



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

February 21, 2013

Ms. Michele V. Leone  
Manager, New England Site Investigation & Remediation  
National Grid  
40 Sylvan Road  
Waltham, MA 02451-1120

RE: Tidewater Manufactured Gas Plant (former)  
Tidewater Street  
Pawtucket, Rhode Island

Dear Ms. Leone:

On November 9, 2011, the Rhode Island Department of Environmental Management (the Department) 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 an efficient manner.

In the matter of the above referenced "Site" (as defined in the Industrial Property Remediation and Reuse Act), and in accordance with Rule 7.07.E (Public Involvement Plans) of the 2011 Remediation Regulations, the Department's Office of Waste Management (OWM) has received the following documents concerning public comments on the draft Public Involvement Plan (PIP):

1. Letter from Holly Dygert to the Department, Re: Tidewater Site Public Involvement Plan, dated January 27, 2013, and received via e-mail on January 28, 2013; and
2. Comments re: Draft Public Involvement Plan, Former Tidewater Facility and Former Power Plant, Tidewater and Merry Streets, Pawtucket, Rhode Island, prepared by the Environmental Justice League of Rhode Island (EJLRI), received via e-mail on February 12, 2013.

In addition, National Grid received several comments at the public meeting for the draft PIP held on January 29, 2013.

Please review these submitted comments along with those received at the public meeting and prepare written responses to each of them as appropriate. A completed document, incorporating responses all of the comments, must be submitted to the Department for review and approval.

**All correspondence regarding this Site should be sent to the attention of:**

Joseph T. Martella II – Senior Engineer  
RIDEM / Office of Waste Management  
235 Promenade Street  
Providence, RI 02908

If you have any questions regarding this letter, please contact me by telephone at (401) 222-2797 extension 7109 or by e-mail at [joseph.martella@dem.ri.gov](mailto:joseph.martella@dem.ri.gov).

Sincerely,



Joseph T. Martella II  
Senior Engineer  
Rhode Island DEM  
Office of Waste Management

Attachments: January 27, 2013, Letter from Holly Dygert to the Department;  
February 12, 2013, Comments re: Draft Public Involvement Plan

Cc: Kelly J. Owens, RIDEM.OWM  
Elizabeth Stone, RIDEM/OOD  
Barbara Morin, RIDEM/OAR  
Barney S. Heath, Pawtucket Planning & Development  
Alan Tenreiro, Chairman, Pawtucket School Committee  
Deborah Cylke, Superintendent, City of Pawtucket School Department  
Julie Nora, Ph.D, International Charter School  
Carolyn Sheehan, Blackstone Academy  
Edna Coia, Francis J. Varieur Elementary School  
Amelia Rose, EJLRI  
Margaret S. Kilpatrick, GZA

January 27, 2013

Mr. Joseph Martella II, Senior Engineer  
RIDEM Office of Waste Management  
Site Remediation Program

Re: Tidewater Site Public Involvement Plan

Dear Mr. Martella,

I am very pleased that RIDEM has implemented a public involvement mechanism to ensure that members of the community who may be exposed to hazards are involved in the remediation process. I reviewed National Grid's draft Public Involvement Plan (PIP) for the Tidewater Site, and I am also very pleased with many of the actions National Grid has proposed to take to ensure that those potentially impacted by the work at Tidewater are informed of the work. I am writing to communicate my suggestions for strengthening the proposed PIP. These suggestions are aimed, first, to optimize the ability of those who could be impacted by the site's hazards to access information about the nature of these hazards and about potential routes of exposure, and, second, to ensure that they are able to influence the process in accordance with their particular concerns.

I appreciate that National Grid solicited comments from the community through the interview process in June of 2012, and provided a synthesis of the suggestions in the *Draft PIP*. National Grid has already acted on many of these suggestions, and has integrated many of them into the proposed PIP. The community bulletin boards – with announcements and the results of weekly air monitoring – are very useful communication tools. I look forward to the incorporation of the color-coded alert system. The information in the boards should be provided in the three primary languages of the community, which are English, Spanish and Portuguese. I was concerned that National Grid seemed to reject a request made during the interviews for information to be translated into both Spanish and Portuguese. I want to underscore the importance of providing information in the community's languages.

I am very pleased that National Grid has proposed to create a color-coded map of Tidewater site hazards to the public as part of the PIP. Despite years of communications about the hazards on the site, the members of the stakeholder group are still unclear about concentrations of particular hazards, and where they are located. Thus, I am eager to see this map. I am also pleased that National Grid is proposing a Community Outreach (poster) Session, and possibly a tour of the site.

