GZA
GeoEnvironmental, Inc.

Engineers and
Scientists

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Mr. Joseph Martella
Rhode Island Department of Environmental Management (RIDEM)
Office of Waste Management
235 Promenade Street
Providence, Rhode Island 02908

530 Broadway
Providence
Rhode Island
02909
401-421-4140
FAX 401-751-8613
http://www.gza.com

Re: Air Quality Monitoring
Natural Gas Regulator Station Upgrade Project
Former Tidewater Facility
Pawtucket, Rhode Island

Dear Mr. Martella:

On behalf of the Narragansett Electric Company d/b/a National Grid (National Grid), GZA GeoEnvironmental, Inc. (GZA) has prepared this letter to summarize plans for Air Quality Monitoring during the upcoming Natural Gas Regulator Station Upgrade project. This summary is based on our submittal related to the potential applicability of Air Pollution Control Regulation No. 9 and air monitoring for this activity dated April 19, 2011, and the Department's comments dated April 22, 2011.

Potential emissions modeling performed by GZA and the Department indicated that all potential emissions from this activity are below the Minimum Quantity thresholds of Regulation No. 9 and therefore a preconstruction permit is not required. Air monitoring during this activity will be conducted consistent with the two tiered strategy presented in our April 19, 2011 Air Quality Monitoring Plan (AQMP) with the following modifications based on the Department's comments:

- Consistent with the Department's recommendations, we will use an action level of 0.1 ppm above background for both real time monitoring instruments (Total Volatile Organic Compounds and benzene). This lower range action level will be considered exceeded in the event readings in excess of 0.1 ppm are sustained for a period of five minutes at the property line. This time period is necessary to account for potential instrument interference associated with ambient conditions. In the unlikely event levels significantly exceeding 0.1 ppm are detected above background, the full five minutes will not be waited prior to initiating mitigating measures/engineered controls;

- As described in our April 19, 2011 submittal, polynuclear aromatic hydrocarbon (PAH) concentrations in the ten soil samples collected in the area of the regulator station upgrades were non-detect for naphthalene. Based on the predictive modeling, these analytical results, and our visual and olfactory observations during recent investigations performed in this area of the site, we do not believe that real-time monitoring for naphthalene is warranted and therefore, as described in the AQMP, the zNose® will not be used for this particular activity. The previous issue related to naphthalene originated from sludges contained within the former gasholders. The materials to be managed associated with this limited excavation project have been characterized as urban fill. Per the Department's comments, National Grid will evaluate future projects at the Tidewater site on a case-by-case basis to determine the appropriate air quality monitoring strategy, which could include the use of the zNose®.

- Consistent with the above discussion related to the relatively low levels of PAHs detected in the soils samples from the regulator station area, monitoring for particle bound PAHs is not warranted. We will monitor for respirable particulate matter as described in the AQMP.

We appreciate the Department's timely review of our April 19, 2011 submittal. The natural gas regulator station upgrade project is currently scheduled to commence on May 23, 2011. As we have discussed previously, the earthwork associated with this upgrade project will take approximately 2 weeks to complete.

Please feel free to contact either of the undersigned or Michele Leone at 781-907-3651 should you have any questions.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

Margaret S. Kilpatrick, P.E.
Senior Project Manager

Adam M. Fasano, CIH
Consultant/Reviewer

James J. Clark, P.E.
Principal

John Hartley
Consultant/Reviewer

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cc: Barbara Morin, RIDEM
Michele Leone, National Grid

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