out **how much** of a chemical there is. The government sets safe amounts or levels for chemicals. The safe level is called a **standard**. If they find a level that is **higher than** the safe standard, then they make plans to do something to keep people safe.

## What happens if a test is too high?

If the level is too high, scientists take action in different ways. Depending on the risk, they will do some or all of the following:

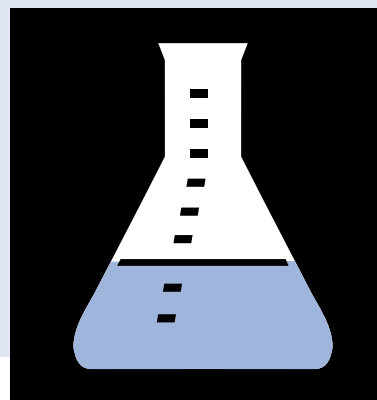
- Remove the contamination
- Cover it up
- Fence in the area
- Plant trees and grass
- Teach people about how to use an area
- Do more tests

Each Brownfield site is different, but the list above will give you a good idea of the kinds of actions that a contaminated site may need.

## How to understand standards

### Here is an example of a “standard.”

Let's say soil at a Brownfield site was tested for **lead**. The test level was **3,500 ppm** (parts per million). The EPA (Federal Environmental Protection Agency) action level is **400 ppm**. So, the level is **higher than the standard** (3,500 ppm is higher than 400 ppm). This means something needs to be done to be sure people can be safe at or near this Brownfield site.



# What is risk?

There is no such thing as living in a world with no risks. Even crossing the street can be risky. The important question is “**What is an acceptable risk?**” “**What is a risk I am willing to take?**”

Sometimes it’s hard to know what is a risk? Who is at risk? For example if children are playing in a crumbling building this can be a **high risk**. Children can fall, get cut or get seriously hurt. Another example is if the air is filled with dust. This may be risky for people with asthma or older people.



## Questions to ask about risk

- Is there a risk?
- Who is most at risk?
- What is the acceptable standard for this chemical?
- Is this standard for a normal size man or woman?
- Is this standard for a child?
- When can this chemical make me unhealthy?
- What could happen to me or my children?
- What about pregnant women?
- How would I know if I am sick from this chemical?
- If you say this level is safe here, does that mean this level is safe for every other place in the country?
- How can I protect myself – minimize the risk (keep the risk low)?
- How can I learn more about this risk? Who can I talk to?
- Is there something I can read?



**Remember! There is no such thing as living in a world with no risks. The important thing is to understand what the risks are.**

*Go to the back page of this booklet for a list of agencies and phone numbers you can use.*

## An example of standards

The safe standard dose of aspirin for the average adult is 2 aspirin every 4 hours. Some adults can take even more than 2 aspirin safely. But if you are a small child, 2 aspirin is way too much. The standard for adults (2 aspirin) is not **the standard** for children.

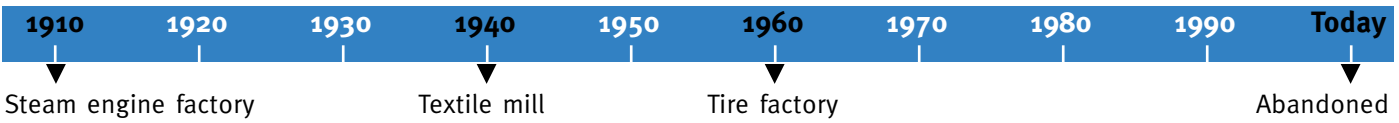
# You can get involved

## Residents know some important history

The past history of a site is important. Talk to the people

who have lived in the neighborhood for a long time. Maybe you are one of those people! People who worked in the facto-

ries and businesses may know what kinds of chemicals were used. This information will help the planners and scientists.



**B**rownfields get **redeveloped** into all kinds of different spaces – schools, businesses, playgrounds. Community people can help decide if the plan to build is a good one. As a resident, you can help decide:

- **Is this plan for redevelopment and reuse good for the neighborhood?**
- **Is the new place going to be safe for neighborhood people?**

There are 2 important times you can get involved with a Brownfield site:

### 1. Get involved when the city or developer is *planning* to cleanup, reuse or build something new at a Brownfield.

For example, a developer is planning to build a new business on an old brownfield site. It will have lots of hills and driveways to make it pretty. The developers think only adults will go to the business site. They want to follow cleanup standards for adults.

**But** neighborhood people know that the hills may attract lots of neighborhood children. This can be dangerous for kids. **The cleanup standards for adults may not be safe for children.** So you can give the developers good information. For example, you could ask them to make the land less inviting for kids.

Call or write your elected officials (*see sample letter and phone calls on pages 8 and 9*). Ask:



- **What is happening with this site?**
- **Are there plans to develop it?**
- **What are the plans?**
- **Will you hold any public meetings to talk about plans?**

## 2. Get involved with the cleanup plans.

The scientists and the contractors may schedule local meetings so that you can come and see and hear about the plans for cleanup. This is one of the times that you and your neighbors can be the most help and have the biggest impact. You can help decide if the plans for cleanup are good.



## Questions to ask about Brownfields cleanup in your neighborhood

**We have already talked about contamination and risk questions on page 4.**

- When will the job start? How will you tell the neighborhood?
- Will there be a lot of noise during the cleanup?
- Will any of the waste be treated on the site? Will any chemicals be released during cleanup?
- Is it safe to truck it through the neighborhood?
- Where is the waste being taken?
- What if some of it spills out?
- Will the site be dusty during cleanup?
- What is being done about dust control? Is the dust dangerous?
- Will the chemicals smell? Will the fumes be toxic?
- Who do I complain to if I see something I think is wrong?
- What kind of signs will be posted while the work is going on?
- Will the signs be in different languages? Will they have pictures?
- Will there be guards at the street crossings to help with the truck traffic?
- Will there be a night watchman at the place where the work is being done?
- Will the site be fenced off?

# What to expect during cleanup

Abandoned cars, used tires and other trash will need to be hauled away. Buildings and structures need to be taken down. Also, old fencing, asphalt parking lots and unused railroad lines will be removed. Metals, glass, boilers, old machinery and any of the

wooden pieces of the building will also be put into dumpsters and taken away to a landfill.

### Trucks

Machines will be digging holes and loading trucks. Large trucks will be traveling back and forth



over the local roads. So you want to know what is the time of day and what days of the week will they be working. Usually the contractor wants to start around **6:30 or 7:00 am** and work until **3:30 or 4:00 pm**. Unless there is a real rush to get the work done, they will work Monday-Friday. So you might ask the question, **“Do you plan to work any overtime on this project?”**

### **What streets will the trucks use?**

Find out what roads the trucks will be using. The people who plan these projects aren't always aware of the kinds of traffic that happen in your neighborhood. You know the local roads – where people walk and drive, and where children play. Maybe there are elderly or sick people on some streets. Usually the truck drivers have more than one choice about what roads they use. You can give them good information about the best routes.



### **How much truck traffic and how messy?**

The contractor should have an idea about how much dirt he needs to take out and bring in. So he can figure out roughly how many loads there will be – 1 truck per hour, 10 trucks per hour or something in between.

Trucks can get dirty. Ask, **“Are you going to have a wash down place for the trucks leaving the job?”** A wash down is a platform that the contractor builds and the trucks ride up on it. While the truck is on the platform, workers with hoses spray high-pressure water to clean the trucks before they go out onto the neighborhood roads. This keeps the mud on the job and keeps your neighborhood clean.

### **How long will the cleanup take?**

Most of the time the developers have a good idea how long the project will take before they

begin. But sometimes they are surprised by the things they find. Although the developers may not be able to give you an exact answer about when the job will be done, they should be able to give a best guess for an ending date.

### **Children and Brownfields**

Talk to your children about Brownfields and cleanup. Explain the dangers of playing at or near the site. **Remember truck drivers cannot see every spot around their trucks.** Tell your children:

- **Be extra careful when you cross streets.**
- **Don't play near the Brownfield.**



**Older people** should also be more careful. If you know of an older person in the neighborhood let them know that the noise and dust will only be temporary.

# Take action: write letters

This is a sample letter you can use to write to officials about a Brownfield site.

Turn to the back page to find the names and addresses of agencies and people.



To \_\_\_\_\_ (write name here)  
\_\_\_\_\_ (include address)

Date \_\_\_\_\_

Dear Mr./Ms. (write name here),

I am a resident of \_\_\_\_\_ Street and I am writing to express my concern about the traffic around the Valley Mills cleanup. The trucks begin at about 6:30 in the morning during the week. This is a **problem** for a number of reasons. We have older people living on this street, and children are also walking to school between 7:30 and 8:30 am.

I would like to **request** that two things happen. I believe the trucks should not start until 9:00 and stop at 4:30. Also, I believe Pine Street would be a better traffic pattern for the trucks entering and leaving the site.

I am eager to see the site cleaned up. But I am equally concerned that this cleanup is done in the best way for our neighborhood. Please call me at \_\_\_\_\_ (your phone number) or write to me at \_\_\_\_\_ (your address).

Thank you for your time.

Sincerely,

\_\_\_\_\_ (your signature)

\_\_\_\_\_ (Print your name clearly here)

◀ **1st paragraph:**  
What is the problem?

◀ **2nd paragraph:**  
What are you asking for?

◀ **3rd paragraph:**  
How can someone get in touch with you?

# Take action: make phone calls

## Phone call #1: Talking about truck traffic during the cleanup.

Turn to the back page to find the names and phone numbers of agencies and people.

**Resident:** Hello. I would like to speak to someone about the clean up of Valley Mills. I live in the neighborhood.

**Operator:** Just a minute please. I'll transfer you.

**Planner:** Hello. Can I help you.

**Resident:** Yes. I am calling about the truck traffic at the cleanup site of Valley Mills. My name is \_\_\_\_\_. I live in the neighborhood ◀ Say who you are. and I would like to talk about the truck traffic.

**Planner:** What seems to be the problem?

**Resident:** I think the trucks are starting too early in the morning and causing ◀ What is the problem? problems for older people. The trucks begin coming out of the site at 6:30 in the morning. This is much too early for this neighborhood. We have many older people living here and this traffic is a problem. I want the planners to ◀ What are you asking for? know that I am calling to say that the trucks should not start until 8:00 in the morning.

**Planner:** I will give the traffic manager your message.

**Resident:** Thank you. And who is the traffic manager? Could you please spell her name for me. Before we hang up I would like ◀ Get the person's name (write it down) your name. Please spell it for me. Also I would like to give you my name and phone number. I would like someone to call me back. (Give your name, spell it and phone number.)

Thank you very much and I will wait to hear from \_\_\_\_\_ (the traffic manager's name).



## Phone call #2: Finding out if there are any plans for a Brownfield site near you.

**Resident:** Hello. I would like to speak to someone about the empty building and vacant lot on Mills Street I live in the neighborhood.

**Operator:** Just a minute please. I'll transfer you.

**Planner:** Hello. Can I help you?

**Resident:** Yes. I am calling about the empty building and vacant lot on Mills Street. My name is \_\_\_\_\_. I live in the neighbor- ◀ Say who you are. hood and I would like to know if the city has any plans to redevelop or reuse this land. Who would know about this land? ◀ What are you asking for?

**Planner:** You will need to speak with Ms. James. Her phone number is \_\_\_\_\_.

**Resident:** Thank you. And can I have your name, please? ◀ Get the person's name (write it down)



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# Where to call or write

Here are some important phone numbers you can call to get more information about Brownfields in your neighborhood.

## **City of Providence, Department of Planning & Development**

400 Westminster St., Providence, RI 02903  
(401) 351-4300

The Providence Department of Planning and Development reviews proposals and prepares re-development plans. Residents can contact the Department to review and get involved with redevelopment plans for their neighborhood. The Department also gives low interest loans for economic development projects.

## **Rhode Island Department of Environmental Management (RI DEM) Office of Waste Management**

235 Promenade St., Providence, RI 02908  
(401) 222-2797

The Rhode Island Department of Environmental Management (RI DEM) is a state agency responsible for regulating Brownfields reuse and redevelopment. RI DEM directs soil, air and water testing at Brownfields sites, and the agency reviews any plan for the future use. It also makes sure that contractors doing work at Brownfields follow all laws. RI DEM helps make legal agreements with developers of Brownfields sites.

## **Rhode Island Department of Health Office of Environmental Health Risk Assessment**

Three Capitol Hill, Providence, RI 02908  
(401) 222-4948

The Rhode Island Department of Health, Office of Environmental Health Risk Assessment provides information on the health effects of chemicals in people's homes, workplaces, or neighborhoods.

## **Environmental Protection Agency (EPA)**

US EPA-NE, One Congress St., Boston, MA 02114-2023  
1-800-EPA-REG1 (1-800-372-7341)

The EPA Brownfields Team provides a variety of technical and financial support involving the assessment and cleanup of Brownfields properties. Activities include community outreach; funding for assessments, job training and revolving loan funds; and expertise in hazardous materials.

## **Agency for Toxic Substances and Disease Registry (ATSDR)**

Office of Urban Affairs, 1600 Clifton Rd, Atlanta, GA 30333  
1-888-42-ATSDR (1-888-422-8737)

*in Boston:* ATSDR Region 1, US EPA-NE, One Congress St., Suite 1100 (HBT), Boston, MA 02114-2023  
(617) 918-1495

ATSDR is the main federal public health agency that deals with hazardous waste issues. ATSDR gives states and others advice about what could be the health problems from chemicals and toxic sites.

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# LOS TERRENOS BALDIOS:



Convertiendo  
lugares malos  
en lugares  
buenos

Cómo pueden  
participar  
las  
comunidades

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# Qué es un terreno baldío?

Esta guía es sobre edificios sin uso o abandonados y sitios en la ciudad llamados **terrenos baldíos**. Son lugares sucios y a veces peligrosos en su vecindario. Usualmente los terrenos baldíos son los lugares en donde funcionaban fábricas u otras industrias. Muchas veces son lugares muy sucios y llenos de basura.

Los terrenos baldíos pueden estar llenos de cosas peligrosas — suciedad, edificios en ruinas y aún sustancias químicas peligrosas y **tóxicas** (*tóc-si-cas*). Tóxico significa que esas sustancias químicas son peligrosas para la salud de los seres humanos. Cuando se limpia un terreno baldío, el vecindario se convierte en un lugar mejor.

Por todo el país se están

limpiando los terrenos baldíos y se los **reurbaniza** (convierte) en lugares mejores y más limpios — por ejemplo nuevas industrias, parques o se les da otros usos. Esta guía le explicará qué es lo que usted necesita hacer para participar (ayudar) y hacer buenas preguntas sobre el **nuevo uso** y la **nueva urbanización** de los terrenos baldíos.

Mientras usted sepa más sobre terrenos baldíos usted podrá participar en la planificación y mejora de esos lugares. Por ejemplo, supongamos que el terreno baldío será urbanizado nuevamente y se edificará una escuela con un lugar de juegos para toda la comunidad. Los vecinos pueden



participar y ayudar a decidir:

- **¿Es el plan de urbanizar nuevamente y usar los terrenos de nuevo es bueno para el vecindario?**
- **¿Será el nuevo lugar seguro para la gente del vecindario?**

## ¿Por qué los terrenos baldíos pueden ser lugares peligrosos?



### #1 Peligros que usted puede ver

Hay dos tipos de **riesgos** en los lugares baldíos — cosas que usted puede ver y cosas que usted no puede ver. Las cosas que usted puede ver, como las ventanas y vidrios rotos, los pisos de madera podrida, los clavos y las cañerías oxidadas y los antiguos barriles son un problema. Todas esas cosas son peligrosas. Los niños que juegan en un terreno baldío viejo corren un gran riesgo. Pueden encontrar, bajo tierra, tanques de

almacenamiento y caer dentro de ellos.

### #2 Peligros que usted no puede ver

Un terreno baldío puede tener sustancias químicas que usted no ve. **Algunas sustancias químicas pueden ser peligrosas para la salud de los seres humanos.** Las sustancias químicas pueden ser tóxicas y pueden producir enfermedades si las personas ingieren, respiran o tienen contacto con ellas.

# Las sustancias químicas

## ¿De dónde vienen las sustancias químicas?

Algunas veces las antiguas fábricas o negocios dejaron en el lugar que abandonaron químicos en las cañerías, barriles y tanques de petróleo enterrados, estos pueden tener un escape. Cuando tienen un escape (o *gotean*) en el suelo, los químicos pueden entrar en el terreno y dentro del agua de pozos y de ríos. Los científicos (investigadores) analizan para ver si el agua y el suelo son seguros.

## ¿Cuándo es una sustancia química peligrosa?

Piense lo siguiente: **las sustancias químicas están en todas partes y en todo lo que nosotros comemos y bebemos.** Nuestros cuerpos tienen sustancias químicas. La mayoría de estos químicos son naturales y seguros. **Pero algunos químicos, en cantidades diferentes, pueden ser peligrosos.**

Los negocios antiguos pueden dejar residuos químicos peligrosos. Por ejemplo, un antiguo negocio de limpieza en seco puede dejar peligrosos residuos de **COV** (compuestos orgánicos volátiles) en el suelo.



Comprendiendo las sustancias químicas		
Químico analizado	Uso común Uso en la casa	Uso en la industria o negocios de:
Pesticidas . . . . .	. . . Polvo para cucarachas Veneno para ratas	. . . Agricultura o Cías químicas
COV . . . . .	. . . Gasolina . . . . . Limpiadores en seco Bolitas de naftalina	. . . Refinería de petróleo
Semi-volátiles . . . . .	. . . Hollín . . . . .	. . . Incineradores
Metales . . . . .	. . . Baterías . . . . . Termómetros	. . . Cías de enchapado

▲ Este gráfico demuestra algunas de las clases de químicos que se pueden encontrar en un terreno baldío. En la columna de la *izquierda* se encuentra el nombre de la sustancia química, en la columna del *medio* usted podrá ver el uso diario del químico, aún en el hogar. La columna de la *derecha* muestra qué tipo de grandes industrias usan estos químicos. Este gráfico indica que hay varias formas de usar las sustancias químicas.

Los COV son sustancias químicas que pueden estar en el aire que respiramos.

## Cuando analizan los niveles de los químicos ¿qué cantidad encuentran?

Si los químicos están en todos lados ¿cómo saben los expertos lo que tienen que analizar?

Los científicos, usualmente, analizan el terreno y el agua

para descubrir químicos. Si ellos saben qué tipo de industria estaba ahí antes, eso ayudará a los científicos a decidir qué es lo que tienen que analizar. Algunos de esos análisis son **muy caros**. Por lo tanto ellos primero hacen el análisis básico. Se harán más análisis después de obtener los primeros resultados.

Para hacer los análisis, los científicos cavan hoyos, o **pozos**, dentro de la tierra y toman muestras del agua dentro de la tierra.



# El estándar para sustancias químicas: ¿cuánto es demasiado?

Cuando los científicos analizan el terreno baldío (la tierra o el agua) quieren saber **los niveles** de químicos que hay. El gobierno establece cuales son las cantidades o niveles seguros para los químicos. El nivel seguro es llamado **estándar**. Si ellos encuentran un nivel que es mayor al estándar, planifican hacer algo para mantener segura a la gente.

## ¿Qué pasa si el análisis es muy alto?

Si el nivel es muy alto los científicos toman acciones en diferentes formas. Dependiendo del riesgo pueden hacer lo siguiente:

- Remover la contaminación
- Cubrirla
- Cercar el área
- Plantar árboles y césped
- Enseñarle a la gente cómo usar el área
- Hacer más análisis

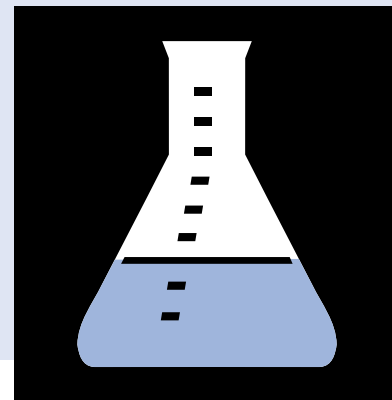
Cada terreno baldío es diferente, pero la lista mencionada le da a usted una buena idea del tipo de acciones a seguir en un lugar contaminado.



## Cómo entender el estándar

### Veamos un ejemplo de “estándar”

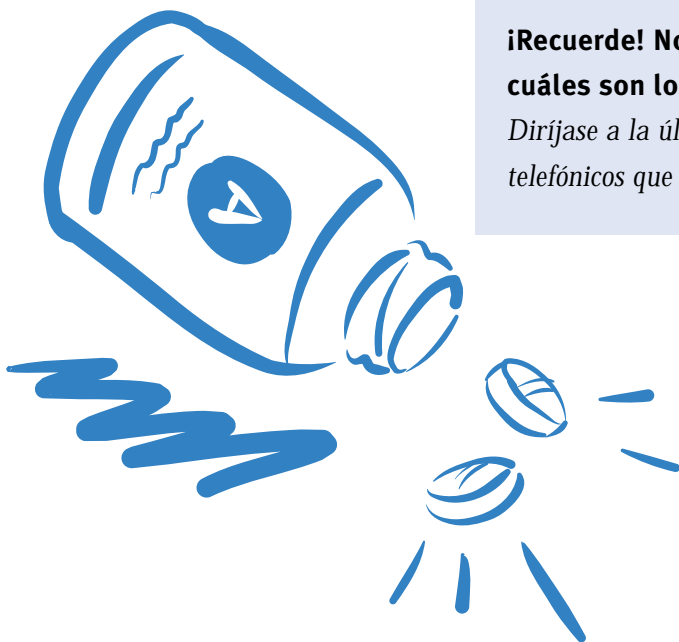
Digamos que la tierra de un terreno baldío fue analizada para saber si contenía plomo. El nivel de análisis fue de **3.500 ppm** (partes por millón). El nivel de acción de la Agencia Federal de Protección al Medio Ambiente (EPA, sus siglas en inglés) es de **400 ppm**. Por lo tanto el nivel es **mayor que el estándar** seguro (3.500 ppm es mayor que 400 ppm). Esto significa que se necesita hacer algo para asegurarse que la gente esté segura en el terreno baldío o cerca de él.



# ¿Qué es riesgo?

No hay ninguna cosa en el mundo que no tenga riesgos. Aún el cruzar la calle puede ser riesgoso. La pregunta importante es “¿Qué es un riesgo aceptable?”. “¿Qué es un riesgo que estoy dispuesto a aceptar?”.

A veces es difícil saber qué es un riesgo y quién está en riesgo. Por ejemplo si los niños están jugando en un edificio en ruinas eso puede ser un **gran riesgo**. Los niños se pueden caer, cortarse o lesionarse seriamente. Otro ejemplo es si el aire está lleno de polvo. Eso puede ser riesgoso para la gente con asma o para la gente mayor.



## Preguntas para hacer acerca de un riesgo

- ¿Hay riesgo?
- ¿Quién está más en riesgo?
- ¿Cuál es el nivel estándar aceptable para este químico?
- ¿Cuál es el riesgo estándar para la talla de un hombre o mujer normal?
- ¿Cuál es el riesgo estándar para un niño?
- ¿Cuándo es una sustancia química insalubre?
- ¿Qué me puede suceder a mí o a mis hijos?
- ¿Qué pasa con mujeres embarazadas?
- ¿Cómo sabré si me he enfermado debido a este químico?
- Si usted dice que aquí el nivel es seguro aquí, ¿esto quiere decir que el nivel es seguro en otros lugares del país?
- ¿Cómo me puedo proteger o minimizar el riesgo (mantener bajo el riesgo)?
- ¿Cómo puedo aprender más sobre este riesgo? ¿Con quién puedo hablar?
- ¿Hay algo que yo pueda leer?



**¡Recuerde! No existe un mundo sin riesgos. Lo importante es saber cuáles son los riesgos.**

*Diríjase a la última página para ver una lista de agencias y números telefónicos que puede utilizar.*

### Un ejemplo de estándares

La dosis estándar segura de la aspirina para el adulto promedio es de 2 aspirinas cada 4 horas. De hecho, ciertos adultos pueden tomar más de dos aspirinas y estar seguros. Pero si es un niño pequeño, 2 aspirinas es mucho. La dosis estándar segura (de 2 aspirinas) no es la dosis **estándar** para los niños.



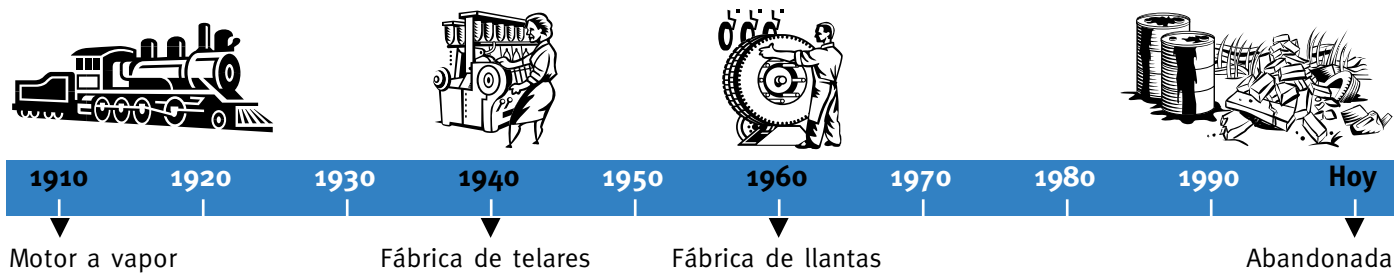
# Usted puede participar

## Los residentes conocen una historia importante

El pasado histórico de un lugar es importante. Hable con la gente

que ha vivido por un largo tiempo en el vecindario. Quizás usted es una de esas personas! La gente que trabajó en esas fábricas o

industrias pueden saber qué tipos de químicos se usaron. Esta información ayudará a los planificadores y a los científicos.



Los terrenos baldíos se reurbanizan en todo tipo de lugares – escuelas, negocios, lugares de juego. La gente de la comunidad puede ayudar a decidir si es bueno el plan de construcción. Como residente, usted puede ayudar a decidir:

- ¿Es este plan para la reurbanización bueno para la comunidad?
- ¿Será seguro el nuevo lugar para la gente del vecindario?

Hay 2 momentos importantes en los cuales usted puede participar en un terreno baldío:

## 1. Participe cuando la ciudad o los urbanizadores están planificando limpiar, reusar o construir algo nuevo en el sitio baldío.

Por ejemplo, digamos que los urbanizadores piensan construir una nueva industria en un terreno baldío viejo. Para ser atractivo tendrá muchas lomas y entradas de autos. Los planificadores piensan que sólo los adultos irán al área industrial. Quieren seguir los

estandares de limpieza para los adultos.

Pero la gente del vecindario sabe que las lomas pueden atraer a muchos niños del vecindario. Este puede ser peligroso para los niños. Puede ser que los estandares de limpieza para los adultos no son seguros para los niños. Pida a los planificadores que no hagan el lugar tentador para los niños.

Llame o escriba a sus funcionarios electos (vea los ejemplos de la carta y de llamadas telefónicas en las páginas 8 y 9). Pregunte:

- ¿Qué está pasando con el lugar?
- ¿Hay planes de urbanizarlo?
- ¿Cuáles son los planes?
- ¿Usted llamará a reuniones públicas para hablar sobre los planes?



## 2. Participe cuando empiecen los planes de limpieza

Puede ser que los científicos y los contratistas propongan un calendario con reuniones locales, por lo tanto usted podrá ir, ver y escuchar sobre los planes para la limpieza. Este es el momento en que usted y sus vecinos pueden ser de gran ayuda y tener el mayor impacto. Usted puede ayudar a decidir si los planes de limpieza son buenos.



## Preguntas que pueda hacer sobre la limpieza del terreno baldío en su vecindario

**Ya hemos hablado sobre la contaminación y preguntas sobre el riesgo. Vea la página 4.**

- ¿Cuándo empezará el trabajo? ¿Cómo usted notificará al vecindario?
- ¿Habrá mucho ruido durante la limpieza?
- ¿Algunos de esos desperdicios serán tratados en el lugar? ¿Va a haber emanaciones de químicos durante la limpieza?
- ¿Es seguro transportarlos en camiones por el vecindario?
- ¿Adónde se llevan los desperdicios?
- ¿Qué sucede si hay un derrame de algún desperdicio?
- ¿Durante la limpieza habrá mucho polvo en el lugar?
- ¿Qué se está haciendo para controlar el polvo? ¿Es peligroso el polvo?
- ¿Los químicos emitirán olores? ¿Los gases serán tóxicos?
- ¿A quién reclamo si veo algo que creo que es incorrecto?
- ¿Qué tipos de letreros serán colocados cuando empiece el trabajo?
- ¿Los letreros serán en diferentes idiomas? ¿Tendrán dibujos?
- ¿Habrá guardianes en los cruces de las calles para ayudar con el tránsito de los camiones?
- ¿Habrá guardianes de noche en el lugar en donde se está trabajando?
- ¿El lugar será cercado?

## Qué esperar durante la limpieza

Los autos abandonados, las llantas usadas y otra basura tendrá que ser transportada a otro lado. Se necesitará demoler los edificios y las estructuras. También se tendrá que remover las antiguas cercas, el asfalto de los lugares de estacionamiento y los carriles de tren abandonados. Los metales, vidrios,

calderas y maquinarias antiguas o cualquiera de las partes de madera del edificio serán puestas dentro de un recipiente para desperdicios y se los llevará a un basurero.

### Camiones

Las máquinas excavarán hoyos y cargarán camiones. Camiones



grandes viajarán de ida y de vuelta sobre los caminos locales. Por lo tanto usted necesita saber durante qué horas del día y qué días de la semana estarán trabajando. Usualmente el contratista desea empezar alrededor de **6:30 ó 7:00 am** y trabajar hasta las **3:30 ó 4:00 pm**. Si no existe un apuro real para terminar el trabajo, ellos trabajarán de lunes a viernes. Entonces usted puede preguntar: **“Planea usted trabajar tiempo extra en este proyecto?”**.

### **¿Qué calles usarán los camiones?**

Averigüe qué caminos usarán los camiones. La gente que planea este proyecto no siempre está consciente del tipo de tráfico que hay en su vecindario. Usted conoce los caminos locales – por donde la gente camina y conduce y en dónde juegan los niños. Quizás hay personas ancianas o enfermas en algunas calles. Usualmente los conductores de camiones tienen más de una posibilidad para elegir la ruta que pueden usar. Usted puede informarles de las rutas mejores.



### **¿Cuánto tránsito de camiones habrá y cuán sucio será?**

El contratista deberá tener una idea sobre cuánta tierra necesita sacar y traer. Por lo tanto él puede calcular aproximadamente cuántas cargas habrá: 1 camión por hora, 10 camiones por hora o entre 1 ó 10 camiones por hora.

Los camiones se ensucian. Pregunte, **“Habrá un lavadero para los camiones que salen del área del trabajo?”**. Un lavadero es una plataforma que el contratista construye y por la cual los camiones pasan. Mientras el camión está sobre la plataforma, los trabajadores provistos con mangueras de alta presión lanzan agua para lavar al camión antes de salir a rodar por los caminos del vecindario. Esto mantiene el barro en el trabajo y mantiene limpio a su vecindario.

### **¿Cuánto tiempo tomará la limpieza?**

La mayoría de los urbanizadores, antes de empezar el proyecto, tienen una buena idea de cuánto se demorarán. Pero a veces tienen

sorpresas por las cosas que encuentran. Aunque los planificadores no puedan darle a usted una respuesta exacta sobre cuándo se acabará el trabajo, ellos podrán darle un cálculo estimado de la fecha de terminación.

### **Los niños y los terrenos baldíos**

Hable con sus niños sobre los terrenos baldíos y su limpieza. Explique los peligros de jugar en el lugar o cerca de él y los peligros de los camiones. Recuerde que los conductores de los camiones no pueden ver cada lugar alrededor de sus camiones. Dígale a sus niños que:

- **Sean más cuidadosos cuando crucen la calle.**
- **No jueguen cerca del terreno baldío.**



También **la gente de edad** tiene que ser más cuidadosa. Si usted conoce a una persona de edad en el vecindario, hágale saber que el ruido y el polvo sólo será transitorio.

# Tome acción: escriba cartas

Este es un ejemplo de una carta que usted puede escribir a los funcionarios sobre el terreno baldío. Diríjase a la última página para ver una lista de agencias y números telefónicos.

A \_\_\_\_\_ (escriba el nombre)  
 \_\_\_\_\_ (incluya domicilio)

Fecha \_\_\_\_\_

Estimado Sr./Estimada Sra. (escriba el nombre):

Yo vivo en la calle \_\_\_\_\_ y le escribo para expresar mi preocupación sobre el tráfico de la limpieza de las fábricas Valley. Los camiones comienzan a transitar durante la semana cerca de las 6:30 Hs. en la mañana. Este es un **problema** por varias razones. Tenemos ancianos viviendo en esta calle y también tenemos a niños caminando entre las 7:30 y las 8:30 am.

Quisiera pedirle dos cosas. Creo que los camiones no deben empezar a transitar hasta las 9:00 y parar a las 4:30. También creo que la calle Pine sería una buena ruta para los camiones que entran y salen del lugar.

Estoy ansioso por ver este lugar limpio. Pero también me preocupa que esta limpieza sea hecha en la mejor forma para mi vecindario. Por favor llámeme al \_\_\_\_\_ (su número de teléfono) o escíbame a \_\_\_\_\_ (su domicilio).

Gracias por su atención.

Atentamente,

\_\_\_\_\_ (su firma)

\_\_\_\_\_ (escribid su nombre claramente aqui)



## ◀ 1er párrafo:

¿Cuál es el problema?

## ◀ 2do párrafo:

¿Qué está pidiendo?

## ◀ 3er párrafo:

¿Como pueden ponerse en contacto con usted?

# Tome acción: haga llamadas

## Llamada telefónica #1: Haciendo un reclamo sobre problemas de tráfico de camiones durante la limpieza.

Diríjase a la última página para ver una lista de agencias y números telefónicos.

*Vecino:* Hola. Quisiera hablar con alguien sobre la limpieza de las fábricas Valley. Yo vivo en el vecindario.

*Operador:* Un minuto por favor. Transferiré su llamada.

*Planificador:* Hola. ¿en qué puedo ayudarle?

*Vecino:* Estoy llamando por el tráfico de camiones en el sitio de limpieza de las fábricas Valley. Yo vivo en el vecindario y quisiera **◀ Identifíquese** hablar sobre el tránsito de los camiones.

*Planificador:* ¿Cuál es el problema?

*Vecino:* Pienso que los camiones comienzan a transitar muy temprano en la mañana **◀ ¿Cuál es el problema?** y están causando problemas a las personas de edad. Los camiones comienzan a salir a las 6:30 de la mañana del terreno. Es muy temprano para el vecindario. Nosotros tenemos a muchos ancianos viviendo acá y este tráfico es un problema. Quisiera que los planificadores supieran de **◀ ¿Qué está pidiendo?** que estoy llamando para decirles que los camiones no deberían empezar hasta las 8:00 de la mañana.

*Planificador:* Bueno, le daré su mensaje al administrador del tráfico.

*Vecino:* Gracias. ¿Quién es el administrador del tráfico? ¿Me podría deletrear su nombre.? Antes de colgar, quisiera su nombre y también **◀ Anote el nombre y escríbalo** quisiera darle a usted mi nombre y mi número de teléfono. Le agradecería si alguien me puede llamar. (De su nombre, deletréelo y de su número de teléfono.)

Muchas gracias y espero la llamada \_\_\_\_\_



(nombre del administrador del tráfico).

## Llamada telefónica #2: Averiguando si hay planes para un sitio baldío cerca de su vecindario.

*Vecino:* Hola. Quisiera hablar con alguien sobre el edificio vacío y el terreno baldío en la calle Fábricas. Yo vivo en el vecindario.

*Operador:* Un minuto por favor. Transferiré su llamada.

*Planificador:* Hola. ¿En qué puedo ayudarle?

*Vecino:* Estoy llamando sobre el edificio vacío y el terreno baldío en la calle **◀ Identifíquese** Fábricas. Vivo en la vecindad y quisiera saber si la municipalidad tiene algún plan para reurbanizarlo o reusar ese terreno. ¿Quién **◀ ¿Qué está pidiendo?** es la persona que podría darme esta información?

*Planificador:* Necesitará hablar con Srta. Rios. Su número de teléfono es \_\_\_\_\_.

*Vecino:* Gracias. ¿Me podría **◀ Anote el nombre y escríbalo** dar su nombre, por favor?

---

# ¿Dónde llamar o escribir?

**En esta página encontrará números de teléfono importantes así usted puede obtener más información acerca de los terrenos baldíos de su vecindario.**

## **Ciudad de Providence, Departamento de Planificación y Desarrollo**

400 Westminster St., Providence, RI 02903  
(401) 351-4300

El Departamento de Planificación y Desarrollo hace la revisión de las propuestas y prepara los planes para el desarrollo. Los residentes pueden contactar al Departamento para revisar y asistir con los planes de desarrollo para el vecindario. El Departamento también da préstamos con bajos intereses para el desarrollo económico de proyectos.

## **Departamento de Medio Ambiente de Rhode Island (RI DEM) Oficina de Administración de Desperdicios (Waste Management en inglés)**

235 Promenade St., Providence, RI 02908  
(401) 222-2797

El Departamento de Medio Ambiente de Rhode Island (RI DEM – siglas en inglés) es una agencia estatal responsable por la regulación, el reuso y redesarrollo de los terrenos baldíos. RI DEM inspecciona el análisis de la tierra, aire y agua en los terrenos baldíos y la agencia revisa los planes para los futuros usos de estos terrenos. También asegura que el contratista trabaja siguiendo las leyes o reglamentos. RI DEM ayuda a hacer arreglos legales con las personas a cargo del desarrollo de los terrenos baldíos.

## **Departamento de Salud Pública de Rhode Island Oficina de Evaluación de Riesgos de salud del medio ambiente**

Three Capitol Hill, Providence, RI 02908  
(401) 222-4948

El Departamento de Salud Pública de Rhode Island – Oficina de Evaluación de Riesgos de salud del medio ambiente provee información sobre los efectos de las sustancias químicas en la salud de la población en sus casas, lugares de trabajos o vecindario.

## **Agencia de Protección del Medio Ambiente (EPA)**

US EPA-NE, One Congress St., Boston, MA 02114-2023  
1-800-EPA-REG1 (1-800-372-7341)

El equipo de EPA (siglas en inglés) para los terrenos baldíos provee una variedad de ayuda técnica y financiera incluyendo la evaluación y limpieza de las propiedades de terrenos baldíos. Las actividades incluyen contactar a la comunidad, tratar de generar dinero para la evaluación, entrenamiento para trabajos y conseguir fondos para préstamos y experiencia con materiales peligrosos.

## **Agencia de Sustancias Tóxicas y Registro de Enfermedades (ATSDR)**

Office of Urban Affairs, 1600 Clifton Rd, Atlanta, GA 30333  
1-888-42-ATSDR (1-888-422-8737)  
*en Boston:* ATSDR Region 1, US EPA-NE, One Congress St., Suite 1100 (HBT), Boston, MA 02114-2023  
(617) 918-1495

ATSDR es la principal agencia federal de salud pública que se dedica a los asuntos de desperdicios peligrosos. ATSDR aconseja a los estados y otras entidades acerca de cuáles pueden ser los problemas de salud derivados de los lugares con químicos y sustancias tóxicas.

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**Este proyecto quiere agradecer** al Plan de Providence y a los residentes de las siguientes comunidades quienes tuvieron un rol muy importante en el desarrollo de este librito. Ellos son: Angela Burgio, Joseph H. Burgio, Carlos Corchado, Marisa Corchado, Mayra Corchado, William O'Brien, David G. Sifuentes, Rosa Solis, Victor Solis, y J. Taylor.

**La asistencia técnica** para este proyecto fue provista por Christina Zarcadoulas, investigación y desarrollo del librito; Eva Anderson, diseño; Miguel Rojas traducción; y Alyson McCann, URI

Home\*A\*Syst; en colaboración con el Departamento de Salud Pública de Rhode Island – Oficina de Evaluación de Riesgos de salud del medio ambiente.

**Asistencia Federal:** ATSDR proveyó 69% del total del costo del proyecto, contribución federal \$ 63.220. El Departamento de Salud Pública de Rhode Island proveyó 31% del costo total y contribución interna de \$ 27.924 (1997 Omnibus Consolidated Appropriations Act Section 507).





## ***Rhode Island Department of Environmental Management***

### **Working to Protect Rhode Island's Environment**

#### **Who We Are....**

The Rhode Island Department of Environmental Management (DEM) is the state agency responsible for preserving the quality of Rhode Island's environment for you and everyone who calls Rhode Island home. Our main office is conveniently located in Providence. We help protect the **AIR** you breathe, the **LAND** your homes, businesses and schools are built on, and the **WATER** you use for swimming and fishing.

#### **What We Do....**

DEM takes citizen complaints about pollution seriously and is committed to responding to complaints as quickly as possible. By contacting us, your complaint can be addressed and the investigation process can begin. Or maybe you don't have a complaint – maybe you have a question or need information about something happening in your neighborhood. We can help.

DEM receives complaints and questions about many subjects, including: illegal dumping, odor complaints from industrial facilities, illegal discharges into streams/rivers, dust problems, and similar threats to public health and the environment.

#### **How We Can Help You....**

DEM encourages your participation in helping us protect the environment and health of your community. We are here to answer your questions and investigate your complaints. Are you looking for information about a particular pollutant such as mercury or exterior lead paint?

Or maybe you are interested in learning more about a piece of property under construction near your home, or how to properly dispose of used oil? Are you concerned about illegal dumping or strange odors in your neighborhood?

We are here to serve you – please do not hesitate to contact us if you have questions, need to file a complaint about something happening in your community, or want more information about the many programs DEM runs that may directly impact you or your neighborhood. You can raise an issue anonymously or leave your name to get follow-up information.

#### ***VISIT OR CALL US:***

##### **IN PERSON:**

MONDAY-FRIDAY, 8:30 AM-4:00 PM  
235 PROMENADE STREET PROVIDENCE, RI  
(2<sup>nd</sup> FLOOR INFORMATION DESK)

##### **AT OUR WEB SITE:**

[www.dem.ri.gov](http://www.dem.ri.gov)

#### **STILL HAVE QUESTIONS? CALL US:**

GENERAL INFORMATION: **401-222-6800**  
TDD LINE: **401-222-4462**

NEED TO FILE A COMPLAINT?  
**401-222-1360**

AFTER HOURS  
EMERGENCIES/COMPLAINTS:  
**401-222-3070**

STILL DON'T KNOW WHO TO CALL?  
TRY DEM'S OFFICE OF TECHNICAL & CUSTOMER  
ASSISTANCE:  
**401-222-6822**





**Rhode Island Department of Environmental Management**  
**Office of Waste Management**  
**State Site Remediation & Brownfields Program**

### Who We Are....

The Rhode Island Department of Environmental Management's (DEM) Office of Waste Management (OWM) Site Remediation & Brownfields Program was established to provide fair, comprehensive and consistent regulation of the investigation and remediation of hazardous waste and hazardous material releases, implemented in a timely and cost-effective manner. The program is designed to determine if a site poses a threat to human health and the environment and evaluate whether or not proposed remedies effectively provide protection.

This program also supports the redevelopment and reuse of contaminated sites through the Brownfields program. Sites are identified, evaluated, cleaned up and brought back to beneficial reuse in Rhode Island communities.

### What We Do....

OWM's Site Remediation & Brownfields Program regulates and provides technical oversight for the investigation and remediation of releases of hazardous waste and/or hazardous materials to the environment; ensures that those investigations and remedial activities are conducted in a consistent manner that adequately protects human health and the environment; and enforces regulations regarding the proper disposal of abandoned hazardous wastes and hazardous materials.

### The Process ....

Cleaning a contaminated site requires investigation, planning and action. The *Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases*

(<http://www.dem.ri.gov/pubs/regs/regs/waste/remreg04.pdf>) define the specific documents that are needed, or may be needed, as part of that process:

- Notification of Release;
- Site Investigation Work Plan (SIWP);
- Public Notice of Investigation;
- Site Investigation Report (SIR);
- Public Notice of Completed Site Investigation & Public Comment Period on Technical Feasibility of Proposed Remedy;
- Remedial Action Work Plan (RAWP);
- Remedial Action;
- Closure Report; and, if applicable,
- Environmental Land Usage Restriction (ELUR).

We are here to serve you – please do not hesitate to contact us if you have any questions or would like more information about one of the properties within the program that may directly impact you or your neighborhood. Under the Freedom of Information Act you have a right to review site files.

### **FOR MORE INFORMATION CONTACT US:**

#### **AT OUR WEB SITES:**

<http://www.dem.ri.gov>

<http://www.dem.ri.gov/brownfields/default.htm>

#### **STILL HAVE QUESTIONS? CALL OR EMAIL US:**

GENERAL INFORMATION: **401-222-2797**

TDD LINE: **401-222-4462**

Email: [brownfields@dem.ri.gov](mailto:brownfields@dem.ri.gov)



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## Tidewater Site Fact Sheet; September 2010 Holder Dismantling Project

### *Former Tidewater MGP and Electric Generation Site*

#### Background

From the 1880's through roughly the 1970's, a manufactured gas plant (MGP) and electric generation facility operated adjacent to the Seekonk River at the end of Merry and Tidewater streets in Pawtucket, Rhode Island. The Tidewater MGP used industrial processes to produce gas from coal and oil. The gas was used primarily for the same purposes that natural gas is used today. This manufactured gas was stored in large steel holders for subsequent distribution to the neighboring community. Two of these former gas holders are located on the northwest side of the site adjacent to Tidewater Street. These holders contain a relatively small amount of sludge, which was a by-product of the former gas storage, and rainwater, which has accumulated over the past several years.

#### Holder Dismantling Project

As part of National Grid's plan for addressing the former MGP site, these former gas holders are currently being dismantled. This holder dismantling work is being performed consistent with all applicable Rhode Island Department of Environmental Management (RIDEM), City of Pawtucket, and Occupational Safety and Health Administration (OSHA) requirements. This project is being conducted on behalf of National Grid by T Ford Company, Inc. under the supervision of GZA GeoEnvironmental, Inc.

This holder dismantling project consists of the following primary steps:

- Removal of accumulated stormwater from the holders. This step was completed in July 2010.
- Removal of loose/flaking paint and asbestos containing materials from the exterior of the holders. This work was initiated in August 2010 and is anticipated to be complete in late September 2010.
- Removal, processing for transport, and off-site disposal of sludge by-products that have accumulated in the bottom of the holders. Water from the processing of the sludge is being treated on-site and discharged to the Seekonk River under an approved RIDEM permit. This work was also initiated in August 2010 and is anticipated to be completed in early October 2010.
- Dismantling and off-site disposal of the steel tank structures. The steel holders will be cut into small pieces by large shears. The steel will then be loaded onto trucks and shipped off-site for recycling. No explosives will be used. This effort is currently expected to be initiated in late September 2010 and be complete by mid to late December 2010.

National Grid is taking steps to minimize any inconvenience to the neighboring community from this project. In addition to all the required on-site worker health and safety measures, this project includes several measures designed specifically to address the neighboring community and limit any inconveniences to the extent practical. These measures include:

- Operation of a real-time, state of the art perimeter air monitoring system that detects both particulates and chemical compounds in the air at the project boundaries. In the event unacceptable air quality levels are even approached, the system alerts on-site personnel and either work is stopped or other air quality safeguards are implemented. This perimeter monitoring system operates 24 hours per day, 7 days a week.
- Monitoring of noise at the work zone perimeter to ensure that noise levels are within acceptable levels.
- Operation of foams and fragrance enhanced mister units to mitigate nuisance odors, which are primarily related to the handling of the sludge contained in the bottom of the holders. On-site personnel are routinely evaluating these odors (both on and off-site) and are making adjustments to these odor control measures. Once the sludge disposal work is complete (currently anticipated by early October 2010), the potential for nuisance odors should be significantly reduced.
- Routinely sprinkling water over the surface of the work area and unpaved site roadways to control dust migration.
- Restricting access to the site with fencing and having security personnel on site 24 hour, 7 days a week.
- Coordinating truck traffic so as not to interfere with the neighboring school/community.

Schedule - As described above, the holder dismantling activities are currently anticipated to be complete by late December 2010. The sludge handling and disposal activity, which could be the primary cause of potential nuisance odors, is scheduled to be complete by early October 2010.

Questions and Comments - If you would like more information on National Grid's activities at the site, please contact Michele Leone from National Grid at 781-907-3651.



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### **Ficha Técnica del Sitio Tidewater, Septiembre 2010 Proyecto de Desmantelamiento de los Tanques de Gas**

#### **Antigua Tidewater Planta de Gas (MGP) y Sitio de Generación Eléctrica**

##### **Antecedentes**

Desde 1880 hasta aproximadamente 1970 operaron en la vecindad del río Seekonk, al final de las calles Merry y Tidewater en Pawtucket, Rhode Island una planta de gas (MGP) y una planta de generación eléctrica. La planta de gas Tidewater, mediante procesos industriales, produjo gas usando carbón y petróleo. Este gas se utilizó para los mismos propósitos que el gas natural se usa en la actualidad. El gas manufacturado era almacenado en tanques de metal de gran tamaño para su posterior distribución en la comunidad vecina. Dos de estos viejos tanques de gas están situados al noroeste del sitio vecino a la calle Tidewater. Estos tanques contienen una cantidad relativamente pequeña de fango, el cual es un subproducto del almacenamiento de gas junto con agua de lluvia y se ha acumulado en los últimos años.

##### **Proyecto de desmantelamiento de los tanques**

Como parte del plan de National Grid para el antiguo sitio MPG estos antiguos tanques de gas están siendo desmantelados. Este proyecto se realiza siguiendo todos los requerimientos del Departamento de Manejo Ambiental de Rhode Island (Rhode Island Department of Environmental Management, RIDEM), ciudad de Pawtucket y Seguridad Ocupacional y Administración de Salud (Occupational Safety and Health Administration, OSHA) aplicables al caso. Este proyecto está siendo conducido en nombre de National Grid por la compañía T Ford bajo la supervisión de GZA Environmental, Inc.

El proyecto de desmantelamiento de los tanques consiste en los siguientes pasos

- Remoción del agua pluvial acumulada en los tanques. Este paso fue completado en julio de 2010.
- Remoción de pintura suelta o en escamas y de material con contenido de asbestos del exterior de los tanques. Este trabajo fue iniciado en agosto del 2010 y se anticipa que será completado a principios de octubre del 2010.
- Remoción, procesado para transporte y depósito fuera de sitio de los fangos subproductos acumulados en el fondo de los tanques. El agua producto del procesado de los fangos es tratada en el sitio y descargada en el río Seekonk con la aprobación de RIDEM. Este proceso fue iniciado en agosto del 2010 y se anticipa que será completado al principio de octubre del 2010.
- Desmantelamiento y depósito fuera del lugar de las estructuras metálicas de los tanques. Los tanques metálicos serán cortados en pedazos pequeños usando grandes hojas cortantes. El metal será entonces cargado en camiones y transportado fuera del lugar para ser reciclado. Este trabajo será realizado sin utilizar explosivos. Se prevé que este proceso se iniciara a fines de septiembre y que se finalizara aproximadamente entre mediados y finales de diciembre del 2010.

National Grid está tomando todas las medidas necesarias para minimizar los inconvenientes producidos en la comunidad aledaña. Además de todas las medidas relacionadas al bienestar y la seguridad de los trabajadores en el sitio, este proyecto incluye varias medidas designadas especialmente con el objetivo de limitar los inconvenientes producidos a la comunidad, en la medida de lo posible. Estas medidas incluyen:

- Operación de un sistema de monitoreo de aire de vanguardia en tiempo real. Este sistema detecta tanto partículas como compuestos químicos en el aire de los límites del proyecto. En el caso de producirse niveles cercanos a niveles inaceptables el sistema alertará al personal del sitio y consecuentemente los trabajos serán detenidos o nuevas medidas para salvaguardar el nivel de la calidad del aire serán implementadas. Este sistema de monitoreo del perímetro de la obra operará las 24 horas del día los 7 días de la semana.
- Monitoreo del nivel del ruido en el perímetro de la obra para asegurar que el nivel de ruido esté dentro de niveles aceptables.
- Operación de unidades de espumas y atomizadores de fragancias con el objetivo de mitigar olores molestos, los que están relacionados principalmente con el manejo de los fangos contenidos en el fondo de los tanques. El personal de la obra estará constantemente monitoreando estos olores (tanto dentro del perímetro de la obra como fuera de ella) y ajustando las medidas para controlarlos. Una vez que el proceso de eliminación de los fangos sean completado (lo que se anticipa que sucederá aproximadamente a principios de octubre), la probabilidad de ocurrencia de olores molestos se verá reducida en forma considerable.
- Rociado frecuente de la superficie de trabajo y de los caminos sin pavimentar de la obra con agua para reducir la migración de polvo.
- Restricción del acceso a la obra mediante cercos y teniendo personal de seguridad en la obra las 24 horas del día, los 7 días de la semana.
- Coordinación del tráfico de camiones de modo de no interferir con las actividades de las escuelas y comunidades vecinas.

##### **Programa de Actividades**

Como fue descrito más arriba se anticipa que las actividades de desmantelamiento de los tanques serán completadas a fines de diciembre del 2010. Las actividades relacionadas con los fangos, las cuales podrían causar olores molestos, están programadas para ser finalizadas a principios de octubre del 2010.

##### **Preguntas y Comentarios**

Si usted necesita más información con respecto a las actividades de National Grid en el Sitio, por favor contacte a Michele Leone de la National Grid en 781-907-3651.

April 27, 2011  
File No. 05.0043654.30-C

Patterson Realty Corp.  
PO Box 1668  
Pawtucket, RI 02860

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вам его перевели.

Re: Notice to Abutter 54B 95  
Proposed System Upgrade Activities  
Natural Gas Regulator Station  
Former Tidewater Facility  
Pawtucket, Rhode Island

Dear Abutter:

The purpose of this letter is to notify you that National Grid will be conducting system upgrade activities to the existing natural gas regulator station at the former Tidewater facility located at the end of Tidewater Street in Pawtucket, Rhode Island.

The facility upgrades, which have been approved by the Rhode Island Public Utility Commission (RIPUC), will consist of:

- the relocation of an existing overhead 16-inch gas main to below ground;
- shallow excavation work within the fenced natural gas station area to properly abandon existing facilities;
- removal of limited areas of impacted concrete and surface soils;
- general renovation of the buildings;
- replacement of the security fence surrounding the regulator station area; and
- updating of all the equipment including electronic and communication services within the buildings.

The work will begin in early **May 2011** and is expected to take approximately **four months**. Work will generally take place from **7:00 a.m. – 4:00 p.m., Monday to Friday**. We apologize in advance for any inconvenience, but this project is part of our commitment to provide continuous improvements and keep the natural gas delivery system safe and reliable.

If you would like more information or have any questions, please contact Paul Stasiuk at 401-784-7991. Should you be an owner of property that is leased, we request that you provide a copy of this letter to your tenants.

Very truly yours,

Paul Stasiuk  
Coordinator, Community Relations

cc: Joe Martella, RIDEM  
Michele Leone, National Grid

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August 1, 2011  
File No. 05.0043654.00-C



International Charter School  
Attn: Dr. Julie Nora, Director  
334 Pleasant Street  
Pawtucket, Rhode Island 02860

530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Re: Notice to Abutter  
Short Term Response Action – Pipe Removal  
Former Tidewater Facility  
Pawtucket, Rhode Island  
RIDEM Case No. 95-022

Dear Abutter:

The purpose of this letter is to notify you that The Narragansett Electric Company d/b/a National Grid (National Grid) will be conducting limited response activities at the former Tidewater Manufactured Gas Plant (MGP) and the former Pawtucket No. 1 Power Station Site located at the ends of Tidewater and Merry Streets in Pawtucket, Rhode Island. This notice is being provided to abutting property owners and tenants in accordance with requirements established in the Rhode Island Department of Environmental Management's (RIDEM) Rules and Regulation for the Investigation and Remediation of Hazardous Materials (Remediation Regulations). Should you be an owner of property that is leased, we request that you provide a copy of this letter to your tenants.

The proposed limited response actions are being completed to address an above ground portion of a former steel process pipe located along the Seekonk River associated with former Manufactured Gas Plant (MGP) facility operations. Certain sections of the piping are in disrepair and contain residual coal tar-like material. These coal tar-like materials have been observed on the ground surface and river embankment beneath this piping which may be contributing to intermittent sheen outbreaks recently observed along a limited portion of the Seekonk River adjacent to the Site. In an effort to mitigate these conditions, National Grid proposes to complete certain response activities. Specifically, these activities will involve: (1) the removal and off-Site disposal of a 150-foot section of above grade process piping; and (2) the removal and off-Site disposal of a limited volume of impacted soil (approximately 1 cubic yard) located proximate to the process pipe. In addition, residual, hardened coal tar-like material located on the river embankment will be manually removed and containerized in drums with the removed surface soil described above for off-Site transport to a licensed receiving facility for disposal. The proposed field activities are scheduled to commence on or about August 22, 2011, and it is estimated that the project will take approximately 1 week to complete.

