



Request for Response to Public Comments on STRAPs

August 18, 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:

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.

In the matter of the above-referenced property (the Site), the Department's OWM has received the attached sixty-three (63) public comments regarding the technical feasibility of the remedial actions proposed in the Liquefaction Project Short Term Response Action Plan (STRAP) and the Holcim Driveway STRAP Addendum. Some of the submitted comments address topics beyond the scope of the STRAPs and the Remediation Regulations, concerning the siting and federal licensing of the liquefaction facility. As such, a copy of this letter and attached comments is also being sent to the Federal Energy Regulatory Commission (FERC).

Please review the attached comments, the stenographer's records from the July 13, 2017 and August 9, 2017 Public Meetings, and any other written comments submitted to National Grid at the meetings, and prepare written responses to each of them, as appropriate. A completed document, incorporating responses to all of the comments, must be submitted to the Department for review and approval. The Department will be conducting a review of comments specific to the Department and the Remediation Regulations, and will prepare responses to those comments, as applicable.

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
Dave Reis, 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

Comment No. 1

Martella, Joseph (DEM)

From: Jessica Stults
Sent: Thursday, July 20, 2017 10:37 AM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : public comment re strap permit for lng plant

Dear Mr. Martella,

I'm writing as a member of the community to express my opposition to allowing the STRAP permit for National Grid's LNG facility on Allens Avenue.

It seems clear to me that the affected community is united in opposition to the proposed plant and that these concerns have not been adequately taken into account. I am personally concerned about the impact of this plant on human health and feel that the community must have a greater say in whether plans to build this plant go forward.

I hope that RIDEM will do everything possible to facilitate community participation in this decision, and that you will work to protect the lives and health of Rhode Islanders both in the short and long term.

Thank you for your consideration and time.

Sincerely,
Jessica Stults

Comment No. 2

Christine Rayner

Providence, RI
02907

Attention: Joseph Martella
RIDEM Office of Waste Management
235 Promenade Street
Providence, RI
02908
joseph.martella@dem.ri.gov

Dear Mr. Martella,

July 21, 2017

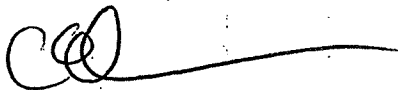
As a resident of a neighborhood two miles from Field's Point, and as a citizen concerned about the already high levels of pollution in Providence, I am alarmed by the plans of National Grid to build a liquefied natural gas facility on Field's Point.

There was a hearing on July 13 regarding the STRAP permit that National Grid is seeking. First of all, I was disgusted by the hearing location, at the Public Safety Complex (main police station). Let's not sugarcoat this - people of color, particularly urban, low-income people of color, do not generally experience the high levels of trust for the police that white people like myself enjoy. I can understand that this location is sometimes used for public hearings, but in this particular situation, it was unwise and unfair, as many of those who would be affected by the facility are, in fact, low income residents of Providence. This choice does not lead to the goal stated in DEM's own rules: "An atmosphere of "equal participation" among all involved should be established" (DEM's rules for investigation of hazardous substances, Section 7.07 Part C). In addition, National Grid started the meeting an hour later than scheduled, so some people left, and it put an undue burden on people who could only attend the meeting with children. No childcare was provided.

I am alarmed and concerned that National Grid is attempting to SEPARATE the issue of soil remediation from the REASON they want the soil removed, which is to build a liquefied natural gas plant at Field's Point. There has already been a gas leak and explosion in the area in late March, which could have destroyed the hospitals and neighborhood. The risk would be even greater with the construction of another liquefied natural gas facility. Low income people who are forced to live in this area because it is cheap are at undue risk in case of explosion. In addition, the added fossil fuel infrastructure is not needed by our state, which needs to be working to get away from fossil fuel energy and working TOWARDS renewable, clean energy sources.

Please deny the STRAP permit that National Grid is seeking.

Yours sincerely,



Christine Rayner

Comment No. 3

Martella, Joseph (DEM)

From: Jenkins, Melissa
Sent: Friday, August 04, 2017 10:08 AM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : No LNG in PVD

Dear Mr. Martella,

I'm submitting public comment on the plan to build an LNG liquefaction facility at Fields Point. I understand that you are seeking comments specifically on soil and groundwater contaminants at this point, but please hear me that the entire proposal to place such a facility in a densely populated area adjacent to hospitals and schools and along a main travel artery to Providence is a dangerous and completely unnecessary endeavor. There have already been 2 recent accidents relating to transport of hazardous materials through that area that were life-threatening and extremely frightening to residents of the area, myself included. Now you want to dig up hazardous chemicals from the soil and distribute them into the air we all breathe. Seriously? This area is largely comprised of poor and minority residents. It has one of the highest rates of childhood asthma in Rhode Island, a deadly disease. You want to further endanger the health of these residents in the service of cheap energy? This is environmental racism, plain and simple.

I live a mile from this proposed facility. As a bicycle commuter through the area daily, I can attest that the air quality is already terrible. I develop asthma symptoms myself when I bike along Allens Avenue. I arrive at work covered with grime and metal dust. I do not think that adding toxic chemicals to the air is in any way acceptable. Furthermore, I intend to insist on the cleanup of the other polluting companies along that corridor.

An LNG facility carries a very high risk to the surrounding community, which includes me and my neighbors, Rhode Island Hospital, Hasbro Children's Hospital, and the Meeting Street School, which cares for children with special needs. Those children breathe the air that you want to pollute. They travel the roads you want to fill with trucks, further reducing air quality and road safety. They sleep in that neighborhood every night – in peril from hazardous material spills and train derailments. What on earth are you thinking?

Please do everything in your power to halt this proposed project. We do not want it, we do not need it, and we will not allow it. Build wind turbines and solar power arrays. Develop conservation protocols. Build bike lanes that help more people to avoid polluting with cars. We, as a community, will rally around these measures. But we are not going to support industrialization and sacrifice of our neighborhood in the service of cheap energy. We want clean energy, and we need clean air.

Thank you for hearing my comments.

--
Melissa Jenkins, Ph.D.
Clinical Neuropsychologist, BRAINWORKS RI
Clinical Assistant Professor, Alpert School of Medicine at Brown University

Comment No. 4

8-8-17

Voice Mail Message – 642 Allens Ave., Providence – STRAP Comment

Laura Westberg

Resident of Providence. Calling to oppose an LNG facility in Providence and asking DEM to deny the STRAP Permit National Grid is asking for.

Comment No. 5

Martella, Joseph (DEM)

From: Daisy Schnepel <
Sent: Tuesday, August 08, 2017 10:56 AM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : Comment About STRAP

Dear Mr. Martella,

As a resident in close proximity to the Allens Avenue National Grid site and as a leader within the Fox Point Neighborhood Association I am urging DEM to not approve the STRAP permit that will allow National Grid to dig in toxic soil that will put our neighboring communities, schools and Health Centers at risk. Please insist that National Grid clean up the whole property or leave it alone so as not to make things worse. This is the only responsible solution to their request to do major construction at the site.

Sincerely,
Daisy Schnepel

Providence, RI 02906
Vice-president FPNA

Comment No. 6

Martella, Joseph (DEM)

From: Kate Blacklock
Sent: Tuesday, August 08, 2017 12:28 PM
To: Martella, Joseph (DEM)
Cc: NoLNGinPVD@gmail.com
Subject: [EXTERNAL] : DENY THE STRAP

Mr. Martella,

I am a resident of Providence and a very concerned citizen. I am totally against the building of the liquefaction center for LNG manufacturing. I am concerned about the extreme safety and environmental issues this will cause for the neighborhood I live in. I write to usage you to deny the STRAP permit to National Grid and STOP this plant from being constructed.

We should be supporting renewable energy projects NOT THIS DANGEROUS PLAN>

Sincerely,

Kate Blacklock

Providence, RI 02906

Comment No. 7

Martella, Joseph (DEM)

From: Mary Pendergast
Sent: Tuesday, August 08, 2017 10:31 AM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : No LNG

Dear Mr. Martella,

The Sisters of Mercy Ecology office is in strong opposition to the STRAP permit in preparation for the LNG storage tank in Providence.

The poorest people of the community live in that area and it is another example of environmental racism.

Sincerely,

Mary Pendergast, RSM

Comment No. 8

Martella, Joseph (DEM)

From: Pat Jaehnig
Sent: Tuesday, August 08, 2017 7:45 AM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : Please say NO! To STRAP permit

Sent from my iPad

Comment No. 9

Martella, Joseph (DEM)

From: Lincoln, Evelyn
Sent: Tuesday, August 08, 2017 10:53 AM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : STRAP permit for National Grid

Dear Mr. Martella,

I am a resident of Fox Point, and I oppose National Grid digging in toxic soil on Allen's Avenue to install a liquid gas facility. I would be in favor of development of the area if it was stringently decontaminated first, and then developed for use according to the STRICTEST provisions for cleanliness and safety. Our waterfront is our most valuable and beloved resource and the seabirds and aquatic life there are our responsibility to care for. The land around that area should be used in accordance with the ecology of the bay. Please be a voice of sanity in this conversation.

Thank you so much,
Evelyn Lincoln

Providence, RI 02906

Evelyn Lincoln
Professor, History of Art & Architecture and Italian Studies
415 List Art Center, Brown University
Box 1855/ 64 College Street
Providence, RI 02912-1855 USA

Comment No. 10

Martella, Joseph (DEM)

From: Cris Monteiro
Sent: Tuesday, August 08, 2017 4:46 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : No LNG in Providence! No to STRAP permit

Dear Mr. Martella,

I am writing you today to urge the RIDEM to deny National Grid a STRAP permit for the proposed LNG liquefying site in Providence. As you know this site has been a dumping ground for toxins since the earlier part of the last century.

As a concerned citizen, I respectfully demand that the public be involved in whatever plans go forward for this site. If the site is to truly be remediated for toxins, it is imperative that public meetings and transparent processes be required from National Grid. Ultimately public health must come before any corporate bottom line regarding this matter.

Furthermore there has been contradictory and questionable information about what should be done to remediate the area where National Grid wants to build this facility. Many say that the protective cap should not be removed, others say that the area shouldn't be disturbed at all. National Grid wants to do both remove the cap and move contaminated soil around. If a safe and complete removal of the toxic soil was possible, who would be responsible to pay for that?

There are just too many unanswered questions to proceed at this point. The meeting this week is a good first step, but it comes too soon to the deadline, so I must again respectfully ask that DEM deny the STRAP permit at this time.

Thank you,

Cris Monteiro
Providence Community Acupuncture
1055 Westminster Street
Providence, RI 02903

Comment No. 11

Martella, Joseph (DEM)

From: green hills
Sent: Tuesday, August 08, 2017 5:00 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : DENY National Grid's STRAP permit

Dear Mr. Martella,

I am writing to ask you and the DEM to deny National Grid's STRAP permit for the LNG plant in Providence.

I am a former Providence resident and current Scituate resident, but this issue is still very important to me because environmental issues do not follow municipal boundaries and everyone deserves to live in a safe neighborhood.

For the past year, community members have been demanding public involvement around the toxic soil. National Grid tried everything possible to avoid it, even going to the federal government to undercut state laws. We had to fight to get them to hold public meetings.

"STRAP" soil permits are for cleaning up contamination, not building more polluting facilities. We have the right to request alternative remediation plans, such as leaving the toxic soil alone or actually cleaning up the site.

National Grid is planning to remove a protective cap that was added during previous clean up work in order to build the liquefaction facility. This is the opposite of what should be done to remediate the site.

DEM has the power to deny National Grid the STRAP permit. This would stop the LNG liquefaction facility from being able to be built. Please do what is best for public interest, NOT corporate interests. Let's make RI an example for the rest of the country.

Thank you,
Rose Catania

Comment No. 12

Martella, Joseph (DEM)

From: rachel playe '
Sent: Wednesday, August 09, 2017 12:39 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : No LNG

Dear Mr. Martella,

I am unable to come into the comment period today at Christ Church, but I wanted to voice my option of the STRAP permit.

I believe we do not need to support fracking by furthering development on the LNG. My understanding is by digging up toxic soil and "pile driving" into the bedrock can risk contamination. I don't want this to open in my city. This project is unnecessary. We need to be putting more energy and money into building efficient renewable energy. Support fossil fuels is the way of the past. By denying the STRAP permit you can send a message that we do not need to expand our use of fossil fuels.

Thank you
Rachel Playe

Comment No. 13

Martella, Joseph (DEM)

From: Liz Downing <liz@nationalgrid.com>
Sent: Wednesday, August 09, 2017 1:43 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : National Grid STRAP application comment letter

Dear Mr. Martella,

I respectfully request that RI DEM deny National Grid's application for a STRAP application for the proposed LNG facility on Allens Avenue. There is clearly no evidence that National Grid's proposed work on this site falls within the guidelines of the STRAP application. National Grid should follow the correct procedure to fully remediate this toxic site and contribute to the community that supports its business. Cutting corners on the remediation of a site so contiguous with other dangerous and polluted areas as well as a large volume of residents is irresponsible and careless. There is no reason why National Grid should be held to anything less than the utmost standards for preventing public health and environmental catastrophes. We rely on RI DEM to make sure these standards are fair, enforced and followed. Thank you,

Liz Downing
Providence, RI 02906

Comment No. 14

Martella, Joseph (DEM)

From:
Sent: Wednesday, August 09, 2017 5:54 PM
To: Martella, Joseph (DEM)
Cc: amy.willoughby@nationalgrid.com
Subject: [EXTERNAL] : Proposed LNG site in PVD

Dear Mr. Martella,

I'm writing to request that DEM deny National Grid the STRAP permit needed to begin construction on the proposed LNG site on Allens Ave.

