



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

7 March 2012

Ms. Margaret Kilparick
GZA
530 Broadway
Providence, RI 02909

Dear Ms. Kilpatrick:

The RI DEM Office of Air Resources (OAR) has reviewed the 13 February 2012 letter entitled "Evaluation of Applicability of Air Pollution Control Regulation No. 9; Substation Upgrade Earthwork Activities" for the Tidewater Facility in Pawtucket, RI, which was submitted by GZA on behalf of National Grid. OAR agrees that, if the measurements reported in that document adequately characterize the pollutant concentrations in the soil that would be excavated during this project, an air permit would not be required. However, the OAR has the following concerns regarding the soil samples:

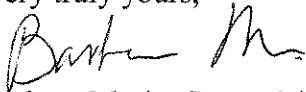
- Considering the spatial extent of the proposed excavation, it is not clear that an adequate number of samples were taken. Please provide support for the appropriateness and adequacy of the spacing and locations of sampling sites.
- The levels of certain pollutants reported in some of the samples are considerably higher than in others, indicating the possible presence of hotspots in the vicinity of those sample locations. For instance, the hydrocarbon level reported for the Sub-4 sample is above the I/C criterion and is nearly four times higher than the reported level at the next highest site. Similarly, the reported Method 920 naphthalene level at Sub-3 is considerably higher than at other locations (level at Sub-4 cannot be determined because of a high detection level at that site). Additional samples should be taken in the vicinity of sample sites with reported elevations to determine whether higher levels are present in the areas around those sites.
- The maximum sampling depth was 24 inches. OAR would like to see the results of deeper samples, given that the project plan calls for excavation to a depth of 48 inches around Sub-3; 36 inches in the duct bank connecting Sub-1, Sub-2 and Sub-3; and 40 inches in the TRENWA trench (Sub-4, Sub-5 and Sub-6).



- OAR is concerned about the lack of agreement between the reported levels of hydrocarbons, metals and PAH in the primary and blind duplicate samples taken at Sub-9. Note that VOC results at that site were largely non-detects. Without more information, it is impossible to determine the reason for those discrepancies (e.g. a lack of sample homogeneity or variability in the analyses). Any information that GZA can provide that would shed light on these discrepancies would add confidence to the results.

If you have any questions about this material, please contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Barbara Morin". The signature is fluid and cursive, with a prominent initial "B" and a long, sweeping tail.

Barbara Morin, Supervising Environmental Scientist
Office of Air Resources