The proposed activities are further detailed in a *Short Term Response Action Plan* (STRAP) submitted to the Rhode Island Department of Environmental Management (RIDEM) in October 2010 (Revised January 2011) and *Evaluation of Applicability of Air Pollution Control Regulation No. 9, Proposed Above Ground Former Processing Pipe Removal* submitted to RIDEM's Office of Air Resources in July 2011. There is a 14-day comment period, commencing with the date of delivery of this notice, during which the public may review RIDEM records pertaining to this property and submit written comments regarding the proposed limited response activities described

herein. Copies of the submittals referenced above can be obtained on RIDEM's website (<http://www.dem.ri.gov/programs/benviron/waste/tide.htm>). The proposed limited response actions will be conducted in accordance with RIDEM's Remediation Regulations and will be performed by GZA GeoEnvironmental, Inc. (GZA) on behalf of National Grid.

If you would like more information or have any questions, please contact Michele Leone of National Grid at 781-907-3651.

Very truly yours,

GZA GeoEnvironmental, Inc.



Margaret S. Kilpatrick, P.E.  
Senior Project Manager



James J. Clark, P.E.  
Principal

MSK/JJC:tja

cc: Joe Martella, RIDEM  
Michele Leone, National Grid

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Пожалуйста, попросите чтобы  
вам его перевели.

October 21, 2011  
File No. 05.0043654.00-C



City of Pawtucket  
137 Roosevelt Avenue  
Pawtucket, Rhode Island 02860

530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Re: Notice to Abutter  
Supplemental Site Investigation Work Plan Addendum – Max Read Field  
Former Tidewater Facility  
Pawtucket, Rhode Island  
RIDEM Case No. 95-022

Dear Abutter:

The purpose of this letter is to notify you that The Narragansett Electric Company d/b/a National Grid (National Grid) will be conducting additional environmental investigation activities associated with the former Tidewater Manufactured Gas Plant (MGP) and the former Pawtucket No. 1 Power Station Site located at the ends of Tidewater and Merry Streets in Pawtucket, Rhode Island. This notice is being provided to abutting property owners and tenants in accordance with requirements established in the Rhode Island Department of Environmental Management's (RIDEM) Rules and Regulation for the Investigation and Remediation of Hazardous Materials (Remediation Regulations). Should you be an owner of property that is leased, we request that you provide a copy of this letter to your tenants.

The purpose of the upcoming additional subsurface investigation is to further investigate certain data gaps identified following completion of recent Site investigation activities at the Site. Specifically, the proposed investigation is being completed to address the visual observations of fill materials proximate to the eastern boundary of the Max Read Field. The investigation will include advancement of up to 5 test boring locations using a direct-push Geoprobe® rig. The field activities are scheduled to commence on or about November 7, 2011, and will occur over an approximate 2 to 3 day period.

The proposed activities are further detailed in a *Supplemental Site Investigation Work Plan (SSIWP) Addendum* submitted to the Rhode Island Department of Environmental Management (RIDEM) in August 2011. There is a 14-day comment period, commencing with the date of delivery of this notice, during which the public may review RIDEM records pertaining to this property and submit written comments regarding the proposed investigation activities described herein. Copies of the submittal referenced above can be obtained on RIDEM's website (<http://www.dem.ri.gov/programs/benviron/waste/tide.htm>). These investigation activities will be conducted in accordance with RIDEM's Remediation Regulations and will be performed by GZA GeoEnvironmental, Inc. (GZA) on behalf of National Grid.



If you would like more information or have any questions, please contact Michele Leone of National Grid at 781-907-3651.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.



Margaret S. Kilpatrick, P.E.  
Senior Project Manager



James J. Clark, P.E.  
Principal

MSK/JJC:tja

cc: Joe Martella, RIDEM  
Michele Leone, National Grid

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August 10, 2012  
GZA File No. 05.0043654.00



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Re: Notice to Abutter and Interested Parties  
Proposed Electrical Substation Upgrades  
Former Tidewater Facility  
Pawtucket, Rhode Island  
RIDEM Case No. 95-022

To Abutter and/or Interested Parties:

The purpose of this letter is to notify you that The Narragansett Electric Company d/b/a National Grid (National Grid) intends to complete certain upgrades to the Pawtucket No. 1 Substation at the Tidewater Site located at the ends of Tidewater and Merry Streets in Pawtucket, Rhode Island. This notice is being provided to abutting property owners, neighboring residents and interested parties, consistent with previous notices for these types of facility upgrades and with our discussions with members of the public at the Community Interviews held at the Blackstone Valley Visitor Center on June 19 and 20, 2012. Should you be an owner of property that is leased, we request that you provide a copy of this letter to your tenants.

The electrical substation upgrades will require limited earthwork within and proximate to the fenced substation area to allow for installation of new electrical conduit, cable and/or appurtenances. Upgrades of certain electrical equipment will also take place within the substation yard and associated building. The proposed substation upgrades are necessary to allow for National Grid to continue providing reliable service to the electric customers of Rhode Island. As these proposed upgrades will require some limited disturbance of soil at the Site, National Grid will perform air monitoring consistent with a RIDEM approved plan during the excavation activities. A fact sheet is attached to this notice with more detailed information regarding the proposed earthwork and air monitoring program. The excavation work associated with the utility upgrade project is expected to be conducted over an approximate eight week period during this six month reconstruction project. The project is anticipated to begin on September 4, 2012, with the earthwork being completed between late September and December 2012.

If you would like more information or have any questions, please contact Michele Leone of National Grid at 781-907-3651.

Very truly yours,

GZA GeoEnvironmental, Inc.

A handwritten signature in blue ink, appearing to read 'M. Kilpatrick', is written over a faint, illegible stamp or watermark.

Margaret S. Kilpatrick, P.E.  
Senior Project Manager

cc: Joe Martella, RIDEM  
Michele Leone, National Grid

Attachment: Tidewater Site Fact Sheet – Electrical Substation Upgrades  
J:\ENV\43654.msk\Corresp\Substation Notification Letters\43654 00 Substation abutter notification Final.docx

10 de Agosto, 2012  
GZA File No. 05.0043654.00

Re: Aviso a Colindantes y Partes Interesadas  
Mejoras Propuestas a la Subestación Eléctrica  
Antigua Facilidad de Tidewater  
Pawtucket, Rhode Island  
RIDEM Case No. 95-022



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Aviso a Colindantes y/o Partes Interesadas:

El propósito de la presente es notificarles que The Narragansett Electric Company, d/b/a National Grid (National Grid), intenta completar ciertas mejoras á la Subestación Pawtucket No. 1 en Tidewater localizada al final de las calles Tidewater y Merry en Pawtucket, Rhode Island. Esta noticia es provista á todos los dueños de propiedades colindantes, residentes vecinos y personas interesadas consistente con avisos previos con este tipo de mejoras á facilidades y con nuestras discusiones con miembros del público durante Entrevistas Comunales mantenidas en el Blackstone Valley Visitor Center durante el 19 y 20 de Junio, 2012. Si usted es el dueño de una propiedad, le pedimos que provea una copia de esta carta a todos sus inquilinos.

Las mejoras a la subestación eléctrica requerirán cierto trabajo de terreno dentro y en la proximidad del área vallada permitiendo la instalación de conductos eléctricos nuevos, cables y/o accesorios. Cierta equipo eléctrico será también mejorado dentro del terreno de la subestación y los edificios asociados. Estas mejoras son necesarias para permitir que National Grid continúe proveyendo un servicio confiable a los clientes de Rhode Island. A medida que las mejoras propuestas crearan cierta, limitada, perturbación del terreno en el lugar, National Grid conducirá monitoreo de aire consistente con un plan que es RIDEM-aprobado durante las actividades de excavación. Se adiciona una hoja de especificaciones conteniendo información más detallada relativa al trabajo de suelos propuesto así como el programa de monitoreo de aire. Se espera que el trabajo de excavación asociado con las mejoras de la utilidad tome, aproximadamente, un periodo de ocho semanas durante los seis meses del proyecto de reconstrucción. Se anticipa que el proyecto empezara en 4 de Septiembre, 2012 habiendo completado el trabajo de suelos entre finales de Septiembre y Diciembre 2012.

Si requiere más información o tiene preguntas adicionales, por favor contacte Michele Leone de National Grid al 781-907-3651.

Respetuosamente suyo,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink, appearing to read 'Margaret S. Kilpatrick', is written over a faint, light blue circular stamp or watermark.

Margaret S. Kilpatrick, P.E.  
Senior Project Manager

cc: Joe Martella, RIDEM  
Michele Leone, National Grid

Adición: Tidewater Hoja de Especificaciones – Mejoras Subestación Eléctrica

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## Tidewater Site Fact Sheet – Electrical Substation Upgrades

### Former Tidewater MGP and Electric Generation Site

#### Background

From the 1880s through approximately the 1970s, a manufactured gas plant (MGP) and electric generation facility operated adjacent to the Seekonk River at the end of Merry and Tidewater streets in Pawtucket, Rhode Island. The Tidewater MGP used industrial processes to produce gas from coal and oil. The gas produced was used primarily for the same purposes that natural gas is used today (heating, cooking, etc.). MGPs, which were common throughout the northeast before the region's natural gas pipelines were built, often yielded by-products of the gas production process such as tars, sludges and oils. The Tidewater electric generation facility formerly used coal, oil, tar and other substances to produce electricity. Some of these substances have remained in the environment at facilities such as these after they were closed down.

The gas manufacturing and electric generating operations at the Tidewater facility were terminated in 1968 and 1975, respectively. Today, National Grid continues to operate a natural gas regulating and interchange station on the north portion of the property and an electrical substation and switch house on the south portion of the property. These facilities serve to provide essential gas and electrical service to customers in Rhode Island. Figure 1, Site Plan, shows the location of these features. The location of the electrical substation is depicted on Figure 1.

#### Proposed Electrical Substation Upgrades

As part of facility upgrades, National Grid intends to complete certain reconstruction activities associated with the Pawtucket No. 1 Substation located in the central portion of the Site. The proposed work will occur within the southern fenced area of the existing substation and in the access/parking area immediately east and outside of the fenced portion of the substation. Figure 2, Proposed Substation Upgrades and Pre-Characterization Sampling, shows the location of these features. The reconstruction activities will require limited earthwork to install new underground cables, conduits and other facility utilities and properly abandon certain existing system features. These limited earthwork activities are anticipated to result in the temporary displacement of approximately 160 cubic-yards of soil. The majority of these excavated materials will be reused to backfill the trenches. A limited amount of excess materials may be transported off-Site for disposal. As part of the substation reconstruction earthwork, soils excavated during conduit installation work and miscellaneous shallow excavation activities will be temporarily placed in a working stockpile on plastic sheeting adjacent to the excavation for subsequent reuse as backfill. Temporary soil stockpiles will also be placed on and covered with plastic sheeting, or placed within watertight, covered roll-off containers.

#### Pre-characterization Sampling

Based on testing performed on soil samples collected within the electrical substation and proposed excavation areas, it is anticipated that excavated materials will likely exhibit low levels of polynuclear aromatic hydrocarbons (PAHs), inorganics (metals), total petroleum hydrocarbon (TPH), and cyanide. PAHs and arsenic were detected in soil at concentrations in excess of RIDEM's Method 1 Industrial/Commercial Direct Exposure Criteria (I/C-DEC). No Volatile Organic Compounds (VOCs) were detected above the Method 1 I/C-DEC, with results of most VOC compounds being non-detect. Overall, the quality of the materials in this area of the Site is consistent with that of typical urban fill that is commonly found in industrialized, urban areas.

#### Air Quality Monitoring

While the soil data collected in the area of planned excavation suggest the potential for air quality impacts associated with this work is relatively low, National Grid will monitor air quality during these activities to confirm. As described below, in the unlikely event impacts are detected above RIDEM-approved threshold levels, certain controls will be put in place to address detections.

This air monitoring will be performed as described in GZA's February 20, 2012 *Evaluation of Applicability of Air Pollution Control Regulation No. 9* submittal to the RIDEM Office of Air Resources and GZA's subsequent correspondence with RIDEM dated June 14, 2012 and July 27, 2012. On July 5, 2012, RIDEM issued a letter stating that an air permit for these proposed earthwork activities would not be required.

During the proposed substation earthwork activities, GZA will perform real-time air monitoring for total VOCs, and particulate dust within the work zone and at the property line as described in the above referenced submittals and correspondence which were reviewed and approved by RIDEM. Specific monitoring for benzene will also be conducted in the event total VOCs are detected above threshold levels. Real-time air monitoring will utilize hand held instruments so field personnel can alter locations based on the activity being performed and changing wind directions. Readings will be

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## Tidewater Site Fact Sheet – Electrical Substation Upgrades

### Former Tidewater MGP and Electric Generation Site

collected both within the work zone itself as well as at certain locations along the Site perimeter. Field personnel will select the appropriate monitoring location reading depending on activities being performed and wind direction. The following table presents the real-time monitoring action levels for the work zone perimeter and property line. Figure 1, Site Plan, shows the property line air monitoring locations (S1 through S5) that will be monitored during the work.

Compound	Work Zone Perimeter	Property Line
Total Volatile Organic Compounds (TVOC)	1.0 ppm	0.1 ppm
Respirable Particulate Dust (PM10)	1,000 ug/m3	150 ug/m3

In the event these real time action levels are exceeded at sustainable levels within the work zone or at the property line (*i.e.*, in excess of the respective action levels for a period of 5 minutes), GZA will immediately identify the likely cause, and the Contractor shall implement appropriate engineering controls and/or modify work practices to address the action level exceedances. The following table presents the actions that will be undertaken if a sustained exceedance of either respirable dust or TVOC is encountered.

Compound	Immediate Actions in Event of a Sustained Exceedance of Action Levels
Total Volatile Organic Compounds (TVOC)	<ol style="list-style-type: none"><li>1. Evaluate the likely source of sustained readings (<i>i.e.</i> truck emissions, moisture in the area, off-site source, actual work, etc.)</li><li>2. If determined that the source is the actual work, Contractor shall immediately implement appropriate engineering controls and/or modify work practices to address exceedances.</li><li>3. Immediately deploy summa canisters in both an upgradient and downgradient location and submit for laboratory analysis when the work day is complete.</li></ol>
Respirable Particulate Dust (PM10)	<ol style="list-style-type: none"><li>1. Evaluate the source of sustained readings (<i>i.e.</i> earthwork, heavy wind, off-Site source, etc.)</li><li>2. If determined that the source is the actual work, Contractor shall immediately implement appropriate engineering controls (<i>e.g.</i>, application of water, etc.) and/or modify work practices to address the exceedances.</li></ol>

Certain air monitoring data (*i.e.*, volatile organic compound screening data, , dust monitoring data and analytical data) will be posted on the bulletin boards to be located at the end of Tidewater Street and the end of Bowles Court, pending City approval.

### Schedule

The overall reconstruction project is anticipated to take approximately six months to complete and is currently scheduled to begin on September 10, 2012. The excavation work and monitoring described above is expected to be conducted over an approximately eight week period (late September and December 2012) during this six month reconstruction project.

### Questions and Comments

If you would like more information on National Grid's activities at the site, please contact Michele Leone from National Grid at 781-907-3651.

*If you are interested in signing up for the Tidewater mailing list for future announcements about the Site, please contact Michele Leone at the phone number above or Michele.leone@nationalgrid.com.*

### Attachments

Figure 1                      Site Plan  
Figure 2                      Substation Upgrades and Pre-Characterization Sampling

## Tidewater Hoja de Especificaciones – Mejorías Subestación Eléctrica

### Anterior Tidewater MGP y la Generacion Electrica Situan

#### Historial

Desde los años 1880 y a través, aproximadamente, los años de 1970, una planta de gas manufacturado (MGP) y una facilidad de generación eléctrica operaban adyacente al Río Seekonk al final de las calles Merry y Tidewater en Pawtucket, Rhode Island. La Tidewater MGP usaba procesos industriales para producir gas de carbón y aceite. El gas producido se usaba, primariamente, para los mismos propósitos que el gas natural se usa hoy en día (calefacción, cocina, etc.). MGPs que eran muy comunes en el noreste antes de que las líneas de gas natural de la región fueran construidas, a menudo rendían productos secundarios al proceso de producción de gas así como alquitrán, sedimentos, y aceites. La facilidad de generación eléctrica Tidewater usaba carbón, aceite, alquitrán y otras sustancias para producir electricidad. Algunas de estas sustancias se han mantenido en el ambiente en facilidades como esta tipa después de cerrar.

La producción de gas y las operaciones de generación eléctrica en la facilidad de Tidewater fueron terminadas en 1968 y 1975, respectivamente. Hoy en día, la National Grid continúa operando una estación reguladora de gas natural y una estación de intercambio en la porción sur de la propiedad. Estas facilidades proveen gas y servicio eléctrico esencial a los clientes localizados en Rhode Island. La Figura 1, Site Plan, muestra la localidad.

#### Propuesta de mejoras a la Subestación Eléctrica

Como parte de las mejoras a la facilidad, la National Grid intenta completar ciertas actividades de reconstrucción asociadas con la Subestación Pawtucket No. 1 localizada en la porción central del sitio. El trabajo propuesto será confinado al área sur de la existente subestación y en el área de parqueo/acceso inmediatamente al Este y fuera del área cercada de la subestación. La Figura 2, *Proposed Substation Upgrades and Pre-Characterization Sampling*, muestra la localidad. Las actividades de reconstrucción demandan cierto trabajo de suelos para instalar nuevos cables subterráneos, conductos, otras utilidades y el abandono apropiado de ciertos sistemas existentes. Se anticipa que el resultado de estas actividades de suelos será el desplazamiento de aproximadamente 160 yardas-cúbicas de suelo. La mayoría de esos materiales excavados será reusado para rellenar las trincheras. Una cantidad limitada de materiales en exceso podría ser transportada fuera del lugar para su disposición. Como parte de la reconstrucción, los suelos excavados durante la instalación de los conductos y actividades múltiples de excavación ligera serán almacenados temporalmente sobre hojas de plástico adyacente al sitio de excavación para su uso subsecuente como relleno. Temporalmente, cierta cantidad de suelo también será almacenado sobre y cubierto con hojas de plástico o almacenado en contenedores a prueba de agua.

#### Muestreo de Pre-Characterización

Basado en exámenes realizados en las muestras de suelo recogidas dentro de la subestación eléctrica y las áreas de excavación propuesta se anticipa que los materiales excavados presentaran niveles bajos de *polynuclear aromatic hydrocarbons* (PAHs), inorganicos (metales), hidrocarburos petroléos total (TPH) y cianuro. Ciertos de estos componentes (PAHs y arsenico) fueron detectados en el suelo a concentraciones en exceso de RIDEM Method 1 Industrial/Commercial Direct Exposure Criteria (I/C-DEC). Componentes Volátiles Orgánicos (VOCs) por encima del *Method 1* I/C-DEC no fueron detectados. Generalmente, la calidad de los materiales en esta área es consistente con el relleno urbano.

#### Monitoreo de la Calidad de Aire

Mientras que los datos de suelo recopilados en el área de excavación planeada sugieren que el impacto potencial a la calidad de aire asociado con este trabajo es relativamente bajo, National Grid monitoreará la calidad de aire durante estas actividades para confirmación. Como se describe a continuación, en la improbable posibilidad de detectar impacto por encima niveles aprobados por RIDEM, ciertos controles serán instalados para detectar o el trabajo será detenido hasta que la situación está mejorada.

El monitoreo de aire será implementado de acuerdo al proceso descrito en el informe de GZA de 20 Febrero, 2012, *Evaluation of Applicability of Air Pollution Control Regulation No. 9*, enviado a la RIDEM Office of Air Resources y correspondencia subsecuente entre GZA y RIDEM de fecha el 14 de Junio, 2012 y el 27 de Julio 2012. En la fecha de 5 Julio, 2012, RIDEM publicó una carta indicando que un permiso para estas actividades propuestas no sería requerido.



## Tidewater Hoja de Especificaciones – Mejorías Subestación Eléctrica

### Anterior Tidewater MGP y la Generacion Electrica Situan

Durante las actividades de excavación propuestas en la subestación, GZA implementará monitoreo de aire a tiempo real por VOCs y polvo particular en la zona de trabajo y en la línea de la propiedad como descrito en el material referenciado y correspondencia que fueron revisados y aprobados por RIDEM. El monitoreo específico por benzina también será conducido en el evento que los niveles de VOC's sean detectados por encima de los niveles de umbral. El monitoreo de aire a tiempo real utilizará instrumentos de mano de manera que los ingenieros puedan alterar localidades basado en la actividad del momento y cambios en la dirección del viento. Los datos serán adquiridos tanto en el área de trabajo mismo así como en ciertas localidades alrededor del perímetro del sitio. Los ingenieros determinarán la localidad de monitoreo adecuada dependiendo en la actividad y la dirección del viento.

La tabla siguiente representa el monitoreo a tiempo real y niveles de acción para el perímetro de la zona y la línea de propiedad. La Figura 1, Site Plan, muestra las localidades de monitoreo de aire (S1 a S4) usadas durante el trabajo

Compuestos	Perimetro de la Zona	Línea de Propiedad
Total Componentes Volátiles Orgánicos (Volatile Organic Compounds) (TVOC)	1.0 ppm	0.1 ppm
Respirable Particulate Dust (PM10)	1,000 ug/m3	150 ug/m3

En el evento que estos niveles de acción a tiempo real excedan niveles sustentables dentro de la zona de trabajo o la línea de propiedad (i.e., en exceso de respectivo niveles de acción por un periodo de cinco minutos), GZA identificará inmediatamente la causa posible, el Contratista implementará los controles apropiados, modificará los métodos de trabajo y/o parará el trabajo inmediatamente. La siguiente tabla presenta las acciones que se tomaran si se encuentra un exceso sostenido de TVOC o polvo respirable.

Compuesto	Acciones inmediatas en el evento de niveles de acción mantenidos excesivos,
Total Volatile Organic Compounds (TVOC)	<ol style="list-style-type: none"> <li>1. Evaluar la causa posible de las lecturas sostenidas. (i.e. emisiones de los camiones, humedad en el área, fuente fuera del lugar, trabajo actual, etc.)</li> <li>2. Si se determinan que la causa es el trabajo actual, el Contratista implementara los controles de ingeniería apropiados, modificara las practicas de trabajo y/o detendrá el trabajo. Desplegar inmediatamente contenedores SUMMA® en las gradientes alta y baja para someter a un análisis de laboratorio cuando el día concluya.</li> </ol>
Respirable Particulate Dust (PM10)	<ol style="list-style-type: none"> <li>1. Evaluar la fuente de la lectura sostenida. (i.e. excavación, vientos altos, fuente fuera de sitio, etc.)</li> <li>2. Si se determinan que la causa es el trabajo actual, el Contratista implementará los controles de ingeniería apropiados, (aplicación de agua) modificara las practicas de trabajo y/o detendrá el trabajo.</li> </ol>

Ciertos datos de monitoreo de aire (i.e., compuestos orgánicos volátiles, monitoreo de polvo y datos analíticos) serán publicados en los boletines de información localizados al final de la calle Tidewater y el final de la calle Bowles Court, dependiendo la aprobación de la ciudad.

### Horario

Se anticipa que el proyecto en general tome aproximadamente seis meses para cumplir y está programado a empezar en el 10 de Septiembre, 2012. Se espera que el trabajo de excavación y monitoreo previamente descrito tenga una duración de aproximadamente ocho semanas (final de Septiembre y Diciembre 2012) durante los seis meses del proyecto de reconstrucción.

### Preguntas y Comentarios

Si requiere más información o tiene preguntas adicionales, por favor contacte Michele Leone de National Grid al 781-907-3651.

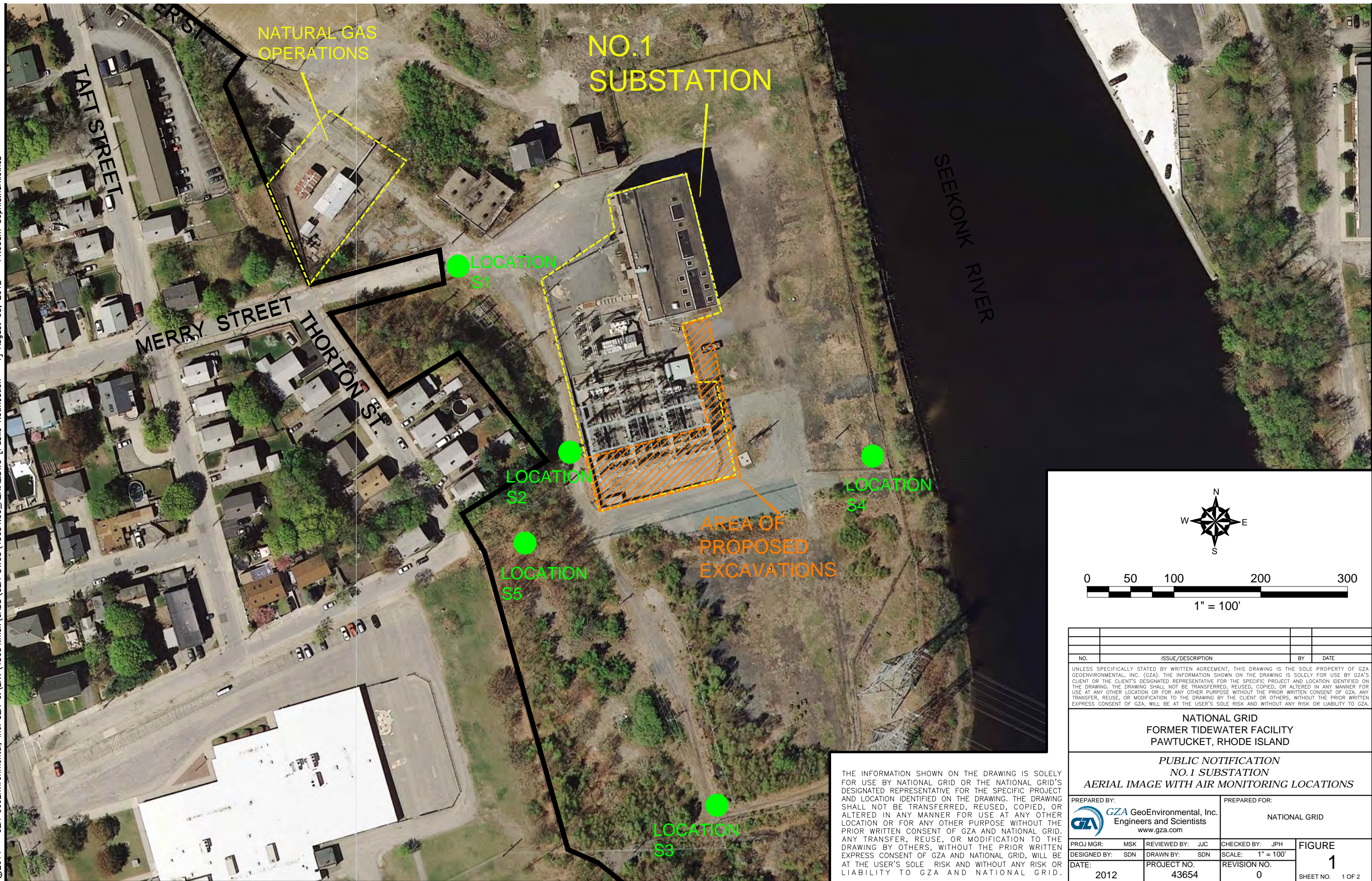
*Si esta interesado a inscribirse para la lista de envío de Tidewater para futuros anuncios acerca del Sitio, visita por favor contáctese con Michele.leone@nationalgrid.com.*

### Adiciones:

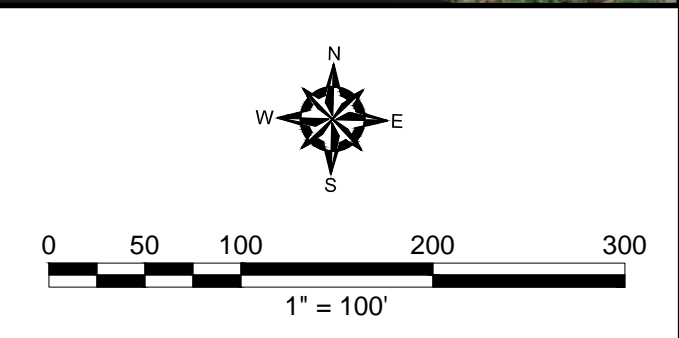
Figure 1                      Site Plan  
 Figure 2                      Substation Upgrades and Pre-Characterization Sampling



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NO.	ISSUE/DESCRIPTION	BY	DATE

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**NATIONAL GRID  
FORMER TIDEWATER FACILITY  
PAWTUCKET, RHODE ISLAND**

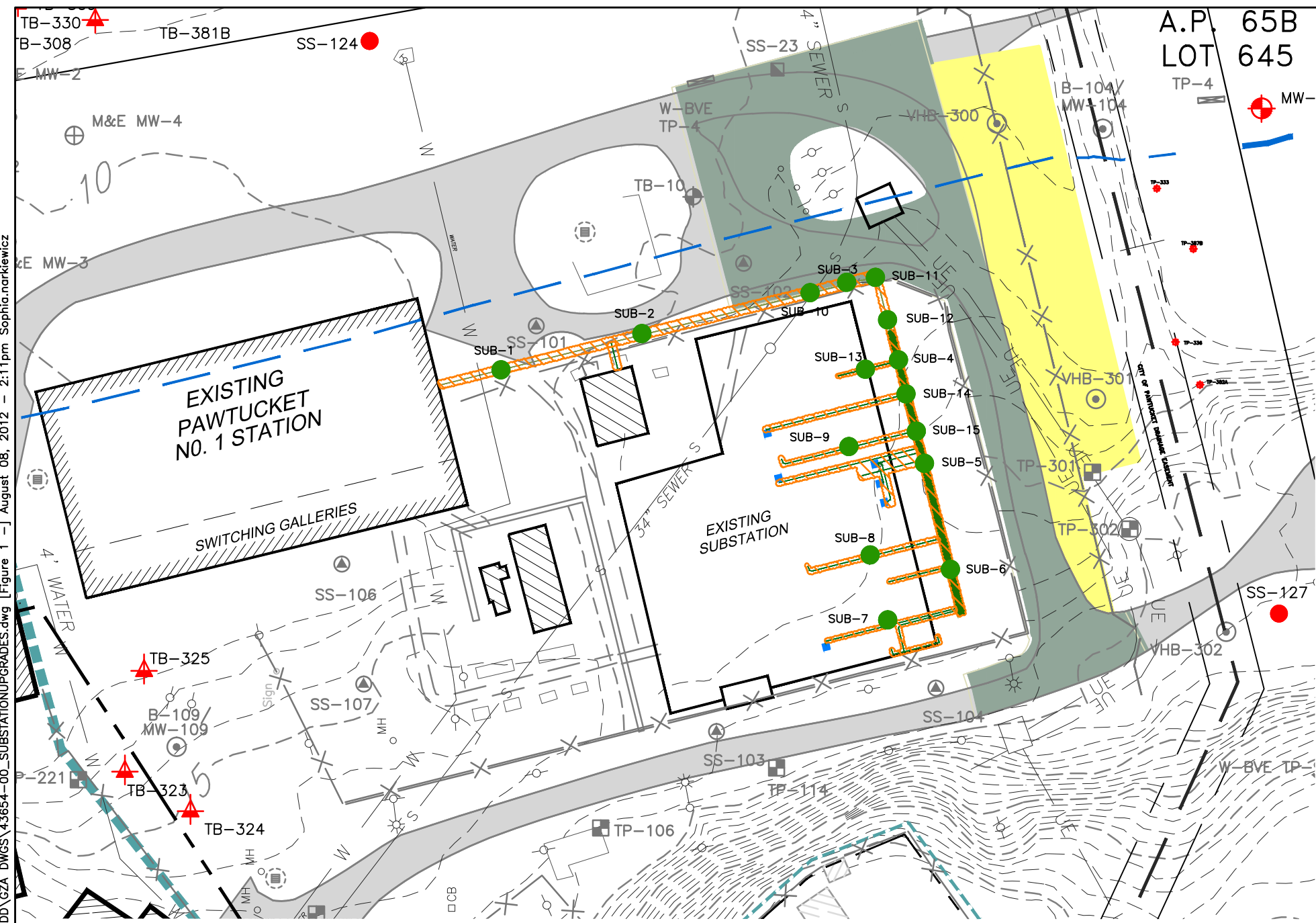
**PUBLIC NOTIFICATION  
NO. 1 SUBSTATION  
AERIAL IMAGE WITH AIR MONITORING LOCATIONS**

PREPARED BY: <b>GZA GeoEnvironmental, Inc.</b> Engineers and Scientists www.gza.com	PREPARED FOR: NATIONAL GRID
--	--------------------------------

PROJ.MGR: MSK	REVIEWED BY: JJC	CHECKED BY: JPH	<b>FIGURE</b> <b>1</b> SHEET NO. 1 OF 2
DESIGNED BY: SDN	DRAWN BY: SDN	SCALE: 1" = 100'	
DATE: 2012	PROJECT NO. 43654	REVISION NO. 0	



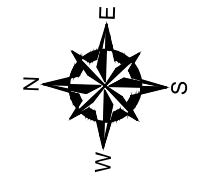
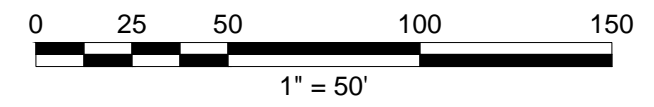
© 2011 - GZA GeoEnvironmental, Inc. GZA-J:\ENV\43654.msk\CADD\GZA DWCS\43654-00\_SUBSTATIONUPGRADES.dwg [Figure 1 -] August 08, 2012 - 2:11pm Sophia.narkiewicz



A.P. 65B  
LOT 645

**GENERAL NOTES:**

- EXISTING CONDITIONS BASE MAP DEVELOPED FROM THE FOLLOWING:
  - ELECTRONIC FILES FROM GEI CONSULTANTS, INC. (FORMERLY AES) ENTITLED "HISTORIC STRUCTURES AND SAMPLE LOCATIONS", ORIGINAL SCALE 1"=80', DATED JULY 1999
  - ELECTRONIC FILES FROM VANASSE HANGEN BRUSTLIN, INC. ENTITLED "SOIL BORING, TEST PIT AND MONITOR WELL LOCATIONS", SCALE: 1"=60', UNDATED
  - ELECTRONIC FILES FROM WELSH ASSOCIATES LAND SURVEYORS, INC. ENTITLED "TOPOGRAPHIC SURVEY (AS-BUILT), FORMER TIDEWATER FACILITY, DEMOLITION OF GAS HOLDERS NOS. 7 & 8", DATED DECEMBER 17, 2010
  - ON-SITE INVESTIGATIONS AND SURVEYS BY GZA PERSONNEL DURING VARIOUS SITE VISITS DURING 2009 AND 2010.
- PROPERTY LINES AND LOT INFORMATION ESTABLISHED FROM INFORMATION PROVIDED ON A DRAWING ENTITLED "PERIMETER SURVEY OF LAND AT THE TIDEWATER FORMER MGP SITE IN PAWTUCKET, RHODE ISLAND FOR ATLANTIC ENVIRONMENTAL SERVICES INC." DEVELOPED BY LOUIS FEDERICI AND ASSOCIATES AND AN AUTO CAD FILE ENTITLED "MAX READ FIELD TRACK EXPANSION 2007" PROVIDED BY THE CITY OF PAWTUCKET.
- HORIZONTAL DATUM IS BASED ON NAD 1983 FROM BASE MAPPING PROVIDED BY GEI CONSULTANTS, INC.
- VERTICAL DATUM IS BASED ON NGVD 1929 (MSL) FROM BASE MAPPING PROVIDED BY GEI CONSULTANTS, INC.
- REFERENCE SEWER DATA FROM SCANNED IMAGE PROVIDED BY THE CITY OF PAWTUCKET, RHODE ISLAND, ENTITLED "STUDY OF SEWERAGE FACILITIES" BY WATERMAN ENGINEERING CO. & ANDERSON NICHOLS CO. DATED NOV. 1975, ORIGINAL SCALE 1"=400' & SCANNED IMAGES OF HISTORIC PLAN & PROFILE DRAWINGS PROVIDED BY THE CITY OF PAWTUCKET, RHODE ISLAND.
- SITE UTILITIES TAKEN FROM 1984 SANBORN MAP AND HISTORIC FIGURES PROVIDED BY NATIONAL GRID. ALL UTILITY LOCATIONS ARE APPROXIMATE AND SHOWN FOR REFERENCE ONLY.
- PROPOSED CONDUIT, HANDHOLES, TRENCHES AND CCTV LOCATIONS AND EXCAVATIONS DEVELOPED FROM PLAN PROVIDED BY TRC, INC., ENTITLED "PAWTUCKET 1 SUBSTATION NO. 107, PAWTUCKET, RHODE ISLAND, 115KV BUS STRUCTURE CONDUIT PLAN," DATED 09/30/2011, ORIGINAL SCALE 1"=8', DRAWING NO. H-90869-4A, REV A.



**LEGEND:**

	PROPERTY LINE		APPROXIMATE AREA OF ROADWAY AND PARKING AREA CAP (20 MIL GEOMEMBRANE OVERLAIN BY 2-3-INCHES OF BEDDING SAND AND A 6-9 INCH LIFT OF PROCESSED MATERIAL)		PRE-CHARACTERIZATION SOIL SAMPLING LOCATION
	APPROX. 200 FT. JURISDICTION LIMIT		APPROXIMATE AREA OF LOW LYING CAP (20 MIL GEOMEMBRANE OVERLAIN BY 3-INCHES OF BEDDING SAND AND A 3-INCH LIFT OF TRAP ROCK)		PROPOSED SOIL EXCAVATIONS
	EXISTING BUILDINGS ON-SITE		EXISTING UNDERGROUND ELECTRIC CABLE IN CONDUIT		
	EXISTING NBC INTERCEPTOR SANITARY SEWER		EXISTING UNDERGROUND ELECTRIC MH/STRUCTURE		
	EXISTING CITY OF PAWTUCKET STORM DRAIN		EXISTING STORM/COMBINED SAN. SEWER OVERFLOW		
	EXISTING WATER LINE		EXISTING CATCH BASIN LOCATIONS		
	EXISTING CONTOUR (MINOR 1 FOOT INTERVAL)		EXISTING ACCESS ROAD		
	EXISTING CONTOUR (MAJOR 5 FOOT INTERVAL)		EXISTING RETAINING WALLS		
			EXISTING FENCE		

NO.	ISSUE/DESCRIPTION	BY	DATE

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**NATIONAL GRID  
FORMER TIDEWATER FACILITY  
PAWTUCKET, RHODE ISLAND**

**PUBLIC NOTIFICATION  
NO. 1 SUBSTATION  
SUBSTATION UPGRADES AND  
PRE-CHARACTERIZATION SAMPLING LOCATIONS**

PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com	PREPARED FOR: NATIONAL GRID		
PROJ MGR: MSK	REVIEWED BY: JJC	CHECKED BY: JPH	FIGURE
DESIGNED BY: SDN	DRAWN BY: SDN	SCALE: 1" = 40'	<b>2</b>
DATE: 2012	PROJECT NO. 43654	REVISION NO. 0	

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This is an important notice. Please have it translated.

Este é um aviso importante. Queira mandá-lo traduzir.  
Este es un aviso importante. Sírvase mandarlo traducir.  
Avis important. Veuillez traduire immédiatement.

ĐÂY LÀ MỘT BẢN THÔNG CÁO QUAN TRỌNG  
XIN VUI LÒNG CHO DỊCH LẠI THÔNG CÁO ẤY  
Questa è un' informazione importante,  
si prega di tradurla.

Это очень важное сообщение.  
Пожалуйста, попросите чтобы  
вам его перевели.

November 26, 2012  
GZA File No. 05.0043654.20



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Re: Notice to Abutter and Interested Parties  
DRAFT Public Involvement Plan  
Former Tidewater Facility  
Pawtucket, Rhode Island  
RIDEM Case No. 95-022

To Abutter and/or Interested Parties:

On behalf of The Narragansett Electric Company d/b/a National Grid (National Grid), GZA GeoEnvironmental, Inc. (GZA) has prepared this letter to inform you of the availability of the draft Public Involvement Plan (PIP) for the Tidewater Site located at the ends of Tidewater and Merry Streets in Pawtucket, Rhode Island. This notice is being provided to abutting property owners, neighboring residents and interested parties consistent with previous notices. Should you be an owner of property that is leased, we request that you provide a copy of this letter to your tenants.

A Public Involvement Plan (PIP) is an agreement between the party conducting response actions (in this case, National Grid) and the public about how they will share information moving forward, and how the public will be able to comment on plans for assessment and cleanup of the Tidewater Site. A PIP is a “living” document and can be amended to reflect additional issues or challenges that may arise during the site cleanup process.

A draft of the PIP has been submitted to the Rhode Island Department of Environmental Management (RIDEM) on November 26, 2012 for review and comment. A copy of this document can be obtained from the following information repositories:

- RIDEM publicly available website: <http://www.dem.ri.gov/programs/benviron/waste/tide.htm>
- National Grid publicly available website: [www.tidewatersite.com](http://www.tidewatersite.com)
- Publicly Accessible Site File at RIDEM's Office of Waste Management filed under Former Tidewater Coal Gasification Plant (Pawtucket), RIDEM Case No. 95-022. Appointments to view the files can be made by contacting RIDEM, Department of Technical and Customer Assistance, 235 Promenade Street, Providence, Rhode Island (telephone: 401-222-4700 extension 7307, <http://www.dem.ri.gov/topics/filerevw.htm>).

National Grid currently plans to schedule a public meeting during the week of January 14, 2013 to discuss comments to the draft PIP. If you have comments regarding the draft PIP, please submit them in writing prior to the public meeting to:

Joseph Martella  
R.I. Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, RI 02908-5767

Details regarding the public meeting, including date, time and venue, will be posted to the RIDEM (<http://www.dem.ri.gov/programs/benviron/waste/tide.htm>) and National Grid Tidewater ([www.tidewatersite.com](http://www.tidewatersite.com)) websites, as well as mailed and emailed to those parties on the Tidewater



mailing list. Interested persons can be added to this mailing list via an email request to Michele Leone at National Grid ([Michele.Leone@nationalgrid.com](mailto:Michele.Leone@nationalgrid.com)) with your name and address or by calling Michele Leone at 1-781-907-3651.

If you would like more information or have any questions, please contact Michele Leone of National Grid at 781-907-3651.

Very truly yours,

GZA GeoEnvironmental, Inc.

A handwritten signature in blue ink, appearing to read "Margaret S. Kilpatrick". The signature is fluid and cursive, with a large initial "M" and "K".

Margaret S. Kilpatrick, P.E.  
Senior Project Manager

cc: Joe Martella, RIDEM  
Elizabeth Stone, RIDEM  
Michele Leone, National Grid

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XIN VUI LÒNG CHO DỊCH LẠI THÔNG CÁO ẤY  
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Пожалуйста, попросите чтобы  
вам его перевели.

Noviembre 26, 2012  
GZA File No. 05.0043654.20



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Re: Aviso a Colindantes y Partes Interesadas  
BORRADOR Plan Público de Participación  
Antigua Facilidad de Tidewater (Sitio)  
Pawtucket, Rhode Island  
RIDEM Case No. 95-022

Aviso a Colindantes y/o Partes Interesadas:

En nombre de Narragansett Electric Company d/b/a National Grid, GZA, ha preparado esta carta para informarles de la disponibilidad del borrador del Plan Público de Participación (PIP) para el Sitio de Tidewater localizado al final de las calles Tidewater y Merry en Pawtucket, Rhode Island. Esta nota está siendo provista a todos los dueños de propiedades colindantes, residentes y partes interesadas y que es consistente con notas previas. Si usted es un dueño de propiedad que es alquilada, requerimos que provean una copia de esta carta a sus inquilinos.

Este Plan (PIP) es en acuerdo con la parte que conduce las acciones y el público, acerca de como compartirán información y cómo el público estará disponible a comentar en los planes para limpieza del Sitio Tidewater. El PIP es un documento "vivo" y puede tener enmiendas para reflejar puntos adicionales o desafíos que puedan presentarse durante el proceso de limpieza.

El borrador del PIP ha sido sometido al Rhode Island Department of Environmental Management (RIDEM) en Noviembre 26, 2012 para revisión y comentarios. Una copia de este documento puede ser obtenido en los siguientes links:

- RIDEM sitio web público:  
<http://www.dem.ri.gov/programs/benviron/waste/tide.htm>
- National Grid disponible en el sitio web público: [www.tidewatersite.com](http://www.tidewatersite.com)
- Archivo público en site RIDEMs, Office of Waste Management filed under Former Tidewater Coal Gasification Plant (Pawtucket), RIDEM Case No. 95-022. Cita para examinar el archivo comunicarse al RIDEM, Department of Technical and Customer Assistance, 235 Promenade Street, Providence, Rhode Island (401-222-4700 extension 7307, <http://www.dem.ri.gov/topics/filerevw.htm>)

National Grid planea actualmente programar una reunión pública durante la semana de Enero 14, 2013 para discutir los comentarios al borrador del PIP.

Si usted tiene comentarios con relación al mismo, por favor envíelos por escrito antes de la reunión mencionada a:

Joseph Martella  
R.I. Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, RI 02908-5767





Detalles relacionados con la reunión pública, incluyendo fecha, hora y dirección, serán puestas en el RIDEM (<http://www.dem.ri.gov/programs/benviron/waste/tide.htm>) y en el National Grid Tidewater ([www.tidewatersite.com](http://www.tidewatersite.com)) redes, así como correos y correos electrónicos a aquellas partes que figuran en la lista del Tidewater.

Personas interesadas pueden ser agregadas a esta lista vía correo electrónico a Michele Leone en el National Grid ([Michele.Leone@nationalgrid.com](mailto:Michele.Leone@nationalgrid.com)) con su nombre y dirección o llamando a Michele Leone al 1-781-907-3651.

Si le gustaría más información, o tiene alguna pregunta, por favor contacte a Michel Leone del National Grid al 781-907-3651.

Atentamente,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink, appearing to read 'Margaret S. Kilpatrick', is written over a light blue horizontal line.

Margaret S. Kilpatrick, P.E.  
Senior Project Manager

cc: Joe Martella, RIDEM  
Elizabeth Stone, RIDEM  
Michele Leone, National Grid

J:\ENV\43654.20\Corresp\Notification\43654 20 PIP notification translated.docx

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XIN VUI LÒNG CHO DỊCH LẠI THÔNG CÁO ẤY  
Questa è un' informazione importante,  
si prega di tradurla.

Это очень важное сообщение.  
Пожалуйста, попросите чтобы  
вам его перевели.

January 14, 2013  
GZA File No. 05.0043654.20



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Re: Notice to Abutters and Interested Parties  
Public Meeting to Discuss DRAFT Public Involvement Plan  
Former Tidewater Facility  
Pawtucket, Rhode Island  
RIDEM Case No. 95-022

To Abutters and/or Interested Parties:

On behalf of The Narragansett Electric Company d/b/a National Grid (National Grid), GZA GeoEnvironmental, Inc. (GZA) has prepared this letter to inform you of a public meeting for the Tidewater Site to be held on **Tuesday, January 29<sup>th</sup> at 6 pm at the Francis J. Varieur Elementary School located at 486 Pleasant Street, Pawtucket, Rhode Island.**

The purpose of this public meeting will be to discuss public comments to the draft Public Involvement Plan (PIP). A PIP is an agreement between the party conducting response actions (in this case, National Grid) and the public about how information will be shared and how the public will be able to provide comments on plans for assessment and cleanup. A PIP is a “living” document and can be amended to reflect additional issues or challenges that may arise during the site cleanup process.

National Grid submitted the draft PIP to the Rhode Island Department of Environmental Management (RIDEM) on November 26, 2012 for review and comment. In addition, on November 27, 2012, National Grid issued a letter notifying abutters and interested parties that the draft PIP was available for review and comment. As described in this letter, a copy of the draft PIP can be obtained from the following information repositories:

- RIDEM publicly available website: <http://www.dem.ri.gov/programs/benviron/waste/tide.htm>
- National Grid publicly available website: [www.tidewatersite.com](http://www.tidewatersite.com)
- Publicly Accessible Site File at RIDEM’s Office of Waste Management filed under Former Tidewater Coal Gasification Plant (Pawtucket), RIDEM Case No. 95-022. Appointments to view the files can be made by contacting RIDEM, Department of Technical and Customer Assistance, 235 Promenade Street, Providence, Rhode Island (telephone: 401-222-4700 extension 7307, <http://www.dem.ri.gov/topics/filerevw.htm>).

Again, the public meeting will be held on Tuesday January 29, 2013 between the hours of 6:00 PM and 8:00 PM at the Francis J. Varieur Elementary School. Representatives of RIDEM, National Grid and GZA will attend the meeting to discuss comments on the draft PIP. This notice is being provided to abutting property owners, neighboring residents and interested parties on our mailing list. Should you be an owner of property that is leased, we request that you provide a copy of this letter to your tenants.

If you would like more information or have any questions, please contact Michele Leone of National Grid at 781-907-3651 or [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com)

Very truly yours,

GZA GeoEnvironmental, Inc.

A handwritten signature in blue ink, appearing to read 'M. Kilpatrick', is written over a faint, light blue circular stamp or watermark.

Margaret S. Kilpatrick, P.E.  
Senior Project Manager

cc: Joe Martella and Elizabeth Stone, RIDEM  
Michele Leone, National Grid

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XIN VUI LÒNG CHO DỊCH LẠI THÔNG CÁO ẤY  
Questa è un' informazione importante,  
si prega di tradurla.

Это очень важное сообщение.  
Пожалуйста, попросите чтобы  
вам его перевели.

14 de Enero 2013  
GZA File No. 05.0043654.20



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Re: Notificación a partes interesadas  
Reunión pública para discutir el borrador del plan de Involucramiento  
Former Tidewater Facility  
Pawtucket, Rhode Island  
RIDEM Case No. 95-022

A asociados y/o partes interesadas

En nombre de la compañía Narragement Electric d/b/a National Grid, GZA GeoEnvironmental, Inc. (GZA) ha preparado esta carta para informarles de una reunión pública para el Sitio Tidewater a ser sostenida **el Martes Enero 29 a las 6 pm en el colegio Francis J. Variour Elementary, localizado en 486 Pleasant Street, Pawtucket, Rhode Island.**

El propósito de esta reunión será para discutir públicamente los comentarios del Plan de Involucramiento (PIP). El PIP es un acuerdo entre la parte conductor de respuestas de acción (en este caso National Grid) y el público, acerca de cómo será compartida la información y cómo el público estará disponible a proveer comentarios en los planes para asesoramiento y limpieza. A PIP es un documento “vivo” y puede ser modificado para reflejar comentarios y puntos adicionales o desafíos que puedan surgir durante el proceso de limpieza.

National Grid ha sometido el borrador de PIP al departamento de Medio ambiente de Rhode Island (RIDEM en noviembre 26, 2012, para revisión y comentarios. En adición, en Noviembre 27, 2012, National Grid hizo una carta notificando a los socios y partes interesadas sobre el borrador PIP que estaba disponible para revisión y comentarios. Como se describe en esta carta, una copia del borrador PIP puede obtenerse de los siguientes centros de información:

- RIDEM sitio disponible en la web: <http://www.dem.ri.gov/programs/benviron/waste/tide.htm>
- National Grid sitio disponible en la web: [www.tidewatersite.com](http://www.tidewatersite.com)
- El archive public en las oficinas de RIDEM archivado bajo el antiguo Tidewater Caso No. 95-022. Citas par aver los archives pueden ser hechas contactando el departamento técnico y servicio al cliente de RIDEM, 235 Promenade Street Providence, Rhode Island (teléfono 401-222-4700 extensión 7307, <http://www.dem.ri.gov/topics/filerevw.htm>).

Una vez más, la reunión pública será sostenida Martes Enero 29 a las 6 pm en el colegio Francis J. Variour Elementary, localizado en 486 Pleasant, Pawtucket, Rhode Island. Representantes de RIDEM, National Grid y GZA estarán presentes en la reunión para discutir los comentarios al borrador PIP. Esta notificación está siendo provista a los asociados dueños, residentes de barrio Street y partes interesadas de nuestra lista de correos. Si usted es dueño de una propiedad que está siendo alquilada, le requerimos que provea una copia de esta carta a sus inquilinos.

Si necesitan más información o tienen alguna pregunta, por favor contactar a Michele Leone al 781-907-3651 r [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com)

Atentamente,

GZA GeoEnvironmental, Inc.

A handwritten signature in blue ink, appearing to read 'M. Kilpatrick', is written over a faint, light blue circular stamp or watermark.

Margaret S. Kilpatrick, P.E.  
Senior Project Manager

cc: Joe Martella and Elizabeth Stone, RIDEM  
Michele Leone, National Grid

**GZA  
GeoEnvironmental, Inc.**

*Engineers and  
Scientists*

March 4, 2013

GZA File No. 05.0043654.20



Re: Notice to Abutters and Interested Parties  
Community Outreach Session  
Former Tidewater Facility  
Pawtucket, Rhode Island  
RIDEM Case No. 95-022

To Abutters and/or Interested Parties:

On behalf of The Narragansett Electric Company d/b/a National Grid (National Grid), GZA GeoEnvironmental, Inc. (GZA) has prepared this letter to inform you of a community outreach session for the Tidewater Site to be held on **Wednesday, March 27<sup>th</sup>, from 6:30 p.m. to 8:30 p.m., at the Francis J. Varietur Elementary School located at 486 Pleasant Street, Pawtucket, Rhode Island.** This notice is being provided to abutting property owners, neighboring residents and interested parties on our mailing list. Should you be an owner of property that is leased, we request that you provide a copy of this letter to your tenants.

This community outreach session is part of National Grid's efforts to keep people informed of environmental activities at the Tidewater Site. The session format will be informal, featuring informational poster boards on a variety of Site-related topics, including history of the Tidewater Site, findings of the investigations, demonstrations of certain field equipment, description of current National Grid operations at the property, etc. Each poster board will be staffed by a representative from National Grid and/or GZA to answer questions. Representatives of the Rhode Island Department of Environmental Management (RIDEM) will also be present to answer questions from the public.

If you would like more information or have any questions, please contact Michele Leone of National Grid at 781-907-3651 or [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com). To request a live translator for the session, please contact Michele by March 18<sup>th</sup>.

Very truly yours,

GZA GeoEnvironmental, Inc.

A handwritten signature in blue ink, appearing to read 'Margaret S. Kilpatrick', is written over a light blue circular stamp.

Margaret S. Kilpatrick, P.E.  
Senior Project Manager

cc: Joe Martella and Elizabeth Stone, RIDEM  
Michele Leone, National Grid

This is an important notice. Please have it translated.

Este é um aviso importante. Queira mandá-lo traduzir.  
Este es un aviso importante. Sírvase mandarlo traducir.  
Avis important. Veuillez traduire immédiatement.

ĐÂY LÀ MỘT BẢN THÔNG CÁO QUAN TRỌNG  
XIN VUI LÒNG CHO DỊCH LẠI THÔNG CÁO ẤY  
Questa è un'informazione importante,  
si prega di tradurla.

Это очень важное сообщение.  
Пожалуйста, попросите чтобы  
вам его перевели.



## SAFETY AND SECURITY FIRST

The Former Tidewater MGP and Electric Generation Site

Over the last several years, National Grid has worked under the direction of the Rhode Island Department of Environmental Management (RIDEM) to conduct environmental assessments at the former Tidewater Site and surrounding properties. These properties include eastern portions of the Max Read Athletic Field owned by the City of Pawtucket.

We know the community near the Tidewater Site, as well as parents and teachers at Varietur and other nearby schools, are concerned about byproducts created by a manufactured gas plant (MGP) that operated at the Site from the 1880s through the 1960s – and want to know more about how National Grid plans to remediate those byproducts. National Grid will continue to distribute these types of fact sheets in the community as part of the company's efforts to keep people informed of environmental activities at the Site.

### Completing Excavations Associated With Electrical Substation Work

National Grid has completed the majority of excavations associated with work designed to upgrade the existing electrical substation that operates on the Tidewater Site. Because assessments identified the presence of a small amount of contamination in soil on the Site, National Grid took steps to protect the health and safety of workers and the general public during the excavation work. These steps included:

- Installing informational bulletin boards at the ends of Tidewater Street and Bowles Court.
- Developing a color-coded system to notify residents and parents whether National Grid was conducting excavation activities on any given day. This information was posted daily to the bulletin boards.
- Monitoring the air for compounds and dust during active excavation activities at six locations around the perimeter of the Tidewater Site, including one fixed location near the residences on Thorton Street. National Grid posted the air monitoring data to the bulletin boards weekly.
- Implementing a phone message alert system to communicate time-sensitive information to interested parties, such as if air quality readings exceeded the project's conservative limits during earthwork activities.



*The majority of excavation associated with upgrading the existing Tidewater electrical substation is complete.*

### RIDEM Considering National Grid's Recommended Remedial Option

National Grid submitted a Remedial Alternative Evaluation (RAE) to RIDEM in July 2011 comparing four options for the Tidewater Site. We recommended moving forward with one of the options, which would involve:

- Installing two ground coverings, called engineered caps, across the site.
- Installing an underground steel wall to protect the Seekonk River from the possible movement of NAPLs. NAPLs are liquids that don't mix well with water, like vegetable oil.
- Removing MGP residuals from select areas of the Site.

The next step is for RIDEM to review the recommended National Grid plan.

