



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT
235 Promenade Street, Providence, Rhode Island 02908

ORDER OF APPROVAL – ADDENDUM 2

January 24, 2022

File No. SR-26-0934A

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

CERTIFIED MAIL

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

RE: Tidewater Coal Gasification
Tidewater Street
Pawtucket, Rhode Island
Plat Map 54B / Lot 826, Plat Map 65B / Lots 645, 647, 649, 662 and portions of Lot 648
and portions of Plat Map 67B / Lots 11 and 21

Dear Mr. Lento:

Enclosed please find the Order of Approval Addendum 2 (the Addendum 2) for the proposed recommended modifications to the current, ongoing remedial actions at the abovementioned property as described in the Revetment Design Modifications Letter – Re: Site Remediation File No. SR-26-0934A/Formerly RIDEM Case No. 95-022, Former Tidewater Facility, 200 Taft Street, Pawtucket, Rhode Island (Revetment Design Modifications Letter), received January 20, 2022, and prepared by GZA GeoEnvironmental, Inc. (GZA). Please review the stipulations of this Order thoroughly to ensure your compliance with the requirements.

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. 2777109, or by E-mail at joseph.martella@dem.ri.gov.

This Addendum 2 shall be recorded in the land evidence records of the City of Pawtucket within thirty (30) days of execution and a recorded copy returned to the Department within fifteen (15) days of recording.

Sincerely,

Joseph T. Martella II
Environmental Engineer III
Office of Land Revitalization & Sustainable Materials Management

cc: Terrence D. Gray, Acting Director, RIDEM/OOD
Ryan Mulcahey, RIDEM/OOD
Leo Hellested, RIDEM/OLRSMM
David Chopy, RIDEM/OC&I
Kelly Owens, RIDEM/OLRSMM
Susan Forcier, Esq., RIDEM/OLS
Ronald Gagnon, RIDEM/OCTA
Nick Pissani, RIDEM/OWR/Storm Water
Neil Personeus, RIDEM/OWR/WQC
Dr. Michael Byrns PhD, RIDOH/Center for Healthy Homes & Environment
Tracy A. Silvia, RI CRMC
Richard Lucia, RI CRMC
Kathryn Kelly, NBC
RI State Senator Dawn Euer, District 13
RI State Senator Meghan Kallman, District 15
RI State Representative Rebecca Kislak, District 4
Christopher Feeney, Stantec
Daniel J. Kroeber, Milone & MacBroon
Michael S. Wierbonics, ACOE/Regulatory Division
Dylan M. Zelazo, Pawtucket Mayor's Office
Bianca Policastro, Pawtucket Planning
Michael D. Cassidy, Pawtucket Planning
Dave Clemente, Director 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
Bridget Boucher, Francis J. Varieur Elementary School
Ms. Dania Alejandra Flores-Heagney, Environmental Justice League of Rhode Island
Michele Leone, National Grid
David J. Rusczyk, GZA
Lance Hill, Pare

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

In the matter of the application for Remedial Action Approval at:

Tidewater Coal Gasification
Tidewater Street
Pawtucket, Rhode Island
File No. SR-26-0934A

ORDER OF APPROVAL – ADDENDUM 2

In the above entitled matter the Rhode Island Department of Environmental Management (the Department) issued to The Narragansett Electric Company d/b/a National Grid (National Grid), in their capacity as Owner and Responsible Party for the remediation of the property located on Tidewater Street (the Site), Pawtucket (Plat 54B / Lot 826, Plat 65B / Lots 662, 645, 647, 649 and portions of Lot 648 and portions of Plat 67B / Lots 11 and 21), an Order of Approval (Order) dated March 5, 2020, and subsequently an Order of Approval Addendum (Addendum 1) dated October 7, 2021.