As a life long Rhode Islander, I object to this project for multiple reasons. Mainly, not only is the soil at this site contaminated with multiple toxic substances that should never be given the opportunity to become airborne, but this LNG terminal is not in the best interest of residents, businesses and organizations in the local area.

Moreover, any activity at 642 Allens Ave. should be focused on remediation of the soil akin to what is appropriate at "superfund" sites. Following that, the best development of this area would certainly be something commercial, residential or open space in nature that does not possess such a high degree of risk or potentially life-threatening consequences.

As a Project Manager in the Office of Waste Management, you have the authority and capacity to stop this ill conceived proposed development. Moreover, as a public servant charged with keeping the best interest of all Rhode Islanders in mind, it is incumbent upon you to consider the impact the construction and resulting LNG terminal will have on the area at large.

As Rhode Islanders, we can do better with this waterfront property in our state's capital. Will you please exercise the powers of your office to ensure we do just that?

Jeremy LaVena

Warwick, RI
02886

Jeremy LaVena

Sent from my iPhone

Comment No. 15

Martella, Joseph (DEM)

From: Sam Hampton
Sent: Wednesday, August 09, 2017 9:31 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : No LNG Plant

Dear Mr. Martella,

Please do not allow the Liquid Natural Gas Plant to move forward. It will be harmful to the environment and dangerous to the surrounding community. We need to focus on renewable resources and making the planet a better place for future generations.

Thank you,
Samson Hampton

Comment No. 16

Martella, Joseph (DEM)

From: Mikaila Mariel Lemonik Arthur
Sent: Wednesday, August 09, 2017 9:41 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : NO to LNG PVD

Dear Mr. Martella,

I am writing to urge you to eject giving National Grid permission to build a natural gas liquefaction facility on a dangerous toxic site in the Port of Providence, exposing residents to harmful substances. This facility will be a danger to the community if built.

Mikaila Arthur

Providence, RI 02906

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Mikaila Mariel Lemonik Arthur

Comment No. 17

Martella, Joseph (DEM)

From: Moira Hinderer
Sent: Wednesday, August 09, 2017 9:47 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : National Grid STRAP Permit Request for Allens Ave Site (public comment)

Dear Mr. Martella,

I am a resident of Providence, RI and I'm writing to submit a comment about National Grid's request for a STRAP permit at the Allens Ave site. As a Providence resident, I'm very concerned about the proposal to remove the protective cap at this site and disrupt the contaminated soil at the site. It is my understanding that residents of south Providence already suffer from higher rates of asthma, cancer, and other diseases associated with environmental contamination. As a person with asthma who is also raising a young child who has asthma, I want to see Providence become a cleaner and safer city, and I worry that they proposed National Grid project will move us in the opposite direction. After listening to National Grid spokespeople present, I do not believe they have a comprehensive plan for the safe remediation of the site. I hope that this permit request will be denied.

Thank you for your time and attention.

Best,
Moira Hinderer

Providence, RI 02906

Comment No. 18

Martella, Joseph (DEM)

From: Camille Williams <[REDACTED]>
Sent: Wednesday, August 09, 2017 10:09 PM
To: Martella, Joseph (DEM)
Cc: NoLNGinPVD@gmail.com
Subject: [EXTERNAL] : National Grid's LNG plant proposal.

Dear Mr. Martella,

I came to the public comment event today but had to leave before my name was called, so I am writing to you instead. I own a home on Michigan Ave, a short distance from the proposed site. My husband and I lived in that house for nine years, and both our children were born during that time. If we were still living there, I would be afraid for my family's health and safety in the face of National Grid's LNG plant proposal, so I sympathize with the grave concerns of the residents you are hearing from.

After we moved six years ago, we kept the house on Michigan Ave. and we rent it to a lovely family with three little girls. I do not want my tenants to have to worry about their family's health and safety.

I am white and middle class, as are my tenants, however I understand that these demographics represent the minority in this neighborhood. I am very concerned about families who are too busy functioning in survival mode due to poverty and therefore lack the bandwidth to make their voices heard on this issue. I am also very concerned that this project is an act of environmental racism against some of our city's most vulnerable and marginalized residents. *We all know that this project would never see the light of day in my current zip code, 02906.*

Of course, there are farther reaching issues at hand as well. The evidence is clear that we must move away from fossil fuel dependence if ANY of our children and grandchildren are to have any hope of inheriting a safe planet. Rhode Island DEM needs to focus on supporting the development of green, renewable energy and create jobs in the process.

Last and least, but not insignificant, this project has the potential to tank my property value, which I don't appreciate.

Please be courageous, do the right thing, and stop this dangerous, expensive, unnecessary and discriminatory project from going any further.

Thank you,

Camille Williams
Current property owner and former resident of
Michigan Ave.
Providence, RI 02905

Comment No. 19

Martella, Joseph (DEM)

From: Kathleen Prindiville <
Sent: Wednesday, August 09, 2017 10:22 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : NO LNG in PVD

Dear Mr. Martella,

Please do not approve the STRAPs proposal from National Grid to build their natural gas liquefaction facility on the dangerous toxic site in the Port of Providence.

It is a danger not only to my neighborhood of South Providence, but to all of Providence.

It is not being built behind the hurricane barrier, in the event of a major weather event or accident *HOSPITALS*, downtown, and the universities will be affected. Building so close to a city center is reckless and could be catastrophic. It is a risk to our water, soil, air, to the public safety and to our beautiful Narragansett Bay.

Building on the contaminated site will expose residents of the community and the delicate ecology of the bay to numerous toxic substances. If I grow vegetables in my yard, will I be able to eat them? South Side Community Land Trust has many community gardens in the neighborhood that provide much needed produce to people who have limited access to healthy, fresh foods in the 'food desert' that is South Providence.

When the gas pipeline leak/explosion happened in March, we were torn whether we should seek shelter at 10:30pm at night, which is when we first heard about the leak, we didn't know whether it was safe to sleep in our homes.

On top of the anxiety of our immediate safety, we (residents) ended up not being informed about the explosion, or of the toxic chemicals released into the air surrounding our homes. I found out about the chemicals in JUNE.

I'm incredibly alarmed by the way National Grid has been handling the situation, they are actively minimizing the risks out of their own self interest.

- What type of warning system would be put in place if such an event were to happen at this new facility?
- How will National Grid improve communications with the public and local residents in the immediate danger zone if this facility is built?
- Does National Grid plan to be more transparent about events that take place and less dismissive of accidents and leaks at facilities they operate?

- Why would the RI government be willing to put so many vulnerable people at risk for a energy source that is destroying the environment of the US, increasing the rate of earthquakes, contaminating water and land, and many other risks to public health?
- Will there be reimbursements for food, housing and transportation costs for residents in the event we have to evacuate?
- If this project is allowed to move forward, how will we know we are safe in our homes?
- How will we know that the food we are eating from our gardens are not contaminated?
- How can we be sure we are not putting our loved ones at risk because we live in this neighborhood? It is one of the last affordable places to live in Providence. Many in my community are vulnerable, are not aware that this is project is happening, or that their health, and the environment's health is at stake.

PLEASE DO NOT ALLOW NATIONAL GRID TO BUILD THIS FACILITY.

It will be a failure to the people of this amazing city. We can do better and find more creative ways to bring revenue and interest to this incredible place. We have so much to offer, please don't let LNG build their dangerous facility on our doorstep and put so many at risk. It is a short sighted plan that will have terrible consequences for the people that make this city so unique and vibrant.

Please feel free to call or email me, I am looking forward to your reply and hope you can side with the people and reject this terrible plan for RI.

Thank you for your time,

Kathleen Prindiville and Jonathan Stone

--

Kathleen Prindiville

Comment No. 20

Martella, Joseph (DEM)

From: Pamela Poniatowski <|
Sent: Wednesday, August 09, 2017 10:23 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : No to LNG PVD

Dear Mr. Martella,

I am writing to ask you to deny permission to National Grid to build a natural gas liquefaction facility on a dangerous toxic site in the Port of Providence. This facility would expose residents to harmful substances. It is not in the best interest of Rhode Islanders to have LNG in our state.

Looking forward to a cleaner future,

Pamela Poniatowski

Sent from my iPad

Comment No. 21

Providence, RI 02908
9 August 2017

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

Dear Mr Martella:

I oppose construction of the natural gas liquefaction facility in the Port of Providence for several reasons. Chief among them are the following:

1. The proposed site is in an area of where people of low income live. The incidence of respiratory problems and other environment-related complications is already high for that population. Construction of the plant and its operation will increase health-related illnesses.
2. The proposed site is one with high levels of contaminants in the soil. It is also an area where highly explosive materials are stored. Liquefied Natural Gas (LNG) would only amplify the conflagration if an explosion were to occur.
3. Investing in fossil fuels impedes our progress toward the goals that our Governor has set for transitioning to renewable energy in this state.
4. The proposed site is on the Providence River, an area predicted to be under 11 feet of seawater by the end of this century. Building in this area is short-sighted and doomed to have unrecoverable capital losses.
5. Perpetuating the state's reliance on fossil fuels means continuing our reliance on other states where those fuels are resourced. We should instead be investing in energy sources within our state; sources that will employ and enrich our own citizens.

As a concerned citizen and a person of faith, I implore the Department of Environmental Management not to approve National Grid's proposal.

Sincerely yours,



Terry Bontrager
Climate Action RI
Peace and Justice Committee, Beneficent Congregational Church

Comment No. 22



Key points:

- *The proposed National Grid project does not qualify for a STRAP. STRAPs are granted for activities **immediately** following the release of a hazardous material in order to clean up or treat the materials and remove any imminent hazard, if it exists. The RI Dept. of Environmental Management issued a letter of responsibility in 1998 declaring that the site poses no imminent hazard, and has not reevaluated that decision since.*
- *The proposed National Grid project would **create** an imminent hazard and a potential for harm to the community that doesn't currently exist. It would expose contaminated soil and groundwater to wind and rainwater. The site is in the 100-year floodplain, and a flood or high winds could undo efforts to contain the contaminated material.*
- [The third point from the Coalition letter is intelligible as it stands.]
- *STRAP permits are good for 90 days, but this project is projected to start in 2017 and continue through 2019, with digging not expected to begin until 2018. This is obviously longer than 90 days and thus a STRAP is not the right kind of permit.*

Additional points:

- National Grid has refused to discuss with the public the ways in which this project could threaten community health and safety or respond to public inquiry about these risks. They also refused to discuss with the public the eventual use of the site, which would pose further risks to community health and safety in the form of possible leaks and explosions.
- National Grid has a history of non-compliance with safety regulations for workers, and has made no statement about the training they would receive in handling hazardous materials.

Comment No. 23

Martella, Joseph (DEM)

From: Kevin Descoteaux <_____
Sent: Thursday, August 10, 2017 6:38 AM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : LNG facility in Providence

Hi Joseph. I am writing to express my strong opposition to the proposed LNG facility in Providence. Any site remediation should not be connected in any way with further development of the site. Remediation should decrease not increase the risk to me and others in the area. As per DEM-DSR-01-93 Section 7.07(C)(2): "Community Meetings: The purpose of the meeting is to document community comments and concerns about the investigation, clean-up, and reuse of the Contaminated-Site" the risk of BOTH remediation and future development must be considered. I would also say that the following part of the regulations are cause to deny the STRAP: "No Emergency or Short-Term Response Action undertaken by the Responsible Party may be conducted in a manner which increases the potential for harm, either short-term or long-term, to human health or the environment (DEM-DSR-01-93 Section 6.01).

Thank you

Kevin Descoteaux

Providence

Sent from my Verizon 4G LTE Droid

Comment No. 24

Martella, Joseph (DEM)

From: Adria Marchetti <
Sent: Thursday, August 10, 2017 7:37 AM
To: Martella, Joseph (DEM)
Cc: NoLNGinPVD@gmail.com
Subject: [EXTERNAL] : NO LNG

Dear Mr. Martella,

I am writing to you to urge you to say NO to National Grid's plans for an LNG plant in Providence. The community is asking you to deny National Grid's proposal to build a natural gas liquefaction facility on a dangerous toxic site in the Port of Providence, exposing residents to harmful substances. This facility will be a danger to the community if built. It is in all our interests to keep LNG out of RI, or anywhere for that matter. Let's look towards a cleaner future for our families, neighbors and friends!

Please do not allow this to happen.

Sincerely,
Adria Marchetti

Sent from my iPhone

Comment No. 25



Beneficent Congregational Church, UCC
300 Weybosset Street
Providence, RI 02903-3731
Tel 401.331.9844 Fax 401.331.0021
www.BeneficentChurch.org
Reverend Michelle Madsen-Bibeau

Mr. Joseph T. Martella II
RIDEM Office of Waste Management
Site Remediation Program
235 Promenade Street
Providence, RI 02908

August 9, 2017

Dear Mr. Martella:

I write to express my personal opposition to National Grid's proposed construction of a Liquefied Natural Gas facility in South Providence, and on behalf of the Peace and Justice Committee of Beneficent Church to express concern over both the project and the process to date.