While I am generally satisfied with the strategies National Grid has proposed to convey information to the public, I have two main concerns. The first is that the *Draft PIP* largely neglects the public's role in shaping the remediation process. The second is that the particular

strategy for monitoring air quality that was agreed on for the electrical substation upgrade is included in the *Draft PIP* as the plan for the remediation.

In regards to the first concern, I agree with the characterization of a public involvement process laid out on page 1 of the *Draft PIP*, as “an agreement between the party conducting response actions and the public about how they will share information moving forward, and how the public will be able to comment on plans for assessment and cleanup of the site.” This definition identifies the public as important partner in the remediation process. Since the public’s interests vis-à-vis the remediation process diverge in important ways from those of the property owner, the public must have the ability to shape the remediation, and the precautions that are taken during the remediation process. I am concerned, however, that the *Draft PIP* construes public participation narrowly, as informing the public about work plans that have already been developed.

For example, on page 8, in describing the process through which a final remediation plan for the site will be determined, the *Draft PIP* states that RIDEM will issue a Program Letter when it has concluded that “the site has been adequately assessed” in the Site Investigation Report. The *Draft PIP* continues that “Following receipt of the Program Letter, National Grid will notify [various parties]... that the investigation is complete and that **RIDEM has concurred with the recommended remedial alternative**... Subsequent to this public notification and following receipt of any public comments, the Department will issue a Remedial Decision Letter formally approving the SIR.” In this description, the identification and approval of a remedial strategy are depicted as occurring apart from public involvement. This negates the role of the public in the decision-making process. Moreover, I believe that it is a mischaracterization of the process through which remediation strategies are determined. It is my understanding that the Program Letter solely certifies that RIDEM has determined that the proposed remedy meets the criteria for an acceptable remedy. I understand that the final determination of a remedy cannot be made until members of the community are given an opportunity to consider the proposal, and to convey their concerns to RIDEM.

The characterization of the process through which a *Remedial Action Work Plan* (RAWP) is identified and selected in the *Draft PIP* similarly neglects the role of the public. Though the text states that “Many of the above remedial process steps will be accompanied by public meetings and comment periods” (p.8), I find it disconcerting that the public’s role in shaping the remediation process is not included in National Grid’s description of the decision-making process. This view of public involvement as a process whereby National Grid officials inform the public about the remediation process carries through to other sections of the *Draft PIP*. For example, in the section on Community Meetings, meetings are depicted as opportunities for National Grid representatives to inform community members about the work that has been and will be undertaken in the site. Though informing the community is crucial for facilitating their involvement in the process, it is not sufficient. The document also states that meetings will be held “in conjunction with... Departmental approval of the *Remedial Action Work Plan*; [and]

prior to remedy implementation” (p.14). This neglects the crucial role the public will have in shaping the RAWP.

The *PIP* should be revised to indicate clearly that potential work plans will be presented in community meetings, and that community concerns will be solicited to ensure that the final work plans reflect the concerns and needs of the public. Opportunities for community members to comment on the proposed plans and thereby shape the remediation process should be clearly laid out in the meeting agendas, and in the scheduling of meetings (in relation to RIDEM’s final decisions about work at the site).

In regards to my second concern, one of the requests most of the interviewees made was for National Grid to make data from air monitoring available in real time to the community. While meeting with representatives from National Grid and RIDEM during the early Fall of 2012, we learned that this was not possible with the particular hand held devices being used to monitor emissions during the current electrical substation upgrade. Moreover, RIDEM representatives at the meeting seemed to concur that the small-scale nature of the work and the limited extent of contaminants in the soil did not warrant the more costly kind of air monitoring technologies that enable real-time posting of readings. I am very concerned to see that the particular scheme we agreed to for monitoring emissions and making the results available to community members during the substation upgrade is replicated in the *Draft PIP*. National Grid and GZA officials should be clear that the substation upgrade was classified as separate from the remediation process, which is why the work could be completed without presenting it to the public. As we look ahead to the full remediation, the particular air monitoring strategies, and techniques for communicating information about the results of that monitoring to the community, will need to be determined in conversation with the community about the particular threats posed by particular actions.

In closing, I want to reiterate my support for the PIP process that RIDEM has adopted, and that National Grid has begun to develop. I look forward to continuing to work with RIDEM and National Grid to develop an effective plan for ensuring optimal public involvement.

