



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

May 24, 2012

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), the Department's Office of Waste Management (OWM) has received a written request in the form of a petition from the community, submitted in accordance with Rule 7.07.E (Public Involvement Plans) of the 2011 Remediation Regulations, that a Public Involvement Plan (PIP) be developed and approved for the Site. A copy of the petition, submitted to the Department on March 22, 2012, is included as an attachment to this letter.

The Department acknowledges that informal discussions with National Grid about the request for a PIP have already been conducted. This letter is a formal request from the Department asking National Grid to initiate the process of developing an approvable PIP associated with the planned environmental cleanup of the Tidewater Site. Based upon our recent conversations, the Department understands that National Grid intends to schedule and conduct community interviews as part of the development of the PIP, and will be initiating this phase of the process soon.

Please notify this office within seven days of the receipt of this letter of your plans and proposed schedule for conducting the PIP development process.

If you have any questions regarding this letter or would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 222-2797, extension 7109 or by e-mail at 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
Julie Nora, Ph.D, International Charter School
Carolyn Sheehan, Blackstone Academy
Amelia Rose, EJLRI
Margaret S. Kilpatrick, GZA

Petition to the Rhode Department of Environmental Management and National Grid to cease approval and implementation of any and all remediation work at the Tidewater Site until a Public Involvement Plan is developed and approved.

Preamble:

The former Tidewater Coal Manufactured Gas Site in Pawtucket, RI (hereafter referred to as "Tidewater Site") was retained by Blackstone Valley Electric Company (now the Narragansett Division of National Grid). A former manufactured gas plant (MGP) site is located on the property, as well as a power plant and a landfill. A portion of the property had previously been sold to the city of Pawtucket, which constructed an elementary school and athletic fields on part of the property. The site is most known for its history with illegal mercury storage, which became known to the public in 2004 after minors broke into the site, took the containers of mercury and then broke them open in the parking lot of a nearby apartment complex.

National Grid has been actively contracting out remediation projects at the Tidewater Site for the past few years, which has caused concern amongst many members of the local community. In the fall of 2010, a stakeholder group was formed shortly after the dismantling of two large holder tanks raised concerns amongst residents and parents of the adjacent schools. 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 the RI Department of Environmental Management (RIDEM) requested the air monitoring data it became clear that levels of VOCs and particulates surpassed the 'warning levels' that National Grid had set on multiple occasions. More precise sampling reported concentrations of multiple harmful substances surpassing 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.

The tank dismantling project in the fall of 2010 is but one of many examples of a lack of transparency and clear safety guards on the part of National Grid. The "Completion Report" that GZA Geoenvironmental submitted for the remediation work [Performance-Based PCB Remedial Activities –Natural Gas Regulator Station Area, Former Tidewater Facility, Pawtucket, Rhode Island, RIDEM Case Number 95-022], dated November 3rd, 2011, once again shows failure to conduct work in a way that would enable stakeholders to know about the potential hazards and to take actions to protect themselves (and their children) from these hazards.

Petition:

The petition of certain community members with included signatures brings to the attention the RI Department of Environmental Management's amended site remediation regulations, passed in November 2011. In regards to the requirement for a Public Involvement Plan (PIP):

E. Public Involvement Plans: The Performing Party shall develop, and submit to the Department for review and approval in both hard copy and electronic format (as specified by the Department), a site-specific public involvement plan for any Contaminated-Site for which the Department has received a Notification of Release and for which a minimum of twenty-five (25) residents, local officials or other interested parties have requested, in writing and in the form of a petition, that a formal process be set up for their participation in cleanup planning. The Public Involvement Plan shall address all relevant and applicable requirements of Rule 7.07 A, B, C, and D.

Based on this regulation, the petitioners request that approval and implementation of any and all remediation work is halted at the Tidewater Site until a PIP is approved and implemented. The PIP should provide a framework for the public to shape what the public meetings will look like, what their format would be, and how information and air monitoring samples are communicated to the public. More so, the PIP should recognize 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, dust clouds, etc).

Printed Name	Signature	Address	Phone/Email
LINDA HAZARD	Linda Hazard		
NICOLE MAZARD	Nicole Hazard		
Gina Rodriguez	Gina Rodriguez		
Paul Tetter	Tetter		
Peter Tetter	Tetter		
Rose Anderson	Rose		
Jim Almo	Jim		
Jovanni Hilaire	Jovanni Hilaire		
Zhanlian Feng	Zhanlian Feng		
Shirley Desjardais	Shirley Desjardais		
ROBERT CROKE	Robert Croke		
Yolanda Jennings	Yolanda Jennings		
Cynthia Howard	Cynthia Howard		
Jummy Oagundye	Jummy Oagundye		
Katissa Arias	Katissa Arias		
SUSAN S MURPHY	Susan S Murphy		
Martha Murphy	Martha Murphy		
MARK ANDERWALD	Mark Andewald		
Cover Mulvey	Cover Mulvey		
Michael Gravel	Michael Gravel		
Hannah Merdink	Hannah Merdink		
Jennifer Kassi-Stephens	Jennifer Kassi-Stephens		
Roben Bautista	Roben Bautista		
Holly Dygert	Holly Dygert		
Amelia Rose	Amelia Rose		
Sullivan Dix	Sullivan Dix		
JESOS HOLGUM	Jesus E. Holgum		

REDACTED