### Implementing the First-of-Its-Kind Public Involvement Plan (PIP) in Rhode Island

Throughout our work at the Tidewater Site, both now and in the future, we're committed to sharing information. Many of the communications activities we've undertaken have been incorporated into the state's first Public Involvement Plan (PIP). A PIP is an agreement between a party conducting remediation activities and the public on how information will be shared with the community. It also addresses how the public can comment on plans for the Site. PIPs are tailored to specific sites. A PIP can be updated to reflect additional issues or challenges that may arise during the remedial process. Elements of National Grid's PIP for the Tidewater Site:



<p><b>Public Notice</b></p> <ul style="list-style-type: none"> <li>• Mailing list to announce public meetings, distribute fact sheets, etc.</li> <li>• Optional email list           <ul style="list-style-type: none"> <li>- Sign up at <a href="http://www.tidewatersite.com">www.tidewatersite.com</a></li> <li>- Or, send request to National Grid (see below contact information)</li> </ul> </li> </ul>	<p><b>Fact Sheets and Enhanced Communications</b></p> <ul style="list-style-type: none"> <li>• Fact sheets to communicate new information and/or achievement of significant milestones</li> <li>• Informational Bulletin Boards (placed at the ends of Tidewater Street and Bowles Court)</li> <li>• Phone Message Alert System</li> </ul>
<p><b>Community Meetings</b></p> <ul style="list-style-type: none"> <li>• Encourages participation by all to create an atmosphere of constructive, open dialogue</li> </ul>	<p><b>Information Repositories</b></p> <ul style="list-style-type: none"> <li>• Publicly Accessible Site File</li> <li>• RIDEM Case No. 95-022:           <ul style="list-style-type: none"> <li>- <a href="http://www.dem.ri.gov/topics/filerevw.htm">http://www.dem.ri.gov/topics/filerevw.htm</a></li> </ul> </li> <li>• Websites:           <ul style="list-style-type: none"> <li>- <a href="http://www.tidewatersite.com">www.tidewatersite.com</a></li> <li>- <a href="http://www.dem.ri.gov/programs/benviron/waste/tide.htm">http://www.dem.ri.gov/programs/benviron/waste/tide.htm</a></li> </ul> </li> <li>• Local Information: Repository           <ul style="list-style-type: none"> <li>- Pawtucket Library (13 Summer St.)</li> </ul> </li> <li>• Bulletin Boards: Tidewater Street and Bowles Court</li> </ul>

### Community Information Session Planned for March 2013

National Grid is working with RIDEM and GZA GeoEnvironmental, Inc. (GZA), an environmental consulting firm in Providence, to finalize the PIP and a remedial program for the Tidewater Site. National Grid will hold a community outreach session in March 2013 to present information about the Site. Following this session, National Grid and RIDEM will hold the initial community meeting within 60 days after RIDEM issues a Program Letter to National Grid for the Site. The Program Letter formally puts the findings of the Site Investigation Report (SIR) out for a public comment period.

ACTIVITY	TIME PERIOD
Community Outreach Session	Within 60 days of Draft PIP Meeting
Initial Community Meeting	Within 60 days of receipt of Program Letter from RIDEM – during Site Investigation Report (SIR) public comment period
Public Meeting on DRAFT Remedial Action Approval Plan (RAWP)	Within 12 months of receipt of Remedial Decision Letter
Submit RAWP for RIDEM approval	Within 6 months of DRAFT RAWP Meeting
Public Meeting prior to start of project	Minimum of 30 days prior to start of work
Public Meetings during remediation	Meeting schedule to be presented for discussion purposes once remedial schedule is developed and approved by RIDEM
Public Meeting upon completion of the project	Within 30 days following completion of remediation

#### If You Have Questions and Comments

For more information on National Grid's activities at the site, please contact Michele Leone at 781-907-3651 or [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com) or visit our website at [www.tidewatersite.com](http://www.tidewatersite.com)

4 de marzo, 2013

Expediente GZA No. 05.0043654.20



Ref: Aviso a personas aledañas o partes interesadas  
Sesión de información a la comunidad  
sobre lo que anteriormente fueron las instalaciones Tidewater  
Pawtucket, Rhode Island  
Caso de RIDEM No. 95-022

A personas aledañas y/o partes interesadas:

530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

A nombre de The Narragansett Electric Company, conocida empresarialmente como National Grid (National Grid), GZA GeoEnvironmental, Inc. (GZA) ha preparado esta carta para informarle que el **miércoles, 27 de marzo** se llevará a cabo una sesión de información a la comunidad con referencia al sitio conocido como Tidewater. La sesión será de **6:30pm a 8:30pm en la escuela primaria Francis J. Varieur** localizada en el **486 de la calle Pleasant, Pawtucket, Rhode Island**. Este aviso se da a conocer tanto a los dueños de propiedades aledañas, como a los residentes del vecindario y a toda parte interesada que se encuentra inscrita en nuestra lista de distribución postal. Si usted es el dueño de una propiedad que da en alquiler, le pedimos que entregue a sus inquilinos una copia de esta carta.

Esta sesión de información a la comunidad es parte del esfuerzo que National Grid está haciendo para mantener informado al público de las actividades ambientales que tienen lugar en Tidewater. El formato de la sesión es informal; se presentarán carteleras sobre una variedad de tópicos relacionados al sitio, incluyendo: la historia del sitio Tidewater y los resultados de las investigaciones, también habrá demostraciones de cierto tipo de equipo de campo así como una descripción de las operaciones actuales que National Grid está haciendo en la propiedad, etc. Cada cartelera estará a cargo de un empleado de National Grid y/o GZA para contestar cualquier pregunta que pudiera surgir. También habrá empleados del Departamento de Administración Ambiental de Rhode Island (RIDEM, por sus siglas en inglés) para contestar cualquier pregunta que el público pudiera tener.

Si desea obtener más información o desea hacer alguna pregunta, por favor comuníquese con Michele Leone en National Grid al 781-907-3651 ó [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com). Para solicitar la presencia de un intérprete para la sesión, por favor comuníquese con Michele a más tardar el 18 de marzo.

Atentamente,

GZA GeoEnvironmental, Inc.

A handwritten signature in blue ink, appearing to read 'Margaret S. Kilpatrick', is written over a faint, illegible printed name.

Margaret S. Kilpatrick, P.E.  
Administradora encargada del proyecto

cc: Joe Martella y Elizabeth Stone, RIDEM  
Michele Leone, National Grid

# LA PROTECCIÓN Y SEGURIDAD SON LO PRIMERO

El Sitio Conocido Anteriormente Como Tidewater MGP y El Sitio De Producción De Electricidad



En el transcurso de los últimos años, National Grid ha trabajado bajo la dirección del Departamento de Administración Ambiental de Rhode Island (RIDEM, por sus siglas en inglés) para llevar a cabo evaluaciones ambientales en el sitio conocido anteriormente como Tidewater y las propiedades aledañas. Estas propiedades incluyen ciertas partes en la zona este del Max Read Athletic Field, el cual pertenece a la ciudad de Pawtucket.

Sabemos que la comunidad cerca del sitio de Tidewater, así como los padres y maestros en Varietur y otras escuelas cercanas, están preocupados por los subproductos generados por la planta de gas (MGP, en inglés), la cual estuvo abierta en ese sitio desde la década de 1880 hasta la década de 1960, y desean obtener más información sobre cuáles son los planes que National Grid tiene para resolver la presencia de estos subproductos. National Grid va a continuar distribuyendo estas hojas de información en la comunidad como parte de los esfuerzos de la compañía para mantener informada a las personas en lo que se refiere a las actividades ambientales que se llevan a cabo en dicho sitio.

## Completar las excavaciones relacionadas al trabajo de la subestación eléctrica

National Grid ha completado la mayor parte de las excavaciones relacionadas con el trabajo diseñado para modernizar la actual subestación eléctrica que se encuentra en el sitio de Tidewater. Debido a que cuando se hizo la evaluación se detectó la presencia de una pequeña cantidad de contaminación en el suelo del sitio, National Grid tomó los pasos necesarios para proteger la salud y seguridad de los trabajadores y del público en general durante los trabajos de excavación. Estos pasos incluyeron:

- La instalación de carteleros o boletines de información al final de la calle Tidewater y Bowles Court.
- La creación de un sistema codificado con colores para notificar a los residentes y a los padres de familia si, en un día cualquiera, National Grid estaba haciendo excavaciones. Esta información se anunciaba a diario en las carteleros de información.
- El monitoreo del aire para identificar compuestos y polvo durante las actividades de excavación en los seis lugares alrededor del perímetro del sitio Tidewater, incluyendo un lugar fijo cerca de las residencias ubicadas en la calle Thorton. National Grid colocó semanalmente en los boletines la información del monitoreo del aire.
- La implementación de un sistema telefónico de mensajes de alerta para comunicar a personas claves la información que debe saberse de inmediato; por ejemplo: si la lectura de la calidad del aire durante las actividades de



Ya ha concluido la mayor parte de las excavaciones relacionadas a la modernización de la subestación eléctrica Tidewater.

excavación excede los límites conservadores establecidos para el proyecto.

## La manera en la que RIDEM tomará en cuenta la recomendación del plan de remediación presentado por National Grid

En julio, 2011, National Grid le presentó a RIDEM una Evaluación de Remediación Alterna (RAE, en inglés), en donde comparaba cuatro opciones para el sitio de Tidewater. Recomendamos seguir adelante con una de las opciones, la cual incluiría:

- Instalar en todo el sitio dos cubiertas de suelo, conocidas como capas fabricadas.
- Instalar una pared subterránea para proteger al río Seekonk de posibles movimientos de NAPL [fase de líquidos no acuosos]. Los NAPL son líquidos que no se mezclan muy bien con el agua, como por ejemplo: el aceite vegetal.
- Remover los residuos de MGP de áreas seleccionadas del sitio.

El próximo paso de RIDEM es revisar el plan recomendado por National Grid.

## La implementación del Plan de Participación del Público (PIP, en inglés), el primero en su tipo en Rhode Island

Nos comprometemos a compartir información durante el transcurso de nuestro trabajo en el sitio de Tidewater, tanto ahora como en el futuro. Muchas de las actividades de comunicación que hemos tenido las hemos incorporado al Plan de Participación del Público (PIP), el primero en el Estado. Un PIP es un acuerdo entre el público y la parte que está llevando

a cabo actividades de remediación sobre la manera en que la información se compartirá con la comunidad. También incluye la forma en la que el público puede presentar comentarios relacionados al plan que se tiene para el sitio. Cada PIP se redacta específicamente para un lugar. Un PIP se puede poner al día para que contenga los temas o retos adicionales que pudieran surgir durante el proceso de remediación.

Elementos del PIP de National Grid para el sitio de Tidewater:

<p><b>Notificación pública</b></p> <ul style="list-style-type: none"> <li>• Una lista de distribución postal para anunciar reuniones públicas, distribuir hojas de información, etc.</li> <li>• Lista opcional de correos electrónicos:             <ul style="list-style-type: none"> <li>- Inscríbese en <a href="http://www.tidewatersite.com">www.tidewatersite.com</a></li> <li>- También puede solicitar inscripción a National Grid (vea la información de contacto que a continuación se indica.)</li> </ul> </li> </ul>	<p><b>Hojas de información y aumento en la comunicación</b></p> <ul style="list-style-type: none"> <li>• Hojas de información para comunicar nueva información y/o el logro de acontecimientos importantes.</li> <li>• Información en boletines de información (colocados al final de la calle Tidewater y Bowles Court)</li> <li>• Un sistema telefónico de mensajes de alerta.</li> </ul>
<p><b>Reuniones comunitarias</b></p> <ul style="list-style-type: none"> <li>• Alienta la participación de todos para crear una atmósfera constructiva, abierta al diálogo.</li> </ul>	<p><b>Depositarios de información:</b></p> <ul style="list-style-type: none"> <li>• Acceso al público del expediente del sitio             <ul style="list-style-type: none"> <li>- RIDEM, Caso No. 95-022</li> <li>- <a href="http://www.dem.ri.gov/topics/filerevw.htm">http://www.dem.ri.gov/topics/filerevw.htm</a></li> </ul> </li> <li>• Sitios en la red             <ul style="list-style-type: none"> <li>- <a href="http://www.tidewatersite.com">www.tidewatersite.com</a></li> <li>- <a href="http://www.dem.ri.gov/programs/benviron/waste/tide.htm">http://www.dem.ri.gov/programs/benviron/waste/tide.htm</a></li> </ul> </li> <li>• Depositario local de la información             <ul style="list-style-type: none"> <li>- Biblioteca de Pawtucket (13 calle Summer)</li> </ul> </li> <li>• Boletines de información: calle Tidewater y Bowles Court</li> </ul>

### Una sesión de información a la comunidad programada para marzo del 2013

National Grid está trabajando con RIDEM y GZA GeoEnvironmental, Inc. (GZA), esta última una compañía consultora en Providence, para finalizar el PIP del programa de remediación del sitio de Tidewater. En marzo del 2013, National Grid tendrá una sesión de información a la comunidad para presentar información sobre el lugar. Al concluir la sesión, National Grid y RIDEM tendrán la primera reunión comunitaria en los siguientes 60 días después que RIDEM le emita a National Grid una Carta del Programa para el lugar. La Carta del Programa es el medio formal por el que se da a conocer la información contenida en el Informe de Investigación del Sitio (SIR) y así iniciar el periodo de comentarios públicos.

ACTIVIDAD	PERIODO DE TIEMPO
Sesión de información a la comunidad	Dentro de 60 días de la reunión para presentar el borrador del PIP
Primera reunión comunitaria	Dentro de 60 días de haberse recibido la Carta del Programa emitida por RIDEM – durante el periodo de comentarios públicos del Informe de Investigación del Sitio (SIR)
Reunión pública sobre el BORRADOR del Plan de Aprobación de Acciones de Remediación (RAWP, en inglés)	Dentro de los 12 meses de recibirse la Carta de Decisión de la Remediación
Se presenta el RAWP a RIDEM para su aprobación	Dentro de los 6 meses de la reunión sobre el BORRADOR de RAWP
Reunión pública antes de comenzar el proyecto	En un mínimo de 30 días antes de que comiencen los trabajos.
Reunión pública durante la remediación	Reunión programada a presentarse con propósitos de conversaciones una vez que RIDEM haya establecido y aprobado el horario de remediaciones
Reunión pública al completarse el proyecto	Dentro de los 30 días después de haberse completado la remediación

#### De haber preguntas o comentarios

Para obtener más información sobre las actividades de National Grid en ese lugar, por favor comuníquese con Michele Leone al 781-907-3651 ó [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com) o visite nuestro sitio en la red [www.tidewatersite.com](http://www.tidewatersite.com)

04 de março de 2013

Arquivo GZA nº 05.0043654.20



Ref: Notificação aos Donos de Propriedades Vizinhas e Partes Interessadas  
Sessão de Divulgação à Comunidade  
Previamente, Tidewater Facility  
Pawtucket, Rhode Island  
Caso nº 95-022 RIDEM

Aos donos de propriedades vizinhas e/ou partes interessadas:

Em nome da Companhia Elétrica Narragansett, sob o nome comercial National Grid (National Grid), a GZA GeoEnvironmental, Inc. (GZA) preparou esta carta para informá-los sobre uma sessão de divulgação à comunidade em Tidewater Site a ser realizada na **quarta-feira, 27 de março, das 18:30h às 20:30h, na Francis J. Varieur Elementary School, localizada em 486 Pleasant Street, Pawtucket, Rhode Island.** Esta notificação está sendo fornecida a donos de propriedades vizinhas, residentes das vizinhanças e partes interessadas da nossa lista de divulgação. Caso você seja dono de uma propriedade que esteja alugada, solicitamos que forneça uma cópia desta carta aos seus inquilinos.

Esta sessão de divulgação à comunidade faz parte dos esforços da National Grid para manter as pessoas informadas sobre as atividades ambientais em Tidewater Site. O formato da sessão será informal, apresentando cartazes informativos sobre uma variedade de tópicos relacionados ao local, inclusive a história de Tidewater Site, os resultados das investigações, demonstrações de certos equipamentos do campo, descrição de operações atuais da National Grid na propriedade, etc. Para cada cartaz haverá um representante da National Grid e/ou da GZA para responder perguntas. Representantes do Departamento de Gestão Ambiental de Rhode Island (sigla em inglês, RIDEM) também estarão presentes para responder perguntas do público.

Caso queira mais informações ou tenha alguma dúvida, por favor, entre em contato com Michele Leone da National Grid pelo telefone 781-907-3651 ou [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com). Para solicitar um intérprete para a sessão, por favor, entre em contato com a Michele até 18 de março.

Sinceramente,

GZA GeoEnvironmental, Inc.

A handwritten signature in blue ink, appearing to read 'Margaret S. Kilpatrick', is written over a faint, light blue circular stamp or watermark.

Margaret S. Kilpatrick, P.E.  
Gerente Sênior de Projetos

cc: Joe Martella e Elizabeth Stone, RIDEM  
Michele Leone, National Grid



# SEGURANÇA EM PRIMEIRO LUGAR

o antigo Tidewater MGP e Electric Generation Site



Nos últimos anos, a National Grid tem trabalhado sob a direção do Departamento de Gestão Ambiental de Rhode Island (sigla em inglês, RIDEM) para conduzir avaliações ambientais no antigo Tidewater Site e nas propriedades vizinhas. Estas propriedades incluem porções a leste do Campo Atlético Max Read, de propriedade da Cidade de Pawtucket.

Sabemos que a comunidade próxima a Tidewater Site, assim como pais e professores em Varietur e outras escolas próximas, estão preocupados com os subprodutos criados por uma fábrica de gás manufaturado (sigla em inglês, MGP) que operou no local de 1880 até a década de 60, e querem saber mais sobre como a National Grid planeja remediar estes subprodutos. A National Grid continuará a distribuir estes tipos de boletins informativos na comunidade, como parte dos esforços da empresa para manter as pessoas informadas sobre as atividades ambientais no local.

## Conclusão das escavações associadas à obra da subestação elétrica

A National Grid concluiu a maior parte das escavações associadas à obra destinada a atualizar a subestação elétrica existente que opera em Tidewater Site. Uma vez que as avaliações identificaram a presença de uma pequena quantidade de contaminação no solo no local, a National Grid tomou medidas para proteger a saúde e a segurança dos trabalhadores e do público em geral durante o trabalho de escavação. Estas medidas incluíram:

- Instalação de quadros de boletins informativos nos finais da Tidewater Street e Bowles Court.
- Desenvolvimento de um sistema de codificação por cores para notificar os residentes e pais se a National Grid estava conduzindo atividades de escavação em qualquer dia. Esta informação era colocada diariamente nos quadros de boletins.
- Monitoramento do ar para compostos e pó durante as atividades de escavação em seis locais ao redor do perímetro de Tidewater Site, inclusive um local fixo perto das residências na Thornton Street. A National Grid colocou os dados sobre o monitoramento do ar nos quadros de boletins semanalmente.
- Implementação de um sistema de alerta de mensagens por telefone para comunicar informações urgentes às partes interessadas, como, por exemplo, se as leituras da qualidade do ar excedessem os limites conservadores do projeto durante as atividades de terraplenagem.



*A maior parte das escavações associadas à atualização da subestação elétrica existente de Tidewater está concluída.*

## RIDEM considerando a opção corretiva recomendada da National Grid

A National Grid submeteu uma Remedial Alternative Evaluation (RAE) – Avaliação Alternativa Corretiva ao RIDEM em julho de 2011, comparando quatro opções para Tidewater Site. Recomendamos prosseguir com uma das opções, que envolveria:

- Instalação de duas coberturas do solo, chamadas “engineered caps”, pelo site.
- Instalação de uma parede subterrânea para proteger o Rio Seekonk do possível movimento de NAPLs. NAPLs são líquidos que não se misturam bem com a água, como óleo vegetal.
- Remoção dos resíduos de MGP de áreas seletas do Site.

A próxima etapa é o RIDEM analisar o plano recomendado da National Grid.

## Implementação do Plano de Envolvimento Público (sigla em inglês, PIP), o primeiro deste tipo em Rhode Island

Por todo o nosso trabalho em Tidewater Site, agora e no futuro, nos comprometemos a compartilhar as informações. Muitas das atividades de comunicação que assumimos têm sido incorporadas ao primeiro Plano de Envolvimento Público (sigla em inglês, PIP) do estado. Um PIP é um acordo entre uma parte conduzindo atividades de remediação e o público sobre como as informações serão compartilhadas com a comunidade. Ele também aborda como o público pode comentar sobre os planos para o Site. Os PIPs são adaptados para locais específicos. Um PIP pode ser atualizado para refletir problemas ou desafios adicionais que possam surgir durante o processo corretivo.



Elementos do PIP da National Grid para Tidewater Site:

<p><b>Notificação pública:</b></p> <ul style="list-style-type: none"> <li>• Lista de divulgação para anunciar reuniões públicas, distribuir boletins informativos, etc.</li> <li>• Lista opcional de e-mail           <ul style="list-style-type: none"> <li>- Inscreva-se em <a href="http://www.tidewatersite.com">www.tidewatersite.com</a></li> <li>- Ou, envie solicitação à National Grid (veja informações de contato abaixo)</li> </ul> </li> </ul>	<p><b>Boletins informativos e comunicações avançadas:</b></p> <ul style="list-style-type: none"> <li>• Boletins informativos para comunicar novas informações e/ou conquista de marcos significativos</li> <li>• Quadros de boletins informativos (colocados no final da Tidewater Street e Bowles Court)</li> <li>• Sistema de alerta de mensagens por telefone</li> </ul>
<p><b>Reuniões com a comunidade:</b></p> <ul style="list-style-type: none"> <li>• Incentiva a participação de todos para criar uma atmosfera de diálogo aberto e construtivo</li> </ul>	<p><b>Repositórios de informações:</b></p> <ul style="list-style-type: none"> <li>• Arquivo do Site acessível publicamente           <ul style="list-style-type: none"> <li>- Caso nº 95-022 RIDEM</li> <li>- <a href="http://www.dem.ri.gov/topics/filerevw.htm">http://www.dem.ri.gov/topics/filerevw.htm</a></li> </ul> </li> <li>• Websites           <ul style="list-style-type: none"> <li>- <a href="http://www.tidewatersite.com">www.tidewatersite.com</a></li> <li>- <a href="http://www.dem.ri.gov/programs/benviron/waste/tide.htm">http://www.dem.ri.gov/programs/benviron/waste/tide.htm</a></li> </ul> </li> <li>• Repositório local de informações           <ul style="list-style-type: none"> <li>- Pawtucket Library (13 Summer St.)</li> </ul> </li> <li>• Quadros de boletins: Tidewater Street e Bowles Court</li> </ul>

### Sessão de informações à comunidade planejada para março de 2013

A National Grid está trabalhando com o RIDEM e a GZA GeoEnvironmental, Inc. (GZA), uma firma de consultoria ambiental em Providence, para finalizar o PIP e um programa corretivo para Tidewater Site. A National Grid realizará uma sessão de divulgação à comunidade em março de 2013 para apresentar as informações sobre o Site. Após esta sessão, a National Grid e o RIDEM realizarão uma reunião inicial com a comunidade dentro de 60 dias após o RIDEM emitir uma Carta do Programa à National Grid para o Site. A Carta do Programa divulga formalmente os resultados do Site Investigation Report (SIR) (Relatório de Investigação do Site) para um período para comentário público.

ATIVIDADE	PERÍODO DE TEMPO
Sessão de divulgação à comunidade	Dentro de 60 dias da reunião da Minuta do PIP
Reunião inicial com a comunidade	Dentro de 60 dias do recebimento da Carta do Programa do RIDEM– durante o período para comentários públicos relativo ao Relatório de Investigação do Site (SIR)
Reunião pública sobre a Minuta do Plano de Aprovação da Ação Corretiva (sigla em inglês, RAWP)	Dentro de 12 meses do recebimento da Carta de Decisão Corretiva
Submeter RAWP para aprovação do RIDEM	Dentro de 6 meses da Reunião da Minuta do RAWP
Reunião pública antes de iniciar o projeto	Mínimo de 30 dias antes do começo da obra
Reuniões públicas durante a remediação	Programação da reunião a ser apresentada para fins de discussão quando a programação corretiva estiver desenvolvida e aprovada pelo RIDEM
Reunião pública quando da conclusão do projeto	Dentro de 30 dias após a conclusão da remediação

#### Se você tem dúvidas e comentários

Para obter mais informações sobre as atividades da National Grid no local, por favor, entre em contato com Michele Leone pelo telefone 781-907-3651 ou [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com), ou visite nosso website em [www.tidewatersite.com](http://www.tidewatersite.com).

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ĐÂY LÀ MỘT BẢN THÔNG CÁO QUAN TRỌNG  
XIN VUI LÒNG CHO DỊCH LẠI THÔNG CÁO ẤY  
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Пожалуйста, попросите чтобы  
вам его перевели.

June 13, 2013  
File No. 05.0043654.00-C



Re: Notice to Abutter  
Supplemental Site Investigation Work Plan Addendum – Soil Gas Quality  
Former Tidewater Facility  
Pawtucket, Rhode Island  
RIDEM Case No. 95-022

530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Dear Abutter:

The purpose of this letter is to notify you that The Narragansett Electric Company d/b/a National Grid (National Grid) will be conducting additional environmental testing activities associated with the former Tidewater Manufactured Gas Plant (MGP) and the former Pawtucket No. 1 Power Station Site located at the ends of Tidewater and Merry Streets in Pawtucket, Rhode Island. This notice is being provided to abutting property owners, tenants and members of the Tidewater Site mailing list in accordance with requirements established in the Rhode Island Department of Environmental Management's (RIDEM) Rules and Regulation for the Investigation and Remediation of Hazardous Materials (Remediation Regulations). Should you be an owner of property that is leased, we request that you provide a copy of this letter to your tenants.

National Grid is going to test the air beneath the ground at the Site. We will insert about 23 probes into the ground on the property. In certain areas along the western portion of the property, the probes will be installed outside of the existing fence line on National Grid property. The samples will be collected in enclosed air sampling canisters. We will then test and analyze the air samples. Analysis of the air samples will be completed off-Site at a licensed laboratory.

Contractors will begin installing probes on or about July 1, 2013. It will take approximately 4 to 5 days to install the probes and another 2 to 3 days to collect the samples. The results of the evaluation will be submitted to RIDEM and posted to the Tidewater and RIDEM websites (<http://www.tidewatersite.com> and <http://www.dem.ri.gov/programs/benviron/waste/tide.htm>).

The proposed activities are further detailed in a *Supplemental Site Investigation Work Plan (SSIWP) Addendum* submitted to RIDEM in May 2013. There is a 14-day comment period, commencing with the date of delivery of this notice, during which the public may review RIDEM records pertaining to this property and submit written comments regarding the proposed investigation activities described herein. These activities will be conducted in accordance with RIDEM's Remediation Regulations and will be performed by GZA GeoEnvironmental, Inc. (GZA) on behalf of National Grid.

If you would like more information or have any questions, please contact Michele Leone of National Grid at 781-907-3651.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink, appearing to read 'MSK', written over a light blue circular stamp.

Margaret S. Kilpatrick, P.E.  
Senior Project Manager

A handwritten signature in blue ink, appearing to read 'James J. Clark', written over a light blue circular stamp.

James J. Clark, P.E.  
Principal

MSK/JJC:tja

cc: Joe Martella, RIDEM  
Michele Leone, National Grid

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13 de junio, 2013

Archivo No. 05.0043654.00-C



Ref. Aviso a vecinos aledaños  
Agregado del plan de trabajo de investigación adicional del sitio – Calidad del gas en el suelo  
Instalaciones conocidas anteriormente como Tidewater  
Pawtucket, Rhode Island  
RIDEM Caso No. 95-022

530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Estimado vecino aledaño:

El propósito de esta carta es para informarle que The Narragansett Electric Company, conocida también como National Grid (National Grid), estará llevando a cabo otras actividades de evaluación con respecto a los lugares anteriormente conocidos como Tidewater Manufactured Gas Plant (MGP, por sus siglas en inglés) y la Pawtucket Planta de Energía No. 1, localizadas al final de las calles Tidewater y Merry en Pawtucket, Rhode Island. Para cumplir con los requisitos establecidos por el Departamento de Control Ambiental de Rhode Island (RIDEM) en su emisión de Reglas y Regulaciones para la Investigación y Remediación de Materiales Peligrosos (Regulaciones de Remediación), se envía este aviso a todos los dueños de propiedades aledañas, inquilinos y miembros de la lista de contactos por correo. Si usted fuera dueño de alguna propiedad que está en arrendamiento, le pedimos que entregue una copia de esta carta a sus inquilinos.

National Grid va a analizar el aire que se encuentra debajo del suelo en el sitio en cuestión. Se instalarán como 23 sondas en el suelo de la propiedad. En algunas áreas localizadas en la parte oeste de la propiedad, las sondas se instalarán fuera de la actual línea de la barda de la propiedad de National Grid. Las muestras se guardarán en contenedores cerrados para muestras de aire. Luego examinaremos y analizaremos las muestras de aire. El análisis de las muestras de aire se llevará a cabo en otro lugar, es decir, en un laboratorio autorizado.

Los contratistas comenzarán a instalar las sondas como para el 1 de julio, 2013. La instalación de las sondas les tomará aproximadamente de 4 a 5 días y coleccionar las muestras les llevará de 2 a 3 días. Los resultados de la evaluación serán presentados a RIDEM y se darán a conocer en los sitios cibernéticos de Tidewater y RIDEM (<http://www.tidewatersite.com> y <http://www.dem.ri.gov/programs/benviron/waste/tide.htm>)

Las actividades que se proponen están más detalladas en la publicación *Supplemental Site Investigation Work Plan (SSIWP) Addendum* presentado a RIDEM en mayo, 2013. Habrá un periodo de 14 días para comentarios, el cual comenzará en la fecha en que se entregue este aviso; durante ese periodo, el público puede revisar los archivos que RIDEM tiene con respecto a esta propiedad y podrá presentar comentarios escritos con respecto a las actividades de investigación que se proponen y que se describen aquí. Estas actividades se harán de acuerdo a las Regulaciones de Remediación de RIDEM y, a nombre de National Grid, serán llevadas a cabo por GZA GeoEnvironmental, Inc. (GZA).

Si usted desea obtener más información o desea hacer alguna pregunta, por favor comuníquese con Michele Leone de National Grid al 781-907-3651.

Muy atentamente,

GZA GEOENVIRONMENTAL, INC

Margaret S. Kilpatrick, P. E.  
Administradora encargada del proyecto

James J. Clark, P. E.  
Encargado

Cc: Joe Martella, RIDEM  
Michele Leone, National Grid

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13 de junho de 2013  
Arquivo nº 05.0043654.00-C



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Ref: Notificação aos donos de propriedades adjacentes  
Adendo ao Plano de Trabalho de Investigação Complementar no Local – Qualidade do Gás do Solo  
Previamente Tidewater Facility  
Pawtucket, Rhode Island  
Caso nº 95-022 RIDEM

Prezados donos de propriedades adjacentes,

O objetivo desta carta é notificá-los de que a Companhia Elétrica Narragansett, sob o nome comercial National Grid (National Grid) estará conduzindo atividades adicionais de testes ambientais associadas à antiga Fábrica de Gás Manufaturado Tidewater (sigla em inglês, MGP) e ao antigo local da Central Elétrica Pawtucket Nº 1, localizados no final das ruas Tidewater e Merry em Pawtucket, Rhode Island. Esta notificação está sendo enviada aos donos das propriedades adjacentes, inquilinos e membros da lista de mala direta da Tidewater Site, de acordo com os requisitos estabelecidos nas Regras e regulamentação para a investigação e remediação de materiais perigosos (Regulamentações de Remediação) do Departamento de Gestão Ambiental de Rhode Island (sigla em inglês, RIDEM). Caso seja dono de uma propriedade que está alugada, solicitamos que forneça uma cópia desta carta aos seus inquilinos.

A National Grid vai testar o ar sob o solo no local. Inseriremos cerca de 23 sondas no solo na propriedade. Em certas áreas ao longo da parte oeste da propriedade, as sondas serão instaladas fora da linha da cerca existente na propriedade da National Grid. As amostras serão coletadas em recipientes fechados para a amostragem de ar. Então, testaremos e analisaremos as amostras de ar. A análise das amostras de ar será concluída fora do local em um laboratório licenciado.

Os empreiteiros começarão a instalar as sondas em 1º de julho de 2013 ou próximo a esta data. Levará aproximadamente 4 a 5 dias para que as sondas sejam instaladas e outros 2 a 3 dias para a coleta das amostras. Os resultados da avaliação serão apresentados ao RIDEM e publicados nos sites da Tidewater e da RIDEM (<http://www.tidewatersite.com> e <http://www.dem.ri.gov/programs/benviron/waste/tide.htm>).

As atividades propostas estão mais detalhadas em um *Adendo ao Plano de Trabalho de Investigação Complementar no Local* (sigla em inglês, SSIWP) apresentado ao RIDEM em maio de 2013. Há um período de 14 dias para comentários, começando a partir da data da entrega desta notificação, durante o qual o público pode analisar os registros do RIDEM referentes a esta propriedade e apresentar comentários por escrito relativos às atividades propostas de investigação aqui descritas. Estas atividades serão conduzidas de acordo com as Regulamentações de Remediação do RIDEM e serão executadas pela GZA GeoEnvironmental, Inc. (GZA), em nome da National Grid.

Caso queiram mais informações ou tenham alguma dúvida, por favor, entrem em contato com Michele Leone da National Grid pelo telefone 781-907-3651.

Sinceramente,

GZA GEOENVIRONMENTAL, INC.

Margaret S. Kilpatrick, P.E.  
Gerente Sênior de Projetos

James J. Clark, P.E.  
Diretor

cc: Joe Martella, RIDEM  
Michele Leone, National Grid



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## TIDEWATER SITE

### Assessing the Quality of Soil Gas Near Neighboring Properties

Recently, National Grid completed additional environmental tests, specifically sampling and analyzing the air beneath the ground at the Former Tidewater Manufactured Gas Plant (MGP) and Electric Generation Site. These “soil gas” tests, conducted in response to community requests and under the direction of the Rhode Island Department of Environmental Management (RIDEM), measure the level of contaminants present in air below the ground.

The purpose of the testing was to measure the quality of soil gas at interior Site locations and along the property’s western boundary in order to assess the quality of soil gas near neighboring properties. As described below, the testing results do not indicate any concerns related to migration of soil gas from the Tidewater Site.

#### The Testing Process

GZA GeoEnvironmental, Inc. (GZA), on behalf of National Grid, conducted the activities consistent with the *Supplemental Site Investigation Work Plan (SSIWP)*, which was submitted to RIDEM in May 2013. Forty-one soil gas probes were installed into the ground on the property between July 8th and 11th, and on August 22nd, 2013. In certain areas along the western portion of the property, the probes were installed outside of the existing fence line, but still on National Grid property. (Probe locations are shown on Figure 1 – Supplemental Site Investigations, Soil Gas Locations, which is posted on the Tidewater website at [www.tidewatersite.com/wp-content/uploads/2012/08/Figure-1.pdf](http://www.tidewatersite.com/wp-content/uploads/2012/08/Figure-1.pdf).)

During the collection of soil gas samples, 10 samples of air were also collected near the probe locations to measure background contaminant levels in the surrounding air. Five air samples were collected at the bulletin board located on Tidewater Street and another five at the bulletin board located at the end of Bowles Court.

After installing the probes, air was vacuumed from them into specially designed, sealed containers. Samples were then sent to a licensed laboratory for testing.

#### The Test Results

The results of the interior soil gas testing are consistent with previous soil and groundwater testing at the Tidewater Site. While certain compounds were detected at low levels, none of



*The results of the interior soil gas testing are consistent with previous soil and groundwater testing at the Tidewater Site. None of the perimeter soil gas readings exceeded regulatory criteria established by the Connecticut Department of Energy and Environmental Protection, which RIDEM uses.*

the 32 perimeter soil gas readings exceeded regulatory criteria established by the Connecticut Department of Energy and Environmental Protection (CTDEEP) for both residential and industrial/commercial settings. (Rhode Island does not have regulatory criteria for soil gas quality.) The results showed the closer the samples got to the boundary of the Site, the lower the concentrations of these compounds.

Results of the background air testing are summarized in Table 1 (Summary of Ambient Air Sampling), which is posted on the Tidewater website at [www.tidewatersite.com/wp-content/uploads/2012/08/Tables-08282013.pdf](http://www.tidewatersite.com/wp-content/uploads/2012/08/Tables-08282013.pdf), along with Table 2 (Summary of Perimeter Soil Gas Sampling), Table 3 (Summary of Interior Soil Gas Sampling) and Table 4 (Summary of QA/QC Sampling).

#### Next Steps

National Grid is committed to keeping neighbors, the nearby schools and parents informed about our activities at the Former Tidewater MGP and Electric Generation Site. The results of this testing do not suggest any concerns related to migration of soil gas from the Tidewater Site to the neighboring community. We are currently preparing a comprehensive report describing this soil gas study and the results. We anticipate submitting this report to RIDEM in mid- to late September 2013. This comprehensive report will also be posted on the Tidewater website ([www.tidewatersite.com](http://www.tidewatersite.com)).

#### Questions and Comments

If you would like more information on National Grid’s activities at the Site, or would like to sign up for the Tidewater mailing list for future announcements, please contact Michele Leone from National Grid at 781-907-3651 or [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com).

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## TIDEWATER SITE

Avaliando a qualidade do gás no solo perto das propriedades vizinhas

Recentemente, a National Grid concluiu testes ambientais adicionais, especificamente tirando amostras e analisando o ar sob o solo das antigas instalações da Tidewater Manufactured Gas Plant (MGP) e Electric Generation. Estes testes de “gás no solo”, conduzidos em atenção a solicitações da comunidade e sob a direção do Departamento de Gestão Ambiental de Rhode Island (RIDEM), medem o nível de contaminantes no ar sob o solo.

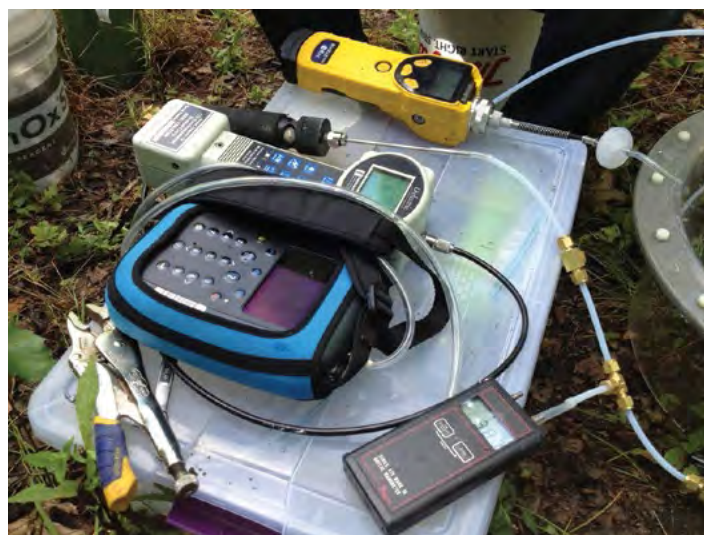
O objetivo do teste era medir a qualidade do gás no solo em locais no interior das instalações e ao longo da divisa oeste da propriedade a fim de avaliar a qualidade do gás no solo perto de propriedades vizinhas. Conforme descrito abaixo, os resultados do teste não indicaram nenhuma preocupação relacionada à migração do gás no solo da Tidewater.

### O processo do teste

A GZA GeoEnvironmental, Inc. (GZA), representando a National Grid, conduziu as atividades de modo consistente com o Adendo ao Plano de Trabalho de Investigação Complementar no Local, que foi apresentado ao RIDEM em maio de 2013. Foram instaladas 41 sondas para gás no solo da propriedade entre 8 e 11 de julho e em 22 de agosto de 2013. Em certas áreas ao longo da parte oeste da propriedade, as sondas foram instaladas fora da linha da cerca existente, mas ainda na propriedade da National Grid (os locais das sondas são mostrados na Figura 1 – Investigações Complementares no Local, Gás no Solo, que está publicada no site da Tidewater em [www.tidewatersite.com/wp-content/uploads/2012/08/Figure-1.pdf](http://www.tidewatersite.com/wp-content/uploads/2012/08/Figure-1.pdf)).

Durante a coleta das amostras do gás no solo, 10 amostras de ar também foram coletadas perto dos locais das sondas para medir os níveis de contaminação ambiental no ar circundante. Foram coletadas cinco amostras de ar em cada um dos quadros de boletins informativos localizados na Tidewater Street e no fim da Bowles Court.

Após a instalação das sondas, o ar foi aspirado para receptáculos vedados e especialmente projetados. As amostras foram então enviadas para um laboratório licenciado para testes.



*Os resultados do teste de gás no solo são consistentes com os testes anteriores do solo e da água subterrânea nas instalações da Tidewater. Nenhuma das leituras de gás no solo do perímetro excedeu os critérios normativos estabelecidos pelo Departamento de Energia e Proteção Ambiental de Connecticut, que o RIDEM usa.*

### Os resultados do teste

Os resultados do teste de gás no solo são consistentes com testes anteriores do solo e da água subterrânea nas instalações da Tidewater. Embora certos compostos tenham sido detectados em níveis baixos, nenhuma das 32 leituras de gás no solo do perímetro excedeu os critérios normativos estabelecidos pelo Departamento de Energia e Proteção Ambiental de Connecticut para ambientes residenciais e industriais/comerciais (Rhode Island não tem critérios normativos para a qualidade de gás no solo). Os resultados mostraram que, quanto mais perto da divisa das instalações, mais baixas as concentrações destes compostos nas amostras.

Os resultados dos testes de ar ambiental estão resumidos na Tabela 1 (Resumo da amostragem do ar ambiental), que está publicada no website da Tidewater em [www.tidewatersite.com/wp-content/uploads/2012/08/Tables-08282013.pdf](http://www.tidewatersite.com/wp-content/uploads/2012/08/Tables-08282013.pdf), junto com a Tabela 2 (Resumo da amostragem de gás no solo do perímetro), Tabela 3 (Resumo da amostragem de gás no solo) e Tabela 4 (Resumo da amostragem QA/QC – garantia de qualidade e controle de qualidade).

### Próximos passos

A National Grid compromete-se a manter os vizinhos, as escolas próximas e os pais informados a respeito das nossas atividades nas antigas instalações da Tidewater Manufactured Gas Plant (MGP) e Electric Generation. Os resultados deste



teste não sugerem quaisquer preocupações relacionadas à migração de gás no solo da Tidewater para a comunidade vizinha. Estamos preparando atualmente um relatório abrangente descrevendo este estudo do gás no solo e os resultados. Esperamos apresentar este relatório ao RIDEM do meio ao fim de setembro de 2013. Este relatório abrangente também será publicado no website da Tidewater ([www.tidewatersite.com](http://www.tidewatersite.com)).

#### Perguntas e Comentários

Se você gostaria de obter mais informações sobre as atividades da National Grid no local, ou gostaria de subscrever à lista de correspondência da Tidewater para futuras comunicações, por favor, entre em contato com Michele Leone da National Grid pelo telefone 781-907-3651 ou [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com).

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## FÁBRICA TIDEWATER

### Evaluación de la calidad del gas del suelo cerca de propiedades vecinas

Recientemente, National Grid finalizó las pruebas ambientales adicionales, que constaron específicamente de la toma de muestras y el análisis del aire debajo del suelo en las antiguas instalaciones del Sitio Tidewater Manufactured Gas Plant (MGP) and Electric Generation Site. Estas pruebas de “gas del suelo”, llevadas a cabo en respuesta a los pedidos de la comunidad y bajo la dirección del Departamento de Gestión Ambiental de Rhode Island (RIDEM, por sus siglas en inglés), miden el nivel de contaminación presente en el aire debajo del suelo.

El objetivo de la prueba era medir la calidad del gas del suelo en el interior de la fábrica y a lo largo del límite oeste de la propiedad, a fin de evaluar la calidad del gas del suelo cerca de las propiedades vecinas. Como se indica a continuación, los resultados de las pruebas no presentan ningún indicio de fugas de gas del suelo del Sitio Tidewater.

#### El proceso de prueba

GZA GeoEnvironmental, Inc (GZA), en nombre de National Grid, llevó a cabo las actividades de acuerdo con el Plan de Trabajo de Investigación Complementario en el Sitio (SSIWP, por sus siglas en inglés), el cual fue presentado ante el RIDEM en mayo de 2013. Se instalaron en el suelo de la propiedad 41 sondas de gas del suelo entre el 8 y el 11 de Julio, y el 22 de agosto de 2013. En determinadas áreas a lo largo de la zona oeste de la propiedad, las sondas se instalaron por fuera del alambrado existente, pero aún en propiedad de National Grid. (Las zonas de las sondas se muestran en la Figura 1: Investigaciones complementarias en el Sitio, zonas de gas del suelo. La figura se encuentra publicada en el sitio web de Tidewater [www.tidewatersite.com/wp-content/uploads/2012/08/Figure-1.pdf](http://www.tidewatersite.com/wp-content/uploads/2012/08/Figure-1.pdf)).

Durante la recolección de muestras de gas del suelo, también se tomaron 10 muestras de aire cerca de las zonas de las sondas para medir los niveles básicos de contaminación en el ambiente. Se tomaron 5 muestras de aire en el tablero de anuncios ubicado en la calle Tidewater Street y otras cinco en el tablero de anuncios ubicado al final de Bowles Court.

Luego de instalar las sondas, el aire se extrajo por aspiración de las sondas y se colocó en recipientes especialmente



*Los resultados de las pruebas de gas del interior del suelo concuerdan con las pruebas de suelo y agua subterránea que se realizaron anteriormente en el Sitio de Tidewater. Ninguna de las lecturas de gas del suelo en el perímetro excedió los criterios regulatorios establecidos por el Departamento de Energía y Protección del Medio Ambiente de Connecticut, los cuales el RIDEM utiliza.*

diseñados y sellados. Después de esto, las muestras se enviaron a un laboratorio autorizado para realizar las pruebas.

#### Los resultados de las pruebas

Los resultados de las pruebas de gas del interior del suelo concuerdan con las pruebas de suelo y agua subterránea que se realizaron anteriormente en el Sitio de Tidewater. Si bien se detectaron niveles bajos de algunos compuestos, ninguna de las 32 lecturas de gas del suelo en el perímetro excedió los criterios regulatorios establecidos por el Departamento de Energía y Protección del Medio Ambiente (CTDEEP) para zonas residenciales e industriales/comerciales. (Rhode Island no tiene un criterio regulatorio para evaluar la calidad de gas del suelo). Los resultados mostraron que mientras más cerca se encontraban las muestras del límite del Sitio, menos concentración de estos compuestos presentaban.

Los resultados de las muestras básicas de aire se encuentran resumidos en la Tabla 1 (Resumen de muestras de aire ambiente), publicada en el sitio web [www.tidewatersite.com/wp-content/uploads/2012/08/Tables-08282013.pdf](http://www.tidewatersite.com/wp-content/uploads/2012/08/Tables-08282013.pdf), junto con la Tabla 2 (Resumen de muestras de gas del interior del suelo en el perímetro), en la Tabla 3 (Resumen de muestras de gas del interior del suelo) y en la Tabla 4 (Resumen de muestras de control de calidad).

## Siguientes pasos

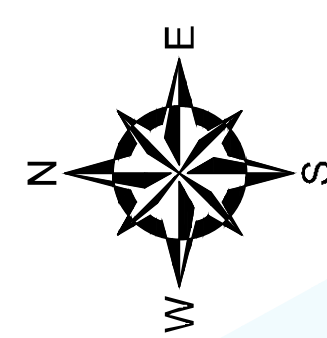
El compromiso de National Grid es mantener informados a los vecinos, a las escuelas cercanas y a los padres acerca de nuestras actividades en el antiguo Sitio Tidewater MGP and Electric Generation Site. Los resultados de estas pruebas no presentan indicios de fugas de gas del suelo del Sitio Tidewater hacia la comunidad vecina. Actualmente, estamos realizando un informe exhaustivo que describe este estudio de gas del suelo y los resultados. Prevemos la entrega del informe al RIDEM entre mediados y fines de septiembre de 2013. Este informe también estará disponible en el sitio web de Tidewater ([www.tidewatersite.com](http://www.tidewatersite.com)).

## Preguntas y comentarios

Para obtener más información sobre las actividades que realiza National Grid en el Sitio o para suscribirse a la lista de correo de Tidewater para recibir futuros anuncios, comuníquese con Michele Leone de National Grid al 781-907-3651 o escriba a [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com).



- LEGEND:**
- SITE AREA BOUNDARIES
  - EXISTING BUILDINGS ON-SITE
  - EXISTING FOUNDATION/PAD ON-SITE
  - EXISTING BUILDINGS/STRUCTURES OFF-SITE
  - EXISTING NBC INTERCEPTOR SANITARY SEWER
  - EXISTING CITY OF PAWTUCKET STORM DRAIN
  - EXISTING WATER LINE
  - EXISTING STORM/COMBINED SAN. SEWER OVERFLOW
  - EXISTING UNDERGROUND ELECTRIC CABLE IN CONDUIT
  - EXISTING UNDERGROUND ELECTRIC MH/STRUCTURE
  - EXISTING ACCESS ROAD
  - EXISTING RETAINING WALLS
  - EXISTING FENCE
  - EXISTING CATCH BASIN LOCATIONS
  - APPROX. 200 FT. JURISDICTION LIMIT
  - APPROXIMATE PROPERTY LINE

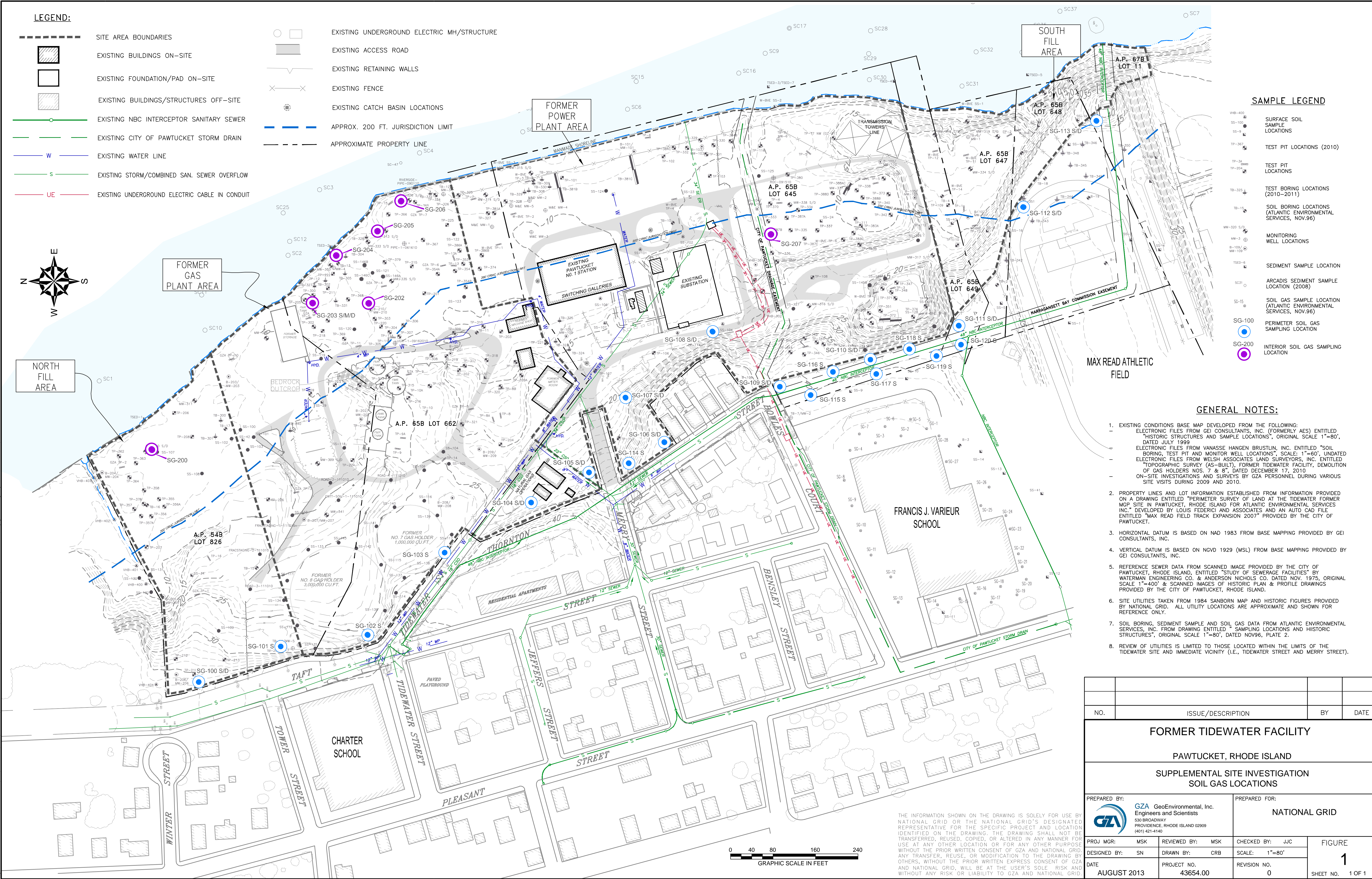


**SAMPLE LEGEND**

- SURFACE SOIL SAMPLE LOCATIONS
- TEST PIT LOCATIONS (2010)
- TEST PIT LOCATIONS
- TEST BORING LOCATIONS (2010-2011)
- SOIL BORING LOCATIONS (ATLANTIC ENVIRONMENTAL SERVICES, NOV.96)
- MONITORING WELL LOCATIONS
- SEDIMENT SAMPLE LOCATION
- ARCADIS SEDIMENT SAMPLE LOCATION (2008)
- SOIL GAS SAMPLE LOCATION (ATLANTIC ENVIRONMENTAL SERVICES, NOV.96)
- PERIMETER SOIL GAS SAMPLING LOCATION
- INTERIOR SOIL GAS SAMPLING LOCATION

**GENERAL NOTES:**

1. EXISTING CONDITIONS BASE MAP DEVELOPED FROM THE FOLLOWING: ELECTRONIC FILES FROM GEI CONSULTANTS, INC. (FORMERLY AES) ENTITLED "HISTORIC STRUCTURES AND SAMPLE LOCATIONS", ORIGINAL SCALE 1"=80', DATED JULY 1999. ELECTRONIC FILES FROM VANASSE HANGEN BRUSTLIN, INC. ENTITLED "SOIL BORING, TEST PIT AND MONITOR WELL LOCATIONS", SCALE: 1"=60', UNDATED. ELECTRONIC FILES FROM WELSH ASSOCIATES LAND SURVEYORS, INC. ENTITLED "TOPOGRAPHIC SURVEY (AS-BUILT), FORMER TIDEWATER FACILITY, DEMOLITION OF GAS HOLDERS NOS. 7 & 8", DATED DECEMBER 17, 2010. ON-SITE INVESTIGATIONS AND SURVEYS BY GZA PERSONNEL DURING VARIOUS SITE VISITS DURING 2009 AND 2010.
2. PROPERTY LINES AND LOT INFORMATION ESTABLISHED FROM INFORMATION PROVIDED ON A DRAWING ENTITLED "PERIMETER SURVEY OF LAND AT THE TIDEWATER FORMER MGP SITE IN PAWTUCKET, RHODE ISLAND FOR ATLANTIC ENVIRONMENTAL SERVICES INC." DEVELOPED BY LOUIS FEDERICI AND ASSOCIATES AND AN AUTO CAD FILE ENTITLED "MAX READ FIELD TRACK EXPANSION 2007" PROVIDED BY THE CITY OF PAWTUCKET.
3. HORIZONTAL DATUM IS BASED ON NAD 1983 FROM BASE MAPPING PROVIDED BY GEI CONSULTANTS, INC.
4. VERTICAL DATUM IS BASED ON NGVD 1929 (MSL) FROM BASE MAPPING PROVIDED BY GEI CONSULTANTS, INC.
5. REFERENCE SEWER DATA FROM SCANNED IMAGE PROVIDED BY THE CITY OF PAWTUCKET, RHODE ISLAND, ENTITLED "STUDY OF SEWERAGE FACILITIES" BY WATERMAN ENGINEERING CO. & ANDERSON NICHOLS CO. DATED NOV. 1975, ORIGINAL SCALE 1"=400' & SCANNED IMAGES OF HISTORIC PLAN & PROFILE DRAWINGS PROVIDED BY THE CITY OF PAWTUCKET, RHODE ISLAND.
6. SITE UTILITIES TAKEN FROM 1984 SANBORN MAP AND HISTORIC FIGURES PROVIDED BY NATIONAL GRID. ALL UTILITY LOCATIONS ARE APPROXIMATE AND SHOWN FOR REFERENCE ONLY.
7. SOIL BORING, SEDIMENT SAMPLE AND SOIL GAS DATA FROM ATLANTIC ENVIRONMENTAL SERVICES, INC. FROM DRAWING ENTITLED "SAMPLING LOCATIONS AND HISTORIC STRUCTURES", ORIGINAL SCALE 1"=80', DATED NOV.96, PLATE 2.
8. REVIEW OF UTILITIES IS LIMITED TO THOSE LOCATED WITHIN THE LIMITS OF THE TIDEWATER SITE AND IMMEDIATE VICINITY (I.E., TIDEWATER STREET AND MERRY STREET).



THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY NATIONAL GRID OR THE NATIONAL GRID'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA AND NATIONAL GRID. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA AND NATIONAL GRID, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA AND NATIONAL GRID.

