



RAWP COMMENT LETTER

February 8, 2019

File No. SR-26-0934A

(Formerly Case No. Case No. 95-022)

Mr. Kenneth E. Lento
Project Manager - Site Investigation & Remediation
National Grid
40 Sylvan Road
Waltham, MA 02451

RE: Tidewater Manufactured Gas Plant (former)
Tidewater Street
Pawtucket, Rhode Island
Plat Map 65B / Lots 647, 648 & 649

Dear Mr. Lento:

The Rhode Island Department of Environmental Management's (the Department) Office of Waste Management (OWM) has reviewed the Remedial Action Work Plan, Former Tidewater Facility, 200 Taft Street, Pawtucket, Rhode Island for the above referenced property (the Site), which was submitted on June 15, 2018, by GZA GeoEnvironmental, Inc. (GZA) in accordance with 250-RICR-140-30-1, Section 1.10 of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations), re-codified January 8, 2019, consistent with the RI Administrative Procedures Act.

After careful review of the Remedial Action Work Plan, Former Tidewater Facility, 200 Taft Street, Pawtucket, Rhode Island, the Department requires a response to the attached comments, questions, and concerns about the submittal, which must be fully addressed in writing to receive an Order of Approval.

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, ext. 7109, or by E-mail at joseph.martella@dem.ri.gov.

Sincerely,

Joseph T. Martella II
Principal Engineer
Office of Waste Management

cc: Kelly Owens, RIDEM/OWM
Ronald Gagnon, RIDEM/OCTA
Ruth Gold, RIDEM/OAR
Neil Personeus, RIDEM/OWR/WQC
Dr. Michael Byrns PhD, RIDOH/Center for Healthy Homes & Environment
Tracy A. Silvia, RI CRMC
Dylan M. Zelazo, Pawtucket Mayor's Office
Susan Mara, Pawtucket Planning
Michael D. Cassidy, Pawtucket Planning
Andrew Silvia, Pawtucket/DPW
Robert Billington, Blackstone Valley Tourism Council
Gerard Charbonneau, Chairman, Pawtucket School Committee
Julie Nora, Ph.D., International Charter School
Carolyn Sheehan, Blackstone Academy
Mary Murray, Francis J. Varieur Elementary School
Ms. Cristina Cabrera, Environmental Justice League of Rhode Island
Michele Leone, National Grid
James J. Clark, GZA

DEPARTMENT COMMENTS
February 8, 2019

Remedial Action Work Plan, Former Tidewater Facility, 200 Taft Street, Pawtucket, Rhode Island
dated June 15, 2018
Tidewater Manufactured Gas Plant (former)
Pawtucket, Rhode Island

1. RAWP Section 11.10.4 (Soil Management Techniques) indicates:
 - a. *“Dry (non-saturated) excavated materials will be staged on-Site directly on the existing ground surface”* It is the Department’s position that staging of the excavated materials directly on the existing ground surface may only be done in areas of the Site that are scheduled to be capped at a later time, and only if the materials are compliant with the Department’s GB Leachability Criteria (GBLC). Otherwise impacted excavated materials must be staged on polyethylene sheeting or in containers.
 - b. *“Residual soils within the saturated materials management area will either be disposed off-Site or reused as fill to achieve the subgrade for the engineered cap if sufficiently dry and stable.”* It is the Department’s position that excavated saturated soils must be properly characterized. Any soil that is not compliant with the GBLC should not be reused onsite and should be properly disposed of at a licensed disposal facility.
 - c. Please provide a site figure identifying all proposed temporary stockpiling locations, temporary materials handling areas, and temporary equipment staging areas.
2. RAWP Section 11.11.1 (Tier I – ‘Real Time Monitoring) indicates the proposed installation of 11 stationary perimeter air monitoring stations. Please clarify if all 11 air monitoring stations will be active and operational each day, or if only a limited number will be selected for daily operation based on prevailing wind direction and the locations of nearby sensitive receptors.
3. Air Quality Monitoring – General Comment – Please include plans to provide the Department with weekly Perimeter Air Quality Monitoring Reports suitable for posting to the Department’s Tidewater web page, similar to the reports being generated and submitted for National Grid’s 642 Allens Avenue, Providence Site.
4. As discussed with representatives of National Grid and GZA at the December 13, 2018, Site visit, please consider options for placement of monitoring wells downgradient of the containment wall. This remedial approach as has been implemented at several other Sites in Rhode Island, and provides a way to demonstrate that the containment wall is functioning as designed to prevent the off-site migration of contaminated groundwater.

5. Please provide updates regarding the status of all other regulatory permits required from offices/agencies outside the jurisdiction of the Department's Office of Waste Management.
6. Please provide documentation showing that the Remedial Action Approval Application Fee was submitted in accordance with Section 1.11.2 of the Remediation Regulations.
7. The Rhode Island Coastal Resources Management Council (CRMC) provided written comments on the Draft RAWP to National Grid and GZA on January 24, 2019. Please include responses addressing all CRMC's comments in the RAWP Addendum.
8. Please submit a RAWP addendum that addresses the abovementioned comments on or before June 1, 2019.
9. The draft Environmental Land Usage Restrictions (ELURs) and draft SMP are currently under review, and any Department comments resulting from that review will be forwarded promptly.