The United Church of Christ affirmed at its 2017 Synod Gathering the denomination's commitment to public witness and advocacy as regards the dangers of climate change in what we view as a critical moment in history. Use of resources to increase our dependence on outmoded and dangerous fossil fuels is counter-productive to the shift we must make to truly renewable and clean sources of energy.

But even if one were inclined to dedicate resources to infrastructure for fossil fuels, it is a breach of public trust to do so on a site whose disruption will expose community members to hazardous toxins. The Department of Environmental Management should reject the STRAP permit, and instead demand full remediation and cleaning of the area.

In addition, Beneficent Church as a multi-racial, multi-ethnic, economically-diverse congregation has a profound concern for the inclusion of affected community members in decisions about siting facilities with potential health and safety risks. Though I am glad that a forum for residents' concerns is being provided today by the Department at Open Table of Christ Church, it is disturbing that community consultation was not previously prioritized. We continue to struggle with the effects of racism and economic disparity in areas of housing, access to services, and political voice. I trust that when those most directly impacted speak today, you will listen, privileging their concerns over expediency or corporate interests. These individuals are, after all, the citizens you represent.

Our congregation is in the midst of a transition in leadership, but I am happy to work with you during my tenure to facilitate conversations in this wonderful Providence community for the common good which is our shared goal.

Blessings,

Michelle Madsen-Bibeau

Michelle Madsen-Bibeau
Interim Minister

Comment No. 26

Martella, Joseph (DEM)

From: Kyle Stumpe
Sent: Thursday, August 10, 2017 7:52 AM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : No LNG Plant in Providence

Dear Mr. Martella,

I am writing to you to urge you to say NO to National Grid's plans for an LNG plant in Providence. The community is asking you to deny National Grid's proposal to build a natural gas liquefaction facility on a dangerous toxic site in the Port of Providence, exposing residents to harmful substances. This facility will be a danger to the community if built. It is in all our interests to keep LNG out of RI, or anywhere for that matter. Let's look towards a cleaner future for our families, neighbors and friends!

For the sake of our children and our loved ones, please do not allow this to happen. Thank you.

Sincerely,
Kyle Stumpe
Providence, RI 02909

Comment No. 27

Martella, Joseph (DEM)

From: April Olmstead
Sent: Thursday, August 10, 2017 7:57 AM
To: Martella, Joseph (DEM)
Cc: NoLNGinPVD@gmail.com
Subject: [EXTERNAL] : NO to National Grid's plans for an LNG plant in Providence

Dear Mr. Martella,

I am writing to as you deny National Grid's proposal to build a natural gas liquefaction facility on a dangerous toxic site in the Port of Providence, exposing residents to harmful substances. This facility will be a danger to the community if built. It is in all our interests to keep LNG out of RI, or anywhere for that matter. Let's look towards a cleaner future for our families, neighbors and friends!

Thank you

April Olmstead
Hope Valley, RI

Comment No. 28

Martella, Joseph (DEM)

From: mark lennon <
Sent: Thursday, August 10, 2017 8:01 AM
To: Martella, Joseph (DEM)
Cc: nolnginpvd@gmail.com
Subject: [EXTERNAL] : National Grid LNG plant

Dear Mr. Martella,

I am writing to let you know that as a long-time providence resident and life-long RI citizen, I oppose the installation of this LNG liquifaction plant in Providence, as it poses great danger to our residents.

Thank you

Mark Lennon

Comment No. 29

Martella, Joseph (DEM)

From: Karen Lee
Sent: Thursday, August 10, 2017 8:30 AM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : No LNG

Dear Mr. Martella,

Please consider why it would be sensible to place a LNG plant on the waterfront, where sea levels will rise?

Why would it be sensible to place such a plant where the air flow moves inland across it and into the city?

Why put a terrorist target near a large population?

It's not sensible at all.

Please say no.

Karen Lee

--

Karen Lee
[See my blog about what I'm up to](#)

Comment No. 30

Martella, Joseph (DEM)

From: Rebecca Kislak
Sent: Thursday, August 10, 2017 8:44 AM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : NO to LNG in PVD

Dear Mr. Martella,

I'm writing as a Providence resident to express my hopes that you will please reject National Grid's request for permission to build a liquefaction facility in Providence. We very much need to be building infrastructure for sustainable energy here in Providence, not building potentially dangerous facilities on a toxic site near so many residents of Providence. The gas leak in the high pressure gas lines in Providence in March really underscores the dangers and the geography of what happens if something goes wrong? This is the wrong energy policy, and in the wrong place. Please request the request.

Thank you for your consideration.

Best wishes,

Rebecca

--

Rebecca Kislak, Esq.
Kislak Consulting LLC
P.O. Box 40143
Providence, RI 02940

www.kislakconsulting.com

Comment No. 31

Martella, Joseph (DEM)

From: luke krafft '
Sent: Thursday, August 10, 2017 8:57 AM
To: Martella, Joseph (DEM)
Cc: NoLNGinPVD@gmail.com
Subject: [EXTERNAL] : No LNG please

If our politicians can't be trusted to protect us and guide is in the direction of safe, sustainable, energy technology, then the educated folks that work for the state are our last hope. Please take the side of the people, present and future, despite whatever the personal cost may be.

Comment No. 32

Martella, Joseph (DEM)

From: Sarah
Sent: Thursday, August 10, 2017 9:17 AM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : LNG

Please, no LNG plant in Providence. Just please no.

Sent from my iPhone

Comment No. 33

Martella, Joseph (DEM)

From: Heidi Dennigan < >
Sent: Thursday, August 10, 2017 9:51 AM
To: Martella, Joseph (DEM)
Cc: noInginpvd@gmail.com
Subject: [EXTERNAL] : Please STOP this STRAP permit for National Grid!

Hello Joseph,

Please, please consider stopping the STRAP permit in Providence for National Grid! As a Providence resident, I fear for the health of my family especially by 1 year old son. Do you live near this site? Imagine if you did. How would you feel? This is scary. You need to do what is right for the residents of Providence and NOT put our health at risk. Health is way more important than money. PLEASE!

I urge you to put a stop to this!

Thank you,
Heidi Dennigan (Providence resident)

Comment No. 34

Martella, Joseph (DEM)

From: Darcie Dennigan <
Sent: Thursday, August 10, 2017 9:52 AM
To: Martella, Joseph (DEM)
Cc: NoLNGinPVD@gmail.com; Gabe Burnstein
Subject: [EXTERNAL] : Deny the STRAP permit

Dear Mr. Martella,

I am asking you, senior sanitary engineer for DEM, to please deny National Grid's STRAP permit for Allens Ave.

I write as a RI resident and also as a mother. For half of every week, my daughter lives with her dad, my ex-husband, less than 1.7 miles from the proposed site. She lives on a lovely street with lots of young families and a nice park nearby.

If digging begins on this site, I would not want her playing at the park. You and I both know that no matter the precaution, the STRAP permit means a list of highly toxic substances being released into an already polluted area. You and I both know that the STRAP permit is just the beginning. It's the first step in further polluting and ruining this area. -- AND in further polluting and ruining our soil and air and water-- AND my beautiful daughter's lungs and body.

And if DEM doesn't listen and doesn't care and digging begins on this site, please be sure that people will not be quiet. Please be sure that this is the beginning of a very large and loud headache for all involved.

No one in any neighborhood deserves to have a liquified natural gas plant built or operating near them. No one deserves that pollution and no one deserves that danger. Please protect this site from National Grid's plans. Please protect all the kids, families, pets, park-goers and hospital patients who would be affected by this proposal.

Thank you.

Sincerely,
Darcie Dennigan

Providence, RI 02906

Comment No. 35

Martella, Joseph (DEM)

From: Dimitri <[redacted]>
Sent: Thursday, August 10, 2017 9:58 AM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : LNG Project

Dear Mr. Martella:

I'm very concerned about the proposed LNG-National Grid cleanup project on Allens Ave. I'm skeptical of National Grid's commitment to public and environmental health and public safety.

I'm also disappointed in the lack of information given to the people of Providence and the lack of public access to the project meetings.

The people of these communities need to be fully informed and kept abreast of developments. I expect the DEM's commitment is to environmental and public health, not to the success of the fossil fuel industry.

Providence resident,
Carl Dimitri

Comment No. 36

Martella, Joseph (DEM)

From: Joe Blank <[\[redacted\]](#)>
Sent: Thursday, August 10, 2017 10:19 AM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : NO LNG plant

Hello

As I lifelong Rhode Island resident I strongly urge you to not go ahead with a dangerous, toxic, and outdated LNG facility in Providence

Thank
Joe

Comment No. 37

Martella, Joseph (DEM)

From: Lynn Sommerville
Sent: Thursday, August 10, 2017 11:01 AM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : LNG processing plant proposal

Dear Sir,

I strongly oppose the construction of a LNG processing plant in Providence. The construction itself has health implications for both Providence and Cranston, both densely populated areas and the plant itself is a health risk to the local population. It is vulnerable to hurricane and other weather vagaries that the coming climate change will make more extreme. It is not fair to the local population, particularly South Providence, which is working hard and successfully to re-invent itself. The choice of site would appear to be associated with the perceived economic state of south Providence compared with alternatives such as Quonset which is less densely populated but wealthier. I hope this is not the case as the health of all our populace should be of the first importance.

I urge you to carefully consider or re-consider this proposal and do what is best for our citizens.

Thank you.

Sincerely,

Lynn H. Sommerville, M.D., Ph.D.

Comment No. 38

Martella, Joseph (DEM)

From: Geerah, Sumintra L. <_____>
Sent: Thursday, August 10, 2017 11:59 AM
To: Martella, Joseph (DEM)
Cc: NoLNGinPVD@gmail.com
Subject: [EXTERNAL] : Say NO to National Grid!

Dear Mr. Martella,

I am writing to you to urge you to say NO to National Grid's plans for an LNG plant in Providence. The community is asking you to deny National Grid's proposal to build a natural gas liquefaction facility on a dangerous toxic site in the Port of Providence, exposing residents to harmful substances. This facility will be a danger to the community if built. It is in all our interests to keep LNG out of RI, or anywhere for that matter. Let's look towards a cleaner future for our families, neighbors and friends!

Please do not allow this to happen.

Sincerely,
Sumintra L. Geerah

Comment No. 39

Martella, Joseph (DEM)

From: Matthew Bessette <Matthew.Bessette@ri.gov>
Sent: Thursday, August 10, 2017 12:12 PM
To: Martella, Joseph (DEM)
Cc: NoLNGinPVD@gmail.com
Subject: [EXTERNAL] : NG STRAP permit

August 10, 2017

Joseph Martella
235 Promenade St.
Providence, RI 02908

Dear Mr. Martella:

I am writing to you regarding National Grid's Liquefaction Project at Fields Point. My request is that RI DEM deny its application for a STRAP permit. As you well know, such a permit is for remediation purposes, not for building more polluting facilities. And although this project differs from KeyPoint's 2005 bid to construct a new LNG import facility, it would nonetheless expand and augment an existing facility located on contaminated water and soil.

The truth is that National Grid's argument hinges on attrition – on decades of lawmakers, administrators, industries, and fossil-fuel interests asking, if not telling, South Providence residents to accept health and safety risks as normal. On this basis, the proposed liquefaction project is indeed not a departure from business as usual. By the project manager's own admission, the monitoring and pollution-control measures would cease after the project is finished. In this manner, the new environmental burdens foisted on the surrounding neighborhoods will become part of National Grid's "tradition" of perpetuating Rhode Island's reliance on fossil fuels at the expense of public safety and public health.

And let us be clear. The seeming appeal of National Grid's proposed LNG terminal, that an existing pipeline would be supplying the gas to the facility, depends on overlooking the fact that this is a pipeline that already carries hydraulically-fractured gas from Pennsylvania. Now that it is becoming more widely known that such interstate pipelines like the Algonquin, along with numerous other LNG terminals, ought to have undergone more rigorous and less-biased environmental assessments than they did, why should their health and safety costs not be considered when an offshoot or piggyback project is at stake?

So whether it is the testimony of families who have suffered illnesses from living in proximity to these pipelines and facilities, the fact that natural gas power plants release 21-120 times more methane than earlier estimates indicated, or the all-too foreseeable risks of spreading contamination and public exposure to dangerous substances that National Grid's current proposal presents, my request is that RI DEM deny this permit and do right by the citizens of South Providence.

Sincerely,
Mr. Matthew Bessette

Comment No. 40

Martella, Joseph (DEM)

From: JANET RIVARD <janet.rivard@providence.ri.gov>
Sent: Thursday, August 10, 2017 12:30 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : NO LNG in PRovidence

Hello Mr Martella,

I am writing to request that you deny the request by National Grid to build a natural gas liquefaction plant in Providence at the port at the Terminal Road site. As a lifelong Providence resident with family here since the 1840s, I implore you to take this step to make our neighborhood a little less unsafe. Growing up close to the port we new from the time we were children that if there were ever an accident with any of the storage tanks, it would spread rapidly in a chain reaction and take out approximately a5 mile radius. Now I hear that the nearby chemical company alone would impact 16 miles. This area has dealt with a frightening potential threat for a very long time. Please do not add to it by allowing this liquefaction plant request.

