



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management  
DIVISION OF SITE REMEDIATION  
291 Promenade Street  
Providence, R.I. 02908-5767

**LETTER OF RESPONSIBILITY  
CASE #95-022**

John H. St. Sauveur, Vice President  
Valley Resources, Inc.  
1595 Mendon Road  
Cumberland, RI 02864

12 September 1995

**CERTIFIED MAIL**

RE: Tidewater Coal Gasification Plant  
Tidewater Street  
Pawtucket, Rhode Island

Dear Mr. St. Saveur:

A Letter of Responsibility is a preliminary document used by the Rhode Island Department of Environmental Management (RIDEM) to indicate its position with regard outstanding environmental issues relating to Rhode Island General Law 23-19.14 and the Rules and Regulations for the Investigation and Remediation of Hazardous Materials Releases (the "Regulations"). This letter has been issued to Blackstone Valley Electric Company who has been identified as a responsible party for the above listed sites. The purpose of this document is to define the relationship between the Department and a Responsible Party and to initiate informal discussions relating to these issues in lieu of formal proceedings.

Please be advised of the following facts relating to the Pawtucket site:

1. The former Tidewater Coal Gasification Plant in Pawtucket, Rhode Island was operated by the Blackstone Valley Gas and Electric Company from the late 1800's until 1963. This property is identified in the records of the City of Pawtucket as Lots 645, 647, 648, 649 and 662 of Assessor's Plat 65.
2. Valley Gas Company, a subsidiary of Valley Resources Inc., is the current owner and operator of the property located on Lot 662 of Plat 65 in Pawtucket, Rhode Island and as such is a **Responsible Party** as defined by Rule 3.66 of the Regulations.

3. On 14 November 1986 Goldberg-Zoino & Associates and R.I. Analytical, on behalf of Valley Gas, collected eleven soil samples from the northern portion of the site. Analysis of these samples presented in the report entitled Work Study Plan, Remedial Investigation for Valley Gas Company, Pawtucket, Rhode Island showed elevated levels of iron, cyanides, and polyaromatic hydrocarbons (PAH's), typical byproducts of the coal gasification process. This constitutes a **Release of Hazardous Substances** to the environment as defined in Rules 3.64 and 3.30 of the Regulations.

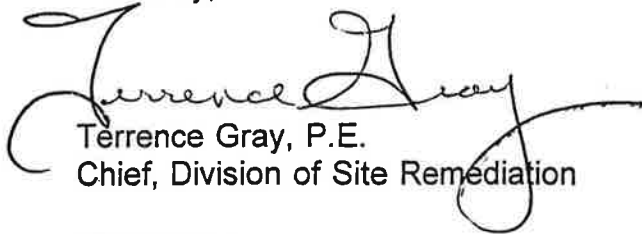
As a result of the above findings, RIDEM, requests that Valley Gas Company comply with the following:

1. Submit to the Department for review by 13 November 1995, a **Remedial Investigation Work Plan** to address the **Releases of Hazardous Substances** that have occurred on Lot 642.
2. Upon Department approval, implement the Plan in accordance with the approved schedule.

Be advised that Valley Gas Company, as a **Responsible Party**, is responsible for complying with the above mentioned Laws and Regulations. Failure to comply may result in further enforcement actions.

Please notify this office within seven days of the receipt of this letter of your plans. All correspondences should be sent to the attention of Timothy M. O'Connor. If you have any questions regarding this letter or would like the opportunity to meet with Department personnel, please contact Mr. O'Connor at (401) 277-3872 extension 7101.

Sincerely,



Terrence Gray, P.E.  
Chief, Division of Site Remediation

TG:TO:dpa

cc: James W. Fester, P.E.  
Timothy M. O'Connor, P.E.  
Claude Cote, Esq.  
John Voorhees, Esq.  
Michael Cassidy, City of Pawtucket