Sincerely,



Holly Dygert  
16 Minto Street  
Providence, RI 02908  
(401) 272-1748



**Environmental  
Justice League of  
Rhode Island**

Environmental Justice League of Rhode Island  
1192 Westminster St. Providence, RI 02909  
Tel: (401) 383-7441 Fax: (401) 941-8156  
[questions@ejlri.org](mailto:questions@ejlri.org)  
[www.ejlri.wordpress.com](http://www.ejlri.wordpress.com)

February 12, 2013

Joseph Martella, Project Manager  
RIDEM  
Office of Waste Management  
235 Promenade Street  
Providence, RI 02908

*Comments re: Draft Public Involvement Plan, Former Tidewater Facility and Former Power Plant, Tidewater and Merry Streets, Pawtucket, Rhode Island*

Dear Mr. Martella,

I am submitting the following comments on behalf of the Environmental Justice League of Rhode Island (EJLRI) regarding the draft Public Involvement Plan (PIP) prepared by GZA on behalf of their client, National Grid, the responsible party for the Tidewater Site.

I have listed a few specific comments first, followed by more general suggestions for the PIP overall.

Page 2 – The draft PIP states: “This plan is not intended to cover Site activities relative to day-to-day operations of the natural gas regulating facility and electrical substation or other uses of the property by National Grid.” Since community members and parents from nearby schools have already met with GZA, RIDEM, and National Grid regarding substation upgrades and earthwork, especially with regard to improving air monitoring plans in relation to this work, which falls outside the official remediation plan, I would ask that this sentence be clarified to ensure that residents can expect to be informed and be invited to actively participate in the shaping of any plans for the site that would require disturbance to soil or otherwise create a potential public health risk. Some of these activities could be interpreted, potentially, as “day-to-day operations”, and therefore this statement should be clarified to clearly differentiate between actual day-to-day operations and other operations that are not specifically included in the remediation but will disturb soil, create potential emissions, etc.

Page 17 – The Pawtucket Public Library will serve as a repository for all of the documents and other information related to the site. I suggest posting a sign or poster at the Library itself (not just on the fence at the Tidewater site) to let the general public know that this repository exists.

Page 19 – If there are revisions proposed for the PIP in the future, National Grid will prepare a revised draft for review and approval by the public and RIDEM. National Grid should prepare a summary sheet to list all of the proposed changes/revisions, as well as the final approved revisions, not simply post the proposed revised draft of the full PIP online and in the physical repository (even if the changes/revisions are highlighted in the full document). This summary sheet should be a separate document to make it easy for the public to access, read, and digest the proposed, and then approved, changes.

In response to concerns raised by residents living on Thornton Street, immediately adjacent to the site, regarding natural gas odors and the possibility of air impacts from the groundwater contamination, I suggest addressing these issues at the poster session National Grid is hosting in the near future. In particular, addressing the issue of vapor intrusion into homes and schools should be a top priority. EJLRI receives technical assistance through an EPA program that assists organizations and community residents in understanding technical information related to Brownfields contamination and remediation. Upon her review of the draft remedial plan submitted to RIDEM by National Grid, our consultant from the New Jersey Institute of Technology recommended the following:

#### VAPOR INTRUSION INVESTIGATION

Some of the chemicals (volatile compounds) identified at the site have the potential to travel through the soil as vapors. These vapors may then move up through the soil into nearby buildings, contaminating indoor air. Therefore, if a vapor intrusion investigation has not been completed, a vapor intrusion investigation is recommended to determine whether the occupants of neighboring buildings are at risk for exposure to VOCs due to vapor intrusion.

We will be submitting a final version of the consultant's review at the appropriate time (when public comments are being accepted on the SIR/recommended remedial alternative), but I wanted to share this recommendation because it speaks directly to concerns raised by residents at the last meeting.

The draft PIP is strong overall, but lacks specifics on how to best engage parents at the local schools. Principals at the schools may not be the best, or only, individuals to notify regarding upcoming work, air monitoring results, public meeting notices, etc. In fact, they can be bottlenecks for getting information out to the wider school community. Suggestions raised at the meeting to engage the Pawtucket Schools Superintendent, the school committee, etc. are all very good, but also are not enough to get through to individual parents. Signs or posters with general information posted at the front offices of the schools adjacent to the site would be a good start (and/or at student pick-up locations), as well as providing copies of public notices to all parents via their child's backpacks, as suggested by the principal at Varieur Elementary, would also help ameliorate this problem. Not all notices need to be sent home via backpacks, but any public meeting announcements should be, as should an initial introductory letter or handout with an overview of the site history and current status, including who to contact for more information. National Grid should work with the principals at the three schools to send this introductory info sheet/letter home with all students as soon as possible.

Lastly, I would like to ask National Grid, GZA, and RIDEM to respond to how phytoremediation might play into the overall remediation strategy for this site, and/or if this approach has been discussed at all in relation to the Tidewater Site.

Sincerely,

A handwritten signature in cursive script that reads "Amelia Rose".

Amelia Rose, Director