NO.	ISSUE/DESCRIPTION	BY	DATE
<b>FORMER TIDEWATER FACILITY</b>			
PAWTUCKET, RHODE ISLAND			
SUPPLEMENTAL SITE INVESTIGATION SOIL GAS LOCATIONS			
PREPARED BY:	GZA GeoEnvironmental, Inc. Engineers and Scientists 550 BROADWAY PROVIDENCE, RHODE ISLAND 02909 (401) 421-4140	PREPARED FOR:	NATIONAL GRID
PROJ MGR:	MSK	REVIEWED BY:	MSK
DESIGNED BY:	SN	DRAWN BY:	CRB
DATE:	AUGUST 2013	PROJECT NO.:	43654.00
		CHECKED BY:	JJC
		SCALE:	1"=80'
		REVISION NO.:	0
			FIGURE <b>1</b>
			SHEET NO. 1 OF 1



**TABLE 1**  
**Summary of Ambient Air Sampling**  
 Former Tidewater Facility  
 Pawtucket, Rhode Island

EPA TO-15 Full List	2008 CT DEEP		Units	Varieur-72413	Tidewater-72513	Varieur-72513	Tidewater-72913	Varieur-72913	Tidewater-73013	Varieur-73013	Tidewater-73113	Varieur-73113	Tidewater-8113
	Residential Criteria	Industrial/Commercial Criteria		13G1044-02 Ambient Air 7/24/2013	13G1148-01 Ambient Air 7/25/2013	13G1148-02 Ambient Air 7/25/2013	13H0055-01 Ambient Air 7/29/2013	13H0055-02 Ambient Air 7/29/2013	13H0055-06 Ambient Air 7/30/2013	13H0055-07 Ambient Air 7/30/2013	13H0055-11 Ambient Air 7/31/2013	13H0055-12 Ambient Air 7/31/2013	13H0164-01 Ambient Air 8/1/2013
Acetone	378,030	500,000	µg/m <sup>3</sup>	31	12	17	18	42	33	34	31	35	26
Benzene	2,456	4,501	µg/m <sup>3</sup>	0.22	0.23	0.23	0.24	0.36	0.26	0.43	0.23	0.27	0.29
Benzyl chloride	NE	NE	µg/m <sup>3</sup>	<0.18	<0.18	<0.18	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26
Bromodichloromethane	1,340	1,340	µg/m <sup>3</sup>	<0.24	<0.12	<0.12	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17
Bromoform	NE	NE	µg/m <sup>3</sup>	<0.36	<0.36	<0.36	<0.52	<0.52	<0.52	<0.52	<0.52	<0.52	<0.52
Bromomethane	780	6,930	µg/m <sup>3</sup>	<0.14	<0.14	<0.14	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19
1,3-Butadiene	NE	NE	µg/m <sup>3</sup>	<0.078	<0.078	<0.078	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11
2-Butanone (MEK)	377,771	500,000	µg/m <sup>3</sup>	5.7	<4.1	<4.1	<5.9	<5.9	<5.9	<5.9	<5.9	6.6	<5.9
Carbon Disulfide	NE	NE	µg/m <sup>3</sup>	<1.1	<1.1	<1.1	<1.6	<1.6	<1.6	<1.6	<1.6	<1.6	<1.6
Carbon Tetrachloride	1,300	1,300	µg/m <sup>3</sup>	0.45	0.45	0.45	0.26	0.43	0.46	0.46	0.46	0.43	0.44
Chlorobenzene	30,254	282,730	µg/m <sup>3</sup>	<0.16	<0.16	<0.16	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23
Chloroethane	378,671	500,000	µg/m <sup>3</sup>	<0.093	<0.093	<0.093	<0.13	<0.13	<0.13	0.22	<0.13	<0.13	<0.13
Chloroform	1,513	13,864	µg/m <sup>3</sup>	0.28	0.16	0.11	<0.12	0.16	0.11	<0.12	0.3	<0.12	<0.12
Chloromethane	3,926	37,362	µg/m <sup>3</sup>	1.3	0.95	1	0.88	1	1	1.5	0.99	0.9	1.1
Cyclohexane	378,242	500,000	µg/m <sup>3</sup>	<0.12	<0.12	<0.12	<0.17	0.34	<0.17	0.29	<0.17	<0.17	<0.17
Dibromochloromethane	NE	NE	µg/m <sup>3</sup>	<0.30	<0.15	<0.15	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21
1,2-Dibromoethane (EDB)	NE	NE	µg/m <sup>3</sup>	<0.27	<0.13	<0.13	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19
1,2-Dichlorobenzene	60,527	500,000	µg/m <sup>3</sup>	<0.21	<0.21	<0.21	<0.30	<0.30	<0.30	<0.30	<0.30	<0.30	<0.30
1,3-Dichlorobenzene	1,515	13,865	µg/m <sup>3</sup>	<0.21	<0.21	<0.21	<0.30	<0.30	<0.30	<0.30	<0.30	<0.30	<0.30
1,4-Dichlorobenzene	18,156	33,277	µg/m <sup>3</sup>	<0.21	<0.21	<0.21	<0.30	<0.30	<0.30	<0.30	<0.30	<0.30	<0.30
Dichlorodifluoromethane (Freon 12)	75,770	500,000	µg/m <sup>3</sup>	2	1.2	1.2	1.1	1.7	1.4	1.4	1.8	1.8	2
1,1-Dichloroethane	15,147	141,568	µg/m <sup>3</sup>	<0.14	<0.071	<0.071	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10
1,2-Dichloroethane	800	800	µg/m <sup>3</sup>	<0.14	<0.14	<0.14	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10
1,1-Dichloroethylene	7,560	70,654	µg/m <sup>3</sup>	<0.14	<0.070	<0.070	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099
cis-1,2-Dichloroethylene	15,119	141,301	µg/m <sup>3</sup>	<0.14	<0.070	<0.070	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099
trans-1,2-Dichloroethylene	15,119	141,305	µg/m <sup>3</sup>	<0.14	<0.070	<0.070	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099
1,2-Dichloropropane	900	1,109	µg/m <sup>3</sup>	<0.16	<0.081	<0.081	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12
cis-1,3-Dichloropropene	900	2,774	µg/m <sup>3</sup>	<0.16	<0.080	<0.080	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11
trans-1,3-Dichloropropene	900	2,774	µg/m <sup>3</sup>	<0.16	<0.080	<0.080	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11
1,2-Dichloro-1,1,2,2-tetrafluoroethane (Freon 114)	NE	NE	µg/m <sup>3</sup>	<0.25	<0.25	<0.25	<0.35	<0.35	<0.35	<0.35	<0.35	<0.35	<0.35
1,4-Dioxane	NE	NE	µg/m <sup>3</sup>	<1.3	<1.3	<1.3	<1.8	<1.8	<1.8	<1.8	<1.8	<1.8	<1.8
Ethanol	NE	NE	µg/m <sup>3</sup>	8.8	4.1	4.5	6.5	25	12	9.5	11	10	8.8
Ethyl Acetate	377,762	500,000	µg/m <sup>3</sup>	1.4	0.29	0.67	0.52	6.4	0.72	0.18	0.5	<0.18	<0.18
Ethylbenzene	43,882	410,364	µg/m <sup>3</sup>	<0.15	<0.15	<0.15	<0.22	<0.22	<0.22	0.61	<0.22	<0.22	<0.22
4-Ethyltoluene	NE	NE	µg/m <sup>3</sup>	<0.17	<0.17	<0.17	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
Heptane	NE	NE	µg/m <sup>3</sup>	0.3	0.16	0.16	<0.14	0.61	<0.20	0.86	<0.20	<0.20	0.23
Hexachlorobutadiene	NE	NE	µg/m <sup>3</sup>	<0.37	<0.37	<0.37	<0.53	<0.53	<0.53	<0.53	<0.53	<0.53	<0.53
Hexane	302,386	500,000	µg/m <sup>3</sup>	<4.9	<4.9	<4.9	<7.0	12	<7.0	<7.0	<7.0	<7.0	<7.0
2-Hexanone (MBK)	NE	NE	µg/m <sup>3</sup>	0.77	0.6	0.48	0.88	0.88	1.3	0.58	1.8	1.8	1.1
Indane	NE	NE	µg/m <sup>3</sup>	<0.44	<0.44	<0.44	<0.62	<0.62	<0.62	<0.62	<0.62	<0.62	<0.62
Indene	NE	NE	µg/m <sup>3</sup>	<0.44	<0.44	<0.44	<0.63	<0.63	<0.63	<0.63	<0.63	<0.63	<0.63
Isopropanol	NE	NE	µg/m <sup>3</sup>	<3.4	<3.4	<3.4	<4.9	8.5	<4.9	<4.9	<4.9	<4.9	<4.9
Isopropylbenzene (Cumene)	29,545	54,140	µg/m <sup>3</sup>	<0.44	<0.44	<0.44	<0.62	<0.62	<0.62	<0.62	<0.62	<0.62	<0.62
Methyl tert-Butyl Ether (MTBE)	129,581	263,819	µg/m <sup>3</sup>	<0.13	<0.13	<0.13	<0.18	<0.18	<0.18	<0.18	<0.18	<0.18	<0.18
Methylene Chloride	2,269	23,554	µg/m <sup>3</sup>	2.2	6.7	2.8	4.4	6.7	5.2	3.2	1.9	<1.7	<1.7
4-Methyl-2-pentanone (MIBK)	378,459	500,000	µg/m <sup>3</sup>	<0.14	0.22	0.18	0.28	0.42	0.52	<0.20	0.67	0.68	0.4
Naphthalene	1,284	12,203	µg/m <sup>3</sup>	0.37	0.27	0.22	0.29	0.48	0.39	0.31	<0.26	<0.26	0.3
Propene	NE	NE	µg/m <sup>3</sup>	<2.4	<2.4	<2.4	<3.4	<3.4	<3.4	<3.4	<3.4	<3.4	<3.4
Styrene	45,420	425,838	µg/m <sup>3</sup>	<0.15	<0.15	<0.15	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21
1,1,2,2-Tetrachloroethane	1,400	1,386	µg/m <sup>3</sup>	<0.24	<0.12	<0.12	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17
Tetrachloroethylene	3,783	6,936	µg/m <sup>3</sup>	<0.24	<0.17	<0.17	<0.12	<0.17	<0.17	<0.17	0.21	<0.17	0.18
Tetrahydrofuran	605	5,814	µg/m <sup>3</sup>	<0.10	<0.10	<0.10	<0.15	0.2	<0.15	<0.15	<0.15	<0.15	<0.15
Toluene	130,246	500,000	µg/m <sup>3</sup>	0.71	0.85	0.8	0.58	1.3	0.72	2.8	0.77	1.1	0.91
1,2,4-Trichlorobenzene	1,135	11,093	µg/m <sup>3</sup>	<0.26	<0.26	<0.26	<0.37	<0.37	<0.37	<0.37	<0.37	<0.37	<0.37
1,1,1-Trichloroethane	115,135	500,000	µg/m <sup>3</sup>	<0.19	<0.096	<0.096	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14
1,1,2-Trichloroethane	1,100	1,100	µg/m <sup>3</sup>	<0.19	<0.096	<0.096	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14
Trichloroethylene	1,100	1,385	µg/m <sup>3</sup>	0.28	<0.094	<0.094	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13	<0.13
Trichlorofluoromethane (Freon 11)	378,591	500,000	µg/m <sup>3</sup>	1.8	1.1	1.2	0.99	1.6	1.6	1.5	1.6	1.4	1.6
1,1,2-Trichloro-1,1,2,2-trifluoroethane (Freon 113)	378,304	500,000	µg/m <sup>3</sup>	1.4	0.58	0.6	0.46	0.9	1.5	1.4	1.9	0.99	1.7
1,2,4-Trimethylbenzene	2,578	23,601	µg/m <sup>3</sup>	<0.17	<0.17	<0.17	<0.25	<0.25	<0.25	0.75	<0.25	<0.25	<0.25
1,3,5-Trimethylbenzene	2,578	23,601	µg/m <sup>3</sup>	<0.17	<0.17	<0.17	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
Vinyl Acetate	86,247	500,000	µg/m <sup>3</sup>	<2.5	<2.5	<2.5	<3.5	<3.5	<3.5	<3.5	<3.5	<3.5	<3.5
Vinyl Chloride	500	1,249	µg/m <sup>3</sup>	<0.090	<0.045	<0.045	<0.064	<0.064	<0.064	<0.064	<0.064	<0.064	<0.064
m&p-Xylene	44,967	421,609	µg/m <sup>3</sup>	<0.30	0.33	<0.30	<0.43	0.48	<0.43	1.8	<0.43	<0.43	<0.43
o-Xylene	44,967	421,609	µg/m <sup>3</sup>	<0.15	<0.15	<0.15	<0.22	<0.22	<0.22	0.74	<0.22	<0.22	<0.22

Notes:  
 NE - Not Established  
 CTDEEP residential and industrial/commercial criteria is obtained from the 2008 Connecticut Remediation Criteria: Technical Support Document Appendix J published by the CTDEEP.  
 CTDEEP Criteria is presented in the 2008 Connecticut Remediation Criteria: Technical Support Document Appendix J - Table I6 and J8 in parts per million (ppmv) with adjustments presented for analytical capabilities and maximum values. To obtain criteria in mg/m<sup>3</sup> units, ppmv criteria is multiplied by the molecular weight of the compound divided by 24.45 (a conversion factor). The mg/m<sup>3</sup> criteria is multiplied by 1000 to obtain µg/m<sup>3</sup>.

TABLE 2
Summary of Perimeter Soil Gas Sampling
Former Tidewater Facility
Pawtucket, Rhode Island

Table with columns for EPA TO-3C, EPA TO-15 Full List, and various soil gas sampling locations (SG-1005 to SG-1100). Rows include chemical names like Helium, Acetone, Benzene, and many others, with corresponding data values.

Notes:
NE - Not Established
CTDEEP residential and industrial/commercial criteria is obtained from the 2008 Connecticut Remediation Criteria: Technical Support Document Appendix J published by the CTDEEP.
CTDEEP Criteria is presented in the 2008 Connecticut Remediation Criteria: Technical Support Document Appendix J - Table J6 and J8 in parts per million (ppmv) with adjustments presented for analytical capabilities and maximum values. To obtain criteria in mg/m³ units, ppmv criteria is multiplied by the molecular weight of the compound divided by 24.45 (a conversion factor). The mg/m³ criteria is multiplied by 1000 to obtain µg/m³.





**TABLE 3**  
**Summary of Interior Soil Gas Sampling**  
Former Tidewater Facility  
Pawtucket, Rhode Island

	2008 CT DEEP		Units	SG-200	SG-202	SG-203S	SG-203M	SG-203D	SG-204	SG-205	SG-206	SG-207
	Residential Criteria	Industrial/Commercial Criteria		13H0164-09 Soil Gas 8/2/2013	13H0164-05 Soil Gas 8/2/2013	13H0164-06 Soil Gas 8/2/2013	13H0164-07 Soil Gas 8/2/2013	13H0164-08 Soil Gas 8/2/2013	13H0164-10 Soil Gas 8/2/2013	13H0164-14 Soil Gas 8/1/2013	13H0164-13 Soil Gas 8/1/2013	13H0164-11 Soil Gas 8/1/2013
<b>EPA TO-3C</b>												
Helium	NE	NE	%	<0.40	<0.40	<0.40	<0.40	<0.40	<0.40	<0.40	<0.40	<0.40
<b>EPA TO-15 Full List</b>												
Acetone	378,030	500,000	µg/m <sup>3</sup>	19	16	<190	<190	<95	<95	11	<95	8.2
Benzene	2,456	4,501	µg/m <sup>3</sup>	7.2	1.3	4000	2400	45	930	<0.16	4.9	1.8
Benzyl chloride	NE	NE	µg/m <sup>3</sup>	<0.26	<0.26	<10	<10	<5.2	<5.2	<0.26	<5.2	<0.26
Bromodichloromethane	1,340	1,340	µg/m <sup>3</sup>	<0.17	<0.17	<6.7	<6.7	<3.4	<3.4	<0.17	<3.4	<0.17
Bromoform	NE	NE	µg/m <sup>3</sup>	<0.52	<0.52	<21	<21	<10	<10	<0.52	<10	<0.52
Bromomethane	780	6,930	µg/m <sup>3</sup>	<0.19	<0.19	<7.8	<7.8	<3.9	<3.9	<0.19	<3.9	<0.19
1,3-Butadiene	NE	NE	µg/m <sup>3</sup>	<0.11	<0.11	<4.4	<4.4	<2.2	<2.2	<0.11	<2.2	<0.11
2-Butanone (MEK)	377,771	500,000	µg/m <sup>3</sup>	<5.9	<5.9	<240	<240	<120	<120	<5.9	<120	<5.9
Carbon Disulfide	NE	NE	µg/m <sup>3</sup>	2.1	17	110	<62	<31	<31	19	<31	2.6
Carbon Tetrachloride	1,300	1,300	µg/m <sup>3</sup>	0.57	<0.16	<6.3	<6.3	<3.1	<3.1	0.56	<3.1	<0.16
Chlorobenzene	30,254	282,730	µg/m <sup>3</sup>	<0.23	<0.23	<9.2	<9.2	<4.6	<4.6	<0.23	<4.6	<0.23
Chloroethane	378,671	500,000	µg/m <sup>3</sup>	0.15	<0.066	<2.6	<2.6	<1.3	<1.3	<0.066	<1.3	<0.066
Chloroform	1,513	13,864	µg/m <sup>3</sup>	11	0.5	<4.9	<4.9	<2.4	<2.4	0.66	<2.4	0.39
Chloromethane	3,926	37,362	µg/m <sup>3</sup>	0.53	0.84	<8.3	<8.3	6.9	<4.1	<0.21	<4.1	0.47
Cyclohexane	378,242	500,000	µg/m <sup>3</sup>	0.89	<0.17	15	<6.9	<3.4	<3.4	0.82	360	1.3
Dibromochloromethane	NE	NE	µg/m <sup>3</sup>	<0.21	<0.21	<8.5	<8.5	<4.3	<4.3	<0.21	<4.3	<0.21
1,2-Dibromoethane (EDB)	NE	NE	µg/m <sup>3</sup>	<0.19	<0.19	<7.7	<7.7	<3.8	<3.8	<0.19	<3.8	<0.19
1,2-Dichlorobenzene	60,527	500,000	µg/m <sup>3</sup>	<0.30	<0.30	<12	<12	<6.0	<6.0	<0.30	<6.0	<0.30
1,3-Dichlorobenzene	1,515	13,865	µg/m <sup>3</sup>	<0.30	<0.30	<12	<12	<6.0	<6.0	<0.30	<6.0	<0.30
1,4-Dichlorobenzene	18,156	33,277	µg/m <sup>3</sup>	<0.30	<0.30	<12	<12	<6.0	<6.0	<0.30	<6.0	<0.30
Dichlorodifluoromethane (Freon 12)	75,770	500,000	µg/m <sup>3</sup>	1.5	1.2	<9.9	<9.9	<4.9	<4.9	1.6	<4.9	1.5
1,1-Dichloroethane	15,147	141,568	µg/m <sup>3</sup>	<0.10	<0.10	<4.0	<4.0	<2.0	<2.0	<0.10	<2.0	<0.10
1,2-Dichloroethane	800	800	µg/m <sup>3</sup>	<0.10	<0.10	<4.0	<4.0	<2.0	<2.0	<0.10	<2.0	<0.10
1,1-Dichloroethylene	7,560	70,654	µg/m <sup>3</sup>	<0.099	<0.099	<4.0	<4.0	<2.0	<2.0	<0.099	<2.0	<0.099
cis-1,2-Dichloroethylene	15,119	141,301	µg/m <sup>3</sup>	<0.099	<0.099	<4.0	<4.0	<2.0	<2.0	<0.099	<2.0	<0.099
trans-1,2-Dichloroethylene	15,119	141,305	µg/m <sup>3</sup>	<0.099	<0.099	<4.0	<4.0	<2.0	<2.0	<0.099	<2.0	<0.099
1,2-Dichloropropane	900	1,109	µg/m <sup>3</sup>	<0.12	<0.12	<4.6	<4.6	<2.3	<2.3	<0.12	<2.3	<0.12
cis-1,3-Dichloropropene	900	2,774	µg/m <sup>3</sup>	<0.11	<0.11	<4.5	<4.5	<2.3	<2.3	<0.11	<2.3	<0.11
trans-1,3-Dichloropropene	900	2,774	µg/m <sup>3</sup>	<0.11	<0.11	<4.5	<4.5	<2.3	<2.3	<0.11	<2.3	<0.11
1,2-Dichloro-1,1,2,2-tetrafluoroethane (Freon 114)	NE	NE	µg/m <sup>3</sup>	<0.35	<0.35	<14	<14	<7.0	<7.0	<0.35	<7.0	<0.35
1,4-Dioxane	NE	NE	µg/m <sup>3</sup>	<1.8	<1.8	<72	<72	<36	<36	<1.8	<36	<1.8
Ethanol	NE	NE	µg/m <sup>3</sup>	4.1	<3.8	<150	<150	<75	<75	<3.8	<75	<3.8
Ethyl Acetate	377,762	500,000	µg/m <sup>3</sup>	0.94	<0.18	<7.2	<7.2	<3.6	<3.6	0.83	<3.6	<0.18
Ethylbenzene	43,882	410,364	µg/m <sup>3</sup>	5.3	<0.22	13000	6800	190	730	0.47	24	0.36
4-Ethyltoluene	NE	NE	µg/m <sup>3</sup>	6.6	<0.25	6000	3000	260	110	4.8	6.9	0.44
Heptane	NE	NE	µg/m <sup>3</sup>	0.3	<0.20	55	41	<4.1	7.9	0.84	360	<0.20
Hexachlorobutadiene	NE	NE	µg/m <sup>3</sup>	<0.53	<0.53	<21	<21	<11	<11	<0.53	<11	<0.53
Hexane	302,386	500,000	µg/m <sup>3</sup>	<7.0	<7.0	<280	<280	<140	<140	<7.0	390	<7.0
2-Hexanone (MBK)	NE	NE	µg/m <sup>3</sup>	0.75	0.53	<8.2	<8.2	<4.1	<4.1	<0.20	<4.1	<0.20
Indane	NE	NE	µg/m <sup>3</sup>	18	<0.62	8200	3100	570	240	5.8	<12	1.4
Indene	NE	NE	µg/m <sup>3</sup>	18	<0.63	160000	20000	8900	940	26	<13	1.2
Isopropanol	NE	NE	µg/m <sup>3</sup>	<4.9	<4.9	<200	<200	<98	<98	<4.9	<98	<4.9
Isopropylbenzene (Cumene)	29,545	54,140	µg/m <sup>3</sup>	0.67	<0.62	460	200	<12	<12	<0.62	<12	<0.62
Methyl tert-Butyl Ether (MTBE)	129,581	263,819	µg/m <sup>3</sup>	<0.18	<0.18	<7.2	<7.2	<3.6	<3.6	<0.18	<3.6	<0.18
Methylene Chloride	2,269	23,554	µg/m <sup>3</sup>	3.8	2.8	<69	<69	<35	<35	2.5	<35	2.4
4-Methyl-2-pentanone (MIBK)	378,459	500,000	µg/m <sup>3</sup>	<0.20	<0.20	<8.2	<8.2	<4.1	<4.1	<0.20	<4.1	<0.20
Naphthalene	1,284	12,203	µg/m <sup>3</sup>	140	9.4	52000	36000	8100	1300	530	8.5	370
Propene	NE	NE	µg/m <sup>3</sup>	<3.4	<3.4	<140	<140	<69	<69	<3.4	<69	<3.4
Styrene	45,420	425,838	µg/m <sup>3</sup>	30	<0.21	29000	44000	1800	820	0.55	<4.3	0.38
1,1,2,2-Tetrachloroethane	1,400	1,386	µg/m <sup>3</sup>	<0.17	<0.17	<6.9	<6.9	<3.4	<3.4	<0.17	<3.4	<0.17
Tetrachloroethylene	3,783	6,936	µg/m <sup>3</sup>	3	6	<6.8	80	100	20	9.2	13	1.5
Tetrahydrofuran	605	5,814	µg/m <sup>3</sup>	0.48	0.48	<5.9	<5.9	<2.9	<2.9	<0.15	<2.9	<0.15
Toluene	130,246	500,000	µg/m <sup>3</sup>	20	0.46	95000	100000	1300	12000	0.41	13	2.9
1,2,4-Trichlorobenzene	1,135	11,093	µg/m <sup>3</sup>	<0.37	<0.37	<15	<15	<7.4	<7.4	<0.37	<7.4	<0.37
1,1,1-Trichloroethane	115,135	500,000	µg/m <sup>3</sup>	2.5	<0.14	<5.5	<5.5	<2.7	<2.7	0.5	<2.7	0.51
1,1,2-Trichloroethane	1,100	1,100	µg/m <sup>3</sup>	<0.14	<0.14	<5.5	<5.5	<2.7	<2.7	<0.14	<2.7	<0.14
Trichloroethylene	1,100	1,385	µg/m <sup>3</sup>	<0.13	<0.13	<5.4	<5.4	<2.7	<2.7	<0.13	<2.7	<0.13
Trichlorofluoromethane (Freon 11)	378,591	500,000	µg/m <sup>3</sup>	1.6	1.2	<11	<11	<5.6	<5.6	3.8	<5.6	2.4
1,1,2-Trichloro-1,1,2,2-trifluoroethane (Freon 113)	378,304	500,000	µg/m <sup>3</sup>	0.6	0.61	<15	<15	<7.7	<7.7	0.83	<7.7	0.73
1,2,4-Trimethylbenzene	2,578	23,601	µg/m <sup>3</sup>	56	0.96	57000	23000	3000	1300	15	6.3	5.7
1,3,5-Trimethylbenzene	2,578	23,601	µg/m <sup>3</sup>	57	0.36	33000	10000	1200	880	8.5	5.5	3
Vinyl Acetate	86,247	500,000	µg/m <sup>3</sup>	<3.5	<3.5	<140	<140	<70	<70	<3.5	<70	<3.5
Vinyl Chloride	500	1,249	µg/m <sup>3</sup>	<0.064	<0.064	<2.6	<2.6	<1.3	<1.3	<0.064	<1.3	<0.064
m&p-Xylene	44,967	421,609	µg/m <sup>3</sup>	48	<0.43	170000	76000	3800	6300	1.5	41	4.5
o-Xylene	44,967	421,609	µg/m <sup>3</sup>	29	0.26	84000	30000	1500	2200	1.6	22	1.4

**Notes:**

NE - Not Established

Red text indicates an exceedance of CTDEEP residential criteria

A bold bordered cell indicates an exceedance of CTDEEP industrial/commercial criteria.

CTDEEP residential and industrial/commercial criteria is obtained from the 2008 Connecticut Remediation Criteria: Technical Support Document Appendix J published by the CTDEEP.

CTDEEP Criteria is presented in the 2008 Connecticut Remediation Criteria: Technical Support Document Appendix J - Table J6 and J8 in parts per million (ppmv) with adjustments presented for analytical capabilities and maximum values. To obtain criteria in mg/m<sup>3</sup> units, ppmv criteria is multiplied by the molecular weight of the compound divided by 24.45 (a conversion factor). The mg/m<sup>3</sup> criteria is multiplied by 1000 to obtain µg/m<sup>3</sup>.

**TABLE 4**  
**Summary of QA/QC Sampling**  
 Former Tidewater Facility  
 Pawtucket, Rhode Island

	2008 CT DEEP		Units	SG-1005	Duplicate #1	SG-113D	Duplicate #2	SG-118S	Duplicate #3
	Residential Criteria	Industrial/Commercial Criteria		13H0055-04 Soil Gas 7/29/2013	13H0055-05 Soil Gas 7/29/2013	13H0164-16 Soil Gas 8/1/2013	13H0164-03 Soil Gas 8/1/2013	13H0996-03 Soil Gas 8/23/2013	13H0996-04 Soil Gas 8/23/2013
<b>EPA TO-3C</b>									
Helium	NE	NE	%	<0.40	<0.40	<0.40	<0.40	<0.40	<0.40
<b>EPA TO-15 Full List</b>									
Acetone	378,030	500,000	µg/m <sup>3</sup>	42	7.8	13	18	26	25
Benzene	2,456	4,501	µg/m <sup>3</sup>	<0.16	<0.16	0.29	0.32	1.5	1.5
Benzyl chloride	NE	NE	µg/m <sup>3</sup>	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26
Bromodichloromethane	1,340	1,340	µg/m <sup>3</sup>	0.37	0.36	<0.17	<0.17	<0.17	<0.17
Bromoform	NE	NE	µg/m <sup>3</sup>	<0.52	<0.52	<0.52	<0.52	<0.52	<0.52
Bromomethane	780	6,930	µg/m <sup>3</sup>	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19
1,3-Butadiene	NE	NE	µg/m <sup>3</sup>	0.11	<0.11	<0.11	<0.11	<0.11	<0.11
2-Butanone (MEK)	377,771	500,000	µg/m <sup>3</sup>	6.7	<5.9	<5.9	<5.9	<5.9	<5.9
Carbon Disulfide	NE	NE	µg/m <sup>3</sup>	<1.6	<1.6	2.4	2.1	3.3	3.2
Carbon Tetrachloride	1,300	1,300	µg/m <sup>3</sup>	0.54	0.52	2.2	2.1	<0.16	0.32
Chlorobenzene	30,254	282,730	µg/m <sup>3</sup>	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23
Chloroethane	378,671	500,000	µg/m <sup>3</sup>	<0.13	<0.13	<0.066	<0.066	<0.13	<0.13
Chloroform	1,513	13,864	µg/m <sup>3</sup>	63	63	1.2	0.94	0.68	0.71
Chloromethane	3,926	37,362	µg/m <sup>3</sup>	0.33	0.21	0.52	0.63	0.22	<0.21
Cyclohexane	378,242	500,000	µg/m <sup>3</sup>	<0.17	<0.17	0.34	<0.17	<0.17	<0.17
Dibromochloromethane	NE	NE	µg/m <sup>3</sup>	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21
1,2-Dibromoethane (EDB)	NE	NE	µg/m <sup>3</sup>	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19
1,2-Dichlorobenzene	60,527	500,000	µg/m <sup>3</sup>	<0.30	<0.30	<0.30	<0.30	<0.30	<0.30
1,3-Dichlorobenzene	1,515	13,865	µg/m <sup>3</sup>	<0.30	<0.30	<0.30	<0.30	<0.30	<0.30
1,4-Dichlorobenzene	18,156	33,277	µg/m <sup>3</sup>	<0.30	<0.30	<0.30	<0.30	<0.30	<0.30
Dichlorodifluoromethane (Freon 12)	75,770	500,000	µg/m <sup>3</sup>	1.9	1.7	1.4	1.4	1.8	1.8
1,1-Dichloroethane	15,147	141,568	µg/m <sup>3</sup>	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10
1,2-Dichloroethane	800	800	µg/m <sup>3</sup>	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10
1,1-Dichloroethylene	7,560	70,654	µg/m <sup>3</sup>	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099
cis-1,2-Dichloroethylene	15,119	141,301	µg/m <sup>3</sup>	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099
trans-1,2-Dichloroethylene	15,119	141,305	µg/m <sup>3</sup>	<0.099	<0.099	<0.099	<0.099	<0.099	<0.099
1,2-Dichloropropane	900	1,109	µg/m <sup>3</sup>	<0.12	<0.12	<0.12	<0.12	<0.12	<0.12
cis-1,3-Dichloropropene	900	2,774	µg/m <sup>3</sup>	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11
trans-1,3-Dichloropropene	900	2,774	µg/m <sup>3</sup>	<0.11	<0.11	<0.11	<0.11	<0.11	<0.11
1,2-Dichloro-1,1,2,2-tetrafluoroethane (Freon 114)	NE	NE	µg/m <sup>3</sup>	<0.35	<0.35	<0.35	<0.35	<0.35	<0.35
1,4-Dioxane	NE	NE	µg/m <sup>3</sup>	<1.8	<1.8	<1.8	<1.8	<1.8	<1.8
Ethanol	NE	NE	µg/m <sup>3</sup>	5.5	<3.8	<3.8	9	<3.8	<3.8
Ethyl Acetate	377,762	500,000	µg/m <sup>3</sup>	1.1	1.2	1.5	1.8	21	20
Ethylbenzene	43,882	410,364	µg/m <sup>3</sup>	<0.22	<0.22	0.5	0.42	1.5	1.5
4-Ethyltoluene	NE	NE	µg/m <sup>3</sup>	<0.25	<0.25	0.28	<0.25	0.65	0.68
Heptane	NE	NE	µg/m <sup>3</sup>	0.26	<0.20	<0.20	0.36	<0.20	<0.20
Hexachlorobutadiene	NE	NE	µg/m <sup>3</sup>	<0.53	<0.53	<0.53	<0.53	<0.53	<0.53
Hexane	302,386	500,000	µg/m <sup>3</sup>	<7.0	<7.0	<7.0	7.3	<7.0	<7.0
2-Hexanone (MBK)	NE	NE	µg/m <sup>3</sup>	2.3	<0.20	0.46	<0.20	0.61	0.66
Indane	NE	NE	µg/m <sup>3</sup>	<0.62	<0.62	<0.62	<0.62	0.65	0.63
Indene	NE	NE	µg/m <sup>3</sup>	<0.63	<0.63	<0.63	<0.63	1.4	1.3
Isopropanol	NE	NE	µg/m <sup>3</sup>	<4.9	<4.9	<4.9	<4.9	<4.9	<4.9
Isopropylbenzene (Cumene)	29,545	54,140	µg/m <sup>3</sup>	<0.62	<0.62	<0.62	<0.62	<0.62	<0.62
Methyl tert-Butyl Ether (MTBE)	129,581	263,819	µg/m <sup>3</sup>	<0.18	<0.18	<0.18	<0.18	<0.18	<0.18
Methylene Chloride	2,269	23,554	µg/m <sup>3</sup>	<1.7	<1.7	2.2	2.9	2.6	<1.7
4-Methyl-2-pentanone (MIBK)	378,459	500,000	µg/m <sup>3</sup>	1	<0.20	0.27	<0.20	<0.20	<0.20
Naphthalene	1,284	12,203	µg/m <sup>3</sup>	0.33	<0.26	1.4	0.62	12	12
Propene	NE	NE	µg/m <sup>3</sup>	4.1	<3.4	<3.4	<3.4	<3.4	<3.4
Styrene	45,420	425,838	µg/m <sup>3</sup>	<0.21	<0.21	1.4	1	0.98	0.98
1,1,2,2-Tetrachloroethane	1,400	1,386	µg/m <sup>3</sup>	<0.17	<0.17	<0.17	<0.17	<0.17	<0.17
Tetrachloroethylene	3,783	6,936	µg/m <sup>3</sup>	64	62	7.5	6	17	16
Tetrahydrofuran	605	5,814	µg/m <sup>3</sup>	0.25	<0.15	<0.15	<0.15	<0.15	<0.15
Toluene	130,246	500,000	µg/m <sup>3</sup>	<0.19	<0.19	1	0.98	10	9.9
1,2,4-Trichlorobenzene	1,135	11,093	µg/m <sup>3</sup>	<0.37	<0.37	<0.37	<0.37	<0.37	<0.37
1,1,1-Trichloroethane	115,135	500,000	µg/m <sup>3</sup>	3.4	3.4	1	0.92	<0.14	<0.14
1,1,2-Trichloroethane	1,100	1,100	µg/m <sup>3</sup>	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14
Trichloroethylene	1,100	1,385	µg/m <sup>3</sup>	25	24	0.47	<0.13	<0.13	<0.13
Trichlorofluoromethane (Freon 11)	378,591	500,000	µg/m <sup>3</sup>	3.2	1.6	1.5	1.5	3.5	3.4
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	378,304	500,000	µg/m <sup>3</sup>	5	0.77	0.92	0.74	0.72	0.72
1,2,4-Trimethylbenzene	2,578	23,601	µg/m <sup>3</sup>	<0.25	<0.25	0.87	0.7	2.6	2.6
1,3,5-Trimethylbenzene	2,578	23,601	µg/m <sup>3</sup>	<0.25	<0.25	0.28	<0.25	0.65	0.65
Vinyl Acetate	86,247	500,000	µg/m <sup>3</sup>	<3.5	<3.5	<3.5	<3.5	<3.5	<3.5
Vinyl Chloride	500	1,249	µg/m <sup>3</sup>	<0.064	<0.064	<0.064	<0.064	<0.064	<0.064
m&p-Xylene	44,967	421,609	µg/m <sup>3</sup>	<0.43	<0.43	0.68	0.61	2.9	2.8
o-Xylene	44,967	421,609	µg/m <sup>3</sup>	<0.22	<0.22	0.35	0.3	1.3	1.2

**Notes:**

NE - Not Established  
 CTDEEP residential and industrial/commercial criteria is obtained from the 2008 Connecticut Remediation Criteria: Technical Support Document Appendix J published by the CTDEEP.  
 CTDEEP Criteria is presented in the 2008 Connecticut Remediation Criteria: Technical Support Document Appendix J - Table J6 and J8 in parts per million (ppmv) with adjustments presented for analytical capabilities and maximum values. To obtain criteria in mg/m<sup>3</sup> units, ppmv criteria is multiplied by the molecular weight of the compound divided by 24.45 (a conversion factor). The mg/m<sup>3</sup> criteria is multiplied by 1000 to obtain µg/m<sup>3</sup>.



# HOW TO FIND MORE INFORMATION ABOUT THE TIDEWATER SITE



- **Local Informational Repository—Pawtucket Public Library**

The local information repository at the Pawtucket Public Library contains copies of submittals included on the RIDEM website listed below. Electronic copies of these submittals are sent to the repository on a monthly basis. Upon request, National Grid will provide hard copies of the material for the library.

- **Publicly Accessible Site File**

Files related to the Tidewater Site are maintained at RIDEM, Case No. 95-022.

- **RIDEM Document Listing Website:**

<http://www.dem.ri.gov/programs/benviron/waste/tide.htm>

- **National Grid Document Listing and Informational Website:** [www.tidewatersite.com](http://www.tidewatersite.com)

- **Mailing List**

National Grid established a mailing list for the former Tidewater Site. The list includes abutting property owners, tenants, easement holders, municipalities and any other interested parties who have requested to be added to the list .

- **Email Distribution List**

Members of the mailing list, as well as other interested parties, have the option to receive information via email.

- **Phone Message Network**

National Grid has established a phone message network to distribute time-sensitive information to interested parties on air monitoring results during periods of active earth disturbing activities at the Site.

## If You Have Questions and Comments

For more information on activities at the site or to sign up for the phone/mailing/ emailing list, please contact Michele Leone at 781-907-3651 or [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com) or visit the website at [www.tidewatersite.com](http://www.tidewatersite.com)





# COMO ENCONTRAR MAIS INFORMAÇÕES

## SOBRE TIDEWATER SITE



- **Repositório local de informações— Biblioteca Pública de Pawtucket**

O repositório local de informações na Biblioteca Pública de Pawtucket contém cópias das submissões incluídas no site do RIDEM relacionado abaixo. As cópias eletrônicas destas submissões são enviadas ao repositório mensalmente. Mediante solicitação, a National Grid fornecerá cópias impressas do material para a biblioteca.

- **Arquivos públicos do site**

Os arquivos relativos ao Tidewater Site são mantidos no RIDEM, Caso No 95-022.

- **Site da lista de documentos do RIDEM:** <http://www.dem.ri.gov/programs/benviron/waste/tide.htm>
- **Lista de documentos da National Grid e site informativo:** [www.tidewatersite.com](http://www.tidewatersite.com)

- **Lista para contato**

A National Grid estabeleceu uma lista de contatos para a antiga Tidewater Site. A lista inclui proprietários vizinhos, inquilinos, titulares de servidão, municipalidades e outras partes interessadas que solicitaram ser adicionadas à lista.

- **Lista de distribuição de e-mail**

Membros da lista de contato, assim como outras partes interessadas, têm a opção de receber informações por e-mail.

- **Rede de mensagens por telefone**

A National Grid estabeleceu uma rede de mensagens por telefone para distribuir informações suscetíveis ao tempo de resposta a partes interessadas sobre os resultados do controle de ar durante períodos de atividade que perturbam o terreno no Site.

### Se você tem dúvidas e comentários

Para mais informações sobre as atividades no local ou subscrever para a lista de telefone/correspondência/ email, contate Michele Leone em 781-907-3651 ou [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com) ou visite o site [www.tidewatersite.com](http://www.tidewatersite.com)





# CÓMO HALLAR MÁS INFORMACIÓN SOBRE EL SITIO TIDEWATER



- **Registro informativo local: Biblioteca Pública de Pawtucket**

El depósito de información local de la Biblioteca Pública de Pawtucket tiene copias de las sumisiones incluidas en el sitio cibernético de RIDEM que se indica a continuación. Las copias electrónicas de estas sumisiones son enviadas mensualmente al depósito. De solicitarse, National Grid proveerá copias en papel del material para la biblioteca.

- **Archivo del sitio accesible al público**

Los archivos relacionados con el Sitio Tidewater se mantienen en el RIDEM, Caso No. 95-022.

- **Sitio web de los listados de documentos del RIDEM:** <http://www.dem.ri.gov/programs/benviron/waste/tide.htm>

- **Sitio web informativo y de listado de documentos de National Grid:** [www.tidewatersite.com](http://www.tidewatersite.com)

- **Lista de correo**

National Grid estableció una lista de correo para el ex Sitio Tidewater. La lista del sitio incluye propietarios de propiedades lindantes, inquilinos, tenedores de servidumbres, municipalidades y toda otra parte interesada que haya solicitado ser agregada a la lista.

- **Lista de distribución**

Los miembros de la lista de correo, así como otras partes interesadas, tienen la opción de recibir la información por correo electrónico.

- **Red de mensajes telefónicos**

National Grid estableció una red de mensajes telefónicos para distribuir información urgente a las partes interesadas sobre los resultados de las supervisión del aire durante períodos de actividades en curso que alteran la tierra en el Sitio.

## Si tiene preguntas y comentarios

Para solicitar más información sobre las actividades en el sitio o suscribirse a la lista telefónica/de correo/de correo electrónico, comuníquese con Michele Leone al 781-907-3651 o a [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com), o visite el sitio web en [www.tidewatersite.com](http://www.tidewatersite.com)





# HOW TO FIND MORE INFORMATION ABOUT THE TIDEWATER SITE



- **Publicly Accessible Site File**

Files related to the Tidewater Site are maintained at RIDEM, Case No. 95-022.

- **RIDEM Document Listing Website:**  
<http://www.dem.ri.gov/programs/benviron/waste/tide.htm>
- **National Grid Document Listing and Informational Website:**  
[www.tidewatersite.com](http://www.tidewatersite.com)
- **Local Informational Repository—  
Pawtucket Public Library**

The local information repository at the Pawtucket Public Library contains digital copies of submittals.

- **Mailing List**

National Grid established a mailing list for the former Tidewater Site. The list includes abutting property owners, tenants, easement holders, municipalities and any other interested parties who have requested to be added to the list .

- **Email Distribution List**

Members of the mailing list, as well as other interested parties, have the option to receive information via email.

- **Phone Message Network**

National Grid has established a phone message network to distribute time-sensitive information to interested parties on air monitoring results during periods of active earth disturbing activities at the Site.

## If You Have Questions and Comments

For more information on activities at the site or to sign up for the phone/mailing/ emailing list, please contact Michele Leone at 781-907-3651 or [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com) or visit the website at [www.tidewatersite.com](http://www.tidewatersite.com)





# COMO ENCONTRAR MAIS INFORMAÇÕES

## SOBRE TIDEWATER SITE



- **Arquivos públicos do site**

Os arquivos relativos ao Tidewater Site são mantidos no RIDEM, Caso No 95-022.

- **Site da lista de documentos do RIDEM:**  
<http://www.dem.ri.gov/programs/benviron/waste/tide.htm>

- **Lista de documentos da National Grid e site informativo:**  
[www.tidewatersite.com](http://www.tidewatersite.com)

- **Repositório local de informações—  
Biblioteca Pública de Pawtucket**

O repositório local de informações na Biblioteca Pública de Pawtucket contém cópias digitais das submissões.

- **Lista para contato**

A National Grid estabeleceu uma lista de contatos para a antiga Tidewater Site. A lista inclui proprietários vizinhos, inquilinos, titulares de servidão, municipalidades e outras partes interessadas que solicitaram ser adicionadas à lista.

- **Lista de distribuição de e-mail**

Membros da lista de contato, assim como outras partes interessadas, têm a opção de receber informações por e-mail.

- **Rede de mensagens por telefone**

A National Grid estabeleceu uma rede de mensagens por telefone para distribuir informações suscetíveis ao tempo de resposta a partes interessadas sobre os resultados do controle de ar durante períodos de atividade que perturbam o terreno no Site.

### Se você tem dúvidas e comentários

Para mais informações sobre as atividades no local ou subscrever para a lista de telefone/correspondência/ email, contate Michele Leone em 781-907-3651 ou [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com) ou visite o site [www.tidewatersite.com](http://www.tidewatersite.com)





# CÓMO HALLAR MÁS INFORMACIÓN SOBRE EL SITIO TIDEWATER



- **Archivo del sitio accesible al público**

Los archivos relacionados con el Sitio Tidewater se mantienen en el RIDEM, Caso No. 95-022.

- **Sitio web de los listados de documentos del RIDEM:** <http://www.dem.ri.gov/programs/benviron/waste/tide.htm>
- **Sitio web informativo y de listado de documentos de National Grid:** [www.tidewatersite.com](http://www.tidewatersite.com)
- **Registro informativo local: Biblioteca Pública de Pawtucket**

El registro local de información en la Biblioteca Pública de Pawtucket contiene copias digitales de las presentaciones.

- **Lista de correo**

National Grid estableció una lista de correo para el ex Sitio Tidewater. La lista del sitio incluye propietarios de propiedades lindantes, inquilinos, tenedores de servidumbres, municipalidades y toda otra parte interesada que haya solicitado ser agregada a la lista.

- **Lista de distribución**

Los miembros de la lista de correo, así como otras partes interesadas, tienen la opción de recibir la información por correo electrónico.

- **Red de mensajes telefónicos**

National Grid estableció una red de mensajes telefónicos para distribuir información urgente a las partes interesadas sobre los resultados de las supervisiones del aire durante períodos de actividades en curso que alteran la tierra en el Sitio.

## Si tiene preguntas y comentarios

Para solicitar más información sobre las actividades en el sitio o suscribirse a la lista telefónica/de correo/de correo electrónico, comuníquese con Michele Leone al 781-907-3651 o a [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com), o visite el sitio web en [www.tidewatersite.com](http://www.tidewatersite.com)







**EXHIBIT II**  
CONTACT LIST

## **TIDEWATER CONTACT LIST**

Pawtucket, Rhode Island  
RIDEM Case No. 95-022

Michele Leone  
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**EXHIBIT III**

**RESPONSES TO SITE-SPECIFIC COMMENTS FROM COMMUNITY INTERVIEWS**



SITE-SPECIFIC COMMENTS FROM COMMUNITY INTERVIEWS  
Former Tidewater Facility  
Pawtucket, Rhode Island

**Comments Received on June 19, 2012:**

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**Meeting from 3p.m. to 3:30 p.m.:**

1. Interviewee inquired about availability of real-time air monitoring.

*Response: On a weekly basis, air monitoring data will be posted to the National Grid website ([www.tidewatersite.com](http://www.tidewatersite.com)) and on the bulletin boards located at the end of Tidewater Street and the end of Bowles Court (the previous weekly data will be posted by the end of day the following Monday). This information will also be transmitted to RIDEM to be posted to the RIDEM-maintained website on an approximately weekly basis. In the event a sustained exceedance of a perimeter threshold level is observed, activation of the phone message alert system will be conducted and this information will also be posted on the National Grid web-site and on the bulletin boards within 48 business hours of collection. See section 4.40 for more information about INFORMATION REPOSITORIES.*

2. The interviewee asked if National Grid could make real-time air monitoring data available via a website with comparisons to the Rhode Island Department of Environmental Management's (RIDEM) Ambient Air Quality Standards.

*Response: Real-time monitoring typically evaluates levels of total volatile organic compounds, benzene and dust. Real time air monitoring will employ either portable hand held field equipment or fixed monitoring stations. Use of hand held versus fixed monitoring stations will be evaluated on a case-by-case basis based on scope of the earthwork project (i.e., level of remediation) and anticipated level of soil impacts. For the majority of earthwork projects at the Site, it is anticipated that real-time air monitoring will be completed using portable hand held field instruments. These hand held field instruments do not have the ability to post this data to a community website in real time. During remedial activities when fixed air monitoring stations are warranted, such as an Air Logics or RespondFast system, data from the fixed station(s) will be transmitted via telemetry to a central polling station computer. Once at the central computer, the data is automatically compared to pre-set warning/alarms levels and is used to call cell phones, pagers, issue alerts, etc. Please note, based on our discussions with Air Logics and our understanding of the RespondFast system used by Weston Solutions, the raw data from the central polling computer is not typically fed to a publically available web-page or other portal.*

*On a weekly basis, air monitoring data will be posted to the National Grid website ([www.tidewatersite.com](http://www.tidewatersite.com)) and on the bulletin boards located at the end of Tidewater Street and the end of Bowles Court (the previous weekly data will be posted by the end of day the following Monday). This information will also be transmitted to RIDEM to be posted to the RIDEM-maintained website on an approximately weekly basis. In addition to activation of the phone*

## SITE-SPECIFIC COMMENTS FROM COMMUNITY INTERVIEWS

Former Tidewater Facility  
Pawtucket, Rhode Island

*message alert system described above, in the event a sustained exceedance of a perimeter threshold level is observed, this information will also be posted on the National Grid web-site and on the bulletin boards within 48 business hours of collection. See section 4.40 for more information about INFORMATION REPOSITORIES.*

*In addition, National Grid will collect laboratory samples in accordance with the RIDEM-approved plan. National Grid will compare this data to RIDEM's Ambient Air Quality Standards and also post it online.*

3. Interviewee suggested public meetings to keep the neighborhood informed. Interviewee would like more active attempts to meet with people in the community and more communication with the schools and students' parents. The interviewee suggested reaching out to the Varieur School principal.

*Response: National Grid/GZA will continue to provide project information to the principals of neighboring schools (charter schools and the public school) for dissemination to teachers and parents. Due to privacy concerns, schools typically do not provide lists of students and parents and their contact information to outside entities. However, interested parents can go to the Tidewater/National Grid website ([www.tidewatersite.com](http://www.tidewatersite.com)) and sign up for updates. See Section 4.10 for more information about PUBLIC NOTICE. In addition, see Table 1 for a schedule of public meetings.*

4. What is best way to obtain information about Site? Interviewee indicated email for general information, hard copies for more details and mailers for neighborhood to ensure completeness.

*Response: National Grid will maintain a site-specific mailing list for the Tidewater Site and will add email addresses to the list as requested by the community. National Grid will use the mailing list to announce public meetings and availability of reports, and distribute fact sheets. These announcements and information will also be posted on the informational bulletin boards located at the end of Tidewater Street and at the end of Bowles Court. National Grid will also make electronic copies of all reports available on National Grid's and the Rhode Island Department of Environmental Management's (RIDEM) websites, as well as at the public library. National Grid will also provide hard copies of the reports at RIDEM's office and the public library upon request. See sections 4.10 and 4.40 for more information about PUBLIC NOTICE and INFORMATION REPOSITORIES.*

5. How often should information be sent out to community about Site? Interviewee indicated that frequency depends on work being conducted. Interviewee requested "door-to-door" fliers.

*Response: National Grid performed an initial walk of the neighborhood to distribute door knob fliers with information on how to join the mailing list in August 2012. This walk covered*

SITE-SPECIFIC COMMENTS FROM COMMUNITY INTERVIEWS  
Former Tidewater Facility  
Pawtucket, Rhode Island

*residences in the neighborhood as shown on the Figure 3 of the PIP. See sections 4.10 and 4.40 for more information about PUBLIC NOTICE and INFORMATION REPOSITORIES.*

6. What locations and times would be convenient for public meetings? Interviewee indicated that night is preferred and that current location (i.e., Blackstone Valley Visitor Center Theater) works.

*Response: National Grid will schedule meetings in the evening at either the Blackstone Valley Visitor Center or Varieur Elementary School, based on availability. The preferred location is Varieur Elementary School, which is within walking distance of the Tidewater Site. See section 4.30 for more information about COMMUNITY MEETINGS.*

7. Interviewee suggested that the National Grid/Tidewater Site be clearly indicated on mailers.

*Response: National Grid developed a "Tidewater Environmental Project" mailing label to more clearly identify correspondence related to the project. See section 4.10 for more information about PUBLIC NOTICE.*

**Meeting from 4p.m. to 4:30 p.m.:**

1. Interviewee requested that the local Housing and Urban Development (HUD) agency be added to the mailing list.

*Response: National Grid will add the local HUD agency to the mailing list, as discussed during subsequent communication with the interviewee. National Grid is waiting to be provided the contact information for the specific HUD agency requested by the interviewee. National Grid will continue to work with the interviewee to obtain this information.*

2. Interviewee suggested posting information in apartment buildings adjacent to the site.

*Response: National Grid has left messages with the interviewee/property manager regarding posting information within the apartment building regarding availability of the bulletin boards and mailings. National Grid will continue to work with them to arrange for the suggested postings, if acceptable.*

3. Interviewee inquired about a site tour at some point in the process.

*Response: National Grid will try to arrange for a limited tour of the site prior to the start of remediation. Given the active utility operations, such as the electrical substation and natural gas regulating station on the property, portions of the site will not be accessible to the public due to safety concerns. During the proposed community outreach session, National Grid will also present photographs and video of various areas of the site. See section 4.30 for more information about COMMUNITY MEETINGS.*



SITE-SPECIFIC COMMENTS FROM COMMUNITY INTERVIEWS

Former Tidewater Facility  
Pawtucket, Rhode Island

4. What is the best way to obtain information about site? Interviewee indicated a website should be used.

*Response: The Rhode Island Department of Environmental Management (RIDEM) will maintain all documents submitted to them regarding the Tidewater site on its website (<http://www.dem.ri.gov/programs/benviron/waste/tide.htm>). In addition, National Grid has established a Site-specific website ([www.tidewatersite.com](http://www.tidewatersite.com)) to provide information regarding the nature and history of MGPs, history and description of the Tidewater Site, and its regulatory background, site contacts and key project documents. National Grid will also post timely public updates on the current and proposed remediation activities at the site on its website. See section 4.40 for more information about INFORMATION REPOSITORIES.*

5. Which locations and times would be convenient for public meetings? Interviewee indicated that evening is best (between 6 p.m. and 7 p.m.).

*Response: National Grid will schedule meetings in the evening at either the Blackstone Valley Visitor Center or Variour Elementary School, based on availability. The preferred location is Variour Elementary School, which is within walking distance of the Tidewater Site. See section 4.30 for more information about COMMUNITY MEETINGS.*

6. Interviewee suggested a phone list for messages about the site.

*Response: National Grid will establish a phone message distribution network. National Grid will share how to join the phone message distribution network on its website ([www.tidewatersite.com](http://www.tidewatersite.com)). In addition, National Grid provided information about participating in the phone message distribution network to individuals on the mailing list in the public notice mailed in the end of October 2012. See section 4.10 for more information about PUBLIC NOTICE.*

**Meeting from 4:30 p.m. – 5:30 p.m.:**

1. Interviewee inquired about real-time air data and suggested that this data be available online.

*Response: Real-time monitoring typically evaluates levels of total volatile organic compounds, benzene and dust. Real time air monitoring will employ either portable hand held field equipment or fixed monitoring stations. Use of hand held versus fixed monitoring stations will be evaluated on a case-by-case basis based on scope of the earthwork project (i.e., level of remediation) and anticipated level of soil impacts. For the majority of earthwork projects at the Site, it is anticipated that real-time air monitoring will be completed using portable hand held field instruments. These hand held field instruments do not have the ability to post this data to a community website in real time. During remedial activities when fixed air monitoring stations are warranted, such as an Air Logics or RespondFast system, data from the fixed station(s) will be transmitted via telemetry to a central polling station computer. Once at the central*

## SITE-SPECIFIC COMMENTS FROM COMMUNITY INTERVIEWS

Former Tidewater Facility  
Pawtucket, Rhode Island

*computer, the data is automatically compared to pre-set warning/alarms levels and is used to call cell phones, pagers, issue alerts, etc. Please note, based on our discussions with Air Logics and our understanding of the RespondFast system used by Weston Solutions, the raw data from the central polling computer is not typically fed to a publically available web-page or other portal.*

*On a weekly basis, air monitoring data will be posted to the National Grid website ([www.tidewatersite.com](http://www.tidewatersite.com)) and on the bulletin boards located at the end of Tidewater Street and the end of Bowles Court (the previous weekly data will be posted by the end of day the following Monday). This information will also be transmitted to RIDEM to be posted to the RIDEM-maintained website on an approximately weekly basis. In addition to activation of the community phone message alert system described above, in the event a sustained exceedance of a perimeter threshold level is observed, this information will also be posted on the National Grid web-site and on the bulletin boards within 48 business hours of collection. See section 4.40 for more information about INFORMATION REPOSITORIES.*

*In addition, National Grid will collect laboratory samples in accordance with the RIDEM-approved plan. National Grid will compare this data to RIDEM's Ambient Air Quality Standards and also post it online.*

2. What is the best way to obtain information about the site? Interviewee indicated meetings, emails and website available in multi-lingual formats.

