



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

SHORT-TERM RESPONSE ACTION APPROVAL LETTER

RIDEM CASE No. 95-022

Ms. Michele V. Leone
National Grid USA Service Company, Inc.
25 Research Drive
Westborough, MA 01582



February 6, 2007

RE: Tidewater Manufactured Gas Plant (former)
Tidewater Street
Pawtucket, Rhode Island

Dear Ms. Leone:

On February 24, 2004, the Rhode Island Department of Environmental Management's (the Department) Office of Waste Management (OWM) 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 a timely and cost-effective manner.

In the matter of the above referenced Site, the Department has on file the following document submitted on behalf of National Grid in accordance with Section 6.00 (Emergency and Short-Term Response) of the Remediation Regulations:

- **Short-Term Response Action Plan, Former Tidewater Facility, Pawtucket, Rhode Island**, dated January 21, 2007, prepared and submitted by GZA GeoEnvironmental, Inc. (GZA), on the behalf of National Grid.

The Department approves the proposed Short-Term Response Action Plan (Plan) provided that all activities and procedures detailed in the Plan are strictly adhered to. Any significant changes to the Plan shall be pre-approved by the Department, and any minor changes shall be reported to the Department by telephone within one (1) working day and in writing within five (5) working days. Start of the work described in the Plan must be initiated within thirty (30) days of issuance of this Short-Term Response Action Approval Letter (Approval).

Dust suppression techniques (i.e. watering, etc.) must be employed at all times during all soil disturbing/handling activities at the Site in order to minimize the generation of fugitive dust and any stockpiled materials, including clean fill, must be underlain and covered with polyethylene sheeting and be secured at the end of each day with appropriate controls to limit the loss of the cover and protect against storm-water and / or wind erosion (i.e. hay bales, rocks, etc).

Sampling and analysis of all media involved in the STRA shall be conducted in accordance with the

requirements of the Plan and this Approval. All clean fill, including sub-grade material and loam, imported to the site shall be sampled prior to delivery and placement. Laboratory analytical results shall be submitted to the OWM via fax (401) 222-3812 or e-mail. Written approval (via e-mail, fax or letter) to use the fill shall be received from the Department prior to use. Clean fill and loam shall be sampled for arsenic at a minimum frequency of one sample per 500 yards. One-quarter of the total number of compliance samples of clean fill and loam shall be sampled for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and the 13 priority pollutant metals. All clean fill utilized onsite shall be compliant with the Department's Method 1 Residential Direct Exposure Criteria (RDEC) pursuant to the Remediation Regulations.

No later than thirty (30) days following the completion of the STRA at the Site, a Short-Term Response Action Report (Report) detailing the STRA activities and the current status of the property shall be submitted to the Department for review and approval. The Report must include all documentation for the clean fill brought on-site including all original laboratory analytical sampling results from the fill demonstrating compliance with the RDEC and either a statement from the facility that provides the clean fill attesting to the materials origin and suitability or written certification by an Environmental Professional that the fill is clean, not jurisdictional and is suitable for the cap. Documentation of the as-built construction details of each work area must also be included.

This Approval does not remove your obligation to obtain any other necessary permits or approvals from other local, state, and/or federal agencies for this project, including but not limited to, the Rhode Island Coastal Resources Management Council (CRMC). National Grid is reminded of its obligation for securing any required permits and other approvals prior to commencing any site activities. **Please notify the Department at least forty-eight (48) hours in advance of any remedial work.** The OWM shall be immediately notified of any site or operation condition that results in non-compliance with this Approval.

In the event that reportable concentrations of any hazardous substance(s) is/are detected, for which the Department has not previously been notified, the Department shall be promptly notified in accordance with Section 5.00 of the Remediation Regulations.

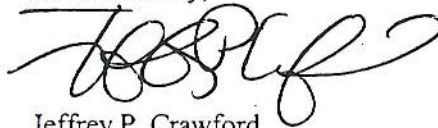
Please contact me by telephone at 401-222-2797, extension 7109 or by e-mail me at joseph.martella@dem.ri.gov if you have any questions.

Sincerely,



Joseph T. Martella
Senior Engineer
Rhode Island DEM

Authorized by,



Jeffrey P. Crawford
Principal Scientist
Rhode Island DEM

Cc: Kelly J. Owens RIDEM / OWM
Thomas Medeiros, CRMC
Margaret S. Kilpatrick, GZA