To make this more real, please allow me to share a brief story about the night of the fire at the port about a decade ago. Knowing the history of the area and living in the home my grandfather bought in 1920, this was one of the more frightening nights of my life. We had bags packed in the car, the dogs' leashes by the door, my daughter sleeping on the first floor couch and I watched TV all night long until I was sure the fire was under control. But we actually were in an evacuation mode! Adding LNG to the already very dangerous mix just makes no sense and is an added public safety hazard.

What we need is to clean up the damaged areas to the best of our ability and then use the space for technologies that will help generate clean energy and not put us further at risk.

Please choose wisely to deny National Grid's request.

Thank you for your time and consideration,

Janet L Rivard Michaud

Comment No. 41

Martella, Joseph (DEM)

From: Sarah O'Brien
Sent: Thursday, August 10, 2017 2:25 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : No to LNG in providence

Please reject giving National Grid permission to build a natural gas liquefaction facility on a dangerous toxic site in the Port of Providence. This will expose residents to harmful substances. This facility will be a danger to the community if built. It is in all our interests to keep LNG out of RI, or anywhere for that matter. Let's look towards a cleaner future for our families, neighbors and friends!

Sarah O'Brien, LICSW, RPT-S
Certified Lactation Counselor

Comment No. 42

Martella, Joseph (DEM)

From: Aarav Sundaresh <NoLNGinPVD@gmail.com>
Sent: Thursday, August 10, 2017 2:32 PM
To: Martella, Joseph (DEM)
Cc: NoLNGinPVD@gmail.com
Subject: [EXTERNAL] : Please deny National Grid's proposal to build a natural gas liquefaction facility

Mr. Martella,

I am writing in opposition to National Grid's proposal to build a natural gas liquefaction facility in the Port of Providence. Please deny this proposal, which would expose residents to harmful substances. This facility would be a danger to the community if built.

Thank you for your consideration.

Aarav Sundaresh

Comment No. 43

Martella, Joseph (DEM)

From:
Sent: Thursday, August 10, 2017 2:57 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : LNG

Dear Mr. Martella,

I am writing to you today to ask that you somehow stop the LNG storage tank. I am a retired environmental engineer. I live in Burrillville, RI.

I cannot believe that the DEM would even contemplate allowing National Grid to put a storage facility/liquefaction facility on that Allens Ave site. From what I have read and what I have researched on this matter, that soil is contaminated with cancer causing chemicals. You know what they are so I won't list them here.

I do not know if you have any children or grandchildren. Regardless of this, you should be very concerned about disturbing this soil. As I am sure you know, if National Grid (or any other company) removes that "cap" and it rains, all those chemicals will either "run off" into other surface waters or the ocean and those chemicals will go into any groundwater in the area. This is so dangerous for the residents in the surrounding area. It is also dangerous for the ocean ecosystem. It may indeed contaminate the groundwater/aquifer!

My other concern is this: Natural gas will/may be exported. If this is true, then why should this liquefaction facility/storage facility be allowed? I am sure that the state of RI will receive taxes, but is that worth the dangers?

If the soil is allowed to be removed, where will it go? Will it be processed? Will it be put into 55-gallon drums and buried somewhere else? Will it be put into the ground in another state?

Many of the VOC's will contaminate the air during any movement of the soil.

You know all that I have written above.

I must implore you to not allow this catastrophic project to happen.

The problem with human beings is that they allow horrible and stupid things to happen for money. Also, human beings always make decisions without looking into the future and to totally understand the long-term ramifications of such decisions.

Thank you for reading this. (I hope that you have.)

We must change our views of how corporations work within the scope of Earth's ecosystems. I am sure you would at least agree with me about this.

Sincerely,

Stephanie Sloman
Burrillville, RI

Comment No. 44

Martella, Joseph (DEM)

From: Manuel Cordero
Sent: Thursday, August 10, 2017 3:25 PM
To: Martella, Joseph (DEM)
Cc: NoLNGinPVD@gmail.com
Subject: [EXTERNAL] : Public Comment - National Grid STRAP Permit

Dear Mr. Martella,

I am writing to provide public comment regarding the STRAP permit RIDEM is currently considering for National Grid's proposed project in the Fields Point area.

I have spent a great deal of time with RISD students studying that area and am very familiar with the industrial history of the site and the known toxicity of the soil. **I am opposed to the approval of the STRAP permit that would allow for National Grid's construction work in the toxic soil,** which would increase the risk of exposing Providence citizens and visitors alike to hazardous and dangerous materials.

On behalf of my family and neighbors I hereby express my deep concern for the adverse effects of the proposed work and the long term impact to the health and safety of future generations in Providence.

Best,
Manuel Cordero

Comment No. 45

Martella, Joseph (DEM)

From: Kate Schapira
Sent: Thursday, August 10, 2017 3:56 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : Comment on STRAP proposed for 642 Allens Ave, Providence, RI

Dear Mr. Martella:

I write to urge the DEM to refuse a STRAP permit to National Grid for 642 Allens Avenue.

Toxic substances from over a century of industrial use permeate the site. Cyanide, arsenic, lead, VOCs, PCBs and multiple hydrocarbons have all been found in non-negligible quantities. National Grid's plan for preventing these from entering the air and the groundwater near the site is insufficient, particularly in the event of extreme weather (high winds, what's known as a hundred-year flood).

I attended the first of two hearings that National Grid held for the proposed STRAP. As for particulate matter in the air—dust and dirt that could be carried on the wind to nearby neighborhoods and hospitals—National Grid's only plan was to “monitor” it. They made no commitment to stopping the project if the levels of toxic or dangerous material in the air exceeded acceptable standards—which in their presentation were unspecified. In a neighborhood that already has high rates of asthma from air pollutants, this is an unacceptable additional burden.

The concept and principle of “environmental justice” definitively and strongly applies to the community whose houses are within the area potentially affected by digging on Allens Avenue. People living in the area are often doing so because it is what is affordable to them, not what they would necessarily choose, and the longer they've been living there, the more exposed they have already been to the toxic materials already associated with multiple industrial sites. They are trapped with the lead, PCBs, cyanide, arsenic and VOCs that are already there, and they would be trapped with any additional quantities released into air and groundwater by the proposed project.

They would also be trapped in the range of any leaks or explosions from the LNG plant that is the reason for the desired remediation. While people who attended the second public meeting reported your claim that DEM has no say in what National Grid does with the site and that considering the final use of the site cannot be part of DEM's decision, DEMDSR0193 Section 7.07(C)(2) states that it is: “Community Meetings: The purpose of the meeting is to document community comments and concerns about the investigation, cleanup, and reuse of the Contaminated Site.” People living near this site will be in danger from it for the entire life of its projects, both the short-term remediation and its subsequent use. I urge you to refer this permit.

Sincerely,
Kate Schapira
Providence, RI

Comment No. 46

Martella, Joseph (DEM)

From: Lisa Petrie <[REDACTED]>
Sent: Thursday, August 10, 2017 6:28 PM
To: Martella, Joseph (DEM)
Cc: NoLNGinPVD@gmail.com; teonlisa@juno.com
Subject: [EXTERNAL] : Please deny the STRAP permit for National Grid's Fields Point LNG facility
Attachments: Coalition Draft STRAP comment letter.pdf

Dear Mr. Martella:

Every Rhode Island resident has a right to breathe clean air, drink clean water, and live in a safe, healthy community, regardless of race, ethnicity, income level, or zip code, and now the people of Southside Providence are counting on you to protect these rights. Though I live in Richmond, I stand with Southside residents in their struggle to protect themselves and their children from this dangerous project.

In the first place, National Grid's proposed Fields Point LNG production facility would in itself be a step backward for the state--locking us into continued fossil fuel addiction for decades when we should be transitioning to 100% renewables—and would pose an unacceptable risk to the health and safety of the surrounding community, and to children in particular. This community is already overburdened with industrial pollution, and suffers the one of the highest asthma rates in the state. Allowing National Grid to go ahead with its LNG facility would only compound these already serious problems. In addition, the facility would be built next to a Univar chemical plant with a hazard radius of 14 miles, which includes over 300 schools with 110,000 children. The risk to these children—approximately two-thirds of Rhode Island's school children—would be heightened by the addition of the LNG facility.

Secondly, as you know, building this facility would involve digging up tons of contaminated soil—soil that contains high levels of toxins such as arsenic, lead, cyanide, asbestos, and PCB's, as well as other harmful chemicals; this is why it would require a STRAP (Short Term Response Action Plan) permit from you. But, as you also know, STRAP permits are for cleaning up toxic sites, not building new pollution sources. Specifically, the permit is for actions taken immediately after discovering a release of hazardous material, or to remove an imminent hazard. But this contamination has not just been discovered, nor does the site pose an imminent hazard if left undisturbed.

In addition, the regulations state that "No Short-Term Response Action.. may be conducted in a manner which increases the potential for harm, either short-term or long-term, to human health or the environment." But the proposed work would increase the risk of harm to both human health *and* the environment by removing a protective cap and bringing contaminated soil up to the surface where the toxins could be blown into the surrounding community and/or the bay, particularly given the high winds that are common in this waterfront area.

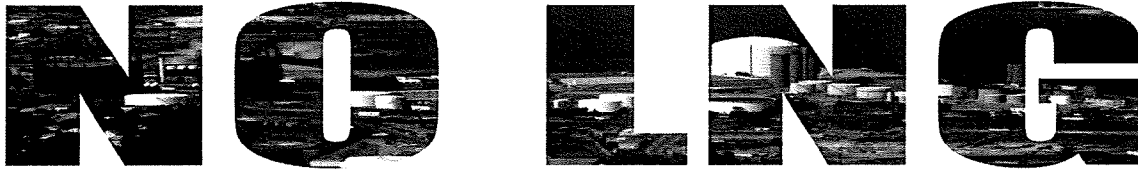
Please do the right thing by denying this permit and stopping yet another instance of environmental racism in this state.

Respectfully Yours,
Lisa Petrie

Carolina, RI 02812

P.S. To the friends I am blind-copying here--sorry I didn't get to this sooner! If anyone is able to send comments, they'll be accepted until midnight tonight. I'm also attaching a draft letter from the No LNG in PVD Coalition to DEM on this project for more info.

Comment No. 46 Attachment



<http://NoLNGinPVD.org> | NoLNGinPVD@gmail.com | #NoLNGinPVD

August 10, 2017

Office of Waste Management
ATTN: Joe Martella, Senior Engineer
Rhode Island Department of Environmental Management
235 Promenade Street
Providence, RI 02908

RE: NATIONAL GRID LNG - COMMENTS ON PROPOSED LIQUEFACTION PROJECT AND
HOLCIM DRIVEWAY STRAPS

We, the No LNG in PVD Coalition, are writing to comment on the Short Term Response Action Plans (STRAPs) for the Proposed Liquefaction Project (RIDEM File Number SR-28-1152) and Holcim Driveway submitted May 12, 2017 and May 30, 2017 respectively. We respectfully request that the Rhode Island Department of Environmental Management (RIDEM) holds no permit applicant above the environmental regulations it is charged to enforce. We request that RIDEM DENY the STRAPs to National Grid, as they do not qualify for a STRAP. If National Grid wishes to proceed they must fully remediate the contaminated site with a Remedial Action Work Plan approved by RIDEM. The following describes how National Grid does not qualify for a STRAP:

“Emergency or Short-Term Response Action shall mean any activities undertaken immediately following the discovery of a Release of Hazardous Material in order to completely or partially contain clean up or treat the Released Material and/or remove an Imminent Hazard if it exists (DEM-DSR-01-93 Section 3.18).”

- Per the definition of an Emergency or Short-Term Response Action in the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, to qualify a project must occur immediately following the discovery of a release, or the removal of an Imminent Hazard. Section 2.2 of the Liquefaction Project STRAP states that RIDEM issued a Letter of Responsibility on February 13, 1998 and site poses no Imminent Hazard, therefore this project does NOT qualify for a STRAP.

“No Emergency or Short-Term Response Action undertaken by the Responsible Party may be conducted in a manner which increases the potential for harm, either short-term or long-term, to human health or the environment (DEM-DSR-01-93 Section 6.01).”

- The proposed construction work would create the potential for harm to human health and the environment. During the proposed construction period contaminated soil and groundwater will be handled and stockpiled. The location of the project is on the Port of Providence which is subject to high winds within the 100-year floodplain, leading to a potential for release of contaminants. Construction will occur near existing fossil fuel infrastructure including existing natural gas pipes which could lead to another pipe burst.
- It is impossible to separate the STRAP from the project, the proposed liquefaction facility. The proposed facility would increase the potential for harm to human health and the environment in an Environmental Justice Community.

“Emergency Permits shall not exceed ninety (90) days in duration (DEM-DSR-01-93 Section 6.05).”

- The STRAP for the proposed Liquefaction Plant indicates: “The schedule for implementation of the work described herein will depend on receipt of the STRAP Approval for the RIDEM and receipt of other necessary permits and approvals. The Project is Projected to begin in 2017 and continue through 2019. Earth disturbing activities are not expected to begin until early 2018.” As the duration is longer than 90 days, the work does not constitute short-term remediation and does not meet the duration requirements for an Emergency or Short-Term permit.

