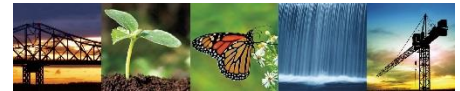




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June 9, 2017
GZA File No. 03.0033554.00-C

Mr. Joseph Martella
Rhode Island Department of Environmental Management (RIDEM)
Office of Waste Management
235 Promenade Street, 3rd Floor
Providence, Rhode Island 02908

Re: Response to Comments
Public Involvement Plan (PIP)
642 Allens Avenue
Providence, Rhode Island
RIDEM Case No. 98-004 / Site Remediation File No. SR-28-1152

Dear Mr. Martella:

GZA GeoEnvironmental, Inc. (GZA), on behalf of The Narragansett Electric Company d/b/a National Grid (National Grid), has prepared this response letter to the Rhode Island Department of Environmental Management (RIDEM) Office of Waste Management's (OWM) *Public Involvement Plan Comment Letter* dated June 2, 2017 regarding the Department's review of GZA's May 4, 2017 Public Involvement Plan (PIP) for the 642 Allens Avenue property (the Site). For your convenience, each of the Department's comments are repeated below followed by our responses in italics.

Comment 1

In accordance with Section 6.0 (Emergency or Short-Term Response) of the Remediation Regulations, a Short-Term Response Action performed under a Short-Term Response Action Plan (STRAP) does not require that a Public Meeting be conducted. The Department acknowledges however, that National Grid has indicated plans to schedule a Public Meeting in the community to present the Liquefaction Project STRAP, and concurs with National Grid's decision. The Department also requests that National Grid commit to the same for any future STRAPs at this site.

Response:

As described in the Remediation Regulations (Rule 7.07C), National Grid will schedule community meetings on an as-requested basis whenever requested by twenty-five (25) persons, or by a governmental subdivision or agency, or by an association having not less than twenty-five (25) members, who are either located near a Contaminated-Site or are potential users of the Contaminated-Site after redevelopment. Section 4.3 of the revised PIP dated June 2017 has been updated to reflect this response.



Comment 2

Section 2.0 (Background), page 4, paragraphs 5 and 6, identify several reports describing remedial actions performed at the Site between 1994 and 2010. Please provide electronic PDF copies of these referenced reports so that they may be posted on the Department's electronic repository web page dedicated to this site.

Response:

The following reports were identified in Section 2.0 of the May 2017 PIP:

- *October 1995 Remedial Action Report for Condensate Tank Closure Compressor Building No. 2 prepared by Resource Controls Remedial Services, Inc. (RCA) on behalf of the Providence Gas Company (PGC);*
- *October 1995 UST Closure Assessment prepared by Hoffman Engineering, Inc. (HEI) on behalf of the PGC;*
- *September 1998 UST Closure Assessment prepared by HEI on behalf of the PGC;*
- *June 1996 Remedial Action Report for Short Term Measure Performed at the Providence Gas Company prepared by RCA on behalf of the PGC;*
- *October 1999 Subsurface Investigation and Proposed Remediation prepared by ESS (ESS) on behalf of the PGC;*
- *January 2001 Remediation of the New Regulator Area – Summarized in the April 2003 Site Investigation Report (SIR) prepared by VHB on behalf of New England Gas Company (NEGC);*
- *May 3, 2001 Summary Letter - Former Compressor Building No. 2 PCB Remediation (without appendices) prepared by PGC;*
- *November 2002 Remedial Action Closure Report prepared by VHB on behalf of the NEGC; and*
- *December 2002 Remedial Action Closure Report prepared by VHB on behalf of the NEGC.*

The January 2001 Remediation of the New Regulator Area was summarized in the April 2003 SIR. No separate documentation has been located in National Grid's or RIDEM's files. As such, the April 2003 SIR is included on the CD attached to this letter. This report was prepared and submitted to RIDEM by NEGC, a predecessor of National Grid.

Electronic copies of these reports are provided on the CD attached to this letter.

Comment 3

Regarding Section 4.1 (Public Notice), page 6, the Department acknowledges that Rule 6.06 of the Remediation Regulations only requires public notice upon the completion of STRAP activities, however, due to the increased level of community interest in this project, the Department requests that National Grid provide Public Notice to all parties on the established mailing list prior to initiating any activities associated with any newly approved STRAP.



Response:

National Grid agrees to provide Public Notice to all parties on the established mailing list prior to initiating any activities associated with any newly approved STRAP. Section 4.1 of the revised PIP dated June 2017 has been updated to reflect this response.

Comment 4

Regarding Section 4.3 (Community Meetings):

- a. Page 6, references Rule 7.07.0 of the Remediation Regulations, but limits the scheduling of "community meetings on an as-requested basis when requested by a minimum of 25 individuals who are located near the Site." Please revise this language consistent with Rule 7.07.C, to indicate a community meeting will be held whenever requested by twenty-five (25) persons, or by a governmental subdivision or agency, or by an association having not less than twenty-five (25) members, who are either located near a Contaminated-Site or are potential users of the Contaminated-Site after redevelopment.

Response:

National Grid agrees to the community meeting language, as presented above and in Rule 7.07C. Section 4.3 of the revised PIP dated June 2017 has been updated to reflect this revised language.

- b. To the list of items that National Grid will include in its written summary of all public meetings, please add a transcription by a stenographer of all oral public comments received.