*Response: National Grid will schedule an initial community meeting and community outreach session to present background information, and discuss site conditions and public concerns about the proposed remedial strategy. In addition, National Grid will hold subsequent community meetings during the remediation process at specified project milestones, such as the Rhode Island Department of Environmental Management's (RIDEM) approval of the Remedial Action Work Plan, prior to remedy implementation and following completion of site-wide remediation. National Grid will schedule additional community meetings during the remedial process at the request of the community. See section 4.30 for more information about COMMUNITY MEETINGS.*

*National Grid will maintain a site-specific mailing list for the Tidewater site and will add email addresses to the mailing list as requested by the community. National Grid will use the mailing list to announce public meetings and the availability of reports, and distribute fact sheets. National Grid used the current mailing list to distribute a Notification Package in August 2012 to inform the public of the upcoming electrical substation upgrade project. As part of this notification in August 2012, National Grid performed an initial walk of the neighborhood to distribute door knob flyers with information on how to join the mailing list. This walk covered*

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*residences in the neighborhood as shown on the Figure 3 of the PIP. See section 4.10 for more information about PUBLIC NOTICE.*

*RIDEM will maintain all documents submitted to them regarding the Tidewater site on its website (<http://www.dem.ri.gov/programs/benviron/waste/tide.htm>). In addition, National Grid has established a site-specific website ([www.tidewatersite.com](http://www.tidewatersite.com)) to provide information regarding the nature and history of MGPs, historic background related to Tidewater, description of the Tidewater site and its regulatory background, site contacts and key project documents. National Grid will also post timely public updates on the current and proposed remediation activities at the Site on its website. See section 4.40 for more information about INFORMATION REPOSITORIES.*

*National Grid will provide mailings, fact sheets and other communications in both English and Spanish. In addition, all mailed communications will contain a translation header in multiple languages stating: "This is an important notice. Please have it translated." Upon request, National Grid will also provide translation assistance for non-English speaking individuals during public meetings.*

3. Interviewee indicated the need to engage members of the community.

*Response: National Grid acknowledges the need to engage community members and keep them informed about the planned investigations and remedial efforts at the Tidewater Site. National Grid has prepared a public involvement plan (PIP) to establish procedures for public and community communications about the Site. National Grid performed an initial walk of the neighborhood to distribute door knob flyers with information on how to join the mailing list in August 2012. This walk covered residences in the neighborhood as shown on the Figure 3 of the PIP. We understand that the Environmental Justice League will be undertaking door-to-door efforts as well.*

4. Interviewee suggested the use of bulletin boards and phone messages to get information to the community about the Site.

*Response: National Grid has installed informational bulletin boards at the end of Tidewater Street and at the end of Bowles Court. The bulletin boards will include all information distributed through the mailing list, as well as weekly updates during remedial work. Please note that if significant vandalism to the bulletin boards occurs, National Grid will look into alternative ways to share information. National Grid will establish a phone message distribution network. National Grid will share how to join the phone message distribution network on its website ([www.tidewatersite.com](http://www.tidewatersite.com)). In addition, National Grid will provide information about participating in the phone message distribution network to individuals on the mailing list. See section 4.10 for more information about PUBLIC NOTICE.*

*See section 4.10 for more information about PUBLIC NOTICE.*



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6. Interviewee suggested the following information should be posted and available for the Site: contact information/responding to public comments/24-hour hotline.

*Response: National Grid will provide site contact information on its website and the informational bulletin boards at the end of Tidewater Street and Bowles Court. Community members can contact site representatives during normal business hours with any comments or questions. A listing of "frequently asked questions" will be maintained on National Grid's website (www.tidewatersite.com). See sections 4.10 and 4.40 for more information about PUBLIC NOTICE and INFORMATION REPOSITORIES.*

*All written public comments related to documents submitted to the Rhode Island Department of Environmental Management(RIDEM), as well as National Grid's response, will be documented in written form as required by RIDEM. National Grid will send a copy of responses to those who submitted comments and also place them in the information repository. Refer to section 4.30 for more information.*

7. Interviewee requested regular stakeholder meetings (limited group of 10 to 15 people).

*Response: National Grid will schedule an initial community meeting and community outreach session to present background information and discuss site conditions and public concerns about the proposed remedial strategy. In addition, National Grid will hold subsequent community meetings during the remediation process at specified project milestones, such as the Rhode Island Department of Environmental Management's (RIDEM) approval of the Remedial Action Work Plan, prior to remedy implementation and following completion of site-wide remediation. National Grid will schedule additional community meetings during the remedial process at the request of the community. Also, National Grid designed the public involvement plan (PIP) to involve all community members and interested parties. National Grid believes that the large number of public meetings and the commitment to schedule additional meetings on an as-needed basis pre-empts the need for smaller, stakeholder meetings. See section 4.30 for more information about COMMUNITY MEETINGS.*

8. Interviewee suggested timely communications with the community.

*Response: National Grid will post weekly updates during full-scale remedial work on the informational bulletin boards located at the end of Tidewater Street and at the end of Bowles Court, and on both the National Grid and the Rhode Island Department of Environmental Management (RIDEM) websites. See sections 4.10 and 4.40 for more information about PUBLIC NOTICE and INFORMATION REPOSITORIES.*

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9. Interviewee suggested bulletin board at the site.

*Response: National Grid has installed informational bulletin boards at the end of Tidewater Street and at the end of Bowles Court. The bulletin boards will include certain information distributed through the mailing list, as well as weekly updates during remedial work. National Grid will also use the bulletin boards to announce public meetings, distribute fact sheets and communicate availability of reports. Please note that if significant vandalism to the bulletin boards occurs, National Grid will look into alternative ways to share information. See section 4.10 for more information about PUBLIC NOTICE.*

11. Interviewee inquired about potential issues that the public needs to be concerned about with the Tidewater Site.

*Response: The primary issue on the Tidewater Site is the potential for air quality issues during remedial implementation. National Grid's selected remedy is designed to limit these air quality impacts. In addition, National Grid will monitor air quality in accordance with a Rhode Island Department of Environmental Management (RIDEM)-approved plan and will provide this information to the public, as presented in the public involvement plan (PIP). See sections 4.10 and 4.40 for more information about PUBLIC NOTICE and INFORMATION REPOSITORIES.*

12. Interviewee suggested use of color-coded maps with impacts.

*Response: National Grid will prepare a simple color-coded map, which will be available on the National Grid website and on the informational bulletin boards. This map will also be presented at the community outreach session.*

13. Interviewee requested the use of more simple, nontechnical terms in communications.

*Response: National Grid's reports and communications to the Rhode Island Department of Environmental Management (RIDEM) are technical documents and as a result, cannot necessarily be simplified. However, National Grid will make every effort to use brief and nontechnical terminology in communications to the public, including in mailings, website information and bulletin board postings. In addition, National Grid will prepare simple executive summaries for major report submittals.*

14. Which locations and times would be convenient for public meetings? Interviewee suggested that the meeting location should be in the school or the neighborhood to achieve the highest attendance and also noted that evenings work well.

*Response: National Grid will schedule meetings in the evening at either the Blackstone Valley Visitor Center or Varieur Elementary School, based on availability. The preferred location is Varieur Elementary School, which is within walking distance of the Tidewater Site. See section 4.30 for more information about COMMUNITY MEETINGS.*

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**Meeting from 5:30 p.m. to 6:30 p.m.:**

1. What is the best way to get information to people? Interviewee indicated that door to door in community would be best.

*Response: National Grid performed an initial walk of the neighborhood to distribute door knob flyers with information on how to join the mailing list in August 2012. This walk covered residences in the neighborhood as shown on the Figure 3 of the PIP. In addition, National Grid will post weekly updates during remedial work to the informational bulletin boards located at the end of Tidewater Street and at the end of Bowles Court, and on both the National Grid and the Rhode Island Department of Environmental Management (RIDEM) websites. See sections 4.10 for more information about PUBLIC NOTICE.*

2. Interviewee indicated that mail is better than email in the community.

*Response: National Grid will maintain a site-specific mailing list for the Tidewater site and will add email addresses to the list as requested by the community. National Grid will use the mailing list to announce public meetings and availability of reports, and distribute fact sheets. See section 4.10 for more information about PUBLIC NOTICE.*

3. Which locations and times would be convenient for public meetings? Interviewee indicated that the schools would be perfect since they are close and within walking distance. Interviewee also suggested meeting times in the early evening (5-6 p.m.).

*Response: National Grid will schedule meetings in the evening at either the Blackstone Valley Visitor Center or Varieur Elementary School, based on availability. The preferred location is Varieur Elementary School, which is within walking distance of the Tidewater Site. See section 4.30 for more information about COMMUNITY MEETINGS.*

4. Interviewee indicated that he is working with the Environmental Justice League in the community and suggested that door knocking is effective.

*Response: National Grid acknowledges the need to engage community members and keep them informed about the planned investigations and remedial efforts at the Tidewater site. National Grid has prepared a public involvement plan (PIP) to establish procedures for public and community communications about the site. As described in the PIP, National Grid performed an initial walk of the neighborhood to distribute door knob flyers with information on how to join the mailing list in August 2012. This walk covered residences in the neighborhood as shown on the Figure 3 of the PIP. We understand that the Environmental Justice League will be undertaking door-to-door efforts as well.*



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5. Interviewee suggested providing information on air impacts in real time.

*Response: Real-time monitoring typically evaluates levels of total volatile organic compounds, benzene and dust. Real time air monitoring will employ either portable hand held field equipment or fixed monitoring stations. Use of hand held versus fixed monitoring stations will be evaluated on a case-by-case basis based on scope of the earthwork project (i.e., level of remediation) and anticipated level of soil impacts. For the majority of earthwork projects at the Site, it is anticipated that real-time air monitoring will be completed using portable hand held field instruments. These hand held field instruments do not have the ability to post this data to a community website in real time. During remedial activities when fixed air monitoring stations are warranted, such as an Air Logics or RespondFast system, data from the fixed station(s) will be transmitted via telemetry to a central polling station computer. Once at the central computer, the data is automatically compared to pre-set warning/alarms levels and is used to call cell phones, pagers, issue alerts, etc. Please note, based on our discussions with Air Logics and our understanding of the RespondFast system used by Weston Solutions, the raw data from the central polling computer is not typically fed to a publically available web-page or other portal.*

*On a weekly basis, air monitoring data will be posted to the National Grid website ([www.tidewatersite.com](http://www.tidewatersite.com)) and on the bulletin boards located at the end of Tidewater Street and the end of Bowles Court (the previous weekly data will be posted by the end of day the following Monday). This information will also be transmitted to RIDEM to be posted to the RIDEM-maintained website on an approximately weekly basis. In addition to activation of the community phone message alert system described above, in the event a sustained exceedance of a perimeter threshold level is observed, this information will also be posted on the National Grid web-site and on the bulletin boards within 48 business hours of collection. See section 4.40 for more information about INFORMATION REPOSITORIES.*

*In addition, National Grid will collect laboratory samples in accordance with the RIDEM-approved plan. National Grid will compare this data to RIDEM's Ambient Air Quality Standards and also post it online.*

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**Comments Received on June 20, 2012:**

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**Meeting from 6p.m. to 7p.m.:**

1. What is the best way to communicate information to the public? Interviewee indicated that easy-to-understand information needs to be available via a website. Interviewee also inquired about the risks posed by the Site to the community during remedial activities.

*Response: National Grid will make every effort to use brief and nontechnical terminology in communications to the public, including in mailings, website information and bulletin board postings. In addition, National Grid will prepare simple executive summaries for major report submittals.*

*In addition, National Grid will provide easy-to-understand information on its website and make it easy to find. In addition, National Grid will make project updates available on both the website and the community bulletin boards. National Grid will also provide contact information for individuals the public can contact for additional information or with questions.*

*The primary issue on the Tidewater site is the potential for air quality issues during remedial implementation. National Grid's selected remedy is designed to limit these air quality impacts. National Grid will monitor air quality in accordance with a Rhode Island Department of Environmental Management (RIDEM)-approved plan and will provide this information to public, as presented in the public involvement plan (PIP). See sections 4.10 and 4.40 for more information about PUBLIC NOTICE and INFORMATION REPOSITORIES. In addition, National Grid may also encounter issues related to truck traffic and management of contaminated material during the remedial and implementation process. National Grid will discuss these issues further during the remedial process outreach and community meetings.*

2. Interviewee suggested installing a community bulletin board at either the Site or school.

*Response: National Grid has installed informational bulletin boards at the end of Tidewater Street and at the end of Bowles Court. The bulletin boards will include certain information distributed through the mailing list, as well as weekly updates during remedial work. National Grid will also use the bulletin boards to announce public meetings, distribute fact sheets and communicate availability of reports. See section 4.10 for more information about PUBLIC NOTICE.*

3. Interviewee inquired about availability of real-time air monitoring online.

*Response: Real-time monitoring typically evaluates levels of total volatile organic compounds, benzene and dust. Real time air monitoring will employ either portable hand held field equipment or fixed monitoring stations. Use of hand held versus fixed monitoring stations will be evaluated on a case-by-case basis based on scope of the earthwork project (i.e., level of*

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*remediation) and anticipated level of soil impacts. For the majority of earthwork projects at the Site, it is anticipated that real-time air monitoring will be completed using portable hand held field instruments. These hand held field instruments do not have the ability to post this data to a community website in real time. During remedial activities when fixed air monitoring stations are warranted, such as an Air Logics or RespondFast system, data from the fixed station(s) will be transmitted via telemetry to a central polling station computer. Once at the central computer, the data is automatically compared to pre-set warning/alarms levels and is used to call cell phones, pagers, issue alerts, etc. Please note, based on our discussions with Air Logics and our understanding of the RespondFast system used by Weston Solutions, the raw data from the central polling computer is not typically fed to a publically available web-page or other portal.*

*On a weekly basis, air monitoring data will be posted to the National Grid website ([www.tidewatersite.com](http://www.tidewatersite.com)) and on the bulletin boards located at the end of Tidewater Street and the end of Bowles Court (the previous weekly data will be posted by the end of day the following Monday). This information will also be transmitted to RIDEM to be posted to the RIDEM-maintained website on an approximately weekly basis. In addition to activation of the community phone message alert system described above, in the event a sustained exceedance of a perimeter threshold level is observed, this information will also be posted on the National Grid web-site and on the bulletin boards within 48 business hours of collection. See section 4.40 for more information about INFORMATION REPOSITORIES.*

*In addition, National Grid will collect laboratory samples in accordance with the RIDEM-approved plan. National Grid will compare this data to RIDEM's Ambient Air Quality Standards and also post it online.*

4. Should regular communications be performed during the cleanup process? Interviewee requested ongoing meetings.

*Response: National Grid will schedule an initial community meeting and community outreach session to present background information and discuss site conditions and public concerns about the proposed remedial strategy. In addition, National Grid will hold subsequent community meetings during the remediation process at specified project milestones, such as the Rhode Island Department of Environmental Management's (RIDEM) approval of the Remedial Action Work Plan, prior to remedy implementation and following completion of Site-wide remediation. National Grid will schedule additional community meetings during the remedial process at the request of the community. See section 4.30 for more information about COMMUNITY MEETINGS.*



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5. Interviewee requested color-coded map of contamination.

*Response: National Grid will prepare simple color-coded map depicting the distribution of site impacts. National Grid will make these maps available on its website and the informational bulletin boards. This map will also be presented at the community outreach session.*

**Meeting from 7p. m. to 7:20 p.m.:**

1. What is the best way to communicate information to the public? Interviewee prefers email and Internet.

*Response: National Grid will maintain a site-specific mailing list for the Tidewater site and will add email addresses to the list as requested by the community. National Grid will use the mailing list to announce public meetings and availability of reports, and distribute fact sheets. See section 4.10 for more information about PUBLIC NOTICE.*

*In addition, National Grid will establish a public website, which will include site-specific information, including timely public updates on current and future remediation activities at the site. See section 4.40 for more information about INFORMATION REPOSITORIES.*

2. Which locations and times would be convenient for public meeting? Interviewee indicated that the current venue at the Blackstone Valley Visitor Center is okay and the evenings are better.

*Response: National Grid will schedule meetings in the evening at either the Blackstone Valley Visitor Center or Varieur Elementary School, based on availability. The preferred location is Varieur Elementary School, which is within walking distance of the Tidewater Site. See section 4.30 for more information about COMMUNITY MEETINGS.*

3. Interviewee suggested flyers/mailings. Interviewee requested expansion of abutter list for mailings.

*Response: National Grid will maintain a site-specific mailing list for the Tidewater site and will add email addresses to list as requested by the community. National Grid will use the mailing list to announce public meetings and availability of reports, and distribute fact sheets. National Grid will also post these announcements and information to the informational bulletin boards located at the end of Tidewater Street and at the end of Bowles Court. National Grid performed an initial walk of the neighborhood to distribute door knob flyers with information on how to join the mailing list in August 2012. This walk covered residences in the neighborhood as shown on the Figure 3 of the PIP. See section 4.10 for more information about PUBLIC NOTICE.*

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**Meeting from 7:20 p.m. to 8:30 p.m.:**

1. Interviewee requested that on Site remedial activities be completed during hours that school is not in session.

*Response: The proposed construction schedule for the comprehensive Site remedy spans approximately two years. Because the work involves earthwork machinery, night work would require extensive lighting and involve significant noise, which would likely be unacceptable to neighboring residents. Further, if construction only took place during the summer when school is not in session, the construction schedule would triple, taking six summers to complete rather than two years.*

2. Interviewee indicated that information is hard to decipher and understand, and requested preparation of simple documents.

*Response: National Grid's reports and communications to the Rhode Island Department of Environmental Management (RIDEM) are technical documents and as a result, cannot necessarily be simplified. However, National Grid will make every effort to use brief and nontechnical terminology in communications to the public, including in mailings, website information and bulletin board postings. In addition, National Grid will prepare simple executive summaries (approximately one to two pages) for major report submittals.*

3. What is the best way to communicate information to the public? Interviewee suggested community mailings.

*Response: National Grid will maintain a site-specific mailing list for the Tidewater Site. In addition, National Grid performed an initial walk of the neighborhood to distribute door knob flyers with information on how to join the mailing list in August 2012. This walk covered residences in the neighborhood as shown on the Figure 3 of the PIP. National Grid will add email addresses to the mailing list as requested by the community and use the mailing list to announce public meetings and availability of reports, and distribute fact sheets. National Grid will also post these announcements and information on the informational bulletin boards located at the end of Tidewater Street and at the end of Bowles Court. See section 4.10 for more information about PUBLIC NOTICE.*

4. Interviewee requested community bulletin board.

*Response: National Grid installed informational bulletin boards at the end of Tidewater Street and at the end of Bowles Court. The bulletin boards will include certain information distributed through the mailing list, as well as weekly updates during remedial work. National Grid will also use the bulletin boards to announce public meetings, distribute fact sheets and communicate availability of reports. See section 4.10 for more information about PUBLIC NOTICE.*

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5. Interviewee requested means of understanding hazards. Requested Risk Characterization to possibly include:

- a. Child/adult exposure scenarios
- b. Discussion of the risks associated with different contaminants. (Interviewee expressed concern about compounds and available information on the Internet)
- c. Comparative risk to assist in explaining levels of risk to the community

*Response: National Grid will conduct remedial work at the site in a manner that limits hazards to onsite workers and off-site community members. Further, there are no complete exposure pathways for soil and groundwater impacts for offsite receptors because National Grid has secured the site with a locked chain link fence. National Grid will address potential air quality risks during implementation of the full-scale remedial approach. National Grid will provide more details about air quality and other potential risks as the process evolves and prior to implementation of full-scale remediation work.*

6. Interviewee requested map of Site/contaminants/hazards.

*Response: National Grid will prepare simple color-coded map depicting the distribution of impacts at the site. National Grid will make these maps available on its website and the informational bulletin boards. This map will also be presented at the community outreach session.*

7. Should regular communications be performed during the cleanup process? Interviewee requested regular meetings during remediation.

*Response: National Grid will hold community meetings during the remediation process at specified project milestones, such as the Rhode Island Department of Environmental Management's (RIDEM) approval of the Remedial Action Work Plan, prior to remedy implementation and following completion of site-wide remediation. National Grid will schedule additional community meetings during the remedial process at the request of the community. See section 4.30 for more information about COMMUNITY MEETINGS.*

8. Interviewee suggested special communications with the schools. Interviewee indicated that communications should be through the principals.

*Response: National Grid will continue to provide project information to the principals of neighboring schools (charter schools and the public school) for dissemination to teachers and parents. Due to privacy concerns, schools typically do not provide lists of students and parents and their contact information to outside entities. However, interested parents can go to the Tidewater/National Grid website and sign up for updates. See section 4.10 for more information about PUBLIC NOTICE.*



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9. Interviewee suggested that a vehicle be established for questions (i.e., a hotline).

*Response: National Grid will provide site contact information on its website and the information bulletin boards at the end of Tidewater Street and Bowles Court. Community members can contact site representatives during normal business hours with any comments or questions. A listing of "frequently asked questions" will be maintained on National Grid's website ([www.tidewatersite.com](http://www.tidewatersite.com)). See sections 4.10 and 4.40 for more information about PUBLIC NOTICE and INFORMATION REPOSITORIES.*

10. Interviewee would prefer if National Grid did not hold the Community PIP Draft Meeting during the summer months.

*Response: Due to community members' vacation schedules during the summer months; National Grid is not planning the community outreach session for August or September. National Grid will likely hold the meeting in the fall.*

11. Interviewee requested that National Grid make frequently asked questions available if a hotline is used.

*Response: National Grid will provide site contact information on its website and the information bulletin boards at the end of Tidewater Street and Bowles Court. Community members can call Site contacts during normal business hours with any comments or questions. A listing of "frequently asked questions" will be maintained on National Grid's website ([www.tidewatersite.com](http://www.tidewatersite.com)). See section 4.10 for more information about PUBLIC NOTICE.*

12. Interviewee suggested flyers on doors.

*Response: National Grid performed an initial walk of the neighborhood to distribute door knob flyers with information on how to join the mailing list in August 2012. This walk covered residences in the neighborhood as shown on the Figure 3 of the PIP. In addition, National Grid will post weekly updates during remedial work to the informational bulletin boards located at the end of Tidewater Street and at the end of Bowles Court, and on both the National Grid and Rhode Island Department of Environmental Management (RIDEM) websites. See section 4.10 for more information about PUBLIC NOTICE.*

13. Interviewee suggested use of Tidewater logo on all mailings.

*Response: National Grid developed a "Tidewater Environmental Project" mailing label to more clearly identify correspondence related to the project. See section 4.10 for more information about PUBLIC NOTICE.*

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14. Should regular communications be performed during the cleanup process? Interviewee agreed with meetings at milestones during remediation.

*Response: National Grid will hold community meetings during the remediation process at specified project milestones, such as the Rhode Island Department of Environmental Management's (RIDEM) approval of the Remedial Action Work Plan, prior to remedy implementation and following completion of site-wide remediation. National Grid will schedule additional community meetings during the remedial process at the request of the community. See section 4.30 for more information about COMMUNITY MEETINGS.*

15. Which locations and times would be convenient for public meetings? Interviewee indicated that schools may be more convenient.

*Response: National Grid will schedule meetings in the evening at either the Blackstone Valley Visitor Center or Varieur Elementary School, based on availability. The preferred location is Varieur Elementary School, which is within walking distance of the Tidewater site. See section 4.30 for more information about COMMUNITY MEETINGS.*

**Comments Received on June 27, 2012:**

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Phone Interview 10 a.m. – 10:45 a.m.

1. Interviewee indicated that it is important to engage the community – suggested door knocking in collaboration with the Environmental Justice League.

*Response: National Grid acknowledges the need to engage community members and keep them informed about the planned investigations and remedial efforts at the Tidewater Site. National Grid has prepared a public involvement plan (PIP) to establish procedures for public and community communications about the Site. As described in the PIP, National Grid performed an initial walk of the neighborhood to distribute door knob flyers with information on how to join the mailing list in August 2012. This walk covered residences in the neighborhood as shown on the Figure 3 of the PIP. We understand that the Environmental Justice League will be undertaking door-to-door efforts as well.*

2. Interviewee indicated that all documents need to be written in simple, plain language.

*Response: National Grid's reports and communications to the Rhode Island Department of Environmental Management (RIDEM) are technical documents and as a result, cannot necessarily be simplified. However, National Grid will make every effort to use brief and nontechnical terminology in communications to the public, including in mailings, website information and bulletin board postings. In addition, National Grid will prepare simple executive summaries for major report submittals.*

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3. Interviewee suggested translations in Spanish and Portuguese.

*Response: National Grid will provide mailings, fact sheets and other communications in both English and Spanish. In addition, all mailed communications will contain a translation header in multiple languages stating: "This is an important notice. Please have it translated." See section 4.20 for more information about ENHANCED COMMUNICATIONS.*

4. Which locations and times would be convenient for public meetings? Interviewee indicated evening meetings are preferable. Meeting locations should be as close to the neighborhood as possible.

*Response: National Grid will schedule meetings in the evening at either the Blackstone Valley Visitor Center or Varieur Elementary School, based on availability. The preferred location is Varieur Elementary School, which is within walking distance of the Tidewater Site. See section 4.30 for more information about COMMUNITY MEETINGS. See section 4.30 for more information about COMMUNITY MEETINGS.*

5. Interviewee suggested providing food and drink, as well as child care at meetings.

*Response: At this time, National Grid does not plan on providing food, drink, or child care at meetings.*

6. Interviewee suggested having translators at all meetings.

*Response: Upon request, National Grid will provide translation assistance for non-English speaking individuals. See section 4.30 for more information about COMMUNITY MEETINGS.*

7. Interviewee liked the bulletin board idea; thought more than two locations would be needed. Interviewee indicated that bulletin boards should include maps.

*Response: National Grid has installed informational bulletin boards at the end of Tidewater Street and at the end of Bowles Court. The bulletin boards will include certain information distributed through the mailing list, as well as weekly updates during remedial work. National Grid will also use the bulletin boards to announce public meetings, distribute fact sheets and communicate availability of reports. In addition, National Grid will post air monitoring data, color-coded maps and Site-related contact information. Please note that if significant vandalism to the bulletin boards occurs, National Grid will look into alternative ways to share information. See section 4.10 for more information about PUBLIC NOTICE.*



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8. Interviewee indicated a need to make it clear that the entire site is addressed in the same manner when it comes to public involvement and the remedy.

*Response: The Rhode Island Department of Environmental Management (RIDEM) is currently reviewing National Grid's recommended remedy for the site. The remedy addresses the entire site in a consistent manner. Similarly, National Grid's environmental monitoring and controls during remedy implementation and post-remedial monitoring will be consistent across the entire site area.*

9. Interviewee indicated that the public must not only be informed on what has happened and what will happen, but also must have a voice on how things get done...follow-through on all public comments.

*Response: All written public comments related to documents submitted to the Rhode Island Department of Environmental Management (RIDEM), as well as National Grid's response, will be documented in written form. National Grid will send a copy of responses to those who submitted comments and also place them in the information repository. In addition, GZA will send a notice announcing the availability of the summary to the Site's mailing and email recipient lists. Refer to section 4.30 for more information.*

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**EXHIBIT IV**

**MAY 22, 2013 RESPONSE TO PUBLIC COMMENTS  
RECEIVED IN REGARDS TO PUBLIC INVOLVEMENT PLAN**

March 22, 2013  
File No. 05.0043654.20-C



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401-421-4140  
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<http://www.gza.com>

Re: Response to Public Comments  
Draft Public Involvement Plan  
Former Tidewater MGP and Power Plant Site  
Pawtucket, Rhode Island  
*RIDEM Case No. 95-022*

Dear Mr. Martella:

On behalf of our client, The Narragansett Electric Company d/b/a National Grid (National Grid), GZA GeoEnvironmental, Inc. (GZA) has prepared this letter in response to written public comments to the November 26, 2012 draft Public Involvement Plan (PIP) prepared for the Former Tidewater Manufactured Gas Plant (MGP) and Power Plant Site located in Pawtucket, Rhode Island (the Site). These comments were provided to National Grid by the Rhode Island Department of Environmental Management (RIDEM) via a February 21, 2013 notification letter. As indicated in RIDEM's February 21, 2013 notification letter, RIDEM received the following written public comments to the draft PIP: 1) a letter dated January 28, 2013, from Ms. Holly Dygert; and 2) a letter dated February 12, 2013, from Ms. Amelia Rose of the Environmental Justice League of Rhode Island (EJLRI). For your convenience, the comments received are repeated below followed by National Grid's responses in *italics*. The RIDEM notification letter along with the two public comment letters is included as an attachment to this letter.

In addition, per RIDEM's February 2013 notification, attached to this letter are responses to public comments that we received during the January 29, 2013, public meeting held at the Francis Varieur Elementary School. These responses were submitted separately to RIDEM on February 15, 2013. This letter also includes updates to responses to audience comments from the January 29, 2013, meeting which were summarized in the February 15, 2013, submittal and responses to questions related to the PIP provided in an email dated March 6, 2013, from Ms. Holly Dygert. A copy of this March 6, 2013 email is also attached.

**January 28, 2013 Letter**

1. Comment: The information in the boards should be provided in the three primary languages of the community, which are English, Spanish and Portuguese. I was concerned that National Grid seemed to reject a request made during the interviews for information to be translated into both Spanish and Portuguese. I want to underscore the importance of providing information in the community's languages.

*Response: Going forward, National Grid will provide the following documents in English, Spanish and Portuguese: 1) Notification Mailings, 2) Fact Sheets and 3) Executive Summaries that will accompany future reports.*



2. Comment: I look forward to the incorporation of the color-coded alert system.

*Response: We implemented the color-coded alert system on the bulletin boards during the recent substation upgrade project. The system involves posting different color sheets to indicate when excavation is active (yellow sheet) and not active (blue sheet).*



3. Comment: I am very pleased that National Grid has proposed to create a color-coded map of Tidewater site hazards to the public as part of the PIP. Despite years of communications about the hazards on the site, the members of the stakeholder group are still unclear about concentrations of particular hazards, and where they are located. Thus, I am eager to see this map.

*Response: We are finalizing the color-coded map for the Tidewater project that illustrates areas of the Site where impacts have been identified in groundwater and soils and we will present it at the upcoming Community Information Session. The final map will also be posted on the National Grid website and the bulletin boards.*

4. Comment: In regards to the first concern, I agree with the characterization of a public involvement process laid out on page 1 of the Draft PIP, as “an agreement between the party conducting response actions and the public about how they will share information moving forward, and how the public will be able to comment on plans for assessment and cleanup of the site.” This definition identifies the public as important partner in the remediation process. Since the public’s interests vis-à-vis the remediation process diverge in important ways from those of the property owner, the public must have the ability to shape the remediation, and the precautions that are taken during the remediation process. I am concerned, however, that the Draft PIP construes public participation narrowly, as informing the public about work plans that have already been developed.

For example, on page 8, in describing the process through which a final remediation plan for the site will be determined, the Draft PIP states that RIDEM will issue a Program Letter when it has concluded that “the site has been adequately assessed” in the Site Investigation Report. The Draft PIP continues that “Following receipt of the Program Letter, National Grid will notify [various parties]... that the investigation is complete and that RIDEM has concurred with the recommended remedial alternative... Subsequent to this public notification and following receipt of any public comments, the Department will issue a Remedial Decision Letter formally approving the SIR.” In this description, the identification and approval of a remedial strategy are depicted as occurring apart from public involvement. This negates the role of the public in the decision-making process. Moreover, I believe that it is a mischaracterization of the process through which remediation strategies are determined. It is my understanding that the Program Letter solely certifies that RIDEM has determined that the proposed remedy meets the criteria for an acceptable remedy. I understand that the final determination of a remedy cannot be made until members of the community are given an opportunity to consider the proposal, and to convey their concerns to RIDEM.

The characterization of the process through which a Remedial Action Work Plan (RAWP) is identified and selected in the Draft PIP similarly neglects the role of the public. Though the text states that “Many of the above remedial process steps will be accompanied by public meetings and comment periods” (p.8), I find it disconcerting that the public’s role in shaping the remediation process is not included in National Grid’s description of the decision-making process. This view of public involvement as a process whereby National Grid officials inform the public about the remediation process carries through to other sections of the Draft PIP. For example, in the section on Community Meetings, meetings are depicted as opportunities for National Grid representatives to inform community members about the work that has been and will be undertaken in the site. Though informing the community is crucial for facilitating their

involvement in the process, it is not sufficient. The document also states that meetings will be held “in conjunction with... Departmental approval of the Remedial Action Work Plan; [and]prior to remedy implementation” (p.14). This neglects the crucial role the public will have in shaping the RAWP.

The PIP should be revised to indicate clearly that potential work plans will be presented in community meetings, and that community concerns will be solicited to ensure that the final work plans reflect the concerns and needs of the public. Opportunities for community members to comment on the proposed plans and thereby shape the remediation process should be clearly laid out in the meeting agendas, and in the scheduling of meetings (in relation to RIDEM’s final decisions about work at the site).



*Response: We are committed to providing the community with opportunities to review and comment on National Grid’s plans to remediate the Tidewater Site. National Grid will revise the PIP to include a public meeting related to the draft Remedial Action Work Plan (RAWP – the document that will be submitted to RIDEM to present the details of how the remedy will be implemented) to provide further opportunity for the public to comment on the Site remediation process. The public meeting regarding the draft RAWP will be held within 12 months of receipt of the Remedial Decision Letter (RDL – letter issued by RIDEM to formally agree with the findings of the Site Investigation Report). This meeting will be held prior to the submittal of the final RAWP to RIDEM and will provide the public an opportunity to provide comment on the remedial strategy for the Tidewater Site. The process going forward and as outlined in the PIP is intended to provide a means of effective “two-way communication” between the public and National Grid. The Initial Community Meeting (which will follow RIDEM’s review of the Site Investigation Report) will provide the public an opportunity to provide comment on the conceptual remedial strategy for the Tidewater Site. The process outlined in the PIP, which follows the requirements of the Remediation Regulations, provides the public opportunity to comment on the remedial process; however, it is noted that RIDEM is ultimately responsible for the final remedial analysis and decisions on the final remedial strategy for the Site.*

5. Comment: In regards to my second concern, one of the requests most of the interviewees made was for National Grid to make data from air monitoring available in real time to the community. While meeting with representatives from National Grid and RIDEM during the early Fall of 2012, we learned that this was not possible with the particular hand held devices being used to monitor emissions during the current electrical substation upgrade. Moreover, RIDEM representatives at the meeting seemed to concur that the small-scale nature of the work and the limited extent of contaminants in the soil did not warrant the more costly kind of air monitoring technologies that enable real-time posting of readings. I am very concerned to see that the particular scheme we agreed to for monitoring emissions and making the results available to community members during the substation upgrade is replicated in the Draft PIP. National Grid and GZA officials should be clear that the substation upgrade was classified as separate from the remediation process, which is why the work could be completed without presenting it to the public. As we look ahead to the full remediation, the particular air monitoring strategies, and techniques for communicating information about the results of that monitoring to the community, will need to be determined in conversation with the community about the particular threats posed by particular actions.

*Response: We will revise the PIP to delete the reference to posting weekly air monitoring data. Air monitoring plans for full-scale remediation of the Tidewater Site have not been developed as the final remedy for the project has not been approved by the RIDEM. The public will have an opportunity to comment and engage in a conversation about the proposed air monitoring program during the RAWP comment process described above.*

**February 12, 2013 Letter**



1. Comment: Page 2 – The draft PIP states: “This plan is not intended to cover Site activities relative to day-to-day operations of the natural gas regulating facility and electrical substation or other uses of the property by National Grid.” Since community members and parents from nearby schools have already met with GZA, RIDEM, and National Grid regarding substation upgrades and earthwork, especially with regard to improving air monitoring plans in relation to this work, which falls outside the official remediation plan, I would ask that this sentence be clarified to ensure that residents can expect to be informed and be invited to actively participate in the shaping of any plans for the site that would require disturbance to soil or otherwise create a potential public health risk. Some of these activities could be interpreted, potentially, as “day-to-day operations”, and therefore this statement should be clarified to clearly differentiate between actual day-to-day operations and other operations that are not specifically included in the remediation but will disturb soil, create potential emissions, etc.

*Response: National Grid will revise the PIP to clarify this sentence as follows: “This plan is not intended to cover Site activities relative to the day-to-day operations, including repair and maintenance of the natural gas regulating facility and electrical substation involving minor soil disturbances (i.e., fence post installation) or other uses of the property by National Grid. Activities at these facilities involving excavations of soils with the potential to create volatile emissions are covered by this PIP. In the event of a facilities emergency requiring immediate soil excavation (utility repair, etc.), National Grid will follow the soil management procedures prepared for the previous natural gas station regulator and electrical substation work (i.e., April 2011 Materials Management Plan and November 2012 Soil Management Plan, respectively). In addition, air monitoring will be completed during these emergency events in accordance with the September 28, 2012, air monitoring summary memorandum submitted to RIDEM to the extent practical.”*

2. Comment: Page 17 – The Pawtucket Public Library will serve as a repository for all of the documents and other information related to the site. I suggest posting a sign or poster at the Library itself (not just on the fence at the Tidewater site) to let the general public know that this repository exists.

*Response: Information about public repositories for the Tidewater project is posted on the bulletin boards at the end of Tidewater Street and Bowles Court. National Grid will contact the Pawtucket Public Library to inquire about the possibility of posting a sign at the Library and will do so with the Library’s permission.*

3. Comment: Page 19 – If there are revisions proposed for the PIP in the future, National Grid will prepare a revised draft for review and approval by the public and RIDEM. National Grid should prepare a summary sheet to list all of the proposed changes/revisions, as well as the final approved revisions, not simply post the proposed revised draft of the full PIP online and in the physical repository (even if the changes/revisions are highlighted in the full document). This summary sheet should be a separate document to make it easy for the public to access, read, and digest the proposed, and then approved, changes.

*Response: While future revisions to the PIP will not re-open the draft and public comment period, we will prepare and make available summary sheets of proposed and approved changes/revisions for the public.*

4. Comment: In response to concerns raised by residents living on Thornton Street, immediately adjacent to the site, regarding natural gas odors and the possibility of air impacts from the groundwater contamination, I suggest addressing these issues at the poster session National Grid is hosting in the near future. In particular, addressing the issue of vapor intrusion into homes and schools should be a top priority. EJLRI receives technical assistance through an EPA program that



assists organizations and community residents in understanding technical information related to Brownfields contamination and remediation. Upon her review of the draft remedial plan submitted to RIDEM by National Grid, our consultant from the New Jersey Institute of Technology recommended the following:

#### VAPOR INTRUSION INVESTIGATION



Some of the chemicals (volatile compounds) identified at the site have the potential to travel through the soil as vapors. These vapors may then move up through the soil into nearby buildings, contaminating indoor air. Therefore, if a vapor intrusion investigation has not been completed, a vapor intrusion investigation is recommended to determine whether the occupants of neighboring buildings are at risk for exposure to VOCs due to vapor intrusion.

We will be submitting a final version of the consultant's review at the appropriate time (when public comments are being accepted on the SIR/recommended remedial alternative), but I wanted to share this recommendation because it speaks directly to concerns raised by residents at the last meeting.

*Response: We understand that nearby neighbors are concerned about vapor intrusion. Based on a number of factors – the way groundwater is distributed and moves at the Site, the way contaminants are distributed at the Site, and the distance from off-Site buildings to the nearest Site impacts- the potential for vapor intrusion into off-Site buildings, including the residences on Thornton Street or the neighboring schools, has not been identified as a potential pathway of concern for the Tidewater Site. We say this for several reasons:*

- *The majority of soil and groundwater impacts are located at least 50 feet away from the nearest Thornton Street residences and the schools.*
- *The portion of the Site that is nearest the residences along Thornton Street is an area where historical operations did not occur and significant impacts (VOCs or others) have not been detected in this area.*
- *In addition to the distance from Site impacts, the residences along Thornton Street and all three of the schools are located hydraulically upgradient of the Site – in other words, groundwater from the Site flows “downhill” towards the river, not towards the homes on Thornton Street or the schools. Therefore, the potential for migration of Site impacts towards Thornton Street and the schools is not a concern.*

*Our conclusion is also supported by:*

- *The March 2003 proposed revisions to the Connecticut Department of Environmental Protection (CTDEP) volatilization criteria, which references vapor intrusion guidance documents prepared by US Environmental Protection Agency (EPA).<sup>1</sup> This guidance indicates that volatilization criteria are applicable to impacts within 30 feet (both depth and lateral distance) from a structure.*
- *RIDEM's guidance document entitled “Evaluation of Vapor Intrusion Potential for Proposed RI School Sites,” dated September 2012.<sup>2</sup> This RIDEM guidance document outlines a step-by-step process for evaluating the potential for vapor intrusion to migrate*

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<sup>1</sup> RIDEM has not yet developed any vapor intrusion criteria and therefore has incorporated the State of Connecticut's volatilization criteria, available here:

[http://www.ct.gov/deep/cwp/view.asp?a=2715&q=458652&deepNav\\_GID=1626](http://www.ct.gov/deep/cwp/view.asp?a=2715&q=458652&deepNav_GID=1626)

<sup>2</sup> RIDEM developed this guidance document in September 2012, available here:

<http://www.dem.ri.gov/programs/benviron/waste/pdf/skulvapr.pdf>

*from the subsurface into an existing or proposed building to be used as a school. Using this guidance document and the understanding of subsurface impacts and groundwater flow direction information, an evaluation for the potential for vapor intrusion into the off-Site schools and residences is not considered warranted.*



*Finally, National Grid's predecessor owners conducted a soil gas survey surrounding the Francis J. Varieur School in 1996. The survey consisted of 28 sampling points adjacent to the school to ascertain whether the potential existed for the migration of vapors from the surrounding soils into the school. No VOCs were detected in the samples, with the exception of two soil gas samples which detected low levels of trichloroethylene (TCE). TCE is not a contaminant associated with historic MGP and power plant operations and is not associated with the Tidewater Site. Subsequent indoor air samples were collected from within the school for TCE analysis. Those samples did not detect any TCE.*

*At this time, National Grid does not plan on having a specific poster board regarding vapor intrusion at the community outreach session. However, we will be willing to discuss the issue should anyone have any questions about vapors. In addition, we would be happy to discuss this issue further with representatives of the New Jersey Institute of Technology (NJIT) if you wish.*

*To address the question regarding natural gas odors in the neighborhood, National Grid will have a representative available from gas operations at the Community Outreach Session to discuss the natural gas odor concerns raised by the community.*

*Natural gas is typically "odorless" from the well head. Federal and State law mandates that gas must be detectable by a person with an average sense of smell. As a result, pipeline operators and in some cases distribution system operators inject a malodorous material called mercaptan, commonly referred to as "odorant". Federal law also mandates that odorant added to a pipeline must not be harmful to people, pipe or other devices. National Grid does has several Level 3 gas leaks (defined as a non-hazardous leak; periodic monitoring required) in the neighborhood. Level 3 leaks do not present a risk to public health or safety. National Grid is continuing to monitor the leaks and is adhering to the strict Federal and State standards.*

5. Comment: The draft PIP is strong overall, but lacks specifics on how to best engage parents at the local schools. Principals at the schools may not be the best, or only, individuals to notify regarding upcoming work, air monitoring results, public meeting notices, etc. In fact, they can be bottlenecks for getting information out to the wider school community. Suggestions raised at the meeting to engage the Pawtucket Schools Superintendent, the school committee, etc. are all very good, but also are not enough to get through to individual parents. Signs or posters with general information posted at the front offices of the schools adjacent to the site would be a good start (and/or at student pick-up locations), as well as providing copies of public notices to all parents via their child's backpacks, as suggested by the principal at Varieur Elementary, would also help ameliorate this problem. Not all notices need to be sent home via backpacks, but any public meeting announcements should be, as should an initial introductory letter or handout with an overview of the site history and current status, including who to contact for more information. National Grid should work with the principals at the three schools to send this introductory info sheet/letter home with all students as soon as possible.

*Response: We provide notifications to those on the mailing/email list, which includes the principals of the neighboring schools. If the principals need assistance in distributing these notifications, we would be happy to help. The best way to find out information currently is to sign-up to the Tidewater mailing/email list via the National Grid website. National Grid encourages all parents/community members to sign up so that they can receive information directly from National Grid. Any interested party is also welcome to contact National Grid's Project Manager, Michele Leone, directly at 781-907-3651.*



*With permission of the neighboring schools, National Grid will post a sign on how to obtain information regarding the Site at the front office of each school. National Grid has prepared an updated fact sheet which was distributed on March 4, 2013, through the mailing and email lists, as well as via door-to-door flyers to the neighboring community. This fact sheet included information about the former Tidewater facility, recent activities at the Site, public involvement activities and next steps for the Site. The fact sheet accompanied a notification letter regarding the date, time and place of the upcoming Community Outreach Session. National Grid distributed this notification package to the schools on March 6, 2013, to be sent home with the students via backpacks. National Grid will continue to work with the principals about sending mailing list items (flyers, fact sheets and public notifications) in multiple languages home with the students via backpacks.*

6. Comment: Lastly, I would like to ask National Grid, GZA, and RIDEM to respond to how phytoremediation might play into the overall remediation strategy for this site, and/or if this approach has been discussed at all in relation to the Tidewater Site.

*Response: We considered phytoremediation but concluded that it is not a feasible remedial alternative for the following reasons:*

- *The depth of the treatment zone is limited by the depth of the root material of the plants.*
- *The contaminants at the former Tidewater facility are located at depth greater than two feet below the ground which is too deep for phytoremediation.*
- *The nature of certain impacts at the Tidewater Site, including separate phase product (in other words, coal tar or oils), are not amenable to treatment via phytoremediation. Due to these limitations, phytoremediation is not deemed appropriate as a potential remedial alternative for the former Tidewater facility.*

**Updates to Responses to Comments from the January 29, 2013 Public Meeting**  
**Open Comments and Questions Received:**

9. Audience member requested that technical documents be translated into “everyone speak” language.

*National Grid will continue to make every effort to use brief and nontechnical terminology in communications with members of the public. In an effort to meet this request, National Grid has hired a communications consultant to assist in the preparation of documents.*

12. Audience member spoke about historical mercury spill and lasting impact on concern from neighborhood. Audience member enquired about money from court settlement and publicly available information regarding mercury spill. He requested that information about the mercury spill, as it pertains to the history of the Tidewater Site, be included on the website and presented during the poster board session.

*National Grid did not own the property when the mercury spill took place in 2004 and was not involved in the cleanup, court proceedings or settlement. Southern Union was the party solely responsible for cleanup of the mercury incident. National Grid purchased the property from Southern Union but did not acquire Southern Union’s liability for the mercury issues on the property. The mercury contamination from the 2004 spill has been cleaned up and removed from the property. In addition, the buildings have been checked for mercury and no mercury is currently stored on the property. National Grid stated that the files associated with the mercury spill are public information and can be reviewed through RIDEM.*



The audience member further requested that information on the mercury spill be posted on the National Grid website.

*National Grid explained that it was not liable for the mercury release and was not involved in the cleanup, court proceedings or settlement. Southern Union was the party solely responsible for cleanup of the mercury incident. National Grid indicated that it would consider the request and provide a formal response in the response to comments on the PIP.*



*The following additional response was prepared by RIDEM and provided to National Grid following the January 2013 public meeting. National Grid was not involved in preparation of this response or involvement in the Southern Union Case.*

*“In June 2012, the U.S. Supreme Court remanded an \$18-million sentence against the owners of New England Gas in a case that stemmed from the 2004 mercury spill at a Pawtucket housing project. The ruling puts at question the \$12 million in damages that were to have gone to Rhode Island environmental groups (the majority of which were to be managed by the Rhode Island Foundation, in order to fund grants in environmental education, remediation, conservation, and children's health). The remaining \$6 million was a fine. The Supreme Court case hinged on circumstances that require juries -- not judges -- to set penalties after criminal convictions, so the ruling does not change the 2008 conviction of Texas-based Southern Union Co. for illegal storage of the hazardous material that belonged to a former subsidiary. But the ruling means the Supreme Court remanded the case for further proceedings in US District Court (RI) consistent with this opinion. The June 2012 Supreme Court Decision can be found at <http://www.supremecourt.gov/opinions/11pdf/11-94a1b2.pdf> . The US District Court heard oral arguments in December 2012 in an attempt to determine how to properly proceed with the case from here. DEM has received no additional information on this matter from the Court since the hearing in December 2012. “ – Communications from RIDEM*

14. Audience member commented on gas smell at Thornton and Merry Streets and whether or not they are safe or being exposed to natural gas (or its additives).

*The odor that the audience member says he smelled is likely associated with mercaptan. Natural gas by itself is odorless. Mercaptan is an odorant that is added to natural gas so the gas can easily be detected. It is carried with the natural gas stream.*

*National Grid will contact its Natural Gas Division to find out more information about this concern. Representatives from National Grid will be available during the March 27, 2013 community outreach meeting to discuss public concerns regarding the natural gas operations at the Tidewater facility.*

*In addition, refer to the response above for Comment 4 of the February 12, 2013 comment letter regarding “natural gas odors.”*

15. Amelia Rose of the Environmental Justice League of Rhode Island (EJLRI) introduced herself and her agency to the audience. She indicated that EJLRI had access to funds from the US Environmental Protection Agency (USEPA) and could be used as a resource to the community. She also suggested that National Grid have a poster board regarding vapor intrusion during the Community Informational Session to educate the public.

*Refer to the response above for Comment 4 of the February 12, 2013 comment letter regarding “vapor intrusion investigation.”*

*RIDEM also added that the potential for volatilization of contaminants from the Site is not supported by the results of the recent air monitoring program (hand held field instruments) which is being followed as part of the electrical substation project.*

17. Audience member suggested that Cape Verdean be added as a language to the translation list. Also suggested that Oak Hill Nursing Home be added to the distribution list.

*National Grid understands that Cape Verdean is a dialect of Portuguese. Based on discussions with a translation service, we also understand that documents translated in Portuguese should be understood by people who speak Cape Verdean. Therefore, National Grid does not plan to provide documents in Cape Verdean. If a community member requires assistance or translation other than Spanish and Portuguese, please contact Michele Leone at National Grid.*

*National Grid has added Oak Hill Nursing Home to the door to door flyer distribution list during the March 4, 2013 mailing.*

### **March 6, 2013 Email**

(1) National Grid should develop separate communication materials for schools – and provide enough copies to give place one in each student’s backpack.

*National Grid will continue to work with the principals to get materials out to parents via backpacks. To avoid confusion in disseminating this information, National Grid will work directly with the principals and other stakeholders.*

(2) School principals want to review all of the fliers/documents that will be sent to parents before NG makes copies, translates, or finalizes the communication, to make sure they communicate effectively. Julie Nora (ICS) and Carolyn Sheehan (Blackstone Valley) made this suggestion.

*National Grid will work with the principals to ensure that they are comfortable with the documents we provide to them for distribution.*

(3) Neighbors also want to review materials before NG sends out communications to neighborhood – point person can be Amelia Rose at EJ League who can send out draft to list of neighbors and collate comments/suggestions within one week and send back to NG for finalization (worry is that the communications are too wordy and will not be read).

*National Grid is working with a communications consultant in order to make mailings more easily understood by the community in response to this concern. Given this, National Grid will not be providing drafts of our communications to the neighbors prior to distribution. We continue to appreciate the community’s input on the communications and welcome suggestions on how to further improve this process.*

(4) Hold regular meetings with a core group of residents and school personnel to give NG/GZA a chance to communicate in a smaller group setting – in addition to the larger public meetings that happen less frequently. This will help increase communication with the most committed/involved residents and school officials who will be ambassadors to other residents and the wider school community to generate their interest and involvement. Also will make larger public meetings less adversarial and more productive because it won’t be the first time people are hearing about a certain issue or proposal.

*National Grid designed the public involvement plan (PIP) to involve all community members and interested parties. National Grid believes that the large number of public meetings and the commitment to schedule additional meetings on an as-needed basis pre-empts the need for smaller, stakeholder meetings. Community members are strongly encouraged to contact Michele Leone at any time throughout the site cleanup process by calling 781-907-3651 or via email at [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com) should they have questions or comments.*



(5) Translation at larger public meetings should be made available regardless of whether someone contacts NG to say they are coming to a meeting – this would help build trust with the neighborhood and principals could guarantee to parents that interpretation would be available at public meetings no matter what.



*At all public meetings, translation assistance will be provided for non-English speaking individuals, upon request. Requests can be made to Michele Leone by calling 781-907-3651 or via email at michele.leone@nationalgrid.com.*

(7) NG should create bookmarks with all relevant contact information as well as instructions for how people can get on the email/phone notification lists. These will be helpful to hand out in the neighborhood and at the schools and would be more likely to be read and communicate effectively – rather than a long letter.

*National Grid has created magnets with the requested information which will be available at the upcoming community information session.*

A bulleted summary of the proposed revisions to the PIP, as discussed above, is attached to this letter.

Should you have any questions or comments regarding the information presented herein, please do not hesitate to contact the undersigned or Michele Leone at 781-907-3651.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink, appearing to read "Margaret S. Kilpatrick".

Margaret S. Kilpatrick, P.E.  
Senior Project Manager

A handwritten signature in blue ink, appearing to read "John P. Hartley".

John P. Hartley  
Consultant/Reviewer

A handwritten signature in blue ink, appearing to read "James J. Clark".

James J. Clark, P.E.  
Principal

Attachments: February 21, 2013 Notification of Public Comments Received  
February 15, 2013 Summary of Meeting  
March 6, 2013 Email  
Summary of Proposed Revisions to PIP

CC: Ms. Michele Leone, National Grid  
Ms. Elizabeth Stone, RIDEM



**FEBRUARY 21, 2013**

NOTIFICATION OF PUBLIC COMMENTS RECEIVED



February 21, 2013

Ms. Michele V. Leone  
Manager, New England Site Investigation & Remediation  
National Grid  
40 Sylvan Road  
Waltham, MA 02451-1120

RE: Tidewater Manufactured Gas Plant (former)  
Tidewater Street  
Pawtucket, Rhode Island

Dear Ms. Leone:

On November 9, 2011, the Rhode Island Department of Environmental Management (the Department) amended the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, (the Remediation Regulations). The purpose of these regulations is 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.

In the matter of the above referenced "Site" (as defined in the Industrial Property Remediation and Reuse Act), and in accordance with Rule 7.07.E (Public Involvement Plans) of the 2011 Remediation Regulations, the Department's Office of Waste Management (OWM) has received the following documents concerning public comments on the draft Public Involvement Plan (PIP):

1. Letter from Holly Dygert to the Department, Re: Tidewater Site Public Involvement Plan, dated January 27, 2013, and received via e-mail on January 28, 2013; and
2. Comments re: Draft Public Involvement Plan, Former Tidewater Facility and Former Power Plant, Tidewater and Merry Streets, Pawtucket, Rhode Island, prepared by the Environmental Justice League of Rhode Island (EJLRI), received via e-mail on February 12, 2013.

In addition, National Grid received several comments at the public meeting for the draft PIP held on January 29, 2013.

Please review these submitted comments along with those received at the public meeting and prepare written responses to each of them as appropriate. A completed document, incorporating responses all of the comments, must be submitted to the Department for review and approval.

**All correspondence regarding this Site should be sent to the attention of:**

Joseph T. Martella II – Senior Engineer  
RIDEM / Office of Waste Management  
235 Promenade Street  
Providence, RI 02908

If you have any questions regarding this letter, please contact me by telephone at (401) 222-2797 extension 7109 or by e-mail at [joseph.martella@dem.ri.gov](mailto:joseph.martella@dem.ri.gov).

Sincerely,



Joseph T. Martella II  
Senior Engineer  
Rhode Island DEM  
Office of Waste Management

Attachments: January 27, 2013, Letter from Holly Dygert to the Department;  
February 12, 2013, Comments re: Draft Public Involvement Plan

Cc: Kelly J. Owens, RIDEM.OWM  
Elizabeth Stone, RIDEM/OOD  
Barbara Morin, RIDEM/OAR  
Barney S. Heath, Pawtucket Planning & Development  
Alan Tenreiro, Chairman, Pawtucket School Committee  
Deborah Cylke, Superintendent, City of Pawtucket School Department  
Julie Nora, Ph.D, International Charter School  
Carolyn Sheehan, Blackstone Academy  
Edna Coia, Francis J. Varieur Elementary School  
Amelia Rose, EJLRI  
Margaret S. Kilpatrick, GZA



January 27, 2013

Mr. Joseph Martella II, Senior Engineer  
RIDEM Office of Waste Management  
Site Remediation Program

Re: Tidewater Site Public Involvement Plan

Dear Mr. Martella,

I am very pleased that RIDEM has implemented a public involvement mechanism to ensure that members of the community who may be exposed to hazards are involved in the remediation process. I reviewed National Grid's draft Public Involvement Plan (PIP) for the Tidewater Site, and I am also very pleased with many of the actions National Grid has proposed to take to ensure that those potentially impacted by the work at Tidewater are informed of the work. I am writing to communicate my suggestions for strengthening the proposed PIP. These suggestions are aimed, first, to optimize the ability of those who could be impacted by the site's hazards to access information about the nature of these hazards and about potential routes of exposure, and, second, to ensure that they are able to influence the process in accordance with their particular concerns.

I appreciate that National Grid solicited comments from the community through the interview process in June of 2012, and provided a synthesis of the suggestions in the *Draft PIP*. National Grid has already acted on many of these suggestions, and has integrated many of them into the proposed PIP. The community bulletin boards – with announcements and the results of weekly air monitoring – are very useful communication tools. I look forward to the incorporation of the color-coded alert system. The information in the boards should be provided in the three primary languages of the community, which are English, Spanish and Portuguese. I was concerned that National Grid seemed to reject a request made during the interviews for information to be translated into both Spanish and Portuguese. I want to underscore the importance of providing information in the community's languages.

