



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

SHORT-TERM RESPONSE ACTION APPROVAL LETTER

May 18, 2016

File No. SR -28-1152

Formerly Case No. 98-004

Amy A. Willoughby
Lead Environmental Scientist
New England Site Investigation & Remediation Group
National Grid
40 Sylvan Road, E3.691
Waltham, MA 02451

RE: Providence Gas Co. – AA
A.k.a. Former New England Gas Company MGP property
642 Allens Avenue, Providence, Rhode Island
Plat Map 56 / Lot 5, Plat Map 101 / Lot 1

Dear Ms. Willoughby:

On November 9, 2011, the Rhode Island Department of Environmental Management's (the Department) Office of Waste Management (OWM) 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 a timely and cost-effective manner. A Short-Term Response Action Approval Letter is a document used by the Department to approve limited remedial actions pursuant to Section 6.00 of the Remediation Regulations at contaminated sites that do not involve the use of complex engineered systems or techniques (i.e., groundwater pump and treat systems, soil vapor extraction systems, etc.).

In the matter of the above-referenced property (the Site), the OWM is in receipt of the following final documentation submitted pursuant to the Remediation Regulations in response to the reported release at the Site:

1. Short Term Response Action Plan (STRAP), Holder 18/21 Capping Project, 642 Allens Avenue, Providence, Rhode Island, received by the Department on April 28, 2016, and prepared by GZA GeoEnvironmental, Inc. (GZA); and
2. Short Term Response Action Plan (STRAP) - Addendum, Holder 18/21 Capping Project, 642 Allens Avenue, Providence, Rhode Island, received by the Department on May 11, 2016, and prepared by GZA.

Together these documents fulfill the requirements of Section 6.00 (Emergency or Short-term Response) of the Remediation Regulations.

The Short Term Response Action Plan (STRAP) requires encapsulation of all regulated site soils in the Holder 18/21 Area through the installation of Department approved engineered controls. STRAP activities include installing erosion and sedimentation controls, clearing and grubbing, miscellaneous demolition activities, inspection of an existing drainage line and removal of accumulated sediment and debris from the line, grading and off-Site disposal of excess materials at an appropriately licensed facility, installation of a variety of Department approved engineered caps, and restoration activities (hydroseeding and fencing). The installation of the engineered caps includes the on-Site infiltration of treated stormwater via a forebay and vegetated sand filter. Soil within the proposed unlined sand filter will be excavated to the depth of the water table and backfilled with clean imported free draining soil. Seven (7) groundwater monitoring wells in the Holder 18/21 Area shall be decommissioned and three (3) groundwater monitoring wells (VHB-10, VHB-18 and GZ-320D) shall be replaced when capping activities are completed. In the event that significant dewatered groundwater is collected prior to and/or during construction activities associated with the Department approved STRAP activities, the collected groundwater shall be containerized in one or more fractionation tanks located on site and batch treated (i.e. per each fractionation tank volume or approximately 20,000 gallons of water) via bag filtration for solids removal, followed by activated carbon treatment to remove organics. Once processed through the treatment system, the treated groundwater will be reintroduced to the ground surface into a constructed dewatering basin located upgradient of the work area and allowed to infiltrate. Samples of the groundwater treatment system effluent shall be collected on the first day of operation of the treatment system, and once per each fractionation tank volume or approximately each 20,000 gallons of water. Each sample shall be analyzed for the suite of constituents listed in the above referenced document to demonstrate compliance with the Department approved treated groundwater discharge objectives. The treated groundwater shall be compliant with the requirements of the Department's Remediation Regulations, and the Rhode Island Rules and Regulations for Ground Water Quality standards for Class GAA/GA groundwater. The treated groundwater shall not be allowed to discharge in an erosive manner or be allowed to run overland into the street or stormwater catch basins. The groundwater treatment and discharge of the treated groundwater shall have direct oversight by National Grid, or their designated representative, at all times.

At this time, the OWM offers its concurrence with the proposed remedial action for the property. The OWM approves the STRA Work Plan provided that all activities and procedures detailed in the STRA Work Plan are strictly adhered to.

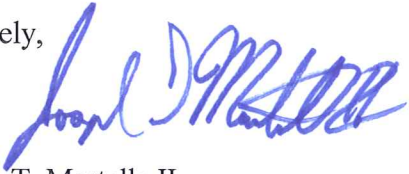
The Performing Party shall notify all abutting property owners, tenants, easement holders, the municipality, and any community well suppliers associated with any well head protection areas which encircle the site, that the Short-Term Remedial Action is complete and make available to them the findings of the Short-Term Response Report submitted in accordance with Rule 6.06 II of the Remediation Regulations. Please submit a draft notification to the Department via E-mail for review and approval prior to distribution.

Within thirty (30) days of completion of all the abovementioned remedial work outlined in the STRA Work Plan, please submit a STRA Closure Report in accordance with Rule 6.09 inclusive of any disposal documentation and laboratory sampling analysis to the OWM for review and approval.

This Short Term Response Action Approval Letter does not remove your obligation to obtain any other necessary permits from other local, State, or Federal agencies. The OWM shall require at least forty-eight (48) hours notice in advance of any remedial work.

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
Senior Engineer
Office of Waste Management

Authorized by,



Kelly J. Owens
Supervising Engineer
Office of Waste Management

cc: Ronald Gagnon, RIDEM/OCTA
Neal Personeus, RIDEM/OWR
Margaret Kilpatrick, GZA
David Reis, RI CRMC
John Zuba, NBC