



Teaching in the languages of our community: English, español, Português

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May 24, 2011

Michele Leone  
National Grid  
40 Sylvan Road  
Waltham MA 02451-1120

Meg Kilpatrick  
GZA GeoEnvironmental, Inc  
530 Broadway  
Providence, RI 02909

Dear Ms. Leone and Ms. Kilpatrick:

Members of the International Charter School (ICS) community recently formed a stakeholder group to follow and evaluate the remediation work being planned for the former Coal Gasification Plant on Tidewater Street in Pawtucket. We would like to thank you for providing ICS and Blackstone Academy with four full copies of the January 2011 Site Investigation Data Report. A subgroup of the stakeholder group has briefly reviewed the report, but because much of this extensive report is very technical we were not able to understand the entire report. We look forward to the civic meeting when it and the remediation plan will be presented to the community.

The goal of the stakeholder group is to ensure that the remediation is conducted in a way that safeguards the health of members of the school. We are particularly concerned about protecting the children, whose size and stage in the human development process make them especially vulnerable to toxic substances. With this goal in mind, we observed shortcomings in the Gas Holder Dismantling work that was conducted at the site last Fall. We note these concerns here and suggest solutions to improve the process as the full remediation goes forward.

At the conclusion of the Gas Holder Dismantling Project, we learned that additional mechanisms have been successfully employed at similar sites to keep emissions from contaminating the air in the surrounding community. For example, we understand that caps and tents are often erected around sites to mitigate migration of VOCs. These types of protective measures should be employed as the full remediation project goes forward.

Our experience during the fall prompted concerns about the system for monitoring potential hazards while the work is in progress. During the Dismantling Project, members of the community contacted representatives from National Grid and GZA GeoEnvironmental to complain about strong chemical smells in the air. The representatives indicated that the smells were a nuisance, rather than a potential hazard, and cited the air monitoring system as evidence that chemicals of concern did not reach levels that could harm members of the community. Nonetheless, after RIDEM requested the air monitoring data, we learned that levels of VOCs and particulates surpassed the 'warning levels' that National Grid had set on multiple occasions. Nonetheless, the data from the continuous monitoring did not indicate the specific VOCs that were emitted. Since the harms that particular VOCs pose vary dramatically, it is impossible for members of the community to use this kind of data to gauge the affects of spikes in VOCs on the community (i.e., implications of high concentrations of benzene vs. naphthalene).



We also learned from the more precise sampling that concentrations of multiple harmful substances surpassed limits set by the EPA, including benzene, naphthalene, and lead, among others. Unfortunately, this precise sampling was done on an ad hoc basis (the Status Update on the Former Gas Holder Dismantling Project indicates six sampling dates). As a result, we cannot know what kind of exposures occurred throughout the approximately three month period when school was in session and the work was being conducted.

Thus, we see the need for an improved monitoring system. The system should be designed, first and foremost, to protect members of the surrounding community from potential exposures. It should recognize not just air monitors but also members of the community as mechanisms of oversight. To this end, it should include a clear mandate and protocol for investigating reports that community members make about emissions (i.e., individual complaints about strong chemical smells).

In order to best protect members of the community from exposures, the system will also require continual monitoring of specific compounds of concern, which vary based on the nature of the particular location and work. Benzene, lead and naphthalene will most likely be recurring substances of concern. 'Warning' levels should be set significantly below the lowest thresholds at which EPA standards have identified a risk of harm, since the site borders two schools and children are particularly susceptible to the harms caused by toxic exposures.

The protective strategy should indicate the interventions in the work process that must be undertaken in the case that these thresholds are reached. In addition, members of the surrounding community should be notified in these cases so that they may take action to protect themselves from potential exposures (i.e., playing inside rather than on the playground).

We assume that the Remediation plan will be finalized between now and the public meeting. We ask that you incorporate our requests for greater prevention into your remediation plan. Finally, from your correspondence, we assume that the discussion of the proposed remediation plan will begin in July. We would ask that you hold the public meeting while school is in session, sometime after September 1, as many of our families and staff members travel over the summer. You can reply to me and I will forward any correspondence to the group.

Thank you in advance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julie', written over a circular stamp or seal.

Julie Nora, Ph.D., Director

C: Mayor Grebien

Joe Martella, RIDEM

Chad Galts, Member, ICS Board of Trustees

Holly Dygert, ICS Parent

Jennifer Rossi, ICS Parent

Joe DaSilva, RIDE

Marybeth Smuts, EPA

Bob Vanderslice, Department of Health

Kate Lacouture, ICS Parent

Tanya Solberg, ICS Parent

Jarod Goldstein, ICS Parent

Carolyn Sheehan, Director, Blackstone Academy

Kyleen Carpenter, Head of School, Blackstone Academy