Response:

National Grid agrees to have a stenographer present for the portion of any meeting that includes a general presentation with question and answer period for the public. After the general presentation, National Grid and its consultants will be available for any further discussion at tables that will be set up with posters and/or other information. At the tables, National Grid and its consultants will write down any questions that come from the public so that a record is maintained. This record will be included in the meeting summary described in the PIP. A stenographer will not be used at the table discussions. Section 4.3 of the revised PIP dated June 2017 has been updated to reflect this revised language.

Comment 5

In accordance with Rule 7.07.D (Information Repositories) of the Remediation Regulations, please establish an informational repository in the community near the Contaminated-Site in accordance with the applicable requirements of this Rule.



Response:

National Grid will establish an informational repository at a Providence Community Library once permission from such library is granted. At this time, National Grid is seeking permission from either Washington Park Library located at 1316 Broad Street or Knight Memorial Library located at 275 Elmwood Avenue. Due to space limitations at the libraries, all information will be provided in electronic format and will be consistent with the information available on the website maintained by RIDEM for the 642 Allens Avenue Site (<http://www.dem.ri.gov/programs/wastemanagement/site-remediation/Providence-Gas-Co.php>). Section 4.4 of the revised PIP dated June 2017 has been updated to reflect this response.

Comment 6

Please submit a revised Public Involvement Plan that addresses the abovementioned comments on or before June 30, 2017.

Response:

A revised PIP which addresses the above comments is being submitted separately, but concurrently, with this letter.

We trust this information addresses your comments and look forward to continuing to work cooperatively with RIDEM. Should you have any questions or comments regarding the information presented herein, please do not hesitate to contact the undersigned or Amy Willoughby at (781) 907-3644.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink that reads 'Sophia Narkiewicz'.

Sophia Narkiewicz, P.E.
Assistant Project Manager
401-421-4140 – sophia.narkiewicz@gza.com

A handwritten signature in blue ink that reads 'Margaret S. Kilpatrick'.

Margaret S. Kilpatrick, P.E.
Associate Principal
401-421-4140 – margaret.kilpatrick@gza.com

cc: Ms. Amy Willoughby, National Grid

Attachments:

June 2, 2017 *Public Involvement Plan Comment Letter*
CD of Previous Reports



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

PUBLIC INVOLVEMENT PLAN COMMENT LETTER

June 2, 2017

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:

The Rhode Island Department of Environmental Management's (the Department) Office of Waste Management (OWM) has reviewed the Public Involvement Plan, 642 Allens Avenue, Providence, Rhode Island (PIP) for the above referenced property (the Site), which was submitted on May 4, 2017, by GZA GeoEnvironmental, Inc. (GZA) in accordance with Rule 7.07.E of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations).

After careful review of the PIP, the Department requires a response to the attached comments, questions, and concerns about the submittal, which must be fully addressed in writing.

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: Ronald Gagnon, RIDEM/OCTA
Kelly J. Owens, RIDEM.OWM
Susan Forcier, Esq., RIDEM/OLS
Gregory Swift, RIDEM/OWR
Ruth Gold, RIDEM/OAR
Barbara Morin, RIDOH/Center for Healthy Homes & Environment
Rich Lucia, RI CRMC
Kenneth J. Warn, FERC
Robert E. Azar, Providence Planning and Development
Dania Alejandra Flores-Heagney, EJLRI
Robin L. Main, Esq., Hinckley Allen
Margaret S. Kilpatrick, GZA

DEPARTMENT COMMENTS

June 2, 2017

Public Involvement Plan, dated May 4, 2017
Providence Gas Co. – AA, 642 Allens Avenue
Providence, Rhode Island

1. In accordance with Section 6.0 (Emergency or Short-Term Response) of the Remediation Regulations, a Short-Term Response Action performed under a Short-Term Response Action Plan (STRAP) does not require that a Public Meeting be conducted. The Department acknowledges however, that National Grid has indicated plans to schedule a Public Meeting in the community to present the Liquefaction Project STRAP, and concurs with National Grid's decision. The Department also requests that National Grid commit to the same for any future STRAPs at this site.
2. Section 2.0 (Background), page 4, paragraphs 5 and 6, identify several reports describing remedial actions performed at the Site between 1994 and 2010. Please provide electronic PDF copies of these referenced reports so that they may be posted on the Department's electronic repository web page dedicated to this site.
3. Regarding Section 4.1 (Public Notice), page 6, the Department acknowledges that Rule 6.06 of the Remediation Regulations only requires public notice upon the completion of STRAP activities, however, due to the increased level of community interest in this project, the Department requests that National Grid provide Public Notice to all parties on the established mailing list prior to initiating any activities associated with any newly approved STRAP.
4. Regarding Section 4.3 (Community Meetings):
 - a. Page 6, references Rule 7.07.C of the Remediation Regulations, but limits the scheduling of "*community meetings on an as-requested basis when requested by a minimum of 25 individuals who are located near the Site.*" Please revise this language consistent with Rule 7.07.C, to indicate a community meeting will be held whenever requested by twenty-five (25) persons, or by a governmental subdivision or agency, or by an association having not less than twenty-five (25) members, who are either located near a Contaminated-Site or are potential users of the Contaminated-Site after redevelopment.
 - b. To the list of items that National Grid will include in its written summary of all public meetings, please add a transcription by a stenographer of all oral public comments received.

5. In accordance with Rule 7.07.D (Information Repositories) of the Remediation Regulations, please establish an informational repository in the community near the Contaminated-Site in accordance with the applicable requirements of this Rule.
6. Please submit a revised Public Involvement Plan that addresses the abovementioned comments on or before June 30, 2017.