I am very pleased that National Grid has proposed to create a color-coded map of Tidewater site hazards to the public as part of the PIP. Despite years of communications about the hazards on the site, the members of the stakeholder group are still unclear about concentrations of particular hazards, and where they are located. Thus, I am eager to see this map. I am also pleased that National Grid is proposing a Community Outreach (poster) Session, and possibly a tour of the site.

While I am generally satisfied with the strategies National Grid has proposed to convey information to the public, I have two main concerns. The first is that the *Draft PIP* largely neglects the public's role in shaping the remediation process. The second is that the particular

strategy for monitoring air quality that was agreed on for the electrical substation upgrade is included in the *Draft PIP* as the plan for the remediation.

In regards to the first concern, I agree with the characterization of a public involvement process laid out on page 1 of the *Draft PIP*, as “an agreement between the party conducting response actions and the public about how they will share information moving forward, and how the public will be able to comment on plans for assessment and cleanup of the site.” This definition identifies the public as important partner in the remediation process. Since the public’s interests vis-à-vis the remediation process diverge in important ways from those of the property owner, the public must have the ability to shape the remediation, and the precautions that are taken during the remediation process. I am concerned, however, that the *Draft PIP* construes public participation narrowly, as informing the public about work plans that have already been developed.

For example, on page 8, in describing the process through which a final remediation plan for the site will be determined, the *Draft PIP* states that RIDEM will issue a Program Letter when it has concluded that “the site has been adequately assessed” in the Site Investigation Report. The *Draft PIP* continues that “Following receipt of the Program Letter, National Grid will notify [various parties]... that the investigation is complete and that **RIDEM has concurred with the recommended remedial alternative**... Subsequent to this public notification and following receipt of any public comments, the Department will issue a Remedial Decision Letter formally approving the SIR.” In this description, the identification and approval of a remedial strategy are depicted as occurring apart from public involvement. This negates the role of the public in the decision-making process. Moreover, I believe that it is a mischaracterization of the process through which remediation strategies are determined. It is my understanding that the Program Letter solely certifies that RIDEM has determined that the proposed remedy meets the criteria for an acceptable remedy. I understand that the final determination of a remedy cannot be made until members of the community are given an opportunity to consider the proposal, and to convey their concerns to RIDEM.

The characterization of the process through which a *Remedial Action Work Plan* (RAWP) is identified and selected in the *Draft PIP* similarly neglects the role of the public. Though the text states that “Many of the above remedial process steps will be accompanied by public meetings and comment periods” (p.8), I find it disconcerting that the public’s role in shaping the remediation process is not included in National Grid’s description of the decision-making process. This view of public involvement as a process whereby National Grid officials inform the public about the remediation process carries through to other sections of the *Draft PIP*. For example, in the section on Community Meetings, meetings are depicted as opportunities for National Grid representatives to inform community members about the work that has been and will be undertaken in the site. Though informing the community is crucial for facilitating their involvement in the process, it is not sufficient. The document also states that meetings will be held “in conjunction with... Departmental approval of the *Remedial Action Work Plan*; [and]

prior to remedy implementation” (p.14). This neglects the crucial role the public will have in shaping the RAWP.

The *PIP* should be revised to indicate clearly that potential work plans will be presented in community meetings, and that community concerns will be solicited to ensure that the final work plans reflect the concerns and needs of the public. Opportunities for community members to comment on the proposed plans and thereby shape the remediation process should be clearly laid out in the meeting agendas, and in the scheduling of meetings (in relation to RIDEM’s final decisions about work at the site).

In regards to my second concern, one of the requests most of the interviewees made was for National Grid to make data from air monitoring available in real time to the community. While meeting with representatives from National Grid and RIDEM during the early Fall of 2012, we learned that this was not possible with the particular hand held devices being used to monitor emissions during the current electrical substation upgrade. Moreover, RIDEM representatives at the meeting seemed to concur that the small-scale nature of the work and the limited extent of contaminants in the soil did not warrant the more costly kind of air monitoring technologies that enable real-time posting of readings. I am very concerned to see that the particular scheme we agreed to for monitoring emissions and making the results available to community members during the substation upgrade is replicated in the *Draft PIP*. National Grid and GZA officials should be clear that the substation upgrade was classified as separate from the remediation process, which is why the work could be completed without presenting it to the public. As we look ahead to the full remediation, the particular air monitoring strategies, and techniques for communicating information about the results of that monitoring to the community, will need to be determined in conversation with the community about the particular threats posed by particular actions.

In closing, I want to reiterate my support for the PIP process that RIDEM has adopted, and that National Grid has begun to develop. I look forward to continuing to work with RIDEM and National Grid to develop an effective plan for ensuring optimal public involvement.

Sincerely,



Holly Dygert  
16 Minto Street  
Providence, RI 02908  
(401) 272-1748





**Environmental  
Justice League of  
Rhode Island**

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February 12, 2013

Joseph Martella, Project Manager  
RIDEM  
Office of Waste Management  
235 Promenade Street  
Providence, RI 02908

*Comments re: Draft Public Involvement Plan, Former Tidewater Facility and Former Power Plant, Tidewater and Merry Streets, Pawtucket, Rhode Island*

Dear Mr. Martella,

I am submitting the following comments on behalf of the Environmental Justice League of Rhode Island (EJLRI) regarding the draft Public Involvement Plan (PIP) prepared by GZA on behalf of their client, National Grid, the responsible party for the Tidewater Site.

I have listed a few specific comments first, followed by more general suggestions for the PIP overall.

Page 2 – The draft PIP states: “This plan is not intended to cover Site activities relative to day-to-day operations of the natural gas regulating facility and electrical substation or other uses of the property by National Grid.” Since community members and parents from nearby schools have already met with GZA, RIDEM, and National Grid regarding substation upgrades and earthwork, especially with regard to improving air monitoring plans in relation to this work, which falls outside the official remediation plan, I would ask that this sentence be clarified to ensure that residents can expect to be informed and be invited to actively participate in the shaping of any plans for the site that would require disturbance to soil or otherwise create a potential public health risk. Some of these activities could be interpreted, potentially, as “day-to-day operations”, and therefore this statement should be clarified to clearly differentiate between actual day-to-day operations and other operations that are not specifically included in the remediation but will disturb soil, create potential emissions, etc.

Page 17 – The Pawtucket Public Library will serve as a repository for all of the documents and other information related to the site. I suggest posting a sign or poster at the Library itself (not just on the fence at the Tidewater site) to let the general public know that this repository exists.

Page 19 – If there are revisions proposed for the PIP in the future, National Grid will prepare a revised draft for review and approval by the public and RIDEM. National Grid should prepare a summary sheet to list all of the proposed changes/revisions, as well as the final approved revisions, not simply post the proposed revised draft of the full PIP online and in the physical repository (even if the changes/revisions are highlighted in the full document). This summary sheet should be a separate document to make it easy for the public to access, read, and digest the proposed, and then approved, changes.

In response to concerns raised by residents living on Thornton Street, immediately adjacent to the site, regarding natural gas odors and the possibility of air impacts from the groundwater contamination, I suggest addressing these issues at the poster session National Grid is hosting in the near future. In particular, addressing the issue of vapor intrusion into homes and schools should be a top priority. EJLRI receives technical assistance through an EPA program that assists organizations and community residents in understanding technical information related to Brownfields contamination and remediation. Upon her review of the draft remedial plan submitted to RIDEM by National Grid, our consultant from the New Jersey Institute of Technology recommended the following:

#### VAPOR INTRUSION INVESTIGATION

Some of the chemicals (volatile compounds) identified at the site have the potential to travel through the soil as vapors. These vapors may then move up through the soil into nearby buildings, contaminating indoor air. Therefore, if a vapor intrusion investigation has not been completed, a vapor intrusion investigation is recommended to determine whether the occupants of neighboring buildings are at risk for exposure to VOCs due to vapor intrusion.

We will be submitting a final version of the consultant's review at the appropriate time (when public comments are being accepted on the SIR/recommended remedial alternative), but I wanted to share this recommendation because it speaks directly to concerns raised by residents at the last meeting.

The draft PIP is strong overall, but lacks specifics on how to best engage parents at the local schools. Principals at the schools may not be the best, or only, individuals to notify regarding upcoming work, air monitoring results, public meeting notices, etc. In fact, they can be bottlenecks for getting information out to the wider school community. Suggestions raised at the meeting to engage the Pawtucket Schools Superintendent, the school committee, etc. are all very good, but also are not enough to get through to individual parents. Signs or posters with general information posted at the front offices of the schools adjacent to the site would be a good start (and/or at student pick-up locations), as well as providing copies of public notices to all parents via their child's backpacks, as suggested by the principal at Varieur Elementary, would also help ameliorate this problem. Not all notices need to be sent home via backpacks, but any public meeting announcements should be, as should an initial introductory letter or handout with an overview of the site history and current status, including who to contact for more information. National Grid should work with the principals at the three schools to send this introductory info sheet/letter home with all students as soon as possible.

Lastly, I would like to ask National Grid, GZA, and RIDEM to respond to how phytoremediation might play into the overall remediation strategy for this site, and/or if this approach has been discussed at all in relation to the Tidewater Site.

Sincerely,

A handwritten signature in cursive script that reads "Amelia Rose".

Amelia Rose, Director

**FEBRUARY 15, 2013**

SUMMARY OF MEETING



**GZA**  
**GeoEnvironmental, Inc.**

*Engineers and  
Scientists*

February 15, 2013  
GZA File No. 05.0043654.20-C

Mr. Joseph Martella  
Rhode Island Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, Rhode Island 02908



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Providence  
Rhode Island  
02909  
401-421-4140  
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<http://www.gza.com>

Re: *Meeting Summary - January 29, 2013*  
Draft Public Involvement Plan  
Former Tidewater MGP and Power Plant Site  
Pawtucket, Rhode Island  
*RIDEM Case No. 95-022*

Dear Mr. Martella:

On behalf of our client, The Narragansett Electric Company d/b/a National Grid (National Grid), GZA GeoEnvironmental Inc. (GZA) is pleased to provide the attached summary of the January 29, 2013 public meeting associated with the Former Tidewater Manufactured Gas Plant (MGP) and Power Plant Site located in Pawtucket, Rhode Island (the Site). The purpose of the public meeting was to discuss public comments to the draft Public Involvement Plan (PIP) which was submitted to the Department on November 26, 2012.

Should you have any questions or comments regarding the information presented herein, please do not hesitate to contact the undersigned or Michele Leone at 781-907-3651.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink, appearing to read 'M. Kilpatrick', is written over a faint, light blue circular stamp or watermark.

Margaret S. Kilpatrick, P.E.  
Senior Project Manager  
401-421-4140 – [margaret.kilpatrick@gza.com](mailto:margaret.kilpatrick@gza.com)

Attachment: Summary of Meeting

CC: Ms. Michele Leone, National Grid  
Ms. Elizabeth Stone, RIDEM

Summary of Meeting  
 DRAFT Public Involvement Plan (PIP)  
 Former Tidewater Facility  
 Pawtucket, Rhode Island

January 29, 2013 6 PM  
 Francis J. Varieur Elementary School  
 486 Pleasant Street  
 Pawtucket, Rhode Island

- **Introduction to Meeting – Michele Leone (National Grid Representative)**
- **Presentation of DRAFT PIP dated November 26, 2012 – Elizabeth Stone (Rhode Island Department of Environmental Management or RIDEM) and Meg Kilpatrick, P.E. (GZA GeoEnvironmental, Inc.)**

The presentation included a summary of the Draft Public Involvement Plan (PIP) for the former Tidewater Facility (the Site). The draft PIP was developed based on input from the public provided during the community interviews completed in June 2012, as well as input from RIDEM. It provides a blueprint for keeping the public informed during the site cleanup process. It also presents how the public can participate in the process and comment on the project. A PIP is a living document and can be amended to reflect additional issues or challenges that may arise during the cleanup process.

National Grid submitted a draft PIP to RIDEM on November 26, 2012. The draft PIP has four components: 1) public notice, 2) fact sheets and enhanced communications, 3) community meetings and 4) information repositories. The four components are presented in the below table.

<p><b><u>Public Notice:</u></b></p> <ul style="list-style-type: none"> <li>• Mailing List (used to announce public meetings, distribute fact sheets, information about availability of reports, etc.)</li> <li>• Email List (optional)</li> <li>• Sign up at <a href="http://www.tidewatersite.com">www.tidewatersite.com</a></li> <li>• Or, send request to National Grid</li> </ul>	<p><b><u>Fact Sheets and Enhanced Communications:</u></b></p> <ul style="list-style-type: none"> <li>• Fact Sheets (used to inform of development of new information and/or achievement of significant milestones)</li> <li>• Informational Bulletin Boards (end of Tidewater Street and Bowles Court)</li> <li>• Phone Message Alert System during excavation</li> </ul>
<p><b><u>Community Meetings:</u></b></p> <ul style="list-style-type: none"> <li>• Encourages equal participation by all to create an atmosphere of constructive, open dialogue</li> <li>• Proposed Schedule and Objective of Public Meetings</li> <li>• Evening meeting time</li> <li>• Francis J. Varieur School (preferred venue)</li> </ul>	<p><b><u>Information Repositories:</u></b></p> <ul style="list-style-type: none"> <li>• Publicly Accessible Site File: RIDEM Case No. 95-022 <a href="http://www.dem.ri.gov/topics/filerevw/htm">www.dem.ri.gov/topics/filerevw/htm</a></li> <li>• Publicly Accessible Websites: <a href="http://www.tidewatersite.com">www.tidewatersite.com</a> <a href="http://www.dem.ri.gov/benviron/waste/tide/htm">www.dem.ri.gov/benviron/waste/tide/htm</a></li> <li>• Local Information Repository: Pawtucket Library (13 Summer St) Bulletin Boards: Tidewater St &amp; Bowles Ct</li> </ul>

Following the public comment period for the draft PIP, National Grid will provide a response to comments and revise the PIP as necessary for submittal to RIDEM for final review and approval.

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National Grid will hold a community outreach session in March 2013 to present information about the Site in an informal poster-board type setting. Following this session, National Grid will hold the initial community meeting within 60 days after receipt of the Program Letter from RIDEM (issued following RIDEM’s formal review of the Site Investigation Report submitted by National Grid). The schedule of community meetings follows, and National Grid encourages participation by all to create an atmosphere of constructive, open dialogue.

ACTIVITY	TIME PERIOD
Community Outreach Session	Within 60 days of Draft PIP Meeting (March 2013)
Initial Community Meeting	Within 60 days of receipt of Program Letter – during SIR Public Comment Period
Public Meeting on DRAFT Remedial Action Approval Plan (RAWP)	Within 12 months of receipt of Remedial Decision Letter
Submit RAWP for RIDEM Approval	Within 6 months of DRAFT RAWP Meeting
Public Meeting prior to initiation of remedy	Minimum of 30 days prior to start of remediation
Public Meetings during remediation	Meeting schedule to be presented for discussion purposes once remedial schedule is developed and approved by RIDEM
Public Meeting upon completion of the remedy	Within 30 days following completion of remediation

A copy of the presentation associated with the January 29, 2013 Draft PIP meeting is posted on the National Grid Tidewater website ([www.tidewatersite.com](http://www.tidewatersite.com)).

**Questions and Comments Session:** *(Responses provided in italics)*

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National Grid provided a brief summary of written public comments received to date on the DRAFT PIP.

- Public requested that Portuguese (in addition to Spanish) be included as languages for documents requiring translation.

*National Grid stated that going forward, the following document types will be provided in English, Spanish and Portuguese: 1) Notification Mailings, 2) Fact Sheets and 3) brief Executive Summaries which will accompany future reports.*

- Public requested that color-coded alert system be implemented on the bulletin boards.

*National Grid stated that the color-coded alert system has been implemented on the bulletin boards during the recent excavation project. The system involves posting different color sheets to indicate when excavation is active (yellow sheet) and not active (blue sheet).*



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- Public requested color-coded map of Tidewater Site contaminants.

*National Grid stated that the color-coded map for the Tidewater project is being finalized and will be presented at the upcoming Community Information Session. The final map will also be posted on the National Grid website and the bulletin boards.*

- Public expressed concern that current Draft PIP does not take into account the public's role in providing input into the remediation process.

*National Grid reinforced that the process going forward and as outlined in the PIP is intended to provide a means of effective "two-way communications" between the public and National Grid. National Grid stated that the Initial Community Meeting (which will follow RIDEM's review of the Site Investigation Report) will provide the public an opportunity to provide comment on the conceptual remedial strategy for the Tidewater Site. In addition, National Grid indicated that the current draft of the PIP has been modified to include a public meeting on the draft Remedial Action Work Plan (RAWP – the document that will be submitted to RIDEM to present the details of how the remedy will be implemented) to further provide an opportunity for the public to comment on the Site cleanup process.*

- Public expressed concern that current Draft PIP does not consider air monitoring during the remediation of the Tidewater Site.

*National Grid stated that the air monitoring plans for full-scale remediation of the Tidewater Site have not been developed as the final remedy for the project has not been approved. National Grid stated that the public will have an opportunity to comment and present their concerns during future public meetings, which National Grid will incorporate into the air monitoring plan for the final remediation.*

Audience member relayed concern that draft PIP references weekly posting of air monitoring data and that inclusion of this language will set a precedent for future air quality monitoring.

*National Grid stated that the PIP will be modified to delete reference to the posting of weekly air monitoring data.*

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**Open Comments and Questions Received:**

1. Audience member enquired about date for the Community Outreach Session.

*The current schedule is to have the Community Outreach Session in mid to late March 2013.*

2. Audience member enquired about what March 2013 Community Outreach Session consist of.

*The Community Outreach Session will consist of an informal meeting where information will be presented on poster boards to the public. The poster boards will include a variety of topics, including such things as "What is an Manufactured Gas Plant?" history of the Tidewater Site, findings of the investigations, demonstrations of field equipment, description of current National Grid operations at the property, etc. Each poster board will be manned by a representative from National Grid and/or GZA to answer questions. RIDEM will also be present to answer questions from the public.*

3. Audience member expressed concern about when to know when things are going on at the Site; specifically, when to leave kids inside.

*Information regarding excavation at the Site is provided through the mailing/email list, posted to the bulletin boards and posted to the Tidewater websites. The National Grid website will also be updated to include the color-coded alert system information (active and no active excavation). National Grid will also inform school principals of the schedule of work.*

4. Audience member stated that he is a parent and emphasized that it is important to remember that parents have no way to obtain information about the Site.

*National Grid provides notifications to those on the mailing/email list, which includes the principals of the neighboring schools. Due to privacy issues, National Grid does not have access to student/parent information. National Grid will continue to work with the school principals in developing an effective way to communicate with the parents. The best way to find out information currently is to sign-up to the Tidewater mailing/email list via the National Grid website. National Grid requested that audience members tell other parents/community members about this and encourage them to sign up so that they can receive information directly from National Grid.*

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- Audience member stated that parents from the International Charter School want a way for the information to be communicated to the parents.

*National Grid will continue to work with the school principals in developing an effective way to communicate with the parents. National Grid encouraged parents to sign-up for the mailing and/or email lists, as well as visit the National Grid website, to obtain information.*

- Audience member stated that he/she feels that the parents have no way to determine what is going on at the site and suggested possibly implementation of additional bulletin boards.

*The bulletin boards were installed at locations proximate to the Tidewater site, as well as accessible and visible to the schools. The two site bulletin boards are located close to each of the neighboring schools. National Grid will look into the possible installation of additional bulletin boards, as well as continuing to work with the school principals in developing an effective way to communicate with the parents.*

- The principal from Blackstone Academy stated the community has various levels of technical understanding and that disseminating information about the Tidewater Site is difficult.

*In the future, National Grid will prepare simple executive summaries for major report submittals. In preparing these summaries, National Grid will make every effort to use brief and nontechnical terminology in communications to the public. In the near future, National Grid will prepare an executive summary for the recent Site Investigation Report as well as an updated Fact Sheet which will be distributed through the mailing lists, as well as placed into the information repositories. National Grid will also continue to work with the school principals in developing an effective way to communicate information to the parents.*

- Audience member stated that, as a parent, the 2- hour notice provided through the phone message alert system was not enough. In addition, notification regarding the Tidewater site needs to be provided to more parties, such as elected officials and School Committee(s). A presentation of information would be warranted.

*The mailing list established for the Tidewater project does include local elected officials as well as school representatives, including the Principals of the Blackstone Academy, International Charter School and Francis J. Varieur School, as well as the Superintendent of schools for the City of Pawtucket. National Grid would be happy to include members of the School Committee on the mailing list, upon receipt of their contact information. National Grid also is willing to meet with*



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*members of the school and local government to present information about the Tidewater site and answer any questions that they may have.*

9. Audience member requested that technical documents be translated into “everyone speak” language.

*National Grid is attempting to do this and will continue to try to produce documents that are better understood by the public.*

10. Audience member asked when RIDEM will be ready to review the Site Investigation Report (SIR).

*Joseph Martella of RIDEM provided details regarding the regulatory process under the RIDEM Remediation Regulations. He indicated that the Public Involvement Plan must be finalized and in place before RIDEM’s review of the SIR can begin.*

Audience member enquired about the timing of this review and if the spring would seem reasonable.

*RIDEM indicated that it may be possible but reiterated that PIP must be finalized before the review of the SIR begins.*

11. Audience member requested that live translators be provided at public meetings.

*National Grid would be happy to provide translators, if requested by the public in advance of the meetings. Future notifications will include language regarding the availability of translators upon request by the public.*

12. Audience member spoke about historical mercury spill and lasting impact on concern from neighborhood. Audience member enquired about money from court settlement and publicly available information regarding mercury spill. He requested that information about the mercury spill, as it pertains to the history of the Tidewater Site, be included on the website and presented during the poster board session.

*National Grid did not own the property when the mercury spill took place in 2004 and was not involved in the cleanup, court proceedings or settlement. Southern Union was the party solely responsible for cleanup of the mercury incident. National Grid purchased the property from*

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*Southern Union but did not acquire Southern Union's liability for the mercury issues on the property. The mercury contamination from the 2004 spill has been cleaned up and removed from the property. In addition, the buildings have been checked for mercury and no mercury is currently stored on-site. National Grid stated that the files associated with the mercury spill are public information and can be reviewed through RIDEM.*

The audience member further requested that information on the mercury spill be posted on the National Grid website.

*National Grid explained that it was not liable for the mercury release was not involved in the cleanup, court proceedings or settlement. Southern Union was the party solely responsible for cleanup of the mercury incident. National Grid indicated that it would consider the request and provide a formal response in the response to comments on the PIP.*

13. Audience member concerned about Tidewater flyer that he received on his door from Environmental Justice League. The flyer depicted biohazard marker and list of chemicals with associated acute health hazards. Audience member relayed information about members of his household and neighbors being diagnosed with cancer and is concerned about what he is being exposed to at his home as he lives on Thornton Street located right next to site. He stressed that he wants to know if he is safe.

*National Grid stressed that the Site is fenced and locked to keep people off of the property. Under normal site conditions, the Site is safe to the community- in other words, there is no potential for airborne contaminants. During times of excavation, when soil is dug up and moved around, there is a potential for airborne contaminants. During soil excavation, National Grid follows an air quality monitoring program which has received public input and has been reviewed and approved by RIDEM. The results of this monitoring are posted to the bulletin boards as well as the Tidewater websites. This program was followed during the recent electrical substation upgrade project. The majority of excavation associated with this project is complete, with the exception of minor fence post installations and minor excavations associated with properly decommissioning equipment. Air data from this project did not show sustained exceedances of the thresholds (defined as being held over a 5-minute time period) at any time. A few transient exceedances of the thresholds were noted during the work which were not associated with the excavation activities (i.e., transient exceedances due to weather interference (rain), movement of trash material, orange peel, etc.) .*

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Audience member asked whether there are emissions coming from the site without moving the soil? Also, audience member wanted to know about indoor air monitoring and whether or not they should be concerned about migration/volatilization into buildings on Thornton Street.

*Contaminants from the site are not getting into the air (i.e., volatilizing) from the soil and groundwater under normal conditions (i.e., no soil being moved or disturbed). The majority of surface soils at Site are indicative of urban fill – soils which would typically be found in urban or city environments and exhibit low levels of contaminants. The majority of impacts are found below the ground surface (deeper than 2 feet) in the soils, at or below the groundwater table. In addition, the majority of soil, groundwater and separate phase product (oil) impacts are found where the historical Manufactured Gas Plant and Power Plant operations took place, primarily along the river area between Winter Street and the land behind the Max Read Field. The area where the residences are located along Thornton Street are in an area where historical operations did not occur and do not have elevated levels of observed impacts. This area is also located upgradient of the site – groundwater from the Site flows “downhill” towards the river, not towards the homes on Thornton Street. Based on this information, National Grid believes that the buildings on Thornton Street are unaffected by the migration and/or volatilization from impacts on the Tidewater Site.*

*The drawbacks to indoor air testing were also discussed, as this type of testing typically will pick up standard house hold products and chemicals, such as paint, cleaners, etc., which cannot be differentiated from possible site contaminants.*

*The findings of the drilling program in Max Read Field were also discussed. Results of the explorations indicated the presence of visually impacted soil at depths greater than 2 feet in a limited area on the eastern portion of the field. The soils at depth are not accessible (i.e., they are covered with 2 feet of visually non-impacted soil which would need to be removed). The exploration program was conducted with knowledge by the City of Pawtucket and the City is aware of the findings of the investigation.*

14. Audience member commented on gas smell at Thornton and Merry Streets and whether or not they are safe or being exposed to natural gas (or its additives).

*The odor that the audience member says he smelled is likely associated with mercaptan. Natural gas by itself is odorless. Mercaptan is an odorant that is added to natural gas so the gas can easily be detected. It is carried with the natural gas stream.*



Summary of Meeting  
DRAFT Public Involvement Plan (PIP)  
Former Tidewater Facility  
Pawtucket, Rhode Island

January 29, 2013 6 PM  
Francis J. Varieur Elementary School  
486 Pleasant Street  
Pawtucket, Rhode Island

*National Grid will contact their Natural Gas Division to find out more information about this concern.*

15. Amelia Rose of the Environmental Justice League of Rhode Island (EJLRI) introduced herself and her agency to the audience. She indicated that EJLRI had access to funds from the US Environmental Protection Agency (USEPA) and could be used as a resource to the community. She also suggested that National Grid have a poster board regarding vapor intrusion during the Community Informational Session to educate the public.

*National Grid will consider adding a poster board regarding vapor intrusion to the Community Informational Session.*

*RIDEM also added that the potential for volatilization of contaminants from the site is not supported by the results of the recent air monitoring program (hand held field instruments) which is being followed as part of the electrical substation project.*

16. Audience member commented on concern regarding interfacing with the schools and the community. They suggested providing information about the site at a 4-6<sup>th</sup> grade comprehension level. Also, they requested that National Grid inform Shea High School about the impacts on the Max Read Field as they use the athletic field for sport activities.

*National Grid will look into this request and get back to the public. In the future, National Grid will prepare simple executive summaries for major report submittals. In preparing these summaries, National Grid will make every effort to use brief and nontechnical terminology in communications to the public. In the near future, National Grid will prepare an executive summary for the recent Site Investigation Report as well as an updated Fact Sheet which will be distributed through the mailing lists, as well as placed into the information repositories. National Grid will also continue to work with the school principals in developing an effective way to communicate information to the parents. Also, National Grid will consider adding Shea High School to the mailing list.*

17. Audience member suggested that Cape Verdean be added as a language to the translation list. Also suggested that Oak Hill Nursing Home be added to the distribution list.

*National Grid will consider adding Cape Verdean to the translation list. National Grid will also consider adding Oak Hill Nursing Home to the mailing list.*

Summary of Meeting  
DRAFT Public Involvement Plan (PIP)  
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Pawtucket, Rhode Island

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486 Pleasant Street  
Pawtucket, Rhode Island

18. Audience member enquired why this is the first Public Involvement Plan in RI and what is typically done in Massachusetts?

*RIDEM indicated that the Remediation Regulations were recently modified in November 2011 to include a formal Public Involvement process, similar to that established in Massachusetts. This is the first PIP in Rhode Island due to the recent change in the regulations. Massachusetts has had a PIP process in place for at least 20 years.*

19. Audience member inquired if the site is “safe,” why all the concern?

*RIDEM indicated that the Site is under the State’s guidance for a reason – there are soil and groundwater impacts at the site which do pose a certain level of exposure risk. RIDEM stressed that the fencing is also there for a reason – to prevent people from entering the Site. RIDEM also gave the example of different levels of exposure at the Site – i.e., on-site workers who are excavating soils (potential high exposure risk) versus people off-site at or near the fence line (low potential exposure risk).*

20. Audience member enquired if wildlife could present an exposure risk via soil disturbance (i.e., burrowing, digging) on site.

*GZA performs weekly site walks to inspect and document the conditions at the Site. There has not been evidence of significant soil disturbance by wildlife at the Site. In the future, we will continue to monitor soil disturbance.*

21. Audience member requested status on South Washout Area repair.

*The earthwork associated with the South Washout Area has not been completed. National Grid will continue to work with the City to have this work completed.*

22. Audience member enquired when the public will receive a response to comments.

*The schedule presented in the presentation was revisited. A summary of today’s meeting will be provided within 10 business days (by 2/12/2013). Written comments on the draft PIP from the public should be provided to RIDEM within 10 business days (by 2/12/2013). RIDEM indicated that an extension to the public comment period may be requested in writing. Timing for response to written comments will be based on how many comments are received.*

**MARCH 6, 2013**

EMAIL

## Margaret Kilpatrick

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**From:** Dygert, Holly <hdygert@ric.edu>  
**Sent:** Wednesday, March 06, 2013 3:39 PM  
**To:** Leone, Michele (Michele.Leone@nationalgrid.com); Margaret Kilpatrick  
**Cc:** joseph.martella@dem.ri.gov; Amelia Rose (amelia.rose@ejlri.org); jenrossi3@gmail.com  
**Subject:** Tidewater Site communications, follow-up suggestions  
**Attachments:** PIP Recommendations Tidewater Community Group.doc

Dear Michele and Meg,

We held a meeting last week with members of the Tidewater community (school officials, parents of school children, and members of the neighborhood) to follow-up on National Grid's recent public meeting. One of the primary concerns expressed was that the language used in the outreach efforts was not accessible to most people. I personally spoke with a woman in the neighborhood who said that she keeps going to these meetings, but she doesn't understand anything that is said. I also noted that one of the attendees prefaced his comments at the meeting with, "I know I sound ignorant, but..." The school administrators, parents and residents had several suggestions of ways to make the communications more effective. We've compiled those suggestions – I am attaching the list and pasting it below.

As a college professor, I am constantly charged with translating expert knowledge into language that is accessible, often to kids coming right out of high school. I'm happy to compile a list of terms that are hard for non-specialists to understand (e.g., remedy, remediation, cap, program letter, abutter, action limits...). The list of definitions that National Grid provided in a former communication is a step in the right direction, but it would be better to replace those specialized terms with more accessible alternatives.

On a different note, can you tell me if you've been able to figure out what the source of the gas smell is that the resident at the public meeting complained about? I've heard multiple people complain about intermittent gas smells over the last couple of years.

Sincerely,

Holly Dygert

### **PIP Recommendations for the Tidewater Site March 6, 2013**

#### **Issues of concern that people would like to be addressed at the poster session:**

Gas Smells – What is this? What are potential impacts?

Differences among remedial alternatives – what options does National Grid have and why are they choosing one option over another?

What are potential future uses of this land/site after remediation? Will National Grid still own the site? Have there been discussions with City of Pawtucket?

What are the implications for neighbors' health based on what kinds of contaminants are at the site?

#### **Further Suggestions for Effectively Communicating with the Public (in preparation for the poster session):**

National Grid should develop separate communication materials for schools – and provide enough copies to give place one in each student's backpack.



School principals want to review all of the fliers/documents that will be sent to parents before NG makes copies, translates, or finalizes the communication, to make sure they communicate effectively. Julie Nora (ICS) and Carolyn Sheehan (Blackstone Valley) made this suggestion.

Neighbors also want to review materials before NG sends out communications to neighborhood – point person can be Amelia Rose at EJ League who can send out draft to list of neighbors and collate comments/suggestions within one week and send back to NG for finalization (worry is that the communications are too wordy and will not be read).

Hold regular meetings with a core group of residents and school personnel to give NG/GZA a chance to communicate in a smaller group setting – in addition to the larger public meetings that happen less frequently. This will help increase communication with the most committed/involved residents and school officials who will be ambassadors to other residents and the wider school community to generate their interest and involvement. Also will make larger public meetings less adversarial and more productive because it won't be the first time people are hearing about a certain issue or proposal.

Translation at larger public meetings should be made available regardless of whether someone contacts NG to say they are coming to a meeting – this would help build trust with the neighborhood and principals could guarantee to parents that interpretation would be available at public meetings no matter what.

Community members recommend that they be permitted to have their own poster/table at the poster session in addition to what NG/GZA are preparing.

NG should create bookmarks with all relevant contact information as well as instructions for how people can get on the email/phone notification lists. These will be helpful to hand out in the neighborhood and at the schools and would be more likely to be read and communicate effectively – rather than a long letter.

**SUMMARY OF PROPOSED CHANGES TO PIP**

## **Summary of Proposed Changes to the Public Involvement Plan (PIP)**

Based on Public Comments Received

Former Tidewater Facility

Pawtucket, Rhode Island

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- Revise to state that National Grid will provide the following in English, Spanish and Portuguese:
  - Notification Mailings
  - Fact Sheets
  - Brief Executive Summaries which will accompany future reports.
- Revise the PIP to change the time period for the public meeting related to the Remedial Action Work Plan (RAWP). As revised, the public meeting regarding the RAWP will be held on the draft version of the RAWP prior to submittal to RIDEM.
- Revise the PIP to delete the reference of posting of weekly air monitoring data.
- Clarify definition of day-to-day uses of the Site that do not fall under the jurisdiction of the PIP. Revise the sentence in the PIP to state “This plan is not intended to cover Site activities relative to the day-to-day operations, including repair and maintenance of the natural gas regulating facility and electrical substation involving minor soil disturbances (i.e., fence post installation) or other uses of the property by National Grid. Activities at these facilities involving excavations of soils with the potential to create volatile emissions are covered by this PIP. In the event of a facilities emergency requiring immediate soil excavation (utility repair, etc.), National Grid will follow the soil management procedures prepared for the previous natural gas station regulator and electrical substation work (i.e., April 2011 Materials Management Plan and November 2012 Soils Management Plan, respectively). In addition, air monitoring will be completed during these emergency events in accordance with the September 28, 2012 air monitoring summary memorandum submitted to RIDEM to the extent practical.”
- Add a summary sheet of proposed revisions and with final approved revisions as an appendix to the PIP.
- Update PIP regarding how National Grid will work with the three neighboring schools to send information (i.e., fact sheets, public notifications, flyers) home to the students.



**EXHIBIT V**

**SUMMARY OF RIDEM-APPROVED CHANGES TO THE  
PUBLIC INVOLVEMENT PLAN**



**Exhibit 5**  
**Summary of RIDEM-Approved Changes to the Public Involvement Plan (PIP)**  
Based on Public Comments Received  
Former Tidewater Facility  
Pawtucket, Rhode Island

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- Revise to state that National Grid will provide the following in English, Spanish and Portuguese:
  - Notification Mailings
  - Fact Sheets
  - Brief Executive Summaries which will accompany future reports.
- Revise the PIP to change the time period for the public meeting related to the Remedial Action Work Plan (RAWP). As revised, the public meeting regarding the RAWP will be held on the draft version of the RAWP prior to submittal to RIDEM.
- Revise the PIP to delete the reference of posting of weekly air monitoring data.
- Clarify definition of day-to-day uses of the Site that do not fall under the jurisdiction of the PIP. Revise the sentence in the PIP to state “This plan is not intended to cover Site activities relative to the day-to-day operations, including repair and maintenance of the natural gas regulating facility and electrical substation involving minor soil disturbances (i.e., fence post installation) or other uses of the property by National Grid. Activities at these facilities involving excavations of soils with the potential to create volatile emissions are covered by this PIP. In the event of a facility emergency requiring immediate soil excavation (utility repair, etc.), National Grid will follow the soil management procedures prepared for the previous natural gas station regulator and electrical substation work (i.e., April 2011 *Materials Management Plan* and November 2012 *Soil Management Plan*, respectively). In addition, air monitoring will be completed during these emergency events in accordance with the September 28, 2012 air monitoring summary memorandum submitted to RIDEM to the extent practical.”
- Add a summary sheet of proposed revisions and with final approved revisions as an exhibit to the PIP.
- Update PIP regarding how National Grid will work with the three neighboring schools to send information (i.e., fact sheets, public notifications, flyers) home to the students.
- Update the November 2012 Draft PIP with more recent public involvement and site investigation activities.



**EXHIBIT VI**

AUGUST 1, 2013 NOTIFICATION FROM RIDEM TO NATIONAL GRID



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

August 1, 2013

Ms. Michele V. Leone  
Manager, New England Site Investigation & Remediation  
National Grid  
40 Sylvan Road  
Waltham, MA 02451-1120

RE: Tidewater Manufactured Gas Plant (former)  
Tidewater Street  
Pawtucket, Rhode Island

Dear Ms. Leone:

On November 9, 2011, the Rhode Island Department of Environmental Management (the Department) amended the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, (the Remediation Regulations). The purpose of these regulations is 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.

In the matter of the above referenced "Site" (as defined in the Industrial Property Remediation and Reuse Act), and in accordance with Rule 7.07.E (Public Involvement Plans) of the 2011 Remediation Regulations, the Department's Office of Waste Management (OWM) has received the following document concerning National Grid's response to public comments on the draft Public Involvement Plan (PIP):

- Response to Public Comments, Draft Public Involvement Plan, Former Tidewater MGP and Power Plant Site, Pawtucket, Rhode Island, RIDEM Case No. 95-022, prepared by GZA GeoEnvironmental, Inc. (GZA), and dated March 22, 2013.

The OWM has reviewed the above referenced Response to Public Comments, and concurs with the proposed changes to the PIP, as listed in that document's attachment titled "Summary of Proposed Changes to the Public Involvement Plan (PIP)." Please prepare a final version of the PIP based upon the proposed changes.

The Department acknowledges that sufficient time has passed since the submittal of the Response to Public Comments, such that some of the information provided in the responses may require updating based upon decisions and activities that have taken place since March 22, 2013. For example, National Grid's decision to perform a soil gas investigation at the site, in response to public concerns raised about potential vapor intrusion. Therefore, the Department requests that

the March 22, 2013, responses be reviewed, and where deemed necessary, that changes or corrections be made, and/or updated information be added as appropriate. This letter and the revised updated responses to public comments should be added to the Final PIP as individual exhibits. Once these items are addressed, please submit the revised Final PIP with all exhibits to the Department in both hard copy for the public file and electronic PDF format suitable for posting on the Department's Tidewater web page.

If you have any questions regarding this letter, please contact me by telephone at (401) 222-2797 extension 7109 or by e-mail at [joseph.martella@dem.ri.gov](mailto:joseph.martella@dem.ri.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph T. Martella II". The signature is fluid and cursive, with the first name "Joseph" and last name "Martella" being the most prominent parts.

Joseph T. Martella II  
Senior Engineer  
Rhode Island DEM  
Office of Waste Management

Cc: Kelly J. Owens, RIDEM.OWM  
Elizabeth Stone, RIDEM/OOD  
Barbara Morin, RIDEM/OAR  
Barney S. Heath, Pawtucket Planning & Development  
Alan Tenreiro, Chairman, Pawtucket School Committee  
Deborah Cylke, Superintendent, City of Pawtucket School Department  
Julie Nora, Ph.D, International Charter School  
Carolyn Sheehan, Blackstone Academy  
Edna Coia, Francis J. Variieur Elementary School  
Amelia Rose, EJLRI  
Margaret S. Kilpatrick, GZA





**EXHIBIT VII**

OCTOBER 15, 2013 UPDATED RESPONSE TO PUBLIC COMMENTS  
RECEIVED IN REGARDS TO PUBLIC INVOLVEMENT PLAN

October 15, 2013  
File No. 05.0043654.20-C

Mr. Joseph Martella  
Rhode Island Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, Rhode Island 02908



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Re: Revised Response to Public Comments  
Public Involvement Plan  
Former Tidewater MGP and Power Plant Site  
Pawtucket, Rhode Island  
*RIDEM Case No. 95-022*

Dear Mr. Martella:

On behalf of our client, The Narragansett Electric Company d/b/a National Grid (National Grid), GZA GeoEnvironmental, Inc. (GZA) has prepared this updated letter in response to written public comments to the November 26, 2012 draft Public Involvement Plan (PIP) prepared for the Former Tidewater Manufactured Gas Plant (MGP) and Power Plant Site located in Pawtucket, Rhode Island (the Site). This letter supersedes our letter dated March 22, 2013 "Response to Public Comments" and serves to address the following comments provided to National Grid:

- Notification Letter from the Rhode Island Department of Environmental Management (RIDEM) Office of Waste Management (OWM) dated February 21, 2013 which enclosed written public comments to the draft PIP:
  - A letter dated January 28, 2013, from Ms. Holly Dygert
  - A letter dated February 12, 2013 from Ms. Amelia Rose of the Environmental Justice League of Rhode Island (EJLRI);
- A letter dated February 15, 2013, from GZA, summarizing responses to comments that were received from the audience during the meeting held on January 29, 2013;
- An email dated March 6, 2013, from Ms. Holly Dygert;
- A Response to Comments letter dated March 22, 2013, from GZA, summarizing the responses to public comments received since N
- November 26, 2012; and
- Notification Letter from the RIDEM dated August 1, 2013, concurring with the March 22, 2013 Response to Comments letter and requesting the Response to Comments letter be revised for recent updates on public involvement activities at the Tidewater Site and that the PIP be finalized.

Copies of the correspondence referenced above are attached to this letter. For your convenience, the comments received are repeated below followed by National Grid's responses in *italics*.

**January 28, 2013 Letter**

1. Comment: The information in the boards should be provided in the three primary languages of the community, which are English, Spanish and Portuguese. I was concerned that National Grid seemed to reject a request made during the interviews for information to be translated into both Spanish and Portuguese. I want to underscore the importance of providing information in the community's languages.



*Response: Going forward, National Grid will provide the following documents in English, Spanish and Portuguese: 1) Notification Mailings, 2) Fact Sheets and 3) Executive Summaries that will accompany future reports.*

2. Comment: I look forward to the incorporation of the color-coded alert system.

*Response: We implemented the color-coded alert system on the bulletin boards and on the website home page ([www.tidewatersite.com](http://www.tidewatersite.com)) during the recent substation upgrade project. The system involves posting different color sheets to indicate when excavation is active (yellow sheet) and not active (blue sheet).*

3. Comment: I am very pleased that National Grid has proposed to create a color-coded map of Tidewater site hazards to the public as part of the PIP. Despite years of communications about the hazards on the site, the members of the stakeholder group are still unclear about concentrations of particular hazards, and where they are located. Thus, I am eager to see this map.

*Response: A color-coded map for the Tidewater project that illustrates areas of the Site where impacts have been identified in groundwater and soils has been finalized. It was presented at the Community Information Session held on March 27, 2013. The final map was posted on the National Grid website ([www.tidewatersite.com](http://www.tidewatersite.com)) and the bulletin boards. The map has been provided in the revised PIP as Figure 4 and is entitled "Observed Impacts".*

4. Comment: In regards to the first concern, I agree with the characterization of a public involvement process laid out on page 1 of the Draft PIP, as "an agreement between the party conducting response actions and the public about how they will share information moving forward, and how the public will be able to comment on plans for assessment and cleanup of the site." This definition identifies the public as important partner in the remediation process. Since the public's interests vis-à-vis the remediation process diverge in important ways from those of the property owner, the public must have the ability to shape the remediation, and the precautions that are taken during the remediation process. I am concerned, however, that the Draft PIP construes public participation narrowly, as informing the public about work plans that have already been developed.

For example, on page 8, in describing the process through which a final remediation plan for the site will be determined, the Draft PIP states that RIDEM will issue a Program Letter when it has concluded that "the site has been adequately assessed" in the Site Investigation Report. The Draft PIP continues that "Following receipt of the Program Letter, National Grid will notify [various parties]... that the investigation is complete and that RIDEM has concurred with the recommended remedial alternative... Subsequent to this public notification and following receipt of any public comments, the Department will issue a Remedial Decision Letter formally approving the SIR." In this description, the identification and approval of a remedial strategy are depicted as occurring apart from public involvement. This negates the role of the public in the decision-making process. Moreover, I believe that it is a mischaracterization of the process through which remediation strategies are determined. It is my understanding that the Program Letter solely certifies that RIDEM has determined that the proposed remedy meets the criteria for an acceptable remedy. I understand that the final determination of a remedy cannot be made until members of the community are given an opportunity to consider the proposal, and to convey their concerns to RIDEM.



The characterization of the process through which a Remedial Action Work Plan (RAWP) is identified and selected in the Draft PIP similarly neglects the role of the public. Though the text states that “Many of the above remedial process steps will be accompanied by public meetings and comment periods” (p.8), I find it disconcerting that the public’s role in shaping the remediation process is not included in National Grid’s description of the decision-making process. This view of public involvement as a process whereby National Grid officials inform the public about the remediation process carries through to other sections of the Draft PIP. For example, in the section on Community Meetings, meetings are depicted as opportunities for National Grid representatives to inform community members about the work that has been and will be undertaken in the site. Though informing the community is crucial for facilitating their involvement in the process, it is not sufficient. The document also states that meetings will be held “in conjunction with... Departmental approval of the Remedial Action Work Plan; [and]prior to remedy implementation” (p.14). This neglects the crucial role the public will have in shaping the RAWP.

The PIP should be revised to indicate clearly that potential work plans will be presented in community meetings, and that community concerns will be solicited to ensure that the final work plans reflect the concerns and needs of the public. Opportunities for community members to comment on the proposed plans and thereby shape the remediation process should be clearly laid out in the meeting agendas, and in the scheduling of meetings (in relation to RIDEM’s final decisions about work at the site).

*Response: We are committed to providing the community with opportunities to review and comment on National Grid’s plans to remediate the Tidewater Site. National Grid has revised the PIP to include a public meeting related to the draft Remedial Action Work Plan (RAWP – the document that will be submitted to RIDEM to present the details of how the remedy will be implemented) to provide further opportunity for the public to comment on the Site remediation process. The public meeting regarding the draft RAWP will be held within 12 months of receipt of the Remedial Decision Letter (RDL – letter issued by RIDEM to formally agree with the findings of the Site Investigation Report). This meeting will be held prior to the submittal of the final RAWP to RIDEM and will provide the public an opportunity to provide comment on the remedial strategy for the Tidewater Site. The process going forward and as outlined in the PIP is intended to provide a means of effective “two-way communication” between the public and National Grid. The Initial Community Meeting (which will follow RIDEM’s review of the Site Investigation Report) will provide the public an opportunity to provide comment on the conceptual remedial strategy for the Tidewater Site. The process outlined in the PIP, which follows the requirements of the Remediation Regulations, provides the public opportunity to comment on the remedial process; however, it is noted that RIDEM is ultimately responsible for the final remedial analysis and decisions on the final remedial strategy for the Site.*

5. Comment: In regards to my second concern, one of the requests most of the interviewees made was for National Grid to make data from air monitoring available in real time to the community. While meeting with representatives from National Grid and RIDEM during the early Fall of 2012, we learned that this was not possible with the particular hand held devices being used to monitor emissions during the current electrical substation upgrade. Moreover, RIDEM representatives at the meeting seemed to concur that the small-scale nature of the work and the limited extent of contaminants in the soil did not warrant the more costly kind of air monitoring technologies that enable real-time posting of readings. I am very concerned to see that the particular scheme we agreed to for monitoring emissions and making the results available to community members during the substation upgrade is replicated in the Draft PIP. National Grid and GZA officials should be clear that the substation upgrade was classified as separate from the remediation process, which is why the work could be completed without presenting it to the public. As we look ahead to the full remediation, the particular air monitoring strategies, and techniques for communicating information about the results of that monitoring to the community, will need to be determined in conversation with the community about the particular threats posed by particular actions.



*Response: The PIP has been revised to delete the reference to posting weekly air monitoring data. Air monitoring plans for full-scale remediation of the Tidewater Site have not been developed as the final remedy for the project has not been approved by the RIDEM. The public will have an opportunity to comment and engage in a conversation about the proposed air monitoring program during the RAWP comment process described above.*



**February 12, 2013 Letter**

1. Comment: Page 2 – The draft PIP states: “This plan is not intended to cover Site activities relative to day-to-day operations of the natural gas regulating facility and electrical substation or other uses of the property by National Grid.” Since community members and parents from nearby schools have already met with GZA, RIDEM, and National Grid regarding substation upgrades and earthwork, especially with regard to improving air monitoring plans in relation to this work, which falls outside the official remediation plan, I would ask that this sentence be clarified to ensure that residents can expect to be informed and be invited to actively participate in the shaping of any plans for the site that would require disturbance to soil or otherwise create a potential public health risk. Some of these activities could be interpreted, potentially, as “day-to-day operations”, and therefore this statement should be clarified to clearly differentiate between actual day-to-day operations and other operations that are not specifically included in the remediation but will disturb soil, create potential emissions, etc.

*Response: National Grid has revised the PIP to clarify this sentence as follows: “This plan is not intended to cover Site activities relative to the day-to-day operations, including repair and maintenance of the natural gas regulating facility and electrical substation involving minor soil disturbances (i.e., fence post installation) or other uses of the property by National Grid. Activities at these facilities involving excavations of soils with the potential to create volatile emissions are covered by this PIP. In the event of a facility emergency requiring immediate soil excavation (utility repair, etc.), National Grid will follow the soil management procedures prepared for the previous natural gas station regulator and electrical substation work (i.e., April 2011 Materials Management Plan and November 2012 Soil Management Plan, respectively). In addition, air monitoring will be completed during these emergency events in accordance with the September 28, 2012, air monitoring summary memorandum submitted to RIDEM to the extent practical.”*

2. Comment: Page 17 – The Pawtucket Public Library will serve as a repository for all of the documents and other information related to the site. I suggest posting a sign or poster at the Library itself (not just on the fence at the Tidewater site) to let the general public know that this repository exists.

*Response: Information about public repositories for the Tidewater project is posted on the bulletin boards at the end of Tidewater Street and Bowles Court. National Grid contacted the Pawtucket Public Library and posted a sign in English, Spanish and Portuguese to provide more information about the Tidewater Site. These signs were posted on October 8, 2013. Copies of the signs are provided in Exhibit I of the October 2013 PIP.*

3. Comment: Page 19 – If there are revisions proposed for the PIP in the future, National Grid will prepare a revised draft for review and approval by the public and RIDEM. National Grid should prepare a summary sheet to list all of the proposed changes/revisions, as well as the final approved revisions, not simply post the proposed revised draft of the full PIP online and in the physical repository (even if the changes/revisions are highlighted in the full document). This summary sheet should be a separate document to make it easy for the public to access, read, and digest the proposed, and then approved, changes.

*Response: While future revisions to the PIP will not re-open the formal draft and public comment period, we will prepare and make available a summary sheet of proposed and approved changes/revisions for*

*the public. A summary sheet of RIDEM-approved changes to the November 2012 Draft PIP is included as Exhibit V.*

4. Comment: In response to concerns raised by residents living on Thornton Street, immediately adjacent to the site, regarding natural gas odors and the possibility of air impacts from the groundwater contamination, I suggest addressing these issues at the poster session National Grid is hosting in the near future. In particular, addressing the issue of vapor intrusion into homes and schools should be a top priority. EJLRI receives technical assistance through an EPA program that assists organizations and community residents in understanding technical information related to Brownfields contamination and remediation. Upon her review of the draft remedial plan submitted to RIDEM by National Grid, our consultant from the New Jersey Institute of Technology recommended the following:



#### VAPOR INTRUSION INVESTIGATION

Some of the chemicals (volatile compounds) identified at the site have the potential to travel through the soil as vapors. These vapors may then move up through the soil into nearby buildings, contaminating indoor air. Therefore, if a vapor intrusion investigation has not been completed, a vapor intrusion investigation is recommended to determine whether the occupants of neighboring buildings are at risk for exposure to VOCs due to vapor intrusion.

We will be submitting a final version of the consultant's review at the appropriate time (when public comments are being accepted on the SIR/recommended remedial alternative), but I wanted to share this recommendation because it speaks directly to concerns raised by residents at the last meeting.

*Response: We understand that nearby neighbors are concerned about vapor intrusion. Based on a number of factors – the way groundwater is distributed and moves at the Site, the way contaminants are distributed at the Site, and the distance from off-Site buildings to the nearest Site impacts- the potential for vapor intrusion into off-Site buildings, including the residences on Thornton Street or the neighboring schools, has not been identified as a potential pathway of concern for the Tidewater Site.*

*In response to public concern, National Grid conducted soil gas sampling during July and August 2013 in the interior portion of the Tidewater Site and along the perimeter of the Tidewater Site. The results of the interior soil gas testing are consistent with previous soil and groundwater testing at the Tidewater Site. While certain compounds were detected at low levels, none of the perimeter soil gas readings exceeded regulatory criteria established by the Connecticut Department of Energy and Environmental Protection (CTDEEP) for both residential and industrial/commercial settings. (Rhode Island does not have regulatory criteria for soil gas quality.) The results showed the closer the samples got to the boundary of the Site, the lower the concentrations of these compounds. Overall, the test results indicate that potential migration of impacted soil gas from the Tidewater Site towards neighboring properties and structures does not pose a risk to the neighbors.*

*National Grid provided a fact sheet/summary, a figure and analytical soil gas results to RIDEM describing the soil gas sampling and preliminary results on August 28, 2013 and posted this information to the Tidewater website ([www.tidewatersite.com](http://www.tidewatersite.com)). Availability of this information was provided via email to those recipients of the Tidewater email distribution lists. A copy of this fact sheet is included in Exhibit I. National Grid submitted a comprehensive report describing this soil gas study and the results to RIDEM in October 2013. This comprehensive report was also posted on the Tidewater website ([www.tidewatersite.com](http://www.tidewatersite.com)).*

*To address the question regarding natural gas odors in the neighborhood, National Grid had representatives available from gas operations at the Community Outreach Session held on March 27, 2013 to discuss the natural gas odor concerns raised by the community.*



*Natural gas is typically "odorless" from the well head. Federal and State law mandates that gas must be detectable by a person with an average sense of smell. As a result, pipeline operators and in some cases distribution system operators inject a malodorous material called mercaptan, commonly referred to as "odorant". Federal law also mandates that odorant added to a pipeline must not be harmful to people, pipe or other devices. National Grid does have Level 3 gas leaks (defined as a non-hazardous leak; periodic monitoring required) in our gas distribution system. Level 3 leaks do not present a risk to public health or safety. National Grid monitors the leaks and is adhering to the strict Federal and State standards. In addition, a leak in the neighborhood near the Site was repaired in March 2013. If members of the neighborhood or community smell gas, they should notify National Grid immediately (1-800-640-1595) and we will investigate the odor.*

5. Comment: The draft PIP is strong overall, but lacks specifics on how to best engage parents at the local schools. Principals at the schools may not be the best, or only, individuals to notify regarding upcoming work, air monitoring results, public meeting notices, etc. In fact, they can be bottlenecks for getting information out to the wider school community. Suggestions raised at the meeting to engage the Pawtucket Schools Superintendent, the school committee, etc. are all very good, but also are not enough to get through to individual parents. Signs or posters with general information posted at the front offices of the schools adjacent to the site would be a good start (and/or at student pick-up locations), as well as providing copies of public notices to all parents via their child's backpacks, as suggested by the principal at Varieur Elementary, would also help ameliorate this problem. Not all notices need to be sent home via backpacks, but any public meeting announcements should be, as should an initial introductory letter or handout with an overview of the site history and current status, including who to contact for more information. National Grid should work with the principals at the three schools to send this introductory info sheet/letter home with all students as soon as possible.

*Response: We provide notifications to those on the mailing/email list, which includes the principals of the neighboring schools. If the principals need assistance in distributing these notifications, we would be happy to help. The best way to find out information currently is to sign-up to the Tidewater mailing/email list via the National Grid website ([www.tidewatersite.com](http://www.tidewatersite.com)). National Grid encourages all parents/community members to sign up so that they can receive information directly from National Grid. Any interested party is also welcome to contact National Grid's Project Manager, Michele Leone, directly at 781-907-3651.*

*National Grid contacted the three neighboring schools and posted a sign in English, Spanish and Portuguese to provide more information about the Tidewater Site. These signs were posted on October 8, 2013. Copies of the signs are provided in Exhibit I of the October 2013 PIP. National Grid has prepared an updated fact sheet which was distributed on March 4, 2013, through the mailing and email lists, as well as via door-to-door flyers to the neighboring community. This fact sheet included information about the former Tidewater facility, recent activities at the Site, public involvement activities and next steps for the Site. The fact sheet accompanied a notification letter regarding the date, time and place of the upcoming Community Outreach Session. National Grid distributed this notification package to the schools on March 6, 2013, to be sent home with the students via backpacks. National Grid will continue to work with the principals about sending mailing list items (flyers, fact sheets and public notifications) in multiple languages home with the students via backpacks.*

6. Comment: Lastly, I would like to ask National Grid, GZA, and RIDEM to respond to how phytoremediation might play into the overall remediation strategy for this site, and/or if this approach has been discussed at all in relation to the Tidewater Site.

