



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](mailto: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.