On January 20, 2022, the Department received a written request from GZA GeoEnvironmental, Inc. (GZA), for approval of modifications to the original Order and the Addendum 1 with respect to the ongoing remedial activities at the Site. The following documents were submitted by GZA on behalf of National Grid regarding the requested modifications:

1. Revetment Letter to United States Army Corps of Engineers - Re: USACE File No. NAE-2019-02150, Remedial Activities Project, Former Tidewater Facility, 200 Taft Street, Pawtucket, Rhode Island, received by the Department on January 11, 2022, and prepared by GZA; and
2. Revetment Design Modifications Letter – Re: Site Remediation File No. SR-26-0934A/Formerly RIDEM Case No. 95-022, Former Tidewater Facility, 200 Taft Street, Pawtucket, Rhode Island, received by the Department on January 20, 2022, and prepared by GZA.

Subject to the conditions herein, the above listed documents, in addition to the documents listed in the Order dated March 5, 2020, and Addendum 1 dated October 7, 2021, describe a plan to remediate existing contamination pursuant to Rhode Island General Laws 23-19.14-1 et seq. and 250-RICR-140-30-1, the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations), in accordance therewith.

Based on review of the above referenced documents, the Department has concluded that a modification to the prior orders are warranted.

It is the Department's intent that this Addendum 2 continues to place primary responsibility for the construction, operation, maintenance, and monitoring of the approved Remedial Action Work Plan (RAWP) and its associated implementation on National Grid. As the Responsible Party and Performing Party, National Grid is expected to implement the RAWP in an expeditious and professional manner that prevents non-compliance with the original Order, Addendum 1, this

Addendum 2, and the RAWP, and is protective of human health and the environment. For the convenience of National Grid and its contractors and consultants, the changes made to the original Order and Addendum 1 by this Addendum 2 have been highlighted below.

Upon consideration thereof, the Department of Environmental Management's Office of Land Revitalization and Sustainable Materials Management (LRSMM) approves said plan or means to remediate contamination through this Addendum 2 provided that:

1. All conditions set forth in the Order of Approval dated March 5, 2020, and Addendum 1 dated October 7, 2021, shall remain in full force and effect unless specifically altered by this Addendum 2.
2. The revetment cap design in the northern portion of the Site between Stations 4+00 and 5+95 (approximately 195 feet along the shoreline) shall be modified to minimize the disturbance of coal tar impacted soil and the risk of a potential breach in the controls (turbidity curtains and absorbent booms) installed within the Seekonk River. The modified revetment cap design involves the placement of stone, multiple layers of reactive core matting (RCM), woven and nonwoven geotextiles, and riprap on top of the existing surface of impacted sediment, all below mean high water (MHW) and the high tide line (HTL) rather than disturbing this material during regrading. The slope of the revetment cap will also be adjusted below MHW and the revetment cap will extend several feet beyond what was originally anticipated. The existing riverbank above MHW will be regraded consistent with the original permitted design.
3. All appropriate and enhanced and/or upgraded best management practices shall be followed, including but not limited to daily monitoring, inspection and maintenance of the turbidity curtains and absorbent booms during all shoreline work, and immediate notification and response to control any potential future breach of the turbidity curtain and absorbent boom system.

The original Order, Addendum 1 and this Addendum 2 shall remain in full force and effect provided said RAWP is implemented in a manner satisfactory to the Department of Environmental Management. Failure to comply with all points outlined in the Department approved RAWP and stipulated in the Order, Addendum 1 and this Addendum 2 shall result in the revocation of the Order of Approval and may result in the issuance of a Notice of Violation against the Performing Party.

The original Order, Addendum 1 and this Addendum 2 shall be subject to modification or revocation in accordance with law.

Entered as the Order of the Department of Environmental Management this 24 day of January, 2022.

By:

 Digitally signed by Matthew DeStefano
DN: C=US,
E=matthew.destefano@dem.ri.gov,
CN=Matthew DeStefano
Reason: I am approving this document
Date: 2022.01.24 09:40:52-05'00'

Matthew D. DeStefano
Deputy Administrator
Office of Land Revitalization & Sustainable Materials Management
Department of Environmental Management

Tidewater Coal Gasification, Tidewater Street, Pawtucket
Order of Approval – Addendum 2

January 24, 2022
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