As described above, the Project does NOT meet the requirements of a Short-Term Response Action Plan. No LNG in PVD Coalition strongly requests that RIDEM DENY National Grid their STRAPs. Any future earthwork on the site in contaminated soils must only be conducted under the full remediation of the site.

In addition to finding that the STRAP does NOT meet the requirements of an Emergency or Short-Term Response Action therefore requiring denial of the permit, the No LNG in PVD coalition has the following additional comments on the STRAP:

- “The notice shall contain, at a minimum, the following information: A Brief description of Hazardous Waste Involved (DEM-DSR-01-93 Section 6.06(B))”
 - Both the first and second public meeting notices had no mention of which hazardous waste is involved.
- “A brief description of the treatment action and/or other actions authorized by the permit (DEM-DSR-01-93 Section 6.06(C)).”
 - The description is limited to soil and groundwater management, and earthwork.
- “The duration and effective dates of the permit (DEM-DSR-01-93 Section 6.06(E)).”
 - The duration of work associated with the requested permits was not included in either notices.
- National Grid refused to hold a public meeting per RIDEM’s regulations. “Community Meetings: The purpose of the meeting is to : 1) disseminate information about the Department’s Site Remediation program and the specific *Contaminated-Site* of interest; 2) document community comments and concerns about the investigation, clean-up, and *reuse of the Contaminated-Site*, and 3) *engage in a dialogue with the public about the Contaminated-Site*. Community meetings will be organized by the Performing Party and will be *accessible* to those who wish to attend (considering public transportation and access for disabled. All “*equal participation*” among all involved should be established – avoiding panels, head tables, or auditorium presentations. Translation assistance for non-English speakers shall be provided by the Performing Party when appropriate (DEM-DSR-01-93 Section 7.07(C)).”
 2. National Grid refused to discuss the Reuse of the Contaminated-Site, the liquefaction facility, during the community meeting, which is stated in the purpose of a community meeting.
 3. During the community meeting National Grid refused to acknowledge that there is any risk with the soil and groundwater. Effects from potential exposure to the contaminated material being handled were not discussed and were quickly dismissed. The words Contaminated, Carcinogenic, Excess Lifetime Cancer Risk, Hazardous Material, Hazardous Substance and Hazardous Waste.were absent from the dialogue, stead such contaminated material was referred to as “compounds”. Even National Grid’s poster on “What is a STRAP and What is a PIP” does not include the word Hazardous which is in RIDEM’s definition of a STRAP. National Grid was engaging in public relations not in real engagement and dialogue with the public about a contaminated site.
- “The Responsible Party shall, throughout the implementation of that action, monitor and evaluate the performance, effectiveness and completeness of the action in abating, preventing or eliminating contamination and more specifically, the Imminent Hazard (DEM-DSR-01-93 Section 6.08).”
 - As National Grid has a history of non-compliance with safety regulations (include info on no personal protective equipment for workers on pipe burst, and dust complaints. The No LNG in PVD coalition requests that an independent environmental monitor is allowed on

site throughout the construction period of the STRAPs, and that the No LNG in PVD coalition is reimbursed on a (bi-weekly/monthly?) bases for the cost of the independent monitor. The monitor will report back to the coalition and the public.

- Section 4.1 of the STRAP states “In general, the fill consists of sands and gravels with cinders, cinder ash, coke and coal fragments.”
 - Several of the borings indicate the soil is a silt or fine sand, both of which are significantly more susceptible to becoming airborne than a just sands and gravel. In addition during the first public meeting National Grid indicated there was no threat to the soil having dust impacts. It is concerning that National Grid is downplaying the potential dust threat by what material they claim is predominant especially at a coastal site with potential for high winds.
- Please provide copies of all air monitoring (Section 6.6.1 of STRAP) results to the No LNG in PVD Coalition on a weekly basis.
- Section 6.7 Decontamination Protocol lacks requirements to keep construction workers and their families safe. There is no discussion about workers cleaning up prior to eating or leaving the site, about not allowing food or drinks near where work is occurring with contaminated soil and groundwater.
- Will the person overseeing construction oversight have had OSHA Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) Supervisor training?
- Will the construction workers have been HAZWOPER trained?
- What Personal Protective Equipment will the construction workers use?
- Will the construction workers be informed of the material they are working with?
- Section 6.8 Soil Stockpile Management Requirements describes the contaminated soil being moved a minimum of three times before either being shipped off-site or buried beneath the cap.
 - As this project is located on the coast, which is prone to high winds, stormwater and floodwater, No LNG in PVD Coalition requests that the contaminated soil is immediately stored in liquid tight containers that can be shipped when excavated, therefore limiting the migration of the contaminated soil to impact human health or the environment.
- The project is located in potential habitat for the federally listed threatened red knot (*Calidris canutus rufa*). In addition 19 bird species that are protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act may be potentially affected by the proposed activities according to U.S. Fish and Wildlife Service (USFWS) IPaC on July 5, 2017. It is requested that an Ecological Risk Assessment is conducted per (DEM-DSR-01-93 Section 8.05A) and report (DEM-DSR-01-93 Section 8.05B)
- “An Environmentally Sensitive Area shall mean any of the following areas: Areas which provide habitat for Federally endangered or threatened species as determined by the U.S. Department of Fish and Wildlife (DEM-DSR-01-93 Section 3.21).”
 - Please coordinated with the USFWS to determine if the Site provides habitat for red knot.
 - If it is determined the site does provide habitat, National Grid must comply with the Endangered Species Act.
 - If determined to be an Environmentally Sensitive Area, National Grid must meet the more stringent thresholds of Method 3 during any remediation work. “Method 3 shall mean the determination of appropriate remedial objectives based on the concentrations of

Hazardous Substances developed in accordance with Rule 8.04 (Method 3 Remedial Objectives) and Rule 8.05 (ecological Protection) of the Remediation Regulations (DEM-DSR-01-93 Section 3.49).”

Comment No. 47

Martella, Joseph (DEM)

From: Robert L. Malin <_____>
Sent: Thursday, August 10, 2017 6:31 PM
To: Martella, Joseph (DEM); Lisa Petrie
Cc: NoLNGinPVD@gmail.com
Subject: [EXTERNAL] : Re: Please deny the STRAP permit for National Grid's Fields Point LNG facility

This was excellently written race Lisa can we use this to send around I would like to put my name on it at least
On Thu, Aug 10, 2017 at 6:29 PM Lisa Petrie <_____> wrote:

Dear Mr. Martella:

Every Rhode Island resident has a right to breathe clean air, drink clean water, and live in a safe, healthy community, regardless of race, ethnicity, income level, or zip code, and now the people of Southside Providence are counting on you to protect these rights. Though I live in Richmond, I stand with Southside residents in their struggle to protect themselves and their children from this dangerous project.

In the first place, National Grid's proposed Fields Point LNG production facility would in itself be a step backward for the state--locking us into continued fossil fuel addiction for decades when we should be transitioning to 100% renewables—and would pose an unacceptable risk to the health and safety of the surrounding community, and to children in particular. This community is already overburdened with industrial pollution, and suffers the one of the highest asthma rates in the state. Allowing National Grid to go ahead with its LNG facility would only compound these already serious problems. In addition, the facility would be built next to a Univar chemical plant with a hazard radius of 14 miles, which includes over 300 schools with 110,000 children. The risk to these children—approximately two-thirds of Rhode Island's school children—would be heightened by the addition of the LNG facility.

Secondly, as you know, building this facility would involve digging up tons of contaminated soil—soil that contains high levels of toxins such as arsenic, lead, cyanide, asbestos, and PCB's, as well as other harmful chemicals; this is why it would require a STRAP (Short Term Response Action Plan) permit from you. But, as you also know, STRAP permits are for cleaning up toxic sites, not building new pollution sources. Specifically, the permit is for actions taken immediately after discovering a release of hazardous material, or to remove an imminent hazard. But this contamination has not just been discovered, nor does the site pose an imminent hazard if left undisturbed.

In addition, the regulations state that "No Short-Term Response Action.. may be conducted in a manner which increases the potential for harm, either short-term or long-term, to human health or the environment." But the proposed work would increase the risk of harm to both human health *and* the environment by removing a protective cap and bringing contaminated soil up to the surface where the toxins could be blown into the surrounding community and/or the bay, particularly given the high winds that are common in this waterfront area.

Please do the right thing by denying this permit and stopping yet another instance of environmental racism in this state.

Respectfully Yours,

Lisa Petrie

Carolina, RI 02812

P.S. To the friends I am blind-copying here--sorry I didn't get to this sooner! If anyone is able to send comments, they'll be accepted until midnight tonight. I'm also attaching a draft letter from the No LNG in PVD Coalition to DEM on this project for more info.

Comment No. 48

Martella, Joseph (DEM)

From: Sarah Mack
Sent: Thursday, August 10, 2017 7:31 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : No to LNG PVD

Dear Mr. Martella,

I write asking you to reject giving National Grid permission to build a natural gas liquefaction facility on a dangerous toxic site in the Port of Providence. This would expose residents to harmful substances. This facility will be a danger to our community if built. It is in all our interests to keep LNG out of RI. Please consider this for the safety of our families, neighbors and friends!

Sincerely,

Sarah Mack

Sent from my iPhone

Comment No. 49

Martella, Joseph (DEM)

From: Brienna Oulette
Sent: Thursday, August 10, 2017 7:39 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : LNG

Dear Mr. Martella,

As a small business owner, I'm asking you to reject National Grid's request for permission to build a natural gas liquefaction facility. I work on the Southside of Providence and I do NOT want that facility built in this beautiful city. It is in all our interests to keep LNG out of RI, or anywhere for that matter.

Let's look towards a cleaner future for our families, neighbors and friends!

--

Brienna Oulette, LICSW, QMHP
Clinician

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Comment No. 50

Martella, Joseph (DEM)

From: Walt <
Sent: Thursday, August 10, 2017 7:54 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : Natural Gas Liquefaction Facility

Dear Mr. Martella,

I am writing in opposition to National Grid building a natural gas liquefaction facility. LNG does not belong in RI would be a danger to its citizens. Thank you.

Walter J. Reis

North Providence, Rhode Island

Comment No. 51

Martella, Joseph (DEM)

From: kbf4
Sent: Thursday, August 10, 2017 8:42 PM
To: Martella, Joseph (DEM)
Cc: NoLNGinPVD@gmail.com
Subject: [EXTERNAL] : Please deny the STRAP permit for National Grid's Fields Point LNG facility
Importance: High

Dear Mr. Martella:

Every Rhode Island resident has a right to breathe clean air, drink clean water, and live in a safe, healthy community, regardless of race, ethnicity, income level, or zip code, and now the people of Southside Providence are counting on you to protect these rights. Though we live in South Kingstown, we both stand with Southside residents in their struggle to protect themselves and their children from this dangerous project.

In the first place, National Grid's proposed Fields Point LNG production facility would in itself be a step backward for the state—locking us into continued fossil fuel addiction for decades when we should be transitioning to 100% renewables—and would pose an unacceptable risk to the health and safety of the surrounding community, and to children in particular. This community is already overburdened with industrial pollution, and suffers the one of the highest asthma rates in the state. Allowing National Grid to go ahead with its LNG facility would only compound these already serious problems. In addition, the facility would be built next to a Univar chemical plant with a hazard radius of 14 miles, which includes over 300 schools with 110,000 children. The risk to these children—approximately two-thirds of Rhode Island's school children—would be heightened by the addition of the LNG facility.

Secondly, as you know, building this facility would involve digging up tons of contaminated soil—soil that contains high levels of toxins such as arsenic, lead, cyanide, asbestos, and PCB's, as well as other harmful chemicals; this is why it would require a STRAP (Short Term Response Action Plan) permit from you. But, as you also know, STRAP permits are for cleaning up toxic sites, not building new pollution sources. Specifically, the permit is for actions taken immediately after discovering a release of hazardous material, or to remove an imminent hazard. But this contamination has not just been discovered, nor does the site pose an imminent hazard if left undisturbed.

In addition, the regulations state that "No Short-Term Response Action.. may be conducted in a manner which increases the potential for harm, either short-term or long-term, to human health or the environment." But the proposed work would increase the risk of harm to both human health *and* the environment by removing a protective cap and bringing contaminated soil up to the surface where the toxins could be blown into the surrounding community and/or the bay, particularly given the high winds that are common in this waterfront area.

Please consider Providence children as well as future generations' health and wellbeing, not mention the health of Rhode Island's coastal environment by denying this permit and stopping yet another instance of environmental racism in this state.

Sincerely,

Kim and Robert Falcone

Wakefield, RI. 02879

Comment No. 52

Martella, Joseph (DEM)

From: Suzanne Enser
Sent: Thursday, August 10, 2017 8:54 PM
To: Martella, Joseph (DEM)
Cc: Lisa Petrie; Fossil Free RI; Southern RI Progressive Alliance
Subject: [EXTERNAL] : Please DENY the STRAP permit for National Grid's Fields Point LNG facility

Dear Mr. Martella:

Every Rhode Island resident has a right to breathe clean air, drink clean water, and live in a safe, healthy community, regardless of race, ethnicity, income level, or zip code. We are counting on you to protect these rights.

Though I live in South Kingstown, I stand with the residents of the Southside of Providence in their struggle to protect themselves and their children, not to mention planet earth, from this adsurb project.