*Response: We considered phytoremediation but concluded that it is not a feasible remedial alternative for the following reasons:*

- *The depth of the treatment zone is limited by the depth of the root material of the plants.*
- *The contaminants at the former Tidewater facility are located at depth greater than two feet below the ground which is too deep for phytoremediation.*
- *The nature of certain impacts at the Tidewater Site, including separate phase product (in other words, coal tar or oils), are not amenable to treatment via phytoremediation. Due to these limitations, phytoremediation is not deemed appropriate as a potential remedial alternative for the former Tidewater facility.*



**Updates to Responses to Comments from the January 29, 2013 Public Meeting**  
**Open Comments and Questions Received:**

1. Audience member requested that technical documents be translated into “everyone speak” language.

*National Grid will continue to make every effort to use brief and nontechnical terminology in communications with members of the public. In an effort to meet this request, National Grid has hired a communications consultant to assist in the preparation of documents.*

2. Audience member spoke about historical mercury spill and lasting impact on concern from neighborhood. Audience member enquired about money from court settlement and publicly available information regarding mercury spill. He requested that information about the mercury spill, as it pertains to the history of the Tidewater Site, be included on the website and presented during the poster board session.

*National Grid did not own the property when the mercury spill took place in 2004 and was not involved in the cleanup, court proceedings or settlement. Southern Union was the party solely responsible for cleanup of the mercury incident. National Grid purchased the property from Southern Union but did not acquire Southern Union’s liability for the mercury issues on the property. The mercury contamination from the 2004 spill has been cleaned up and removed from the property. In addition, the buildings have been checked for mercury and no mercury is currently stored on the property. National Grid stated that the files associated with the mercury spill are public information and can be reviewed through RIDEM.*

The audience member further requested that information on the mercury spill be posted on the National Grid website.

*National Grid explained that it was not liable for the mercury release and was not involved in the cleanup, court proceedings or settlement. Southern Union was the party solely responsible for cleanup of the mercury incident. National Grid indicated that it would consider the request and provide a formal response in the response to comments on the PIP.*

*The following additional response was prepared by RIDEM and provided to National Grid following the January 2013 public meeting. RIDEM updated this information in August 2013. National Grid was not involved in preparation of this response or involvement in the Southern Union Case.*

*“In June 2012, the U.S. Supreme Court remanded an \$18-million sentence against the owners of New England Gas in a case that stemmed from the 2004 mercury spill at a Pawtucket housing project. The ruling puts at question the \$12 million in damages that were to have gone to Rhode Island environmental groups (the majority of which were to be managed by the Rhode Island Foundation, in order to fund grants in environmental education, remediation, conservation, and children’s health). The remaining \$6*





million was a fine. The Supreme Court case hinged on circumstances that require juries -- not judges -- to set penalties after criminal convictions, so the ruling does not change the 2008 conviction of Texas-based Southern Union Co. for illegal storage of the hazardous material that belonged to a former subsidiary. But the ruling means the Supreme Court remanded the case for further proceedings in US District Court (RI) consistent with this opinion. The June 2012 Supreme Court Decision can be found at <http://www.supremecourt.gov/opinions/11pdf/11-94a1b2.pdf>. The US District Court heard oral arguments in December 2012 in an attempt to determine how to properly proceed with the case from here. On April 25, 2013, the US District Court (RI) issued a preliminary sentencing memorandum on the Southern Union penalty related to the improper storage of waste mercury at their facility in Pawtucket. Due to the June 2012 Supreme Court decision, the US District Court (RI) is limited to fining Southern Union \$500,000 or the equivalent in community service, rather than the \$6 million fine and \$12 million in charitable contributions that had previously been imposed as punishment. The Court allowed prosecutors, Southern Union and unspecified members of the greater environmental community 90 days to suggest a community service proposal valued at no more than \$500,000 and will schedule sentencing once proposals are received and reviewed. " – Communications from RIDEM

3. Audience member commented on gas smell at Thornton and Merry Streets and whether or not they are safe or being exposed to natural gas (or its additives).

*The odor that the audience member says he smelled is likely associated with mercaptan. Natural gas by itself is odorless. Mercaptan is an odorant that is added to natural gas so the gas can easily be detected. It is carried with the natural gas stream.*

*To address the question regarding natural gas odors in the neighborhood, National Grid had representatives available from gas operations at the Community Outreach Session held on March 27, 2013 to discuss the natural gas odor concerns raised by the community.*

*In addition, refer to the response above for Comment 4 of the February 12, 2013 comment letter regarding "natural gas odors."*

*If members of the neighborhood or community smell gas, they should notify National Grid immediately (1-800-640-1595) and we will investigate the odor.*

4. Amelia Rose of the Environmental Justice League of Rhode Island (EJLRI) introduced herself and her agency to the audience. She indicated that EJLRI had access to funds from the US Environmental Protection Agency (USEPA) and could be used as a resource to the community. She also suggested that National Grid have a poster board regarding vapor intrusion during the Community Informational Session to educate the public.

*Refer to the response above for Comment 4 of the February 12, 2013 comment letter regarding "vapor intrusion investigation."*

*RIDEM also added that the potential for volatilization of contaminants from the Site is not supported by the results of the recent air monitoring program (hand held field instruments) which is being followed as part of the electrical substation project.*

5. Audience member suggested that Cape Verdean be added as a language to the translation list. Also suggested that Oak Hill Nursing Home be added to the distribution list.

*National Grid understands that Cape Verdean is a dialect of Portuguese. Based on discussions with a translation service, we also understand that documents translated in Portuguese should be understood by people who speak Cape Verdean. Therefore, National Grid does not plan to provide documents in*

*Cape Verdean. If a community member requires assistance or translation other than Spanish and Portuguese, please contact Michele Leone at National Grid.*

*National Grid has added Oak Hill Nursing Home to the door to door flyer distribution list during the March 4, 2013 mailing. See Figure 3, Door-to-Door Notification for the updated distribution area.*

### **March 6, 2013 Email**

(1) National Grid should develop separate communication materials for schools – and provide enough copies to give place one in each student’s backpack.

*National Grid will continue to work with the principals to get materials out to parents via backpacks. To avoid confusion in disseminating this information, National Grid will work directly with the principals and other stakeholders.*

(2) School principals want to review all of the fliers/documents that will be sent to parents before NG makes copies, translates, or finalizes the communication, to make sure they communicate effectively. Julie Nora (ICS) and Carolyn Sheehan (Blackstone Valley) made this suggestion.

*National Grid will work with the principals to ensure that they are comfortable with the documents we provide to them for distribution.*

(3) Neighbors also want to review materials before NG sends out communications to neighborhood – point person can be Amelia Rose at EJ League who can send out draft to list of neighbors and collate comments/suggestions within one week and send back to NG for finalization (worry is that the communications are too wordy and will not be read).

*National Grid is working with a communications consultant in order to make mailings more easily understood by the community in response to this concern. Given this, National Grid will not be providing drafts of our communications to the neighbors prior to distribution. We continue to appreciate the community’s input on the communications and welcome suggestions on how to further improve this process.*

(4) Hold regular meetings with a core group of residents and school personnel to give NG/GZA a chance to communicate in a smaller group setting – in addition to the larger public meetings that happen less frequently. This will help increase communication with the most committed/involved residents and school officials who will be ambassadors to other residents and the wider school community to generate their interest and involvement. Also will make larger public meetings less adversarial and more productive because it won’t be the first time people are hearing about a certain issue or proposal.

*National Grid designed the public involvement plan (PIP) to involve all community members and interested parties. National Grid believes that the large number of public meetings and the commitment to schedule additional meetings on an as-needed basis pre-empts the need for smaller, stakeholder meetings. Community members are strongly encouraged to contact Michele Leone at any time throughout the site cleanup process by calling 781-907-3651 or via email at [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com) should they have questions or comments.*

(5) Translation at larger public meetings should be made available regardless of whether someone contacts NG to say they are coming to a meeting – this would help build trust with the neighborhood and principals could guarantee to parents that interpretation would be available at public meetings no matter what.



*At all public meetings, translation assistance will be provided for non-English speaking individuals, upon request. Requests can be made to Michele Leone by calling 781-907-3651 or via email at michele.leone@nationalgrid.com.*

(6) NG should create bookmarks with all relevant contact information as well as instructions for how people can get on the email/phone notification lists. These will be helpful to hand out in the neighborhood and at the schools and would be more likely to be read and communicate effectively – rather than a long letter.

*National Grid created magnets with the requested information which were available at the Community Outreach Session held on March 27, 2013.*

A bulleted summary of the proposed revisions to the PIP, as discussed above, is included in the revised PIP as Exhibit V.

Should you have any questions or comments regarding the information presented herein, please do not hesitate to contact the undersigned or Michele Leone at 781-907-3651.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.



Margaret S. Kilpatrick, P.E.  
Senior Project Manager



John P. Hartley  
Consultant/Reviewer



James J. Clark, P.E.  
Principal

Attachments: February 21, 2013 Notification of Public Comments Received  
February 15, 2013 Summary of Meeting  
March 6, 2013 Email  
March 22, 2013 Response to Comments Letter  
August 1, 2013 Notification of Concurrence of Response to Comments Received and Finalization of the PIP

CC: Ms. Michele Leone, National Grid  
Ms. Elizabeth Stone, RIDEM

**FEBRUARY 21, 2013**

NOTIFICATION OF PUBLIC COMMENTS RECEIVED





February 21, 2013

Ms. Michele V. Leone  
Manager, New England Site Investigation & Remediation  
National Grid  
40 Sylvan Road  
Waltham, MA 02451-1120

RE: Tidewater Manufactured Gas Plant (former)  
Tidewater Street  
Pawtucket, Rhode Island

Dear Ms. Leone:

On November 9, 2011, the Rhode Island Department of Environmental Management (the Department) amended the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, (the Remediation Regulations). The purpose of these regulations is 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.

In the matter of the above referenced "Site" (as defined in the Industrial Property Remediation and Reuse Act), and in accordance with Rule 7.07.E (Public Involvement Plans) of the 2011 Remediation Regulations, the Department's Office of Waste Management (OWM) has received the following documents concerning public comments on the draft Public Involvement Plan (PIP):

1. Letter from Holly Dygert to the Department, Re: Tidewater Site Public Involvement Plan, dated January 27, 2013, and received via e-mail on January 28, 2013; and
2. Comments re: Draft Public Involvement Plan, Former Tidewater Facility and Former Power Plant, Tidewater and Merry Streets, Pawtucket, Rhode Island, prepared by the Environmental Justice League of Rhode Island (EJLRI), received via e-mail on February 12, 2013.

In addition, National Grid received several comments at the public meeting for the draft PIP held on January 29, 2013.

Please review these submitted comments along with those received at the public meeting and prepare written responses to each of them as appropriate. A completed document, incorporating responses all of the comments, must be submitted to the Department for review and approval.

**All correspondence regarding this Site should be sent to the attention of:**

Joseph T. Martella II – Senior Engineer  
RIDEM / Office of Waste Management  
235 Promenade Street  
Providence, RI 02908

If you have any questions regarding this letter, please contact me by telephone at (401) 222-2797 extension 7109 or by e-mail at [joseph.martella@dem.ri.gov](mailto:joseph.martella@dem.ri.gov).

Sincerely,



Joseph T. Martella II  
Senior Engineer  
Rhode Island DEM  
Office of Waste Management

Attachments: January 27, 2013, Letter from Holly Dygert to the Department;  
February 12, 2013, Comments re: Draft Public Involvement Plan

Cc: Kelly J. Owens, RIDEM.OWM  
Elizabeth Stone, RIDEM/OOD  
Barbara Morin, RIDEM/OAR  
Barney S. Heath, Pawtucket Planning & Development  
Alan Tenreiro, Chairman, Pawtucket School Committee  
Deborah Cylke, Superintendent, City of Pawtucket School Department  
Julie Nora, Ph.D, International Charter School  
Carolyn Sheehan, Blackstone Academy  
Edna Coia, Francis J. Varieur Elementary School  
Amelia Rose, EJLRI  
Margaret S. Kilpatrick, GZA

January 27, 2013

Mr. Joseph Martella II, Senior Engineer  
RIDEM Office of Waste Management  
Site Remediation Program

Re: Tidewater Site Public Involvement Plan

Dear Mr. Martella,

I am very pleased that RIDEM has implemented a public involvement mechanism to ensure that members of the community who may be exposed to hazards are involved in the remediation process. I reviewed National Grid's draft Public Involvement Plan (PIP) for the Tidewater Site, and I am also very pleased with many of the actions National Grid has proposed to take to ensure that those potentially impacted by the work at Tidewater are informed of the work. I am writing to communicate my suggestions for strengthening the proposed PIP. These suggestions are aimed, first, to optimize the ability of those who could be impacted by the site's hazards to access information about the nature of these hazards and about potential routes of exposure, and, second, to ensure that they are able to influence the process in accordance with their particular concerns.

I appreciate that National Grid solicited comments from the community through the interview process in June of 2012, and provided a synthesis of the suggestions in the *Draft PIP*. National Grid has already acted on many of these suggestions, and has integrated many of them into the proposed PIP. The community bulletin boards – with announcements and the results of weekly air monitoring – are very useful communication tools. I look forward to the incorporation of the color-coded alert system. The information in the boards should be provided in the three primary languages of the community, which are English, Spanish and Portuguese. I was concerned that National Grid seemed to reject a request made during the interviews for information to be translated into both Spanish and Portuguese. I want to underscore the importance of providing information in the community's languages.

I am very pleased that National Grid has proposed to create a color-coded map of Tidewater site hazards to the public as part of the PIP. Despite years of communications about the hazards on the site, the members of the stakeholder group are still unclear about concentrations of particular hazards, and where they are located. Thus, I am eager to see this map. I am also pleased that National Grid is proposing a Community Outreach (poster) Session, and possibly a tour of the site.

While I am generally satisfied with the strategies National Grid has proposed to convey information to the public, I have two main concerns. The first is that the *Draft PIP* largely neglects the public's role in shaping the remediation process. The second is that the particular

strategy for monitoring air quality that was agreed on for the electrical substation upgrade is included in the *Draft PIP* as the plan for the remediation.

In regards to the first concern, I agree with the characterization of a public involvement process laid out on page 1 of the *Draft PIP*, as “an agreement between the party conducting response actions and the public about how they will share information moving forward, and how the public will be able to comment on plans for assessment and cleanup of the site.” This definition identifies the public as important partner in the remediation process. Since the public’s interests vis-à-vis the remediation process diverge in important ways from those of the property owner, the public must have the ability to shape the remediation, and the precautions that are taken during the remediation process. I am concerned, however, that the *Draft PIP* construes public participation narrowly, as informing the public about work plans that have already been developed.

For example, on page 8, in describing the process through which a final remediation plan for the site will be determined, the *Draft PIP* states that RIDEM will issue a Program Letter when it has concluded that “the site has been adequately assessed” in the Site Investigation Report. The *Draft PIP* continues that “Following receipt of the Program Letter, National Grid will notify [various parties]... that the investigation is complete and that **RIDEM has concurred with the recommended remedial alternative**... Subsequent to this public notification and following receipt of any public comments, the Department will issue a Remedial Decision Letter formally approving the SIR.” In this description, the identification and approval of a remedial strategy are depicted as occurring apart from public involvement. This negates the role of the public in the decision-making process. Moreover, I believe that it is a mischaracterization of the process through which remediation strategies are determined. It is my understanding that the Program Letter solely certifies that RIDEM has determined that the proposed remedy meets the criteria for an acceptable remedy. I understand that the final determination of a remedy cannot be made until members of the community are given an opportunity to consider the proposal, and to convey their concerns to RIDEM.

The characterization of the process through which a *Remedial Action Work Plan* (RAWP) is identified and selected in the *Draft PIP* similarly neglects the role of the public. Though the text states that “Many of the above remedial process steps will be accompanied by public meetings and comment periods” (p.8), I find it disconcerting that the public’s role in shaping the remediation process is not included in National Grid’s description of the decision-making process. This view of public involvement as a process whereby National Grid officials inform the public about the remediation process carries through to other sections of the *Draft PIP*. For example, in the section on Community Meetings, meetings are depicted as opportunities for National Grid representatives to inform community members about the work that has been and will be undertaken in the site. Though informing the community is crucial for facilitating their involvement in the process, it is not sufficient. The document also states that meetings will be held “in conjunction with... Departmental approval of the *Remedial Action Work Plan*; [and]



prior to remedy implementation” (p.14). This neglects the crucial role the public will have in shaping the RAWP.

The *PIP* should be revised to indicate clearly that potential work plans will be presented in community meetings, and that community concerns will be solicited to ensure that the final work plans reflect the concerns and needs of the public. Opportunities for community members to comment on the proposed plans and thereby shape the remediation process should be clearly laid out in the meeting agendas, and in the scheduling of meetings (in relation to RIDEM’s final decisions about work at the site).

In regards to my second concern, one of the requests most of the interviewees made was for National Grid to make data from air monitoring available in real time to the community. While meeting with representatives from National Grid and RIDEM during the early Fall of 2012, we learned that this was not possible with the particular hand held devices being used to monitor emissions during the current electrical substation upgrade. Moreover, RIDEM representatives at the meeting seemed to concur that the small-scale nature of the work and the limited extent of contaminants in the soil did not warrant the more costly kind of air monitoring technologies that enable real-time posting of readings. I am very concerned to see that the particular scheme we agreed to for monitoring emissions and making the results available to community members during the substation upgrade is replicated in the *Draft PIP*. National Grid and GZA officials should be clear that the substation upgrade was classified as separate from the remediation process, which is why the work could be completed without presenting it to the public. As we look ahead to the full remediation, the particular air monitoring strategies, and techniques for communicating information about the results of that monitoring to the community, will need to be determined in conversation with the community about the particular threats posed by particular actions.

In closing, I want to reiterate my support for the PIP process that RIDEM has adopted, and that National Grid has begun to develop. I look forward to continuing to work with RIDEM and National Grid to develop an effective plan for ensuring optimal public involvement.

Sincerely,



Holly Dygert  
16 Minto Street  
Providence, RI 02908  
(401) 272-1748



**Environmental  
Justice League of  
Rhode Island**

Environmental Justice League of Rhode Island  
1192 Westminster St. Providence, RI 02909  
Tel: (401) 383-7441 Fax: (401) 941-8156  
[questions@ejlri.org](mailto:questions@ejlri.org)  
[www.ejlri.wordpress.com](http://www.ejlri.wordpress.com)

February 12, 2013

Joseph Martella, Project Manager  
RIDEM  
Office of Waste Management  
235 Promenade Street  
Providence, RI 02908

*Comments re: Draft Public Involvement Plan, Former Tidewater Facility and Former Power Plant, Tidewater and Merry Streets, Pawtucket, Rhode Island*

Dear Mr. Martella,

I am submitting the following comments on behalf of the Environmental Justice League of Rhode Island (EJLRI) regarding the draft Public Involvement Plan (PIP) prepared by GZA on behalf of their client, National Grid, the responsible party for the Tidewater Site.

I have listed a few specific comments first, followed by more general suggestions for the PIP overall.

Page 2 – The draft PIP states: “This plan is not intended to cover Site activities relative to day-to-day operations of the natural gas regulating facility and electrical substation or other uses of the property by National Grid.” Since community members and parents from nearby schools have already met with GZA, RIDEM, and National Grid regarding substation upgrades and earthwork, especially with regard to improving air monitoring plans in relation to this work, which falls outside the official remediation plan, I would ask that this sentence be clarified to ensure that residents can expect to be informed and be invited to actively participate in the shaping of any plans for the site that would require disturbance to soil or otherwise create a potential public health risk. Some of these activities could be interpreted, potentially, as “day-to-day operations”, and therefore this statement should be clarified to clearly differentiate between actual day-to-day operations and other operations that are not specifically included in the remediation but will disturb soil, create potential emissions, etc.

Page 17 – The Pawtucket Public Library will serve as a repository for all of the documents and other information related to the site. I suggest posting a sign or poster at the Library itself (not just on the fence at the Tidewater site) to let the general public know that this repository exists.

Page 19 – If there are revisions proposed for the PIP in the future, National Grid will prepare a revised draft for review and approval by the public and RIDEM. National Grid should prepare a summary sheet to list all of the proposed changes/revisions, as well as the final approved revisions, not simply post the proposed revised draft of the full PIP online and in the physical repository (even if the changes/revisions are highlighted in the full document). This summary sheet should be a separate document to make it easy for the public to access, read, and digest the proposed, and then approved, changes.

In response to concerns raised by residents living on Thornton Street, immediately adjacent to the site, regarding natural gas odors and the possibility of air impacts from the groundwater contamination, I suggest addressing these issues at the poster session National Grid is hosting in the near future. In particular, addressing the issue of vapor intrusion into homes and schools should be a top priority. EJLRI receives technical assistance through an EPA program that assists organizations and community residents in understanding technical information related to Brownfields contamination and remediation. Upon her review of the draft remedial plan submitted to RIDEM by National Grid, our consultant from the New Jersey Institute of Technology recommended the following:

#### VAPOR INTRUSION INVESTIGATION

Some of the chemicals (volatile compounds) identified at the site have the potential to travel through the soil as vapors. These vapors may then move up through the soil into nearby buildings, contaminating indoor air. Therefore, if a vapor intrusion investigation has not been completed, a vapor intrusion investigation is recommended to determine whether the occupants of neighboring buildings are at risk for exposure to VOCs due to vapor intrusion.

We will be submitting a final version of the consultant's review at the appropriate time (when public comments are being accepted on the SIR/recommended remedial alternative), but I wanted to share this recommendation because it speaks directly to concerns raised by residents at the last meeting.

The draft PIP is strong overall, but lacks specifics on how to best engage parents at the local schools. Principals at the schools may not be the best, or only, individuals to notify regarding upcoming work, air monitoring results, public meeting notices, etc. In fact, they can be bottlenecks for getting information out to the wider school community. Suggestions raised at the meeting to engage the Pawtucket Schools Superintendent, the school committee, etc. are all very good, but also are not enough to get through to individual parents. Signs or posters with general information posted at the front offices of the schools adjacent to the site would be a good start (and/or at student pick-up locations), as well as providing copies of public notices to all parents via their child's backpacks, as suggested by the principal at Varieur Elementary, would also help ameliorate this problem. Not all notices need to be sent home via backpacks, but any public meeting announcements should be, as should an initial introductory letter or handout with an overview of the site history and current status, including who to contact for more information. National Grid should work with the principals at the three schools to send this introductory info sheet/letter home with all students as soon as possible.

Lastly, I would like to ask National Grid, GZA, and RIDEM to respond to how phytoremediation might play into the overall remediation strategy for this site, and/or if this approach has been discussed at all in relation to the Tidewater Site.

Sincerely,

A handwritten signature in cursive script that reads "Amelia Rose".

Amelia Rose, Director

**FEBRUARY 15, 2013**

SUMMARY OF MEETING



**GZA**  
**GeoEnvironmental, Inc.**

*Engineers and  
Scientists*

February 15, 2013  
GZA File No. 05.0043654.20-C

Mr. Joseph Martella  
Rhode Island Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, Rhode Island 02908



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Re: *Meeting Summary - January 29, 2013*  
Draft Public Involvement Plan  
Former Tidewater MGP and Power Plant Site  
Pawtucket, Rhode Island  
*RIDEM Case No. 95-022*

Dear Mr. Martella:

On behalf of our client, The Narragansett Electric Company d/b/a National Grid (National Grid), GZA GeoEnvironmental Inc. (GZA) is pleased to provide the attached summary of the January 29, 2013 public meeting associated with the Former Tidewater Manufactured Gas Plant (MGP) and Power Plant Site located in Pawtucket, Rhode Island (the Site). The purpose of the public meeting was to discuss public comments to the draft Public Involvement Plan (PIP) which was submitted to the Department on November 26, 2012.

Should you have any questions or comments regarding the information presented herein, please do not hesitate to contact the undersigned or Michele Leone at 781-907-3651.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink, appearing to read 'M. Kilpatrick', is written over a faint, light blue circular stamp or watermark.

Margaret S. Kilpatrick, P.E.  
Senior Project Manager  
401-421-4140 – [margaret.kilpatrick@gza.com](mailto:margaret.kilpatrick@gza.com)

Attachment: Summary of Meeting

CC: Ms. Michele Leone, National Grid  
Ms. Elizabeth Stone, RIDEM

Summary of Meeting  
 DRAFT Public Involvement Plan (PIP)  
 Former Tidewater Facility  
 Pawtucket, Rhode Island

January 29, 2013 6 PM  
 Francis J. Varieur Elementary School  
 486 Pleasant Street  
 Pawtucket, Rhode Island

- **Introduction to Meeting – Michele Leone (National Grid Representative)**
- **Presentation of DRAFT PIP dated November 26, 2012 – Elizabeth Stone (Rhode Island Department of Environmental Management or RIDEM) and Meg Kilpatrick, P.E. (GZA GeoEnvironmental, Inc.)**

The presentation included a summary of the Draft Public Involvement Plan (PIP) for the former Tidewater Facility (the Site). The draft PIP was developed based on input from the public provided during the community interviews completed in June 2012, as well as input from RIDEM. It provides a blueprint for keeping the public informed during the site cleanup process. It also presents how the public can participate in the process and comment on the project. A PIP is a living document and can be amended to reflect additional issues or challenges that may arise during the cleanup process.

National Grid submitted a draft PIP to RIDEM on November 26, 2012. The draft PIP has four components: 1) public notice, 2) fact sheets and enhanced communications, 3) community meetings and 4) information repositories. The four components are presented in the below table.

<p><b><u>Public Notice:</u></b></p> <ul style="list-style-type: none"> <li>• Mailing List (used to announce public meetings, distribute fact sheets, information about availability of reports, etc.)</li> <li>• Email List (optional)</li> <li>• Sign up at <a href="http://www.tidewatersite.com">www.tidewatersite.com</a></li> <li>• Or, send request to National Grid</li> </ul>	<p><b><u>Fact Sheets and Enhanced Communications:</u></b></p> <ul style="list-style-type: none"> <li>• Fact Sheets (used to inform of development of new information and/or achievement of significant milestones)</li> <li>• Informational Bulletin Boards (end of Tidewater Street and Bowles Court)</li> <li>• Phone Message Alert System during excavation</li> </ul>
<p><b><u>Community Meetings:</u></b></p> <ul style="list-style-type: none"> <li>• Encourages equal participation by all to create an atmosphere of constructive, open dialogue</li> <li>• Proposed Schedule and Objective of Public Meetings</li> <li>• Evening meeting time</li> <li>• Francis J. Varieur School (preferred venue)</li> </ul>	<p><b><u>Information Repositories:</u></b></p> <ul style="list-style-type: none"> <li>• Publicly Accessible Site File: RIDEM Case No. 95-022 <a href="http://www.dem.ri.gov/topics/fileview/htm">www.dem.ri.gov/topics/fileview/htm</a></li> <li>• Publicly Accessible Websites: <a href="http://www.tidewatersite.com">www.tidewatersite.com</a> <a href="http://www.dem.ri.gov/benviron/waste/tide/htm">www.dem.ri.gov/benviron/waste/tide/htm</a></li> <li>• Local Information Repository: Pawtucket Library (13 Summer St) Bulletin Boards: Tidewater St &amp; Bowles Ct</li> </ul>

Following the public comment period for the draft PIP, National Grid will provide a response to comments and revise the PIP as necessary for submittal to RIDEM for final review and approval.

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National Grid will hold a community outreach session in March 2013 to present information about the Site in an informal poster-board type setting. Following this session, National Grid will hold the initial community meeting within 60 days after receipt of the Program Letter from RIDEM (issued following RIDEM’s formal review of the Site Investigation Report submitted by National Grid). The schedule of community meetings follows, and National Grid encourages participation by all to create an atmosphere of constructive, open dialogue.

ACTIVITY	TIME PERIOD
Community Outreach Session	Within 60 days of Draft PIP Meeting (March 2013)
Initial Community Meeting	Within 60 days of receipt of Program Letter – during SIR Public Comment Period
Public Meeting on DRAFT Remedial Action Approval Plan (RAWP)	Within 12 months of receipt of Remedial Decision Letter
Submit RAWP for RIDEM Approval	Within 6 months of DRAFT RAWP Meeting
Public Meeting prior to initiation of remedy	Minimum of 30 days prior to start of remediation
Public Meetings during remediation	Meeting schedule to be presented for discussion purposes once remedial schedule is developed and approved by RIDEM
Public Meeting upon completion of the remedy	Within 30 days following completion of remediation

A copy of the presentation associated with the January 29, 2013 Draft PIP meeting is posted on the National Grid Tidewater website ([www.tidewatersite.com](http://www.tidewatersite.com)).

**Questions and Comments Session:** *(Responses provided in italics)*

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National Grid provided a brief summary of written public comments received to date on the DRAFT PIP.

- Public requested that Portuguese (in addition to Spanish) be included as languages for documents requiring translation.

*National Grid stated that going forward, the following document types will be provided in English, Spanish and Portuguese: 1) Notification Mailings, 2) Fact Sheets and 3) brief Executive Summaries which will accompany future reports.*

- Public requested that color-coded alert system be implemented on the bulletin boards.

*National Grid stated that the color-coded alert system has been implemented on the bulletin boards during the recent excavation project. The system involves posting different color sheets to indicate when excavation is active (yellow sheet) and not active (blue sheet).*

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- Public requested color-coded map of Tidewater Site contaminants.

*National Grid stated that the color-coded map for the Tidewater project is being finalized and will be presented at the upcoming Community Information Session. The final map will also be posted on the National Grid website and the bulletin boards.*

- Public expressed concern that current Draft PIP does not take into account the public's role in providing input into the remediation process.

*National Grid reinforced that the process going forward and as outlined in the PIP is intended to provide a means of effective "two-way communications" between the public and National Grid. National Grid stated that the Initial Community Meeting (which will follow RIDEM's review of the Site Investigation Report) will provide the public an opportunity to provide comment on the conceptual remedial strategy for the Tidewater Site. In addition, National Grid indicated that the current draft of the PIP has been modified to include a public meeting on the draft Remedial Action Work Plan (RAWP – the document that will be submitted to RIDEM to present the details of how the remedy will be implemented) to further provide an opportunity for the public to comment on the Site cleanup process.*

- Public expressed concern that current Draft PIP does not consider air monitoring during the remediation of the Tidewater Site.

*National Grid stated that the air monitoring plans for full-scale remediation of the Tidewater Site have not been developed as the final remedy for the project has not been approved. National Grid stated that the public will have an opportunity to comment and present their concerns during future public meetings, which National Grid will incorporate into the air monitoring plan for the final remediation.*

Audience member relayed concern that draft PIP references weekly posting of air monitoring data and that inclusion of this language will set a precedent for future air quality monitoring.

*National Grid stated that the PIP will be modified to delete reference to the posting of weekly air monitoring data.*



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**Open Comments and Questions Received:**

1. Audience member enquired about date for the Community Outreach Session.

*The current schedule is to have the Community Outreach Session in mid to late March 2013.*

2. Audience member enquired about what March 2013 Community Outreach Session consist of.

*The Community Outreach Session will consist of an informal meeting where information will be presented on poster boards to the public. The poster boards will include a variety of topics, including such things as "What is an Manufactured Gas Plant?" history of the Tidewater Site, findings of the investigations, demonstrations of field equipment, description of current National Grid operations at the property, etc. Each poster board will be manned by a representative from National Grid and/or GZA to answer questions. RIDEM will also be present to answer questions from the public.*

3. Audience member expressed concern about when to know when things are going on at the Site; specifically, when to leave kids inside.

*Information regarding excavation at the Site is provided through the mailing/email list, posted to the bulletin boards and posted to the Tidewater websites. The National Grid website will also be updated to include the color-coded alert system information (active and no active excavation). National Grid will also inform school principals of the schedule of work.*

4. Audience member stated that he is a parent and emphasized that it is important to remember that parents have no way to obtain information about the Site.

*National Grid provides notifications to those on the mailing/email list, which includes the principals of the neighboring schools. Due to privacy issues, National Grid does not have access to student/parent information. National Grid will continue to work with the school principals in developing an effective way to communicate with the parents. The best way to find out information currently is to sign-up to the Tidewater mailing/email list via the National Grid website. National Grid requested that audience members tell other parents/community members about this and encourage them to sign up so that they can receive information directly from National Grid.*

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- Audience member stated that parents from the International Charter School want a way for the information to be communicated to the parents.

*National Grid will continue to work with the school principals in developing an effective way to communicate with the parents. National Grid encouraged parents to sign-up for the mailing and/or email lists, as well as visit the National Grid website, to obtain information.*

- Audience member stated that he/she feels that the parents have no way to determine what is going on at the site and suggested possibly implementation of additional bulletin boards.

*The bulletin boards were installed at locations proximate to the Tidewater site, as well as accessible and visible to the schools. The two site bulletin boards are located close to each of the neighboring schools. National Grid will look into the possible installation of additional bulletin boards, as well as continuing to work with the school principals in developing an effective way to communicate with the parents.*

- The principal from Blackstone Academy stated the community has various levels of technical understanding and that disseminating information about the Tidewater Site is difficult.

*In the future, National Grid will prepare simple executive summaries for major report submittals. In preparing these summaries, National Grid will make every effort to use brief and nontechnical terminology in communications to the public. In the near future, National Grid will prepare an executive summary for the recent Site Investigation Report as well as an updated Fact Sheet which will be distributed through the mailing lists, as well as placed into the information repositories. National Grid will also continue to work with the school principals in developing an effective way to communicate information to the parents.*

- Audience member stated that, as a parent, the 2- hour notice provided through the phone message alert system was not enough. In addition, notification regarding the Tidewater site needs to be provided to more parties, such as elected officials and School Committee(s). A presentation of information would be warranted.

*The mailing list established for the Tidewater project does include local elected officials as well as school representatives, including the Principals of the Blackstone Academy, International Charter School and Francis J. Varieur School, as well as the Superintendent of schools for the City of Pawtucket. National Grid would be happy to include members of the School Committee on the mailing list, upon receipt of their contact information. National Grid also is willing to meet with*

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*members of the school and local government to present information about the Tidewater site and answer any questions that they may have.*

9. Audience member requested that technical documents be translated into “everyone speak” language.

*National Grid is attempting to do this and will continue to try to produce documents that are better understood by the public.*

10. Audience member asked when RIDEM will be ready to review the Site Investigation Report (SIR).

*Joseph Martella of RIDEM provided details regarding the regulatory process under the RIDEM Remediation Regulations. He indicated that the Public Involvement Plan must be finalized and in place before RIDEM’s review of the SIR can begin.*

Audience member enquired about the timing of this review and if the spring would seem reasonable.

*RIDEM indicated that it may be possible but reiterated that PIP must be finalized before the review of the SIR begins.*

11. Audience member requested that live translators be provided at public meetings.

*National Grid would be happy to provide translators, if requested by the public in advance of the meetings. Future notifications will include language regarding the availability of translators upon request by the public.*

12. Audience member spoke about historical mercury spill and lasting impact on concern from neighborhood. Audience member enquired about money from court settlement and publicly available information regarding mercury spill. He requested that information about the mercury spill, as it pertains to the history of the Tidewater Site, be included on the website and presented during the poster board session.

*National Grid did not own the property when the mercury spill took place in 2004 and was not involved in the cleanup, court proceedings or settlement. Southern Union was the party solely responsible for cleanup of the mercury incident. National Grid purchased the property from*

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*Southern Union but did not acquire Southern Union's liability for the mercury issues on the property. The mercury contamination from the 2004 spill has been cleaned up and removed from the property. In addition, the buildings have been checked for mercury and no mercury is currently stored on-site. National Grid stated that the files associated with the mercury spill are public information and can be reviewed through RIDEM.*

The audience member further requested that information on the mercury spill be posted on the National Grid website.

*National Grid explained that it was not liable for the mercury release was not involved in the cleanup, court proceedings or settlement. Southern Union was the party solely responsible for cleanup of the mercury incident. National Grid indicated that it would consider the request and provide a formal response in the response to comments on the PIP.*

13. Audience member concerned about Tidewater flyer that he received on his door from Environmental Justice League. The flyer depicted biohazard marker and list of chemicals with associated acute health hazards. Audience member relayed information about members of his household and neighbors being diagnosed with cancer and is concerned about what he is being exposed to at his home as he lives on Thornton Street located right next to site. He stressed that he wants to know if he is safe.

*National Grid stressed that the Site is fenced and locked to keep people off of the property. Under normal site conditions, the Site is safe to the community- in other words, there is no potential for airborne contaminants. During times of excavation, when soil is dug up and moved around, there is a potential for airborne contaminants. During soil excavation, National Grid follows an air quality monitoring program which has received public input and has been reviewed and approved by RIDEM. The results of this monitoring are posted to the bulletin boards as well as the Tidewater websites. This program was followed during the recent electrical substation upgrade project. The majority of excavation associated with this project is complete, with the exception of minor fence post installations and minor excavations associated with properly decommissioning equipment. Air data from this project did not show sustained exceedances of the thresholds (defined as being held over a 5-minute time period) at any time. A few transient exceedances of the thresholds were noted during the work which were not associated with the excavation activities (i.e., transient exceedances due to weather interference (rain), movement of trash material, orange peel, etc.) .*



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Audience member asked whether there are emissions coming from the site without moving the soil? Also, audience member wanted to know about indoor air monitoring and whether or not they should be concerned about migration/volatilization into buildings on Thornton Street.

*Contaminants from the site are not getting into the air (i.e., volatilizing) from the soil and groundwater under normal conditions (i.e., no soil being moved or disturbed). The majority of surface soils at Site are indicative of urban fill – soils which would typically be found in urban or city environments and exhibit low levels of contaminants. The majority of impacts are found below the ground surface (deeper than 2 feet) in the soils, at or below the groundwater table. In addition, the majority of soil, groundwater and separate phase product (oil) impacts are found where the historical Manufactured Gas Plant and Power Plant operations took place, primarily along the river area between Winter Street and the land behind the Max Read Field. The area where the residences are located along Thornton Street are in an area where historical operations did not occur and do not have elevated levels of observed impacts. This area is also located upgradient of the site – groundwater from the Site flows “downhill” towards the river, not towards the homes on Thornton Street. Based on this information, National Grid believes that the buildings on Thornton Street are unaffected by the migration and/or volatilization from impacts on the Tidewater Site.*

*The drawbacks to indoor air testing were also discussed, as this type of testing typically will pick up standard house hold products and chemicals, such as paint, cleaners, etc., which cannot be differentiated from possible site contaminants.*

*The findings of the drilling program in Max Read Field were also discussed. Results of the explorations indicated the presence of visually impacted soil at depths greater than 2 feet in a limited area on the eastern portion of the field. The soils at depth are not accessible (i.e., they are covered with 2 feet of visually non-impacted soil which would need to be removed). The exploration program was conducted with knowledge by the City of Pawtucket and the City is aware of the findings of the investigation.*

14. Audience member commented on gas smell at Thornton and Merry Streets and whether or not they are safe or being exposed to natural gas (or its additives).

*The odor that the audience member says he smelled is likely associated with mercaptan. Natural gas by itself is odorless. Mercaptan is an odorant that is added to natural gas so the gas can easily be detected. It is carried with the natural gas stream.*

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*National Grid will contact their Natural Gas Division to find out more information about this concern.*

15. Amelia Rose of the Environmental Justice League of Rhode Island (EJLRI) introduced herself and her agency to the audience. She indicated that EJLRI had access to funds from the US Environmental Protection Agency (USEPA) and could be used as a resource to the community. She also suggested that National Grid have a poster board regarding vapor intrusion during the Community Informational Session to educate the public.

*National Grid will consider adding a poster board regarding vapor intrusion to the Community Informational Session.*

*RIDEM also added that the potential for volatilization of contaminants from the site is not supported by the results of the recent air monitoring program (hand held field instruments) which is being followed as part of the electrical substation project.*

16. Audience member commented on concern regarding interfacing with the schools and the community. They suggested providing information about the site at a 4-6<sup>th</sup> grade comprehension level. Also, they requested that National Grid inform Shea High School about the impacts on the Max Read Field as they use the athletic field for sport activities.

*National Grid will look into this request and get back to the public. In the future, National Grid will prepare simple executive summaries for major report submittals. In preparing these summaries, National Grid will make every effort to use brief and nontechnical terminology in communications to the public. In the near future, National Grid will prepare an executive summary for the recent Site Investigation Report as well as an updated Fact Sheet which will be distributed through the mailing lists, as well as placed into the information repositories. National Grid will also continue to work with the school principals in developing an effective way to communicate information to the parents. Also, National Grid will consider adding Shea High School to the mailing list.*

17. Audience member suggested that Cape Verdean be added as a language to the translation list. Also suggested that Oak Hill Nursing Home be added to the distribution list.

*National Grid will consider adding Cape Verdean to the translation list. National Grid will also consider adding Oak Hill Nursing Home to the mailing list.*

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18. Audience member enquired why this is the first Public Involvement Plan in RI and what is typically done in Massachusetts?

*RIDEM indicated that the Remediation Regulations were recently modified in November 2011 to include a formal Public Involvement process, similar to that established in Massachusetts. This is the first PIP in Rhode Island due to the recent change in the regulations. Massachusetts has had a PIP process in place for at least 20 years.*

19. Audience member inquired if the site is “safe,” why all the concern?

*RIDEM indicated that the Site is under the State’s guidance for a reason – there are soil and groundwater impacts at the site which do pose a certain level of exposure risk. RIDEM stressed that the fencing is also there for a reason – to prevent people from entering the Site. RIDEM also gave the example of different levels of exposure at the Site – i.e., on-site workers who are excavating soils (potential high exposure risk) versus people off-site at or near the fence line (low potential exposure risk).*

20. Audience member enquired if wildlife could present an exposure risk via soil disturbance (i.e., burrowing, digging) on site.

*GZA performs weekly site walks to inspect and document the conditions at the Site. There has not been evidence of significant soil disturbance by wildlife at the Site. In the future, we will continue to monitor soil disturbance.*

21. Audience member requested status on South Washout Area repair.

*The earthwork associated with the South Washout Area has not been completed. National Grid will continue to work with the City to have this work completed.*

22. Audience member enquired when the public will receive a response to comments.

*The schedule presented in the presentation was revisited. A summary of today’s meeting will be provided within 10 business days (by 2/12/2013). Written comments on the draft PIP from the public should be provided to RIDEM within 10 business days (by 2/12/2013). RIDEM indicated that an extension to the public comment period may be requested in writing. Timing for response to written comments will be based on how many comments are received.*

**MARCH 6, 2013**

EMAIL



## Margaret Kilpatrick

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**From:** Dygert, Holly <hdygert@ric.edu>  
**Sent:** Wednesday, March 06, 2013 3:39 PM  
**To:** Leone, Michele (Michele.Leone@nationalgrid.com); Margaret Kilpatrick  
**Cc:** joseph.martella@dem.ri.gov; Amelia Rose (amelia.rose@ejlri.org); jenrossi3@gmail.com  
**Subject:** Tidewater Site communications, follow-up suggestions  
**Attachments:** PIP Recommendations Tidewater Community Group.doc

Dear Michele and Meg,

We held a meeting last week with members of the Tidewater community (school officials, parents of school children, and members of the neighborhood) to follow-up on National Grid's recent public meeting. One of the primary concerns expressed was that the language used in the outreach efforts was not accessible to most people. I personally spoke with a woman in the neighborhood who said that she keeps going to these meetings, but she doesn't understand anything that is said. I also noted that one of the attendees prefaced his comments at the meeting with, "I know I sound ignorant, but..." The school administrators, parents and residents had several suggestions of ways to make the communications more effective. We've compiled those suggestions – I am attaching the list and pasting it below.

As a college professor, I am constantly charged with translating expert knowledge into language that is accessible, often to kids coming right out of high school. I'm happy to compile a list of terms that are hard for non-specialists to understand (e.g., remedy, remediation, cap, program letter, abutter, action limits...). The list of definitions that National Grid provided in a former communication is a step in the right direction, but it would be better to replace those specialized terms with more accessible alternatives.

On a different note, can you tell me if you've been able to figure out what the source of the gas smell is that the resident at the public meeting complained about? I've heard multiple people complain about intermittent gas smells over the last couple of years.

Sincerely,

Holly Dygert

### **PIP Recommendations for the Tidewater Site March 6, 2013**

#### **Issues of concern that people would like to be addressed at the poster session:**

Gas Smells – What is this? What are potential impacts?

Differences among remedial alternatives – what options does National Grid have and why are they choosing one option over another?

What are potential future uses of this land/site after remediation? Will National Grid still own the site? Have there been discussions with City of Pawtucket?

What are the implications for neighbors' health based on what kinds of contaminants are at the site?

#### **Further Suggestions for Effectively Communicating with the Public (in preparation for the poster session):**

National Grid should develop separate communication materials for schools – and provide enough copies to give place one in each student's backpack.

School principals want to review all of the fliers/documents that will be sent to parents before NG makes copies, translates, or finalizes the communication, to make sure they communicate effectively. Julie Nora (ICS) and Carolyn Sheehan (Blackstone Valley) made this suggestion.

Neighbors also want to review materials before NG sends out communications to neighborhood – point person can be Amelia Rose at EJ League who can send out draft to list of neighbors and collate comments/suggestions within one week and send back to NG for finalization (worry is that the communications are too wordy and will not be read).

Hold regular meetings with a core group of residents and school personnel to give NG/GZA a chance to communicate in a smaller group setting – in addition to the larger public meetings that happen less frequently. This will help increase communication with the most committed/involved residents and school officials who will be ambassadors to other residents and the wider school community to generate their interest and involvement. Also will make larger public meetings less adversarial and more productive because it won't be the first time people are hearing about a certain issue or proposal.

Translation at larger public meetings should be made available regardless of whether someone contacts NG to say they are coming to a meeting – this would help build trust with the neighborhood and principals could guarantee to parents that interpretation would be available at public meetings no matter what.

Community members recommend that they be permitted to have their own poster/table at the poster session in addition to what NG/GZA are preparing.

NG should create bookmarks with all relevant contact information as well as instructions for how people can get on the email/phone notification lists. These will be helpful to hand out in the neighborhood and at the schools and would be more likely to be read and communicate effectively – rather than a long letter.

**MARCH 22, 2013**

**RESPONSE TO COMMENTS LETTER**

March 22, 2013  
File No. 05.0043654.20-C



Mr. Joseph Martella  
Rhode Island Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, Rhode Island 02908

530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Re: Response to Public Comments  
Draft Public Involvement Plan  
Former Tidewater MGP and Power Plant Site  
Pawtucket, Rhode Island  
*RIDEM Case No. 95-022*

Dear Mr. Martella:

On behalf of our client, The Narragansett Electric Company d/b/a National Grid (National Grid), GZA GeoEnvironmental, Inc. (GZA) has prepared this letter in response to written public comments to the November 26, 2012 draft Public Involvement Plan (PIP) prepared for the Former Tidewater Manufactured Gas Plant (MGP) and Power Plant Site located in Pawtucket, Rhode Island (the Site). These comments were provided to National Grid by the Rhode Island Department of Environmental Management (RIDEM) via a February 21, 2013 notification letter. As indicated in RIDEM's February 21, 2013 notification letter, RIDEM received the following written public comments to the draft PIP: 1) a letter dated January 28, 2013, from Ms. Holly Dygert; and 2) a letter dated February 12, 2013, from Ms. Amelia Rose of the Environmental Justice League of Rhode Island (EJLRI). For your convenience, the comments received are repeated below followed by National Grid's responses in *italics*. The RIDEM notification letter along with the two public comment letters is included as an attachment to this letter.

In addition, per RIDEM's February 2013 notification, attached to this letter are responses to public comments that we received during the January 29, 2013, public meeting held at the Francis Varieur Elementary School. These responses were submitted separately to RIDEM on February 15, 2013. This letter also includes updates to responses to audience comments from the January 29, 2013, meeting which were summarized in the February 15, 2013, submittal and responses to questions related to the PIP provided in an email dated March 6, 2013, from Ms. Holly Dygert. A copy of this March 6, 2013 email is also attached.

**January 28, 2013 Letter**

1. Comment: The information in the boards should be provided in the three primary languages of the community, which are English, Spanish and Portuguese. I was concerned that National Grid seemed to reject a request made during the interviews for information to be translated into both Spanish and Portuguese. I want to underscore the importance of providing information in the community's languages.

*Response: Going forward, National Grid will provide the following documents in English, Spanish and Portuguese: 1) Notification Mailings, 2) Fact Sheets and 3) Executive Summaries that will accompany future reports.*



2. Comment: I look forward to the incorporation of the color-coded alert system.

*Response: We implemented the color-coded alert system on the bulletin boards during the recent substation upgrade project. The system involves posting different color sheets to indicate when excavation is active (yellow sheet) and not active (blue sheet).*



3. Comment: I am very pleased that National Grid has proposed to create a color-coded map of Tidewater site hazards to the public as part of the PIP. Despite years of communications about the hazards on the site, the members of the stakeholder group are still unclear about concentrations of particular hazards, and where they are located. Thus, I am eager to see this map.

*Response: We are finalizing the color-coded map for the Tidewater project that illustrates areas of the Site where impacts have been identified in groundwater and soils and we will present it at the upcoming Community Information Session. The final map will also be posted on the National Grid website and the bulletin boards.*

4. Comment: In regards to the first concern, I agree with the characterization of a public involvement process laid out on page 1 of the Draft PIP, as “an agreement between the party conducting response actions and the public about how they will share information moving forward, and how the public will be able to comment on plans for assessment and cleanup of the site.” This definition identifies the public as important partner in the remediation process. Since the public’s interests vis-à-vis the remediation process diverge in important ways from those of the property owner, the public must have the ability to shape the remediation, and the precautions that are taken during the remediation process. I am concerned, however, that the Draft PIP construes public participation narrowly, as informing the public about work plans that have already been developed.

For example, on page 8, in describing the process through which a final remediation plan for the site will be determined, the Draft PIP states that RIDEM will issue a Program Letter when it has concluded that “the site has been adequately assessed” in the Site Investigation Report. The Draft PIP continues that “Following receipt of the Program Letter, National Grid will notify [various parties]... that the investigation is complete and that RIDEM has concurred with the recommended remedial alternative... Subsequent to this public notification and following receipt of any public comments, the Department will issue a Remedial Decision Letter formally approving the SIR.” In this description, the identification and approval of a remedial strategy are depicted as occurring apart from public involvement. This negates the role of the public in the decision-making process. Moreover, I believe that it is a mischaracterization of the process through which remediation strategies are determined. It is my understanding that the Program Letter solely certifies that RIDEM has determined that the proposed remedy meets the criteria for an acceptable remedy. I understand that the final determination of a remedy cannot be made until members of the community are given an opportunity to consider the proposal, and to convey their concerns to RIDEM.

The characterization of the process through which a Remedial Action Work Plan (RAWP) is identified and selected in the Draft PIP similarly neglects the role of the public. Though the text states that “Many of the above remedial process steps will be accompanied by public meetings and comment periods” (p.8), I find it disconcerting that the public’s role in shaping the remediation process is not included in National Grid’s description of the decision-making process. This view of public involvement as a process whereby National Grid officials inform the public about the remediation process carries through to other sections of the Draft PIP. For example, in the section on Community Meetings, meetings are depicted as opportunities for National Grid representatives to inform community members about the work that has been and will be undertaken in the site. Though informing the community is crucial for facilitating their

involvement in the process, it is not sufficient. The document also states that meetings will be held “in conjunction with... Departmental approval of the Remedial Action Work Plan; [and]prior to remedy implementation” (p.14). This neglects the crucial role the public will have in shaping the RAWP.

The PIP should be revised to indicate clearly that potential work plans will be presented in community meetings, and that community concerns will be solicited to ensure that the final work plans reflect the concerns and needs of the public. Opportunities for community members to comment on the proposed plans and thereby shape the remediation process should be clearly laid out in the meeting agendas, and in the scheduling of meetings (in relation to RIDEM’s final decisions about work at the site).



*Response: We are committed to providing the community with opportunities to review and comment on National Grid’s plans to remediate the Tidewater Site. National Grid will revise the PIP to include a public meeting related to the draft Remedial Action Work Plan (RAWP – the document that will be submitted to RIDEM to present the details of how the remedy will be implemented) to provide further opportunity for the public to comment on the Site remediation process. The public meeting regarding the draft RAWP will be held within 12 months of receipt of the Remedial Decision Letter (RDL – letter issued by RIDEM to formally agree with the findings of the Site Investigation Report). This meeting will be held prior to the submittal of the final RAWP to RIDEM and will provide the public an opportunity to provide comment on the remedial strategy for the Tidewater Site. The process going forward and as outlined in the PIP is intended to provide a means of effective “two-way communication” between the public and National Grid. The Initial Community Meeting (which will follow RIDEM’s review of the Site Investigation Report) will provide the public an opportunity to provide comment on the conceptual remedial strategy for the Tidewater Site. The process outlined in the PIP, which follows the requirements of the Remediation Regulations, provides the public opportunity to comment on the remedial process; however, it is noted that RIDEM is ultimately responsible for the final remedial analysis and decisions on the final remedial strategy for the Site.*

5. Comment: In regards to my second concern, one of the requests most of the interviewees made was for National Grid to make data from air monitoring available in real time to the community. While meeting with representatives from National Grid and RIDEM during the early Fall of 2012, we learned that this was not possible with the particular hand held devices being used to monitor emissions during the current electrical substation upgrade. Moreover, RIDEM representatives at the meeting seemed to concur that the small-scale nature of the work and the limited extent of contaminants in the soil did not warrant the more costly kind of air monitoring technologies that enable real-time posting of readings. I am very concerned to see that the particular scheme we agreed to for monitoring emissions and making the results available to community members during the substation upgrade is replicated in the Draft PIP. National Grid and GZA officials should be clear that the substation upgrade was classified as separate from the remediation process, which is why the work could be completed without presenting it to the public. As we look ahead to the full remediation, the particular air monitoring strategies, and techniques for communicating information about the results of that monitoring to the community, will need to be determined in conversation with the community about the particular threats posed by particular actions.

*Response: We will revise the PIP to delete the reference to posting weekly air monitoring data. Air monitoring plans for full-scale remediation of the Tidewater Site have not been developed as the final remedy for the project has not been approved by the RIDEM. The public will have an opportunity to comment and engage in a conversation about the proposed air monitoring program during the RAWP comment process described above.*

**February 12, 2013 Letter**



1. Comment: Page 2 – The draft PIP states: “This plan is not intended to cover Site activities relative to day-to-day operations of the natural gas regulating facility and electrical substation or other uses of the property by National Grid.” Since community members and parents from nearby schools have already met with GZA, RIDEM, and National Grid regarding substation upgrades and earthwork, especially with regard to improving air monitoring plans in relation to this work, which falls outside the official remediation plan, I would ask that this sentence be clarified to ensure that residents can expect to be informed and be invited to actively participate in the shaping of any plans for the site that would require disturbance to soil or otherwise create a potential public health risk. Some of these activities could be interpreted, potentially, as “day-to-day operations”, and therefore this statement should be clarified to clearly differentiate between actual day-to-day operations and other operations that are not specifically included in the remediation but will disturb soil, create potential emissions, etc.

*Response: National Grid will revise the PIP to clarify this sentence as follows: “This plan is not intended to cover Site activities relative to the day-to-day operations, including repair and maintenance of the natural gas regulating facility and electrical substation involving minor soil disturbances (i.e., fence post installation) or other uses of the property by National Grid. Activities at these facilities involving excavations of soils with the potential to create volatile emissions are covered by this PIP. In the event of a facilities emergency requiring immediate soil excavation (utility repair, etc.), National Grid will follow the soil management procedures prepared for the previous natural gas station regulator and electrical substation work (i.e., April 2011 Materials Management Plan and November 2012 Soil Management Plan, respectively). In addition, air monitoring will be completed during these emergency events in accordance with the September 28, 2012, air monitoring summary memorandum submitted to RIDEM to the extent practical.”*

2. Comment: Page 17 – The Pawtucket Public Library will serve as a repository for all of the documents and other information related to the site. I suggest posting a sign or poster at the Library itself (not just on the fence at the Tidewater site) to let the general public know that this repository exists.

*Response: Information about public repositories for the Tidewater project is posted on the bulletin boards at the end of Tidewater Street and Bowles Court. National Grid will contact the Pawtucket Public Library to inquire about the possibility of posting a sign at the Library and will do so with the Library’s permission.*

3. Comment: Page 19 – If there are revisions proposed for the PIP in the future, National Grid will prepare a revised draft for review and approval by the public and RIDEM. National Grid should prepare a summary sheet to list all of the proposed changes/revisions, as well as the final approved revisions, not simply post the proposed revised draft of the full PIP online and in the physical repository (even if the changes/revisions are highlighted in the full document). This summary sheet should be a separate document to make it easy for the public to access, read, and digest the proposed, and then approved, changes.