You know this. The evidence is clear. Global warming is threatening humanity. The "way of life we know of in this moment", will be significantly changed in my 8 year old son's lifetime if we do not control our addiction to fossil fuels, and yes I am suggesting immediately. There is no second chance.

Who are you to have the right to threaten my rights as a citizen of Rhode Island to breathe clean air?

Who are you who would permit National Grid to construct an LNG facility in our state, further contributing to our reliance on fossil fuels when we should be transitioning to 100% renewable energy?

Who are you to have the right to permit such gross and unacceptable risks to

the health and safety of the surrounding community, families, men, women and children, citizens of Rhode Island?

As states in Section 17 of Constitution of The State of Rhode Island and Providence

Plantations..."it shall be the duty of the general assembly (whom you are provided the opportunity to thoughtfully advise) to provide for the conservation of the air, land, water, plant, animal, mineral and other natural resources of the state, and to adopt all means necessary and proper by law to protect the natural environment of the people of the state by providing adequate resource planning for the control and regulation of the use of the natural resources of the state and for the preservation, regeneration and restoration of the natural environment of the state.

Furthermore, its my understanding that no Short-Term Response Action Plan (STRAP) may be conducted in a manner which increases the potential for harm, either short-term or long-term, to human health or the environment.” But the proposed work to build this facility would increase the risk of harm to both human health *and* the environment by removing a protective cap and bringing contaminated soil up to the surface where the toxins could be blown into the surrounding community and/or the bay, particularly given the high winds that are common in this waterfront area.

Please do you job to represent the citizenry of Rhode Island and the global community. Our future depends on your decisions.

Respectfully Yours,

Suzanne Enser

South Kingstown RI 02879

P.S. To all those whom is cc:d, please feel free to use portions of my letter (if you so desire) to send comments directly to Mr. Joseph Martella, Senior Engineer, RIDEM Office of Waste Management. Comments are DUE by midnight TONIGHT.

Comment No. 53

Martella, Joseph (DEM)

From: Elizabeth
Sent: Thursday, August 10, 2017 9:17 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : Stop the STRAP Permit

Dear Sir,

As I'm sure you're aware, the STRAP permit would allow for National Grid's construction work in the toxic soil on Allens Avenue, increasing the risk of exposing people to the high levels of cancerous and hazardous materials there.

PLEASE DO NOT APPROVE THE STRAP PERMIT. Do not allow National Grid to dig in toxic dirt, and put communities, schools and health centers at risk. Make National Grid clean up the entire property, or at least leave it alone so it doesn't get any worse.

Thank you for reading my email.

Sincerely,
Elizabeth Watts

Lynbrook, NY 11563

Comment No. 54

Martella, Joseph (DEM)

From: Jennifer Smith Boylan
Sent: Thursday, August 10, 2017 9:44 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : vote NO on LNG PV

Mr. Martella,

I am writing to urge you to vote NO on LNG PVD. Please do not give National Grid permission to build a natural gas liquefaction facility on a dangerous toxic site in the Port of Providence, exposing residents to harmful substances.

We should be looking to solar and wind to solve any energy needs. Just take a drive to VT to see the number of residential solar panels--that is what where we should be investing our efforts and money. Let's look towards a cleaner future for our families, neighbors and friends. Thank you.

Jennifer Boylan
Barrington

Comment No. 55

Martella, Joseph (DEM)

From: Isabel Mattia
Sent: Thursday, August 10, 2017 9:46 PM
To: Martella, Joseph (DEM)
Cc: NoLNGinPVD@gmail.com
Subject: [EXTERNAL] : NO LNG IN PVD

Hello Mr. Marcella,

Thank you for accepting public comments on the proposed LNG project. I am writing to express my OPPOSITION to the LNG project. I live in Little Compton, RI, but I was born in Providence and I work and go to school in the city. Providence needs to make smart choices for future generations and set an example for the rest of the state by investing in safe renewable energy. Liquefied natural gas is a non renewable dirty energy source which is somehow being marketed to the public as a cleaner safer option. You and I both know this is malarkey and is simply a rebranding effort by the petroleum lobby to keep control over our resources. The problem is that moving into the future, time will prove the reality of the situation. In years to come folks will look back to this time and wonder why we didn't stop crappy projects like this when we had the chance. LNG is not clean or safe, and it is a step in the wrong direction. We are a tiny coastal state with limited land and resources, we should be a leader in clean energy and in mitigating climate change as it will affect us greatly. Even a minor sea level rise will have a big impact on Rhode Island. We need our energy developments to be focused on being sustainable and renewable at every turn. I want my grandchildren to be able to enjoy living a beautiful safe life in Rhode Island. This LNG project is a step in the wrong direction. Please think of the long term future and not of the short term profits. Short term profits are fleeting and not worth gambling our future on. Thank you.

- Isabel

Comment No. 56

Martella, Joseph (DEM)

From: DiZoglio, Joseph
Sent: Thursday, August 10, 2017 9:48 PM
To: Martella, Joseph (DEM)
Cc: NoLNGinPVD@gmail.com
Subject: [EXTERNAL] : Health Concerns over LNG

Good evening DEM,

My name is Joey DiZoglio and I'm a second year medical student at Alpert Medical School. My comments are my own and in no ways affiliated with the school. Nevertheless, as a future healthcare provider and someone who'll be learning at the hospitals near the Allens Ave Site, I think the proposed building project is an indefensible threat to Rhode Island's health care infrastructure.

Since the gas leak earlier this year at I195 it's evident to me that RI's highly advanced and skilled health care industry is at threat. We do not need additional toxic hydrocarbon facilities located so close to patients nor to hospital staff who provide healing, labor, and the middle class income to RI's economy.

I propose a complete rejection of National Grid's (or any other company's) expansion of fossil fuel processing and storage.

--

Sincerely,
Joey DiZoglio
MD 2020 Candidate

Comment No. 57

Martella, Joseph (DEM)

From: Peter Nightingale
Sent: Thursday, August 10, 2017 9:57 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : NATIONAL GRID LNG COMMENTS ON PROPOSED LIQUEFACTION PROJECT AND HOLCIM DRIVEWAY STRAPS

Office of Waste Management
ATTN: Joe Martella, Senior Engineer
Rhode Island Department of Environmental Management
235 Promenade Street Providence, RI 02908

RE: NATIONAL GRID LNG COMMENTS ON PROPOSED LIQUEFACTION PROJECT AND HOLCIM DRIVEWAY STRAPS

Time has run out; there can no longer be any support for fracked gas as a “bridge fuel.” Rhode Island must live up to its constitutional duty to protect the environment for present and future generations. Rhode island must end support for projects that perpetuate environmental racism. Rhode Island must honor U.S. treaties with Indigenous Peoples which committed us to living in harmony with Mother Earth. In other words, Rhode Islanders have no choice but to keep all fossil fuels in the ground and to invest exclusively in a renewable energy infrastructure.

National Grid's plans fly in the face of these considerations and it is the statutory duty of the Rhode Island' Department of Environmental Management to prevent this project from going forward.

That time indeed has run out should be is clear from the following paper written, among others by Dr. James Hansen, who has taken on the role of guardian of youth suing the federal government in a landmark climate lawsuit (<https://www.ourchildrenstrust.org/us/federal-lawsuit>)

Young people's burden: requirement of negative CO₂ emission
(<http://csas.ei.columbia.edu/2017/07/18/young-peoples-burden-requirement-of-negative-co2-emissions/>)

a. The growth rate of greenhouse gas climate forcing has accelerated markedly in the past several years [...], a conclusion **starkly at odds with the common narrative that the world has recently turned the corner toward a solution of the global warming problem.**

b. An appropriate goal is to return global temperature to the Holocene range within a century. Such a goal was still achievable in 2013 if rapid emission reductions had begun at that time and if there were a global program for reforestation and improved agricultural and forestry practices. **Now climate restoration this century would also require substantial technological extraction of CO₂ from the air.** If rapid emission reductions do not begin soon, the burden placed on young people to extract CO₂ emitted by prior generations may become implausibly difficult and costly.” [Emphasis added.]

Respectfully submitted,
Peter Nightingale,
Professor of Physics

--

The next auto-quote (sent by free-ware from my commercial-free computer) is:
People came to feel that it was deeply wrong, perhaps evil, to engage in nuclear war, and are coming to an

awareness that it is deeply wrong, perhaps evil, to destroy our habitat and create a legacy of suffering for our children and grandchildren.

(Robert Jay Lifton)

Sign up to [stay in touch](#) with Nature's Trust RI

[Peter Nightingale](#)

Department of Physics, East Hall

University of Rhode Island

Kingston, RI 02881, USA

Telephone|

Comment No. 58

Martella, Joseph (DEM)

From: Lauren Niedel
Sent: Thursday, August 10, 2017 10:17 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : LNG project In Providence SAY NO

Dear Mr. Martella;

I am going to make this brief. I do not live in Providence, I live in Gloucester and I know what the people are going through fighting against fracked gas infrastructure in the community. This is the wrong time, the wrong reason and the wrong priorities to put this dangerous facility in Providence. We do not need additional fracked gas infrastructure in this state. We need to move to renewable energy - we cannot be beholden to a foreign corporation for the purpose of shipping out fracked gas that will go to foreign countries.

I urge you to vote against approval of the LNG project proposed for Providence.

Sincerely;

Lauren Niedel-Gresh
Democratic State Committeewoman District 40

Chepachet, RI 02814

Comment No. 59

Martella, Joseph (DEM)

From: Kate Aubin
Sent: Thursday, August 10, 2017 10:26 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : Comments on STRAPS for Proposed LNG Facility (RIDEM file number SR-28-1152)

Hi Joseph,

I am writing to ask you to deny National Grid's STRAP permit application. The STRAP permit is National Grid's first step in realizing their proposed LNG facility. The LNG facility would increase our state's reliance on fossil fuels. We need to be moving away from fossil fuels and increase our production of renewable energy, which we have the ability to produce in Rhode Island (we don't have the ability to produce fossil fuels in RI and therefore have to rely on the whims of other states/corporations). The LNG facility would also place more burden on an already burdened community. The people of South Providence deal with the highest asthma rates in the state. The air is polluted from the highway and trucks traveling up and down Allens Ave, delivering chemicals, scrap metal, and other toxic materials into the port. The South Providence community (with its numerous churches, daycares, health facilities, and schools) doesn't deserve to have more toxicity coming into their community. No one does.

Please do the right thing for the people of Rhode Island (and especially the people of South Providence) and deny National Grid's permit.

Thank you,
Kate Aubin

Comment No. 60

Martella, Joseph (DEM)

From: Carole Costanza
Sent: Thursday, August 10, 2017 10:46 PM
To: Martella, Joseph (DEM)
Subject: [EXTERNAL] : Comment on the STRAP permit and the LNG Facility

To Mr Martella,

I ask you - what kind of world will my grandsons live in if we don't stop approving fossil fuel facilities? (and this definitely includes "natural" gas facilities). Will they have access to clean water and air? Will they struggle to find adequate food? Will they suffer from diseases that will run rampant in a ravaged landscape? I'm not exaggerating. If we don't take climate change seriously NOW, we risk losing everything that's important to us. Let's not be the last generation to live on a beautiful and bountiful Earth. It's up to you.

I strongly agree with the points in the following letter by Lisa Petrie:

Every Rhode Island resident has a right to breathe clean air, drink clean water, and live in a safe, healthy community, regardless of race, ethnicity, income level, or zip code, and now the people of Southside Providence are counting on you to protect these rights. Though I live in Richmond, I stand with Southside residents in their struggle to protect themselves and their children from this dangerous project.

In the first place, National Grid's proposed Fields Point LNG production facility would in itself be a step backward for the state--locking us into continued fossil fuel addiction for decades when we should be transitioning to 100% renewables—and would pose an unacceptable risk to the health and safety of the surrounding community, and to children in particular. This community is already overburdened with industrial pollution, and suffers the one of the highest asthma rates in the state. Allowing National Grid to go ahead with its LNG facility would only compound these already serious problems. In addition, the facility would be built next to a Univar chemical plant with a hazard radius of 14 miles, which includes over 300 schools with 110,000 children. The risk to these children—approximately two-thirds of Rhode Island's school children—would be heightened by the addition of the LNG facility.

Secondly, as you know, building this facility would involve digging up tons of contaminated soil—soil that contains high levels of toxins such as arsenic, lead, cyanide, asbestos, and PCB's, as well as other harmful chemicals; this is why it would require a STRAP (Short Term Response Action Plan) permit from you. But, as you also know, STRAP permits are for cleaning up toxic sites, not building new pollution sources. Specifically, the permit is for actions taken immediately after discovering a release of hazardous material, or to remove an imminent hazard. But this contamination has not just been discovered, nor does the site pose an imminent hazard if left undisturbed.

In addition, the regulations state that "No Short-Term Response Action.. may be conducted in a manner which increases the potential for harm, either short-term or long-term, to human health or the environment." But the proposed work would increase the risk of harm to both human health *and* the environment by removing a protective cap and bringing contaminated soil up to the surface where the toxins could be blown into the surrounding community and/or the bay, particularly given the high winds that are common in this waterfront area.

Please do the right thing by denying this permit and stopping yet another instance of environmental racism in this state.

Thank you in advance for doing the right thing,
Carole Costanza

Comment No. 61

Martella, Joseph (DEM)

From: Stephen Dahl
Sent: Thursday, August 10, 2017 10:53 PM
To: Martella, Joseph (DEM)
Cc: nolnginpvd@gmail.com
Subject: [EXTERNAL] : Please deny the STRAP permit for National Grid's Field Point LNG facility

To: joseph.martella@dem.ri.gov

Copy: nolnginpvd@gmail.com

[Please deny the STRAP permit for National Grid's Fields Point LNG facility](#)

National Grid's proposed Fields Point LNG production facility is unacceptable for several reasons. First, it disenfranchises economically disadvantaged people, who don't need further obstacles to their health and well-being. Secondly, while Rhode Island is supposed to be transitioning to a green economy, this proposal would lock in carbon burning fossil fuel for at least 50 more years, with methane a greenhouse gas over 80 times more damaging to climate disruption than carbon dioxide. Thirdly, it is crazy to build this volatile and flammable facility so close to a chemical plant which is in the heart of a densely populated area full of schools and hospitals.

STRAP permits are not to be used for the purpose for which you want to use it. You would be digging up toxic, contaminated soil, yet in addition you would be creating a site which produces contaminants. These permits are intended to be used to remove contamination from a site upon the hazard's discovery, not as sites in which to add more hazardous material after stirring up the old toxins.

Putting this plant in such a populated area is unconscionable. It shows how political power is mishandled by the powerful to disenfranchise those without political authority. This facility isn't something you'd want near you. Don't put it near others. In fact, don't put it anywhere, as it isn't a sustainable solution for sane people who want to stop climate disruption including extreme weather and rising sea-levels. Please come up with a better solution, one that involves renewable energy and builds a better and more just future.

Thank you.

Stephen R. Dahl

Kingston, RI

Comment No. 62

Martella, Joseph (DEM)

From: No LNG in PVD <noLNGinpvd@gmail.com>
Sent: Thursday, August 10, 2017 11:41 PM
To: Martella, Joseph (DEM)
Cc: Forcier, Susan (DEM); Coit, Janet (DEM); Gray, Terry (DEM)
Subject: [EXTERNAL] : Comments on National Grid STRAP application
Attachments: No LNG in PVD Comments on STRAP.pdf

Dear Mr. Martella,

Please see attached for the comments from the No LNG in PVD Coalition.

Collectively, we demand that the Rhode Island Department of Environmental Management deny National Grid the STRAP based on the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases.

Sincerely, the following Elected Officials, Organizations, and Individuals:

Elected Officials:

Representative Edith Ajello, District 1
Representative Chris Blazejewski, District 2
Representative Moira Walsh, District 3
Representative Aaron Regunberg, District 4
Representative Marcia Ranglin-Vassell, District 5
Representative John Lombardi, District 8
Representative Grace Diaz, District 11
Senator Josh Miller, District 28
Senator Jeanine Calkin, District 30
Representative Susan Donovan, District 69
Providence City Councilman Sam Zurier, Ward 2

Organizations:

Climate Action RI
Environmental Justice League of Rhode Island
The FANG Collective
Fossil Free Rhode Island
RI Sierra Club
Sisters of Mercy Ecology

Individuals:

Aaron Jaehnig,
Andrew Poyant,
Chris Kavanagh, RSM
Cristina Cabrera,
David Ahlborn,
Dr. Kara Provost,
Dr. Micah Salkind,
Foluke Fayanjuola
Gina Rodriguez,
Joanne Noonan,

Judee Burr,
Julian Drix,
Karen Blazer,
Kate Schapira,
Mary Pendergast, RSM,
Monica Huertas, RSM,
Norma Fleming, RSM
Rose Catania,
Suzanne Enser,

Comment No 62 Attachment



<http://NoLNGinPVD.org> | NoLNGinPVD@gmail.com | #NoLNGinPVD

August 10, 2017

Office of Waste Management
ATTN: Joe Martella, Senior Engineer
Rhode Island Department of Environmental Management
235 Promenade Street
Providence, RI 02908

RE: NATIONAL GRID LNG - COMMENTS ON PROPOSED LIQUEFACTION PROJECT AND
HOLCIM DRIVEWAY STRAPs

No LNG in PVD is a coalition of residents, community organizations, businesses, churches, health care practitioners, students, educators, and elected officials opposed to National Grid's plans to build the "Fields Point Liquefaction Facility". We are writing to comment on the Short Term Response Action Plans (STRAPs) for the Proposed Liquefaction Project (RIDEM File Number SR-28-1152) and Holcim Driveway submitted May 12, 2017 and May 30, 2017 respectively.

We respectfully request that the Rhode Island Department of Environmental Management (RIDEM) holds no permit applicant above the environmental regulations it is charged to enforce. As the property owner, National Grid assumed responsibility for a historically contaminated property and is subject to regulatory limitations of restricted land use, overseen and enforced by RIDEM. Documents on the online docket for the former New England Gas Company MGP at 642 Allens Ave¹ show a disturbing attempt by National Grid^{2,3} to avoid adhering to RIDEM's Remediation Regulations⁴, and an even more disturbing pattern of RIDEM deferring to National Grid and allowing this.⁵ This continued until the Federal Energy Regulatory Commission (FERC) informed National Grid that they are in fact required to comply with RIDEM's Remediation Regulations⁶. This has been covered in previous letters submitted by No LNG in PVD to RIDEM on November 1, 2016 and February 10, 2017, and confirmed by FERC in April 2017, but is being re-emphasized again due to comments by Joseph Martella at the community meeting held on

¹ <http://www.dem.ri.gov/programs/wastemanagement/site-remediation/Providence-Gas-Co.php>

² <http://www.dem.ri.gov/programs/benviron/waste/Prov-Co/160926ha.pdf>

³ <https://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=14592397>

⁴ <http://www.dem.ri.gov/pubs/regs/regs/waste/remreg11.pdf>

⁵ <http://www.dem.ri.gov/programs/benviron/waste/Prov-Co/161021lr.pdf>

⁶ <http://www.dem.ri.gov/programs/benviron/waste/Prov-Co/170407fl.pdf>

August 9, 2017. At this meeting, Mr. Martella told community members and members of No LNG in PVD that the site in question is private property owned by National Grid and that RIDEM doesn't have authority over how a company chooses to use their property. The following comments are a reminder that National Grid does in fact need to comply with the Remediation Regulations, and RIDEM does in fact have the authority to approve or deny an applicant's proposals, and the authority to require property owners to consider other remedial alternatives instead of the applicant's proposal remedial actions (DEM-DSR-01-93 Section 7.09).

Based on the Remediation Regulations, No LNG in PVD asserts that RIDEM should DENY the STRAPs to National Grid, as the proposed activities do not qualify for a STRAP. If National Grid wishes to proceed they must fully remediate the contaminated site with a comprehensive Remedial Action Work Plan per DEM-DSR-01-93 Section 9 approved by RIDEM (DEM-DSR-01-93 Section 10). The following describes how National Grid does not qualify for a STRAP:

“Emergency or Short-Term Response Action shall mean any activities undertaken immediately following the discovery of a Release of Hazardous Material in order to completely or partially contain clean up or treat the Released Material and/or remove an Imminent Hazard if it exists (DEM-DSR-01-93 Section 3.18).”

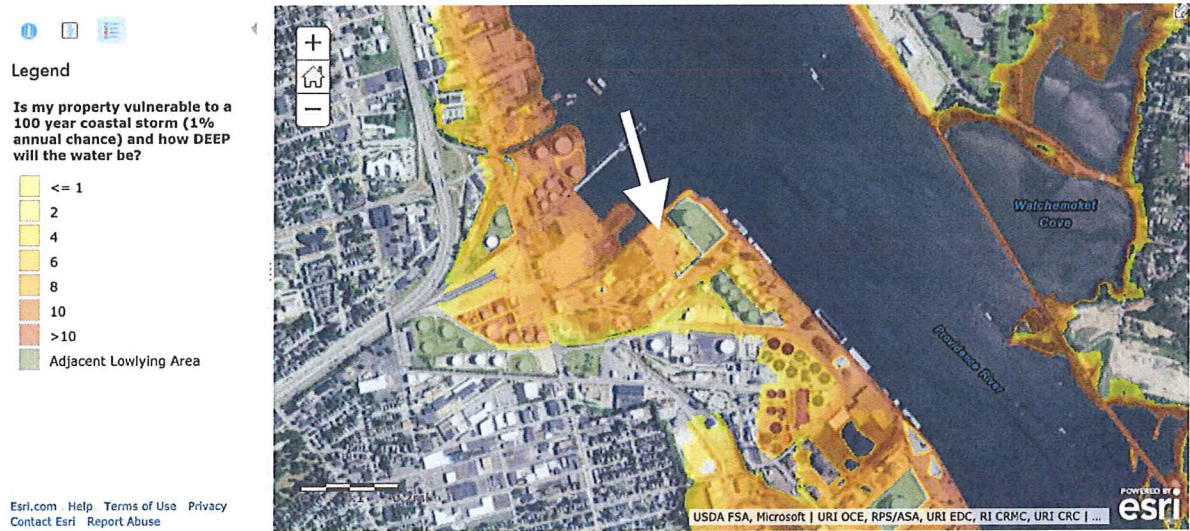
Per the definition of an Emergency or Short-Term Response Action in the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases, to qualify a project must occur immediately following the discovery of a release, or the removal of an Imminent Hazard. Section 2.2 of the Liquefaction Project STRAP states that RIDEM issued a Letter of Responsibility on February 13, 1998 and site poses no Imminent Hazard, therefore this project does NOT qualify for a STRAP.

“No Emergency or Short-Term Response Action undertaken by the Responsible Party may be conducted in a manner which increases the potential for harm, either short-term or long-term, to human health or the environment (DEM-DSR-01-93 Section 6.01).” In addition the analysis of whether the proposed STRAP will have an increase in the potential for harm to human health or the environment can not be segmented from what the end use of the site is per DEM-DSR-01-93 Section 7.07(C)(2): “Community Meetings: The purpose of the meeting is to document community comments and concerns about the investigation, clean-up, and *reuse of the Contaminated-Site.*”

1. The proposed construction work would create the potential for harm to human health and the environment. During the proposed construction period contaminated soil and groundwater will be handled and stockpiled. The location of the project is on the Port of Providence which is subject to high winds and within the floodplain for a 100-year coastal storm (see figure 1), leading to a potential for release of contaminants. While the immediate area surrounding the existing LNG storage tank *might* not be flooded during a 100 year storm event, the location of the proposed construction activities is clearly within the flooding risk zone as determined by the RI Coastal Resources Management Council. Due to climate change, 100 year (1%) storms are becoming more likely and occurring more frequently. National Grid does not have control over

the likelihood or timing of a storm, and would not be able to sufficiently fortify an active construction site in advance of a storm. The proposed activities therefore represent an increase in the potential for harm for both human health and the environment.

Figure 1. STORMTOOLS map, developed by RI Coastal Resources Management Council and University of Rhode Island, showing the depth of water during a 100 year coastal storm.



2. Proposed construction activities will occur near existing fossil fuel infrastructure including an existing high pressure natural gas pipeline. The proposed activities include digging and operation of heavy machinery, as well as driving steel piles into the bedrock to create the foundation for the proposed liquefaction facility. Pile driving poses an increased potential for harm in three distinct ways. First, there is a slight chance it could increase the potential for seismic activity - on July 22, 2015 there was a 2.3 magnitude earthquake with an epicenter at Fields Point⁷, almost directly at the location of the proposed pile driving, which is surrounded by sensitive and high risk fossil fuel and chemical facilities. Second, there is the potential for vertical migration of hazardous contaminants known to be present in the tidally influenced groundwater. Third, and most importantly, the major gas leak that occurred at National Grid's substation further down Allens Ave on March 29, 2017 was determined to have been caused by vibrations from nearby construction.⁸ It is therefore not conjecture or hyperbole to state that construction activity, especially heavy machinery construction and vibrations from pile driving, would increase the risk of a major gas leak and therefore increase the potential for harm. Furthermore, it was later revealed that the gas leak resulted in the sprayed release of polychlorinated biphenyl (PCB)⁹, a banned substance which is also present at 642 Allens Ave. In combination, the combined set of risks related to construction activities proposed in National Grid's STRAP application represent increases in the potential harm to both humans and the environment, and are grounds for denial.

⁷ <http://turnto10.com/archive/earthquake-jolts-rhode-island-in-early-morning-hours>

⁸ providencejournal.com/news/20170330/officials-construction-caused-gas-line-rupture-in-providence

⁹ <http://www.rifuture.org/pipeline-rupture-remediation/>

3. It is impossible to separate the proposed STRAP activities from the overall project, the proposed liquefaction facility. There are immediate short-term risks and hazards related to liquefying natural gas and exporting LNG by truck, and long term risks and hazards related to climate change caused by human consumption of fossil fuels. The proposed facility would increase the potential for harm to human health and the environment in an Environmental Justice Focus Area that has already been overburdened by over a century of pollution related to fossil fuels. An additional facility represents additional potential for harm, and the community has very clearly expressed strong opposition to the proposed reuse of the contaminated site.