*Response: While future revisions to the PIP will not re-open the draft and public comment period, we will prepare and make available summary sheets of proposed and approved changes/revisions for the public.*

4. Comment: In response to concerns raised by residents living on Thornton Street, immediately adjacent to the site, regarding natural gas odors and the possibility of air impacts from the groundwater contamination, I suggest addressing these issues at the poster session National Grid is hosting in the near future. In particular, addressing the issue of vapor intrusion into homes and schools should be a top priority. EJLRI receives technical assistance through an EPA program that

assists organizations and community residents in understanding technical information related to Brownfields contamination and remediation. Upon her review of the draft remedial plan submitted to RIDEM by National Grid, our consultant from the New Jersey Institute of Technology recommended the following:

#### VAPOR INTRUSION INVESTIGATION



Some of the chemicals (volatile compounds) identified at the site have the potential to travel through the soil as vapors. These vapors may then move up through the soil into nearby buildings, contaminating indoor air. Therefore, if a vapor intrusion investigation has not been completed, a vapor intrusion investigation is recommended to determine whether the occupants of neighboring buildings are at risk for exposure to VOCs due to vapor intrusion.

We will be submitting a final version of the consultant's review at the appropriate time (when public comments are being accepted on the SIR/recommended remedial alternative), but I wanted to share this recommendation because it speaks directly to concerns raised by residents at the last meeting.

*Response: We understand that nearby neighbors are concerned about vapor intrusion. Based on a number of factors – the way groundwater is distributed and moves at the Site, the way contaminants are distributed at the Site, and the distance from off-Site buildings to the nearest Site impacts- the potential for vapor intrusion into off-Site buildings, including the residences on Thornton Street or the neighboring schools, has not been identified as a potential pathway of concern for the Tidewater Site. We say this for several reasons:*

- *The majority of soil and groundwater impacts are located at least 50 feet away from the nearest Thornton Street residences and the schools.*
- *The portion of the Site that is nearest the residences along Thornton Street is an area where historical operations did not occur and significant impacts (VOCs or others) have not been detected in this area.*
- *In addition to the distance from Site impacts, the residences along Thornton Street and all three of the schools are located hydraulically upgradient of the Site – in other words, groundwater from the Site flows “downhill” towards the river, not towards the homes on Thornton Street or the schools. Therefore, the potential for migration of Site impacts towards Thornton Street and the schools is not a concern.*

*Our conclusion is also supported by:*

- *The March 2003 proposed revisions to the Connecticut Department of Environmental Protection (CTDEP) volatilization criteria, which references vapor intrusion guidance documents prepared by US Environmental Protection Agency (EPA).<sup>1</sup> This guidance indicates that volatilization criteria are applicable to impacts within 30 feet (both depth and lateral distance) from a structure.*
- *RIDEM's guidance document entitled “Evaluation of Vapor Intrusion Potential for Proposed RI School Sites,” dated September 2012.<sup>2</sup> This RIDEM guidance document outlines a step-by-step process for evaluating the potential for vapor intrusion to migrate*

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<sup>1</sup> RIDEM has not yet developed any vapor intrusion criteria and therefore has incorporated the State of Connecticut's volatilization criteria, available here:

[http://www.ct.gov/deep/cwp/view.asp?a=2715&q=458652&deepNav\\_GID=1626](http://www.ct.gov/deep/cwp/view.asp?a=2715&q=458652&deepNav_GID=1626)

<sup>2</sup> RIDEM developed this guidance document in September 2012, available here:

<http://www.dem.ri.gov/programs/benviron/waste/pdf/skulvapr.pdf>



*from the subsurface into an existing or proposed building to be used as a school. Using this guidance document and the understanding of subsurface impacts and groundwater flow direction information, an evaluation for the potential for vapor intrusion into the off-Site schools and residences is not considered warranted.*



*Finally, National Grid's predecessor owners conducted a soil gas survey surrounding the Francis J. Varieur School in 1996. The survey consisted of 28 sampling points adjacent to the school to ascertain whether the potential existed for the migration of vapors from the surrounding soils into the school. No VOCs were detected in the samples, with the exception of two soil gas samples which detected low levels of trichloroethylene (TCE). TCE is not a contaminant associated with historic MGP and power plant operations and is not associated with the Tidewater Site. Subsequent indoor air samples were collected from within the school for TCE analysis. Those samples did not detect any TCE.*

*At this time, National Grid does not plan on having a specific poster board regarding vapor intrusion at the community outreach session. However, we will be willing to discuss the issue should anyone have any questions about vapors. In addition, we would be happy to discuss this issue further with representatives of the New Jersey Institute of Technology (NJIT) if you wish.*

*To address the question regarding natural gas odors in the neighborhood, National Grid will have a representative available from gas operations at the Community Outreach Session to discuss the natural gas odor concerns raised by the community.*

*Natural gas is typically "odorless" from the well head. Federal and State law mandates that gas must be detectable by a person with an average sense of smell. As a result, pipeline operators and in some cases distribution system operators inject a malodorous material called mercaptan, commonly referred to as "odorant". Federal law also mandates that odorant added to a pipeline must not be harmful to people, pipe or other devices. National Grid does has several Level 3 gas leaks (defined as a non-hazardous leak; periodic monitoring required) in the neighborhood. Level 3 leaks do not present a risk to public health or safety. National Grid is continuing to monitor the leaks and is adhering to the strict Federal and State standards.*

5. Comment: The draft PIP is strong overall, but lacks specifics on how to best engage parents at the local schools. Principals at the schools may not be the best, or only, individuals to notify regarding upcoming work, air monitoring results, public meeting notices, etc. In fact, they can be bottlenecks for getting information out to the wider school community. Suggestions raised at the meeting to engage the Pawtucket Schools Superintendent, the school committee, etc. are all very good, but also are not enough to get through to individual parents. Signs or posters with general information posted at the front offices of the schools adjacent to the site would be a good start (and/or at student pick-up locations), as well as providing copies of public notices to all parents via their child's backpacks, as suggested by the principal at Varieur Elementary, would also help ameliorate this problem. Not all notices need to be sent home via backpacks, but any public meeting announcements should be, as should an initial introductory letter or handout with an overview of the site history and current status, including who to contact for more information. National Grid should work with the principals at the three schools to send this introductory info sheet/letter home with all students as soon as possible.

*Response: We provide notifications to those on the mailing/email list, which includes the principals of the neighboring schools. If the principals need assistance in distributing these notifications, we would be happy to help. The best way to find out information currently is to sign-up to the Tidewater mailing/email list via the National Grid website. National Grid encourages all parents/community members to sign up so that they can receive information directly from National Grid. Any interested party is also welcome to contact National Grid's Project Manager, Michele Leone, directly at 781-907-3651.*



*With permission of the neighboring schools, National Grid will post a sign on how to obtain information regarding the Site at the front office of each school. National Grid has prepared an updated fact sheet which was distributed on March 4, 2013, through the mailing and email lists, as well as via door-to-door flyers to the neighboring community. This fact sheet included information about the former Tidewater facility, recent activities at the Site, public involvement activities and next steps for the Site. The fact sheet accompanied a notification letter regarding the date, time and place of the upcoming Community Outreach Session. National Grid distributed this notification package to the schools on March 6, 2013, to be sent home with the students via backpacks. National Grid will continue to work with the principals about sending mailing list items (flyers, fact sheets and public notifications) in multiple languages home with the students via backpacks.*

6. Comment: Lastly, I would like to ask National Grid, GZA, and RIDEM to respond to how phytoremediation might play into the overall remediation strategy for this site, and/or if this approach has been discussed at all in relation to the Tidewater Site.

*Response: We considered phytoremediation but concluded that it is not a feasible remedial alternative for the following reasons:*

- *The depth of the treatment zone is limited by the depth of the root material of the plants.*
- *The contaminants at the former Tidewater facility are located at depth greater than two feet below the ground which is too deep for phytoremediation.*
- *The nature of certain impacts at the Tidewater Site, including separate phase product (in other words, coal tar or oils), are not amenable to treatment via phytoremediation. Due to these limitations, phytoremediation is not deemed appropriate as a potential remedial alternative for the former Tidewater facility.*

**Updates to Responses to Comments from the January 29, 2013 Public Meeting**  
**Open Comments and Questions Received:**

9. Audience member requested that technical documents be translated into “everyone speak” language.

*National Grid will continue to make every effort to use brief and nontechnical terminology in communications with members of the public. In an effort to meet this request, National Grid has hired a communications consultant to assist in the preparation of documents.*

12. Audience member spoke about historical mercury spill and lasting impact on concern from neighborhood. Audience member enquired about money from court settlement and publicly available information regarding mercury spill. He requested that information about the mercury spill, as it pertains to the history of the Tidewater Site, be included on the website and presented during the poster board session.

*National Grid did not own the property when the mercury spill took place in 2004 and was not involved in the cleanup, court proceedings or settlement. Southern Union was the party solely responsible for cleanup of the mercury incident. National Grid purchased the property from Southern Union but did not acquire Southern Union’s liability for the mercury issues on the property. The mercury contamination from the 2004 spill has been cleaned up and removed from the property. In addition, the buildings have been checked for mercury and no mercury is currently stored on the property. National Grid stated that the files associated with the mercury spill are public information and can be reviewed through RIDEM.*

The audience member further requested that information on the mercury spill be posted on the National Grid website.

*National Grid explained that it was not liable for the mercury release and was not involved in the cleanup, court proceedings or settlement. Southern Union was the party solely responsible for cleanup of the mercury incident. National Grid indicated that it would consider the request and provide a formal response in the response to comments on the PIP.*



*The following additional response was prepared by RIDEM and provided to National Grid following the January 2013 public meeting. National Grid was not involved in preparation of this response or involvement in the Southern Union Case.*

*“In June 2012, the U.S. Supreme Court remanded an \$18-million sentence against the owners of New England Gas in a case that stemmed from the 2004 mercury spill at a Pawtucket housing project. The ruling puts at question the \$12 million in damages that were to have gone to Rhode Island environmental groups (the majority of which were to be managed by the Rhode Island Foundation, in order to fund grants in environmental education, remediation, conservation, and children's health). The remaining \$6 million was a fine. The Supreme Court case hinged on circumstances that require juries -- not judges -- to set penalties after criminal convictions, so the ruling does not change the 2008 conviction of Texas-based Southern Union Co. for illegal storage of the hazardous material that belonged to a former subsidiary. But the ruling means the Supreme Court remanded the case for further proceedings in US District Court (RI) consistent with this opinion. The June 2012 Supreme Court Decision can be found at <http://www.supremecourt.gov/opinions/11pdf/11-94a1b2.pdf> . The US District Court heard oral arguments in December 2012 in an attempt to determine how to properly proceed with the case from here. DEM has received no additional information on this matter from the Court since the hearing in December 2012. “ – Communications from RIDEM*

14. Audience member commented on gas smell at Thornton and Merry Streets and whether or not they are safe or being exposed to natural gas (or its additives).

*The odor that the audience member says he smelled is likely associated with mercaptan. Natural gas by itself is odorless. Mercaptan is an odorant that is added to natural gas so the gas can easily be detected. It is carried with the natural gas stream.*

*National Grid will contact its Natural Gas Division to find out more information about this concern. Representatives from National Grid will be available during the March 27, 2013 community outreach meeting to discuss public concerns regarding the natural gas operations at the Tidewater facility.*

*In addition, refer to the response above for Comment 4 of the February 12, 2013 comment letter regarding “natural gas odors.”*

15. Amelia Rose of the Environmental Justice League of Rhode Island (EJLRI) introduced herself and her agency to the audience. She indicated that EJLRI had access to funds from the US Environmental Protection Agency (USEPA) and could be used as a resource to the community. She also suggested that National Grid have a poster board regarding vapor intrusion during the Community Informational Session to educate the public.

*Refer to the response above for Comment 4 of the February 12, 2013 comment letter regarding “vapor intrusion investigation.”*

*RIDEM also added that the potential for volatilization of contaminants from the Site is not supported by the results of the recent air monitoring program (hand held field instruments) which is being followed as part of the electrical substation project.*

17. Audience member suggested that Cape Verdean be added as a language to the translation list. Also suggested that Oak Hill Nursing Home be added to the distribution list.

*National Grid understands that Cape Verdean is a dialect of Portuguese. Based on discussions with a translation service, we also understand that documents translated in Portuguese should be understood by people who speak Cape Verdean. Therefore, National Grid does not plan to provide documents in Cape Verdean. If a community member requires assistance or translation other than Spanish and Portuguese, please contact Michele Leone at National Grid.*



*National Grid has added Oak Hill Nursing Home to the door to door flyer distribution list during the March 4, 2013 mailing.*

### **March 6, 2013 Email**

(1) National Grid should develop separate communication materials for schools – and provide enough copies to give place one in each student’s backpack.

*National Grid will continue to work with the principals to get materials out to parents via backpacks. To avoid confusion in disseminating this information, National Grid will work directly with the principals and other stakeholders.*

(2) School principals want to review all of the fliers/documents that will be sent to parents before NG makes copies, translates, or finalizes the communication, to make sure they communicate effectively. Julie Nora (ICS) and Carolyn Sheehan (Blackstone Valley) made this suggestion.

*National Grid will work with the principals to ensure that they are comfortable with the documents we provide to them for distribution.*

(3) Neighbors also want to review materials before NG sends out communications to neighborhood – point person can be Amelia Rose at EJ League who can send out draft to list of neighbors and collate comments/suggestions within one week and send back to NG for finalization (worry is that the communications are too wordy and will not be read).

*National Grid is working with a communications consultant in order to make mailings more easily understood by the community in response to this concern. Given this, National Grid will not be providing drafts of our communications to the neighbors prior to distribution. We continue to appreciate the community’s input on the communications and welcome suggestions on how to further improve this process.*

(4) Hold regular meetings with a core group of residents and school personnel to give NG/GZA a chance to communicate in a smaller group setting – in addition to the larger public meetings that happen less frequently. This will help increase communication with the most committed/involved residents and school officials who will be ambassadors to other residents and the wider school community to generate their interest and involvement. Also will make larger public meetings less adversarial and more productive because it won’t be the first time people are hearing about a certain issue or proposal.

*National Grid designed the public involvement plan (PIP) to involve all community members and interested parties. National Grid believes that the large number of public meetings and the commitment to schedule additional meetings on an as-needed basis pre-empts the need for smaller, stakeholder meetings. Community members are strongly encouraged to contact Michele Leone at any time throughout the site cleanup process by calling 781-907-3651 or via email at [michele.leone@nationalgrid.com](mailto:michele.leone@nationalgrid.com) should they have questions or comments.*



(5) Translation at larger public meetings should be made available regardless of whether someone contacts NG to say they are coming to a meeting – this would help build trust with the neighborhood and principals could guarantee to parents that interpretation would be available at public meetings no matter what.



*At all public meetings, translation assistance will be provided for non-English speaking individuals, upon request. Requests can be made to Michele Leone by calling 781-907-3651 or via email at michele.leone@nationalgrid.com.*

(7) NG should create bookmarks with all relevant contact information as well as instructions for how people can get on the email/phone notification lists. These will be helpful to hand out in the neighborhood and at the schools and would be more likely to be read and communicate effectively – rather than a long letter.

*National Grid has created magnets with the requested information which will be available at the upcoming community information session.*

A bulleted summary of the proposed revisions to the PIP, as discussed above, is attached to this letter.

Should you have any questions or comments regarding the information presented herein, please do not hesitate to contact the undersigned or Michele Leone at 781-907-3651.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink, appearing to read "Margaret S. Kilpatrick".

Margaret S. Kilpatrick, P.E.  
Senior Project Manager

A handwritten signature in blue ink, appearing to read "John P. Hartley".

John P. Hartley  
Consultant/Reviewer

A handwritten signature in blue ink, appearing to read "James J. Clark".

James J. Clark, P.E.  
Principal

Attachments: February 21, 2013 Notification of Public Comments Received  
February 15, 2013 Summary of Meeting  
March 6, 2013 Email  
Summary of Proposed Revisions to PIP

CC: Ms. Michele Leone, National Grid  
Ms. Elizabeth Stone, RIDEM

**FEBRUARY 21, 2013**

NOTIFICATION OF PUBLIC COMMENTS RECEIVED



February 21, 2013

Ms. Michele V. Leone  
Manager, New England Site Investigation & Remediation  
National Grid  
40 Sylvan Road  
Waltham, MA 02451-1120

RE: Tidewater Manufactured Gas Plant (former)  
Tidewater Street  
Pawtucket, Rhode Island

Dear Ms. Leone:

On November 9, 2011, the Rhode Island Department of Environmental Management (the Department) amended the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, (the Remediation Regulations). The purpose of these regulations is 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.

In the matter of the above referenced "Site" (as defined in the Industrial Property Remediation and Reuse Act), and in accordance with Rule 7.07.E (Public Involvement Plans) of the 2011 Remediation Regulations, the Department's Office of Waste Management (OWM) has received the following documents concerning public comments on the draft Public Involvement Plan (PIP):

1. Letter from Holly Dygert to the Department, Re: Tidewater Site Public Involvement Plan, dated January 27, 2013, and received via e-mail on January 28, 2013; and
2. Comments re: Draft Public Involvement Plan, Former Tidewater Facility and Former Power Plant, Tidewater and Merry Streets, Pawtucket, Rhode Island, prepared by the Environmental Justice League of Rhode Island (EJLRI), received via e-mail on February 12, 2013.

In addition, National Grid received several comments at the public meeting for the draft PIP held on January 29, 2013.

Please review these submitted comments along with those received at the public meeting and prepare written responses to each of them as appropriate. A completed document, incorporating responses all of the comments, must be submitted to the Department for review and approval.

**All correspondence regarding this Site should be sent to the attention of:**

Joseph T. Martella II – Senior Engineer  
RIDEM / Office of Waste Management  
235 Promenade Street  
Providence, RI 02908

If you have any questions regarding this letter, please contact me by telephone at (401) 222-2797 extension 7109 or by e-mail at [joseph.martella@dem.ri.gov](mailto:joseph.martella@dem.ri.gov).

Sincerely,



Joseph T. Martella II  
Senior Engineer  
Rhode Island DEM  
Office of Waste Management

Attachments: January 27, 2013, Letter from Holly Dygert to the Department;  
February 12, 2013, Comments re: Draft Public Involvement Plan

Cc: Kelly J. Owens, RIDEM.OWM  
Elizabeth Stone, RIDEM/OOD  
Barbara Morin, RIDEM/OAR  
Barney S. Heath, Pawtucket Planning & Development  
Alan Tenreiro, Chairman, Pawtucket School Committee  
Deborah Cylke, Superintendent, City of Pawtucket School Department  
Julie Nora, Ph.D, International Charter School  
Carolyn Sheehan, Blackstone Academy  
Edna Coia, Francis J. Varieur Elementary School  
Amelia Rose, EJLRI  
Margaret S. Kilpatrick, GZA



January 27, 2013

Mr. Joseph Martella II, Senior Engineer  
RIDEM Office of Waste Management  
Site Remediation Program

Re: Tidewater Site Public Involvement Plan

Dear Mr. Martella,

I am very pleased that RIDEM has implemented a public involvement mechanism to ensure that members of the community who may be exposed to hazards are involved in the remediation process. I reviewed National Grid's draft Public Involvement Plan (PIP) for the Tidewater Site, and I am also very pleased with many of the actions National Grid has proposed to take to ensure that those potentially impacted by the work at Tidewater are informed of the work. I am writing to communicate my suggestions for strengthening the proposed PIP. These suggestions are aimed, first, to optimize the ability of those who could be impacted by the site's hazards to access information about the nature of these hazards and about potential routes of exposure, and, second, to ensure that they are able to influence the process in accordance with their particular concerns.

I appreciate that National Grid solicited comments from the community through the interview process in June of 2012, and provided a synthesis of the suggestions in the *Draft PIP*. National Grid has already acted on many of these suggestions, and has integrated many of them into the proposed PIP. The community bulletin boards – with announcements and the results of weekly air monitoring – are very useful communication tools. I look forward to the incorporation of the color-coded alert system. The information in the boards should be provided in the three primary languages of the community, which are English, Spanish and Portuguese. I was concerned that National Grid seemed to reject a request made during the interviews for information to be translated into both Spanish and Portuguese. I want to underscore the importance of providing information in the community's languages.

I am very pleased that National Grid has proposed to create a color-coded map of Tidewater site hazards to the public as part of the PIP. Despite years of communications about the hazards on the site, the members of the stakeholder group are still unclear about concentrations of particular hazards, and where they are located. Thus, I am eager to see this map. I am also pleased that National Grid is proposing a Community Outreach (poster) Session, and possibly a tour of the site.

While I am generally satisfied with the strategies National Grid has proposed to convey information to the public, I have two main concerns. The first is that the *Draft PIP* largely neglects the public's role in shaping the remediation process. The second is that the particular

strategy for monitoring air quality that was agreed on for the electrical substation upgrade is included in the *Draft PIP* as the plan for the remediation.

In regards to the first concern, I agree with the characterization of a public involvement process laid out on page 1 of the *Draft PIP*, as “an agreement between the party conducting response actions and the public about how they will share information moving forward, and how the public will be able to comment on plans for assessment and cleanup of the site.” This definition identifies the public as important partner in the remediation process. Since the public’s interests vis-à-vis the remediation process diverge in important ways from those of the property owner, the public must have the ability to shape the remediation, and the precautions that are taken during the remediation process. I am concerned, however, that the *Draft PIP* construes public participation narrowly, as informing the public about work plans that have already been developed.

For example, on page 8, in describing the process through which a final remediation plan for the site will be determined, the *Draft PIP* states that RIDEM will issue a Program Letter when it has concluded that “the site has been adequately assessed” in the Site Investigation Report. The *Draft PIP* continues that “Following receipt of the Program Letter, National Grid will notify [various parties]... that the investigation is complete and that **RIDEM has concurred with the recommended remedial alternative**... Subsequent to this public notification and following receipt of any public comments, the Department will issue a Remedial Decision Letter formally approving the SIR.” In this description, the identification and approval of a remedial strategy are depicted as occurring apart from public involvement. This negates the role of the public in the decision-making process. Moreover, I believe that it is a mischaracterization of the process through which remediation strategies are determined. It is my understanding that the Program Letter solely certifies that RIDEM has determined that the proposed remedy meets the criteria for an acceptable remedy. I understand that the final determination of a remedy cannot be made until members of the community are given an opportunity to consider the proposal, and to convey their concerns to RIDEM.

The characterization of the process through which a *Remedial Action Work Plan* (RAWP) is identified and selected in the *Draft PIP* similarly neglects the role of the public. Though the text states that “Many of the above remedial process steps will be accompanied by public meetings and comment periods” (p.8), I find it disconcerting that the public’s role in shaping the remediation process is not included in National Grid’s description of the decision-making process. This view of public involvement as a process whereby National Grid officials inform the public about the remediation process carries through to other sections of the *Draft PIP*. For example, in the section on Community Meetings, meetings are depicted as opportunities for National Grid representatives to inform community members about the work that has been and will be undertaken in the site. Though informing the community is crucial for facilitating their involvement in the process, it is not sufficient. The document also states that meetings will be held “in conjunction with... Departmental approval of the *Remedial Action Work Plan*; [and]

prior to remedy implementation” (p.14). This neglects the crucial role the public will have in shaping the RAWP.

The *PIP* should be revised to indicate clearly that potential work plans will be presented in community meetings, and that community concerns will be solicited to ensure that the final work plans reflect the concerns and needs of the public. Opportunities for community members to comment on the proposed plans and thereby shape the remediation process should be clearly laid out in the meeting agendas, and in the scheduling of meetings (in relation to RIDEM’s final decisions about work at the site).

In regards to my second concern, one of the requests most of the interviewees made was for National Grid to make data from air monitoring available in real time to the community. While meeting with representatives from National Grid and RIDEM during the early Fall of 2012, we learned that this was not possible with the particular hand held devices being used to monitor emissions during the current electrical substation upgrade. Moreover, RIDEM representatives at the meeting seemed to concur that the small-scale nature of the work and the limited extent of contaminants in the soil did not warrant the more costly kind of air monitoring technologies that enable real-time posting of readings. I am very concerned to see that the particular scheme we agreed to for monitoring emissions and making the results available to community members during the substation upgrade is replicated in the *Draft PIP*. National Grid and GZA officials should be clear that the substation upgrade was classified as separate from the remediation process, which is why the work could be completed without presenting it to the public. As we look ahead to the full remediation, the particular air monitoring strategies, and techniques for communicating information about the results of that monitoring to the community, will need to be determined in conversation with the community about the particular threats posed by particular actions.

In closing, I want to reiterate my support for the PIP process that RIDEM has adopted, and that National Grid has begun to develop. I look forward to continuing to work with RIDEM and National Grid to develop an effective plan for ensuring optimal public involvement.

Sincerely,



Holly Dygert  
16 Minto Street  
Providence, RI 02908  
(401) 272-1748



**Environmental  
Justice League of  
Rhode Island**

Environmental Justice League of Rhode Island  
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February 12, 2013

Joseph Martella, Project Manager  
RIDEM  
Office of Waste Management  
235 Promenade Street  
Providence, RI 02908

*Comments re: Draft Public Involvement Plan, Former Tidewater Facility and Former Power Plant, Tidewater and Merry Streets, Pawtucket, Rhode Island*

Dear Mr. Martella,

I am submitting the following comments on behalf of the Environmental Justice League of Rhode Island (EJLRI) regarding the draft Public Involvement Plan (PIP) prepared by GZA on behalf of their client, National Grid, the responsible party for the Tidewater Site.

I have listed a few specific comments first, followed by more general suggestions for the PIP overall.

Page 2 – The draft PIP states: “This plan is not intended to cover Site activities relative to day-to-day operations of the natural gas regulating facility and electrical substation or other uses of the property by National Grid.” Since community members and parents from nearby schools have already met with GZA, RIDEM, and National Grid regarding substation upgrades and earthwork, especially with regard to improving air monitoring plans in relation to this work, which falls outside the official remediation plan, I would ask that this sentence be clarified to ensure that residents can expect to be informed and be invited to actively participate in the shaping of any plans for the site that would require disturbance to soil or otherwise create a potential public health risk. Some of these activities could be interpreted, potentially, as “day-to-day operations”, and therefore this statement should be clarified to clearly differentiate between actual day-to-day operations and other operations that are not specifically included in the remediation but will disturb soil, create potential emissions, etc.

Page 17 – The Pawtucket Public Library will serve as a repository for all of the documents and other information related to the site. I suggest posting a sign or poster at the Library itself (not just on the fence at the Tidewater site) to let the general public know that this repository exists.

Page 19 – If there are revisions proposed for the PIP in the future, National Grid will prepare a revised draft for review and approval by the public and RIDEM. National Grid should prepare a summary sheet to list all of the proposed changes/revisions, as well as the final approved revisions, not simply post the proposed revised draft of the full PIP online and in the physical repository (even if the changes/revisions are highlighted in the full document). This summary sheet should be a separate document to make it easy for the public to access, read, and digest the proposed, and then approved, changes.



In response to concerns raised by residents living on Thornton Street, immediately adjacent to the site, regarding natural gas odors and the possibility of air impacts from the groundwater contamination, I suggest addressing these issues at the poster session National Grid is hosting in the near future. In particular, addressing the issue of vapor intrusion into homes and schools should be a top priority. EJLRI receives technical assistance through an EPA program that assists organizations and community residents in understanding technical information related to Brownfields contamination and remediation. Upon her review of the draft remedial plan submitted to RIDEM by National Grid, our consultant from the New Jersey Institute of Technology recommended the following:

#### VAPOR INTRUSION INVESTIGATION

Some of the chemicals (volatile compounds) identified at the site have the potential to travel through the soil as vapors. These vapors may then move up through the soil into nearby buildings, contaminating indoor air. Therefore, if a vapor intrusion investigation has not been completed, a vapor intrusion investigation is recommended to determine whether the occupants of neighboring buildings are at risk for exposure to VOCs due to vapor intrusion.

We will be submitting a final version of the consultant's review at the appropriate time (when public comments are being accepted on the SIR/recommended remedial alternative), but I wanted to share this recommendation because it speaks directly to concerns raised by residents at the last meeting.

The draft PIP is strong overall, but lacks specifics on how to best engage parents at the local schools. Principals at the schools may not be the best, or only, individuals to notify regarding upcoming work, air monitoring results, public meeting notices, etc. In fact, they can be bottlenecks for getting information out to the wider school community. Suggestions raised at the meeting to engage the Pawtucket Schools Superintendent, the school committee, etc. are all very good, but also are not enough to get through to individual parents. Signs or posters with general information posted at the front offices of the schools adjacent to the site would be a good start (and/or at student pick-up locations), as well as providing copies of public notices to all parents via their child's backpacks, as suggested by the principal at Varieur Elementary, would also help ameliorate this problem. Not all notices need to be sent home via backpacks, but any public meeting announcements should be, as should an initial introductory letter or handout with an overview of the site history and current status, including who to contact for more information. National Grid should work with the principals at the three schools to send this introductory info sheet/letter home with all students as soon as possible.

Lastly, I would like to ask National Grid, GZA, and RIDEM to respond to how phytoremediation might play into the overall remediation strategy for this site, and/or if this approach has been discussed at all in relation to the Tidewater Site.

Sincerely,

A handwritten signature in cursive script that reads "Amelia Rose". The signature is written in dark ink and is positioned below the "Sincerely," text.

Amelia Rose, Director

**FEBRUARY 15, 2013**

SUMMARY OF MEETING

**GZA**  
**GeoEnvironmental, Inc.**

*Engineers and  
Scientists*

February 15, 2013  
GZA File No. 05.0043654.20-C

Mr. Joseph Martella  
Rhode Island Department of Environmental Management  
Office of Waste Management  
235 Promenade Street  
Providence, Rhode Island 02908



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Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

Re: *Meeting Summary - January 29, 2013*  
Draft Public Involvement Plan  
Former Tidewater MGP and Power Plant Site  
Pawtucket, Rhode Island  
*RIDEM Case No. 95-022*

Dear Mr. Martella:

On behalf of our client, The Narragansett Electric Company d/b/a National Grid (National Grid), GZA GeoEnvironmental Inc. (GZA) is pleased to provide the attached summary of the January 29, 2013 public meeting associated with the Former Tidewater Manufactured Gas Plant (MGP) and Power Plant Site located in Pawtucket, Rhode Island (the Site). The purpose of the public meeting was to discuss public comments to the draft Public Involvement Plan (PIP) which was submitted to the Department on November 26, 2012.

Should you have any questions or comments regarding the information presented herein, please do not hesitate to contact the undersigned or Michele Leone at 781-907-3651.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink, appearing to read 'M. Kilpatrick', is written over a faint, light blue circular stamp or watermark.

Margaret S. Kilpatrick, P.E.  
Senior Project Manager  
401-421-4140 – [margaret.kilpatrick@gza.com](mailto:margaret.kilpatrick@gza.com)

Attachment: Summary of Meeting

CC: Ms. Michele Leone, National Grid  
Ms. Elizabeth Stone, RIDEM

Summary of Meeting  
 DRAFT Public Involvement Plan (PIP)  
 Former Tidewater Facility  
 Pawtucket, Rhode Island

January 29, 2013 6 PM  
 Francis J. Varieur Elementary School  
 486 Pleasant Street  
 Pawtucket, Rhode Island

- **Introduction to Meeting – Michele Leone (National Grid Representative)**
- **Presentation of DRAFT PIP dated November 26, 2012 – Elizabeth Stone (Rhode Island Department of Environmental Management or RIDEM) and Meg Kilpatrick, P.E. (GZA GeoEnvironmental, Inc.)**

The presentation included a summary of the Draft Public Involvement Plan (PIP) for the former Tidewater Facility (the Site). The draft PIP was developed based on input from the public provided during the community interviews completed in June 2012, as well as input from RIDEM. It provides a blueprint for keeping the public informed during the site cleanup process. It also presents how the public can participate in the process and comment on the project. A PIP is a living document and can be amended to reflect additional issues or challenges that may arise during the cleanup process.

National Grid submitted a draft PIP to RIDEM on November 26, 2012. The draft PIP has four components: 1) public notice, 2) fact sheets and enhanced communications, 3) community meetings and 4) information repositories. The four components are presented in the below table.

<p><b><u>Public Notice:</u></b></p> <ul style="list-style-type: none"> <li>• Mailing List (used to announce public meetings, distribute fact sheets, information about availability of reports, etc.)</li> <li>• Email List (optional)</li> <li>• Sign up at <a href="http://www.tidewatersite.com">www.tidewatersite.com</a></li> <li>• Or, send request to National Grid</li> </ul>	<p><b><u>Fact Sheets and Enhanced Communications:</u></b></p> <ul style="list-style-type: none"> <li>• Fact Sheets (used to inform of development of new information and/or achievement of significant milestones)</li> <li>• Informational Bulletin Boards (end of Tidewater Street and Bowles Court)</li> <li>• Phone Message Alert System during excavation</li> </ul>
<p><b><u>Community Meetings:</u></b></p> <ul style="list-style-type: none"> <li>• Encourages equal participation by all to create an atmosphere of constructive, open dialogue</li> <li>• Proposed Schedule and Objective of Public Meetings</li> <li>• Evening meeting time</li> <li>• Francis J. Varieur School (preferred venue)</li> </ul>	<p><b><u>Information Repositories:</u></b></p> <ul style="list-style-type: none"> <li>• Publicly Accessible Site File: RIDEM Case No. 95-022 <a href="http://www.dem.ri.gov/topics/filerevw/htm">www.dem.ri.gov/topics/filerevw/htm</a></li> <li>• Publicly Accessible Websites: <a href="http://www.tidewatersite.com">www.tidewatersite.com</a> <a href="http://www.dem.ri.gov/benviron/waste/tide/htm">www.dem.ri.gov/benviron/waste/tide/htm</a></li> <li>• Local Information Repository: Pawtucket Library (13 Summer St) Bulletin Boards: Tidewater St &amp; Bowles Ct</li> </ul>

Following the public comment period for the draft PIP, National Grid will provide a response to comments and revise the PIP as necessary for submittal to RIDEM for final review and approval.



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National Grid will hold a community outreach session in March 2013 to present information about the Site in an informal poster-board type setting. Following this session, National Grid will hold the initial community meeting within 60 days after receipt of the Program Letter from RIDEM (issued following RIDEM’s formal review of the Site Investigation Report submitted by National Grid). The schedule of community meetings follows, and National Grid encourages participation by all to create an atmosphere of constructive, open dialogue.

ACTIVITY	TIME PERIOD
Community Outreach Session	Within 60 days of Draft PIP Meeting (March 2013)
Initial Community Meeting	Within 60 days of receipt of Program Letter – during SIR Public Comment Period
Public Meeting on DRAFT Remedial Action Approval Plan (RAWP)	Within 12 months of receipt of Remedial Decision Letter
Submit RAWP for RIDEM Approval	Within 6 months of DRAFT RAWP Meeting
Public Meeting prior to initiation of remedy	Minimum of 30 days prior to start of remediation
Public Meetings during remediation	Meeting schedule to be presented for discussion purposes once remedial schedule is developed and approved by RIDEM
Public Meeting upon completion of the remedy	Within 30 days following completion of remediation

A copy of the presentation associated with the January 29, 2013 Draft PIP meeting is posted on the National Grid Tidewater website ([www.tidewatersite.com](http://www.tidewatersite.com)).

**Questions and Comments Session:** *(Responses provided in italics)*

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National Grid provided a brief summary of written public comments received to date on the DRAFT PIP.

- Public requested that Portuguese (in addition to Spanish) be included as languages for documents requiring translation.

*National Grid stated that going forward, the following document types will be provided in English, Spanish and Portuguese: 1) Notification Mailings, 2) Fact Sheets and 3) brief Executive Summaries which will accompany future reports.*

- Public requested that color-coded alert system be implemented on the bulletin boards.

*National Grid stated that the color-coded alert system has been implemented on the bulletin boards during the recent excavation project. The system involves posting different color sheets to indicate when excavation is active (yellow sheet) and not active (blue sheet).*

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- Public requested color-coded map of Tidewater Site contaminants.

*National Grid stated that the color-coded map for the Tidewater project is being finalized and will be presented at the upcoming Community Information Session. The final map will also be posted on the National Grid website and the bulletin boards.*

- Public expressed concern that current Draft PIP does not take into account the public's role in providing input into the remediation process.

*National Grid reinforced that the process going forward and as outlined in the PIP is intended to provide a means of effective "two-way communications" between the public and National Grid. National Grid stated that the Initial Community Meeting (which will follow RIDEM's review of the Site Investigation Report) will provide the public an opportunity to provide comment on the conceptual remedial strategy for the Tidewater Site. In addition, National Grid indicated that the current draft of the PIP has been modified to include a public meeting on the draft Remedial Action Work Plan (RAWP – the document that will be submitted to RIDEM to present the details of how the remedy will be implemented) to further provide an opportunity for the public to comment on the Site cleanup process.*

- Public expressed concern that current Draft PIP does not consider air monitoring during the remediation of the Tidewater Site.

*National Grid stated that the air monitoring plans for full-scale remediation of the Tidewater Site have not been developed as the final remedy for the project has not been approved. National Grid stated that the public will have an opportunity to comment and present their concerns during future public meetings, which National Grid will incorporate into the air monitoring plan for the final remediation.*

Audience member relayed concern that draft PIP references weekly posting of air monitoring data and that inclusion of this language will set a precedent for future air quality monitoring.

*National Grid stated that the PIP will be modified to delete reference to the posting of weekly air monitoring data.*

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**Open Comments and Questions Received:**

1. Audience member enquired about date for the Community Outreach Session.

*The current schedule is to have the Community Outreach Session in mid to late March 2013.*

2. Audience member enquired about what March 2013 Community Outreach Session consist of.

*The Community Outreach Session will consist of an informal meeting where information will be presented on poster boards to the public. The poster boards will include a variety of topics, including such things as "What is an Manufactured Gas Plant?" history of the Tidewater Site, findings of the investigations, demonstrations of field equipment, description of current National Grid operations at the property, etc. Each poster board will be manned by a representative from National Grid and/or GZA to answer questions. RIDEM will also be present to answer questions from the public.*

3. Audience member expressed concern about when to know when things are going on at the Site; specifically, when to leave kids inside.

*Information regarding excavation at the Site is provided through the mailing/email list, posted to the bulletin boards and posted to the Tidewater websites. The National Grid website will also be updated to include the color-coded alert system information (active and no active excavation). National Grid will also inform school principals of the schedule of work.*

4. Audience member stated that he is a parent and emphasized that it is important to remember that parents have no way to obtain information about the Site.

*National Grid provides notifications to those on the mailing/email list, which includes the principals of the neighboring schools. Due to privacy issues, National Grid does not have access to student/parent information. National Grid will continue to work with the school principals in developing an effective way to communicate with the parents. The best way to find out information currently is to sign-up to the Tidewater mailing/email list via the National Grid website. National Grid requested that audience members tell other parents/community members about this and encourage them to sign up so that they can receive information directly from National Grid.*

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- Audience member stated that parents from the International Charter School want a way for the information to be communicated to the parents.

*National Grid will continue to work with the school principals in developing an effective way to communicate with the parents. National Grid encouraged parents to sign-up for the mailing and/or email lists, as well as visit the National Grid website, to obtain information.*

- Audience member stated that he/she feels that the parents have no way to determine what is going on at the site and suggested possibly implementation of additional bulletin boards.

*The bulletin boards were installed at locations proximate to the Tidewater site, as well as accessible and visible to the schools. The two site bulletin boards are located close to each of the neighboring schools. National Grid will look into the possible installation of additional bulletin boards, as well as continuing to work with the school principals in developing an effective way to communicate with the parents.*

- The principal from Blackstone Academy stated the community has various levels of technical understanding and that disseminating information about the Tidewater Site is difficult.

*In the future, National Grid will prepare simple executive summaries for major report submittals. In preparing these summaries, National Grid will make every effort to use brief and nontechnical terminology in communications to the public. In the near future, National Grid will prepare an executive summary for the recent Site Investigation Report as well as an updated Fact Sheet which will be distributed through the mailing lists, as well as placed into the information repositories. National Grid will also continue to work with the school principals in developing an effective way to communicate information to the parents.*

- Audience member stated that, as a parent, the 2- hour notice provided through the phone message alert system was not enough. In addition, notification regarding the Tidewater site needs to be provided to more parties, such as elected officials and School Committee(s). A presentation of information would be warranted.

*The mailing list established for the Tidewater project does include local elected officials as well as school representatives, including the Principals of the Blackstone Academy, International Charter School and Francis J. Varieur School, as well as the Superintendent of schools for the City of Pawtucket. National Grid would be happy to include members of the School Committee on the mailing list, upon receipt of their contact information. National Grid also is willing to meet with*



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*members of the school and local government to present information about the Tidewater site and answer any questions that they may have.*

9. Audience member requested that technical documents be translated into “everyone speak” language.

*National Grid is attempting to do this and will continue to try to produce documents that are better understood by the public.*

10. Audience member asked when RIDEM will be ready to review the Site Investigation Report (SIR).

*Joseph Martella of RIDEM provided details regarding the regulatory process under the RIDEM Remediation Regulations. He indicated that the Public Involvement Plan must be finalized and in place before RIDEM’s review of the SIR can begin.*

Audience member enquired about the timing of this review and if the spring would seem reasonable.

*RIDEM indicated that it may be possible but reiterated that PIP must be finalized before the review of the SIR begins.*

11. Audience member requested that live translators be provided at public meetings.

*National Grid would be happy to provide translators, if requested by the public in advance of the meetings. Future notifications will include language regarding the availability of translators upon request by the public.*

12. Audience member spoke about historical mercury spill and lasting impact on concern from neighborhood. Audience member enquired about money from court settlement and publicly available information regarding mercury spill. He requested that information about the mercury spill, as it pertains to the history of the Tidewater Site, be included on the website and presented during the poster board session.

*National Grid did not own the property when the mercury spill took place in 2004 and was not involved in the cleanup, court proceedings or settlement. Southern Union was the party solely responsible for cleanup of the mercury incident. National Grid purchased the property from*

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*Southern Union but did not acquire Southern Union's liability for the mercury issues on the property. The mercury contamination from the 2004 spill has been cleaned up and removed from the property. In addition, the buildings have been checked for mercury and no mercury is currently stored on-site. National Grid stated that the files associated with the mercury spill are public information and can be reviewed through RIDEM.*

The audience member further requested that information on the mercury spill be posted on the National Grid website.

*National Grid explained that it was not liable for the mercury release was not involved in the cleanup, court proceedings or settlement. Southern Union was the party solely responsible for cleanup of the mercury incident. National Grid indicated that it would consider the request and provide a formal response in the response to comments on the PIP.*

13. Audience member concerned about Tidewater flyer that he received on his door from Environmental Justice League. The flyer depicted biohazard marker and list of chemicals with associated acute health hazards. Audience member relayed information about members of his household and neighbors being diagnosed with cancer and is concerned about what he is being exposed to at his home as he lives on Thornton Street located right next to site. He stressed that he wants to know if he is safe.

*National Grid stressed that the Site is fenced and locked to keep people off of the property. Under normal site conditions, the Site is safe to the community- in other words, there is no potential for airborne contaminants. During times of excavation, when soil is dug up and moved around, there is a potential for airborne contaminants. During soil excavation, National Grid follows an air quality monitoring program which has received public input and has been reviewed and approved by RIDEM. The results of this monitoring are posted to the bulletin boards as well as the Tidewater websites. This program was followed during the recent electrical substation upgrade project. The majority of excavation associated with this project is complete, with the exception of minor fence post installations and minor excavations associated with properly decommissioning equipment. Air data from this project did not show sustained exceedances of the thresholds (defined as being held over a 5-minute time period) at any time. A few transient exceedances of the thresholds were noted during the work which were not associated with the excavation activities (i.e., transient exceedances due to weather interference (rain), movement of trash material, orange peel, etc.) .*

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Audience member asked whether there are emissions coming from the site without moving the soil? Also, audience member wanted to know about indoor air monitoring and whether or not they should be concerned about migration/volatilization into buildings on Thornton Street.

*Contaminants from the site are not getting into the air (i.e., volatilizing) from the soil and groundwater under normal conditions (i.e., no soil being moved or disturbed). The majority of surface soils at Site are indicative of urban fill – soils which would typically be found in urban or city environments and exhibit low levels of contaminants. The majority of impacts are found below the ground surface (deeper than 2 feet) in the soils, at or below the groundwater table. In addition, the majority of soil, groundwater and separate phase product (oil) impacts are found where the historical Manufactured Gas Plant and Power Plant operations took place, primarily along the river area between Winter Street and the land behind the Max Read Field. The area where the residences are located along Thornton Street are in an area where historical operations did not occur and do not have elevated levels of observed impacts. This area is also located upgradient of the site – groundwater from the Site flows “downhill” towards the river, not towards the homes on Thornton Street. Based on this information, National Grid believes that the buildings on Thornton Street are unaffected by the migration and/or volatilization from impacts on the Tidewater Site.*

*The drawbacks to indoor air testing were also discussed, as this type of testing typically will pick up standard house hold products and chemicals, such as paint, cleaners, etc., which cannot be differentiated from possible site contaminants.*

*The findings of the drilling program in Max Read Field were also discussed. Results of the explorations indicated the presence of visually impacted soil at depths greater than 2 feet in a limited area on the eastern portion of the field. The soils at depth are not accessible (i.e., they are covered with 2 feet of visually non-impacted soil which would need to be removed). The exploration program was conducted with knowledge by the City of Pawtucket and the City is aware of the findings of the investigation.*

14. Audience member commented on gas smell at Thornton and Merry Streets and whether or not they are safe or being exposed to natural gas (or its additives).

*The odor that the audience member says he smelled is likely associated with mercaptan. Natural gas by itself is odorless. Mercaptan is an odorant that is added to natural gas so the gas can easily be detected. It is carried with the natural gas stream.*

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*National Grid will contact their Natural Gas Division to find out more information about this concern.*

15. Amelia Rose of the Environmental Justice League of Rhode Island (EJLRI) introduced herself and her agency to the audience. She indicated that EJLRI had access to funds from the US Environmental Protection Agency (USEPA) and could be used as a resource to the community. She also suggested that National Grid have a poster board regarding vapor intrusion during the Community Informational Session to educate the public.

*National Grid will consider adding a poster board regarding vapor intrusion to the Community Informational Session.*

*RIDEM also added that the potential for volatilization of contaminants from the site is not supported by the results of the recent air monitoring program (hand held field instruments) which is being followed as part of the electrical substation project.*

16. Audience member commented on concern regarding interfacing with the schools and the community. They suggested providing information about the site at a 4-6<sup>th</sup> grade comprehension level. Also, they requested that National Grid inform Shea High School about the impacts on the Max Read Field as they use the athletic field for sport activities.

*National Grid will look into this request and get back to the public. In the future, National Grid will prepare simple executive summaries for major report submittals. In preparing these summaries, National Grid will make every effort to use brief and nontechnical terminology in communications to the public. In the near future, National Grid will prepare an executive summary for the recent Site Investigation Report as well as an updated Fact Sheet which will be distributed through the mailing lists, as well as placed into the information repositories. National Grid will also continue to work with the school principals in developing an effective way to communicate information to the parents. Also, National Grid will consider adding Shea High School to the mailing list.*

17. Audience member suggested that Cape Verdean be added as a language to the translation list. Also suggested that Oak Hill Nursing Home be added to the distribution list.

*National Grid will consider adding Cape Verdean to the translation list. National Grid will also consider adding Oak Hill Nursing Home to the mailing list.*



Summary of Meeting  
DRAFT Public Involvement Plan (PIP)  
Former Tidewater Facility  
Pawtucket, Rhode Island

January 29, 2013 6 PM  
Francis J. Varieur Elementary School  
486 Pleasant Street  
Pawtucket, Rhode Island

18. Audience member enquired why this is the first Public Involvement Plan in RI and what is typically done in Massachusetts?

*RIDEM indicated that the Remediation Regulations were recently modified in November 2011 to include a formal Public Involvement process, similar to that established in Massachusetts. This is the first PIP in Rhode Island due to the recent change in the regulations. Massachusetts has had a PIP process in place for at least 20 years.*

19. Audience member inquired if the site is “safe,” why all the concern?

*RIDEM indicated that the Site is under the State’s guidance for a reason – there are soil and groundwater impacts at the site which do pose a certain level of exposure risk. RIDEM stressed that the fencing is also there for a reason – to prevent people from entering the Site. RIDEM also gave the example of different levels of exposure at the Site – i.e., on-site workers who are excavating soils (potential high exposure risk) versus people off-site at or near the fence line (low potential exposure risk).*

20. Audience member enquired if wildlife could present an exposure risk via soil disturbance (i.e., burrowing, digging) on site.

*GZA performs weekly site walks to inspect and document the conditions at the Site. There has not been evidence of significant soil disturbance by wildlife at the Site. In the future, we will continue to monitor soil disturbance.*

21. Audience member requested status on South Washout Area repair.

*The earthwork associated with the South Washout Area has not been completed. National Grid will continue to work with the City to have this work completed.*

22. Audience member enquired when the public will receive a response to comments.

*The schedule presented in the presentation was revisited. A summary of today’s meeting will be provided within 10 business days (by 2/12/2013). Written comments on the draft PIP from the public should be provided to RIDEM within 10 business days (by 2/12/2013). RIDEM indicated that an extension to the public comment period may be requested in writing. Timing for response to written comments will be based on how many comments are received.*

**MARCH 6, 2013**

EMAIL

## Margaret Kilpatrick

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**From:** Dygert, Holly <hdygert@ric.edu>  
**Sent:** Wednesday, March 06, 2013 3:39 PM  
**To:** Leone, Michele (Michele.Leone@nationalgrid.com); Margaret Kilpatrick  
**Cc:** joseph.martella@dem.ri.gov; Amelia Rose (amelia.rose@ejlri.org); jenrossi3@gmail.com  
**Subject:** Tidewater Site communications, follow-up suggestions  
**Attachments:** PIP Recommendations Tidewater Community Group.doc

Dear Michele and Meg,

We held a meeting last week with members of the Tidewater community (school officials, parents of school children, and members of the neighborhood) to follow-up on National Grid's recent public meeting. One of the primary concerns expressed was that the language used in the outreach efforts was not accessible to most people. I personally spoke with a woman in the neighborhood who said that she keeps going to these meetings, but she doesn't understand anything that is said. I also noted that one of the attendees prefaced his comments at the meeting with, "I know I sound ignorant, but..." The school administrators, parents and residents had several suggestions of ways to make the communications more effective. We've compiled those suggestions – I am attaching the list and pasting it below.

As a college professor, I am constantly charged with translating expert knowledge into language that is accessible, often to kids coming right out of high school. I'm happy to compile a list of terms that are hard for non-specialists to understand (e.g., remedy, remediation, cap, program letter, abutter, action limits...). The list of definitions that National Grid provided in a former communication is a step in the right direction, but it would be better to replace those specialized terms with more accessible alternatives.

On a different note, can you tell me if you've been able to figure out what the source of the gas smell is that the resident at the public meeting complained about? I've heard multiple people complain about intermittent gas smells over the last couple of years.

Sincerely,

Holly Dygert

### **PIP Recommendations for the Tidewater Site March 6, 2013**

#### **Issues of concern that people would like to be addressed at the poster session:**

Gas Smells – What is this? What are potential impacts?

Differences among remedial alternatives – what options does National Grid have and why are they choosing one option over another?

What are potential future uses of this land/site after remediation? Will National Grid still own the site? Have there been discussions with City of Pawtucket?

What are the implications for neighbors' health based on what kinds of contaminants are at the site?

#### **Further Suggestions for Effectively Communicating with the Public (in preparation for the poster session):**

National Grid should develop separate communication materials for schools – and provide enough copies to give place one in each student's backpack.

School principals want to review all of the fliers/documents that will be sent to parents before NG makes copies, translates, or finalizes the communication, to make sure they communicate effectively. Julie Nora (ICS) and Carolyn Sheehan (Blackstone Valley) made this suggestion.

Neighbors also want to review materials before NG sends out communications to neighborhood – point person can be Amelia Rose at EJ League who can send out draft to list of neighbors and collate comments/suggestions within one week and send back to NG for finalization (worry is that the communications are too wordy and will not be read).

Hold regular meetings with a core group of residents and school personnel to give NG/GZA a chance to communicate in a smaller group setting – in addition to the larger public meetings that happen less frequently. This will help increase communication with the most committed/involved residents and school officials who will be ambassadors to other residents and the wider school community to generate their interest and involvement. Also will make larger public meetings less adversarial and more productive because it won't be the first time people are hearing about a certain issue or proposal.

Translation at larger public meetings should be made available regardless of whether someone contacts NG to say they are coming to a meeting – this would help build trust with the neighborhood and principals could guarantee to parents that interpretation would be available at public meetings no matter what.

Community members recommend that they be permitted to have their own poster/table at the poster session in addition to what NG/GZA are preparing.

NG should create bookmarks with all relevant contact information as well as instructions for how people can get on the email/phone notification lists. These will be helpful to hand out in the neighborhood and at the schools and would be more likely to be read and communicate effectively – rather than a long letter.



**SUMMARY OF PROPOSED CHANGES TO PIP**

## **Summary of Proposed Changes to the Public Involvement Plan (PIP)**

Based on Public Comments Received

Former Tidewater Facility

Pawtucket, Rhode Island

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- Revise to state that National Grid will provide the following in English, Spanish and Portuguese:
  - Notification Mailings
  - Fact Sheets
  - Brief Executive Summaries which will accompany future reports.
- Revise the PIP to change the time period for the public meeting related to the Remedial Action Work Plan (RAWP). As revised, the public meeting regarding the RAWP will be held on the draft version of the RAWP prior to submittal to RIDEM.
- Revise the PIP to delete the reference of posting of weekly air monitoring data.
- Clarify definition of day-to-day uses of the Site that do not fall under the jurisdiction of the PIP. Revise the sentence in the PIP to state “This plan is not intended to cover Site activities relative to the day-to-day operations, including repair and maintenance of the natural gas regulating facility and electrical substation involving minor soil disturbances (i.e., fence post installation) or other uses of the property by National Grid. Activities at these facilities involving excavations of soils with the potential to create volatile emissions are covered by this PIP. In the event of a facilities emergency requiring immediate soil excavation (utility repair, etc.), National Grid will follow the soil management procedures prepared for the previous natural gas station regulator and electrical substation work (i.e., April 2011 Materials Management Plan and November 2012 Soils Management Plan, respectively). In addition, air monitoring will be completed during these emergency events in accordance with the September 28, 2012 air monitoring summary memorandum submitted to RIDEM to the extent practical.”
- Add a summary sheet of proposed revisions and with final approved revisions as an appendix to the PIP.
- Update PIP regarding how National Grid will work with the three neighboring schools to send information (i.e., fact sheets, public notifications, flyers) home to the students.

**AUGUST 1, 2013**

NOTIFICATION OF CONCURRENCE OF RESPONSE TO COMMENTS RECEIVED AND  
FINALIZATION OF THE PIP



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

August 1, 2013

Ms. Michele V. Leone  
Manager, New England Site Investigation & Remediation  
National Grid  
40 Sylvan Road  
Waltham, MA 02451-1120

RE: Tidewater Manufactured Gas Plant (former)  
Tidewater Street  
Pawtucket, Rhode Island

Dear Ms. Leone:

On November 9, 2011, the Rhode Island Department of Environmental Management (the Department) amended the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, (the Remediation Regulations). The purpose of these regulations is 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.

In the matter of the above referenced "Site" (as defined in the Industrial Property Remediation and Reuse Act), and in accordance with Rule 7.07.E (Public Involvement Plans) of the 2011 Remediation Regulations, the Department's Office of Waste Management (OWM) has received the following document concerning National Grid's response to public comments on the draft Public Involvement Plan (PIP):

- Response to Public Comments, Draft Public Involvement Plan, Former Tidewater MGP and Power Plant Site, Pawtucket, Rhode Island, RIDEM Case No. 95-022, prepared by GZA GeoEnvironmental, Inc. (GZA), and dated March 22, 2013.

The OWM has reviewed the above referenced Response to Public Comments, and concurs with the proposed changes to the PIP, as listed in that document's attachment titled "Summary of Proposed Changes to the Public Involvement Plan (PIP)." Please prepare a final version of the PIP based upon the proposed changes.

The Department acknowledges that sufficient time has passed since the submittal of the Response to Public Comments, such that some of the information provided in the responses may require updating based upon decisions and activities that have taken place since March 22, 2013. For example, National Grid's decision to perform a soil gas investigation at the site, in response to public concerns raised about potential vapor intrusion. Therefore, the Department requests that



the March 22, 2013, responses be reviewed, and where deemed necessary, that changes or corrections be made, and/or updated information be added as appropriate. This letter and the revised updated responses to public comments should be added to the Final PIP as individual exhibits. Once these items are addressed, please submit the revised Final PIP with all exhibits to the Department in both hard copy for the public file and electronic PDF format suitable for posting on the Department's Tidewater web page.

If you have any questions regarding this letter, please contact me by telephone at (401) 222-2797 extension 7109 or by e-mail at [joseph.martella@dem.ri.gov](mailto:joseph.martella@dem.ri.gov).

Sincerely,



Joseph T. Martella II  
Senior Engineer  
Rhode Island DEM  
Office of Waste Management

Cc: Kelly J. Owens, RIDEM.OWM  
Elizabeth Stone, RIDEM/OOD  
Barbara Morin, RIDEM/OAR  
Barney S. Heath, Pawtucket Planning & Development  
Alan Tenreiro, Chairman, Pawtucket School Committee  
Deborah Cylke, Superintendent, City of Pawtucket School Department  
Julie Nora, Ph.D, International Charter School  
Carolyn Sheehan, Blackstone Academy  
Edna Coia, Francis J. Variieur Elementary School  
Amelia Rose, EJLRI  
Margaret S. Kilpatrick, GZA