“Emergency Permits shall not exceed ninety (90) days in duration (DEM-DSR-01-93 Section 6.05).”

The STRAP for the proposed Liquefaction Plant indicates: “The schedule for implementation of the work described herein will depend on receipt of the STRAP Approval for the RIDEM and receipt of other necessary permits and approvals. The Project is Projected to begin in 2017 and continue through 2019. Earth disturbing activities are not expected to begin until early 2018.” As the duration is longer than 90 days, the work does not constitute short-term remediation and does not meet the duration requirements for an Emergency or Short-Term permit.

As described above, the Project does NOT meet the requirements of a Short-Term Response Action Plan. No LNG in PVD Coalition strongly requests that RIDEM DENY National Grid’s STRAP applications. Any future earthwork on the site in contaminated soils must only be conducted under the full remediation of the site per DEM-DSR-01-93 Section 9 and all other applicable sections of the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases as amended November 2011.

Before making a final decision on this permit application, RIDEM should conduct and publish a Health Risk Assessment and include a comment period on the findings. No LNG in PVD expects that all submitted comments, whether verbal or written, will be posted by RIDEM along with responses from National Grid to all comments.

Enclosed below please find additional related comments on how this project is impacting an Environmental Justice community and how RIDEM is implementing their Environmental Justice policy for these STRAPs, as well as additional comments on technical aspects of the proposed STRAP activities. It remains No LNG in PVD Coalition’s position that the STRAPs must be denied by RIDEM.

Signed,

Elected Officials:

Representative Edith Ajello, District 1
Representative Chris Blazejewski, District 2
Representative Moira Walsh, District 3
Representative Aaron Regunberg, District 4
Representative Marcia Ranglin-Vassell, District 5
Representative John Lombardi, District 8
Representative Grace Diaz, District 11
Senator Josh Miller, District 28
Senator Jeanine Calkin, District 30
Representative Susan Donovan, District 69
Providence City Councilman Sam Zurier, Ward 2

Organizations:

Climate Action RI
Environmental Justice League of Rhode Island
The FANG Collective
Fossil Free Rhode Island
RI Sierra Club
Sisters of Mercy Ecology

Individuals:

Aaron Jaehnig,
Andrew Poyant,
Chris Kavanagh, RSM
Cristina Cabrera,
David Ahlborn,
Dr. Kara Provost,
Dr. Micah Salkind,
Foluke Fayanjuola
Gina Rodriguez,
Joanne Noonan,
Judee Burr
Julian Drix,
Karen Blazer,
Kate Schapira,
Mary Pendergast, RSM,
Monica Huertas,
Norma Fleming, RSM
Rose Catania,
Suzanne Enser,

Enclosure A) Additional technical comments

In addition to finding that the STRAP does NOT meet the requirements of an Emergency or Short-Term Response Action therefore requiring denial of the permit, the No LNG in PVD Coalition has compiled the following additional comments on the STRAP:

Inadequate notice and communication:

“The notice shall contain, at a minimum, the following information:” (DEM-DSR-01-93 Section 6.06)

- “A Brief description of Hazardous Waste Involved (DEM-DSR-01-93 Section 6.06(B))”

Both the first and second public meeting notices had no mention of which hazardous waste is involved.

- “A brief description of the treatment action and/or other actions authorized by the permit (DEM-DSR-01-93 Section 6.06(C)).”

The description is limited to soil and groundwater management, and earthwork.

- “The duration and effective dates of the permit (DEM-DSR-01-93 Section 6.06(E)).”

The duration of work associated with the requested permits was not included in either notices.

National Grid did not hold a public meeting per RIDEM’s regulations. “Community Meetings: The purpose of the meeting is to: 1) disseminate information about the Department’s Site Remediation program and the specific *Contaminated-Site* of interest; 2) document community comments and concerns about the investigation, clean-up, and *reuse of the Contaminated-Site*, and 3) *engage in a dialogue with the public about the Contaminated-Site*. Community meetings will be organized by the Performing Party and will be *accessible* to those who wish to attend (considering public transportation and access for disabled. All “*equal participation*” among all involved should be established – avoiding panels, head tables, or auditorium presentations. Translation assistance for non-English speakers shall be provided by the Performing Party when appropriate (DEM-DSR-01-93 Section 7.07(C)).”

National Grid refused to discuss the Reuse of the Contaminated-Site, the liquefaction facility, during the community meeting, which is stated in the purpose of a community meeting.

During the community meeting National Grid refused to acknowledge that there is any risk with the soil and groundwater. Effects from potential exposure to the contaminated material being handled were not discussed and were quickly dismissed. The words Contaminated, Carcinogenic,

Excess Lifetime Cancer Risk, Hazardous Material, Hazardous Substance and Hazardous Waste were absent from the dialogue, instead such contaminated material was referred to as “compounds”. Even National Grid’s poster on “What is a STRAP and What is a PIP” does not include the word Hazardous which is in RIDEM’s definition of a STRAP. National Grid was engaging in public relations not in real engagement and dialogue with the public about a contaminated site.

Monitoring and Safety:

“The Responsible Party shall, throughout the implementation of that action, monitor and evaluate the performance, effectiveness and completeness of the action in abating, preventing or eliminating contamination and more specifically, the Imminent Hazard (DEM-DSR-01-93 Section 6.08).”

As National Grid has a history of non-compliance with safety regulations. Soil work conducted on the southwestern portion of the site for the “Holder 18-21” project was approved under a previous STRAP and was conducted in another area in the site known to have high levels of hazardous substances. A video¹⁰ taken during the work in September 2016 shows visible dust blowing both on and off of the property, from uncovered piles of soil. After news came out about PCB contamination at the site of the major gas leak on Allens Ave in March 2017, another video¹¹ was taken that showed a soil stockpile being moved into a truck parked on Allens Ave, directly across from a parking lot for Rhode Island Hospital. None of the workers were wearing protective equipment other than hard hats, and there was no supervisor from National Grid immediately on site.

The No LNG in PVD coalition requests that an independent environmental monitor is allowed on site throughout the construction period of the STRAPs, and that the No LNG in PVD Coalition is reimbursed on a weekly basis for the cost of the independent monitor. The monitor will report back to the coalition and the public.

Section 4.1 of the STRAP states “In general, the fill consists of sands and gravels with cinders, cinder ash, coke and coal fragments.”

Several of the borings indicate the soil is a silt or fine sand, both of which are significantly more susceptible to becoming airborne than a just sands and gravel. There is no discussion of how likely the cinder ash, coke and coal fragments may become airborne. In addition during the first public meeting National Grid indicated there was no threat to the soil having dust impacts. It is concerning that National Grid is downplaying the potential dust threat by what material they claim is predominant especially at a coastal site with potential for high winds.

¹⁰ Video available: <https://drive.google.com/file/d/0ByoLfjPIG7k4b0xzOVdBcmswWGM/view?usp=sharing>

¹¹ Video available: <https://drive.google.com/file/d/0B4mUxl7HhXyEbThtUmdDWk5GTTg/view?usp=sharing>

RIDEM should require that National Grid provide copies of all air monitoring (Section 6.6.1 of STRAP) results to the No LNG in PVD Coalition on a daily basis.

Section 6.7 Decontamination Protocol lacks requirements to keep construction workers and their families safe. There is no discussion about workers cleaning up prior to eating or leaving the site, about not allowing food or drinks near where work is occurring with contaminated soil and groundwater.

- Will the person overseeing construction oversight have had OSHA Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) Supervisor training?
- Will the construction workers have been HAZWOPER trained?
- What Personal Protective Equipment will the construction workers use?
- Will the construction workers be informed of the material they are working with?

Section 6.8 Soil Stockpile Management Requirements describes the contaminated soil being moved a minimum of three times before either being shipped off-site or buried beneath the cap.

- As this project is located on the coast, which is prone to high winds, stormwater and floodwater, No LNG in PVD Coalition requests that the contaminated soil is immediately stored in liquid tight containers that can be shipped when excavated, therefore limiting the migration of the contaminated soil to impact human health or the environment.

The STRAP lacks mitigation measures that will adequately prevent the spread of the contaminated material.

- Will trenches in be properly covered if rain is forecasted to prevent water from entering the contaminated material?
- Will work stop if it is raining or there are high winds?
- As the project is located on the coast, which adds the potential for high winds, it is requested that additional air monitoring occur along the perimeter of the site.

Ecological concerns

The project is located in potential habitat for the federally listed threatened red knot (*Calidris canutus rufa*). In addition 19 bird species that are protected by the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act may be potentially affected by the proposed activities according to U.S. Fish and Wildlife Service (USFWS) IPaC on July 5, 2017. It is requested that an Ecological Risk Assessment is conducted per (DEM-DSR-01-93 Section 8.05A) and report (DEM-DSR-01-93 Section 8.05B)

- “An Environmentally Sensitive Area shall mean any of the following areas: Areas which provide habitat for Federally endangered or threatened species as determined by the U.S. Department of Fish and Wildlife (DEM-DSR-01-93 Section 3.21).”
 - Please coordinated with the USFWS to determine if the Site provides habitat for red knot.
 - If it is determined the site does provide habitat, National Grid must comply with the Endangered Species Act.
 - If determined to be an Environmentally Sensitive Area, National Grid must meet the more stringent thresholds of Method 3 during any remediation work. “Method 3 shall mean the determination of appropriate remedial objectives based on the concentrations of

Hazardous Substances developed in accordance with Rule 8.04 (Method 3 Remedial Objectives) and Rule 8.05 (ecological Protection) of the Remediation Regulations (DEM-DSR-01-93 Section 3.49).”

Enclosure B) Environmental Justice Focus Area

National Grid's Public Involvement Plan, approved by RIDEM on June 28, 2017, states that "this Site is not located within an EJ Focus Area, therefore, the requirements of Rule 7.07B (fact sheets and enhanced communications) do not apply." The development of fact sheets and use of enhanced communication is an essential part of the Remediation Regulations and should not be cut out. Other elements of the regulations are also ignored due to this fundamental problem. Section 1.04 (Environmental Justice and Public Involvement) and Section 7.01 D (sign requirements) are applicable elements of the Remediation Regulations and need to be applied fully to the entirety of the property at 642 Allens Ave.

The static map of EJ Focus areas used by RIDEM is an outdated interpretation of the definition of Environmental Justice Focus Areas included in the Remediation Regulations: "Section 3.20 (Definitions) Environmental Justice Focus Areas shall mean areas defined by United States Census block groups that are in the highest fifteen percent (15%) of all Census block groups in Rhode Island with respect to the percent population identified as racial minorities or the highest fifteen percent (15%) of Rhode Island census block groups with respect to percent population with income identified as being twice the federal poverty level or below (utilizing the most recent and readily available data from the United States Census)."

A report generated by the EPA's EJSCREEN tool¹², which uses more recent and more readily available census data than the static EJ areas map on the RIDEM website¹³ indicates that the demographics of the half mile radius around the 642 Allens Avenue site are:

- 87th percentile in Rhode Island for minority population
- 86th percentile in Rhode Island for low income population

This therefore meets the definition of Environmental Justice Focus Area in the Remediation Regulations. In addition, the population impacted by the site within a half mile radius is in the 83rd percentile for linguistic isolation, and in the 86th percentile for percentage of the population with less than a high school degree.

According to Section 1.04 of the Remediation Regulations: "*the Department will promote public participation based on the beliefs that individuals should have a timely, meaningful way to participate in decisions that impact them, and that public participation in its best form is an ongoing, two-way process that benefits both the public and the agency. The Department defines public participation as people getting timely and accurate information, being heard at meaningful times, and if interested, **contributing to the development of workable solutions...** Department's objective is to provide for proactive consideration of environmental justice concerns in order to help ensure that all **communities have a strong voice in environmental decision-making relative to the investigations and remediation of property regardless of race, color national origin, English language proficiency, or income.**" (emphasis added)*

¹² <https://drive.google.com/file/d/0B4mUxI7HhXyEWU1nZDVHQmF0Qlk/view?usp=sharing>

¹³ <http://www.dem.ri.gov/envequity/graphics/ejareas.jpg>

In Environmental Justice Focus Areas, and especially with communities with limited english language proficiency and educational background, there is an even greater onus and responsibility for enhanced communication and ensuring that impacted communities understand the risks and are meaningfully involved in decision-making. This includes decisions related to Section 7.04 (development of at least two remedial alternatives) and Section 7.09 (Remedy Selection), which therefore justify comments made in opposition to the LNG Facility (National Grid's selected remedy) as well as the community demands for remedial alternatives that include 1) no action (not allowing for construction) and 2) full and comprehensive remediation of the entire property.

The following technical comments are additional argument, based on census data, refuting National Grid claims that there this is not an environmental justice site, and justifying that the site in question does in fact need to be considered an Environmental Justice Focus Area by RIDEM. Note that the following analysis focuses on the *percentage* of "minority population" in census tracts and uses the EPA definition of greater than 50% qualifying as Environmental Justice community, whereas RIDEM regulations define EJ areas as the top 15 percentile. The state as a whole has 25% "minority" population, while the half mile radius around the property is 66% "minority", which translates to the 87th percentile in the state (e.g. top 13 percentile).

In the overall application to FERC, National Grid LNG (NGLNG) manipulated the analysis of demographic data by omitting key census tracts and block groups. There are six (6) Census Tracts, containing a total of 18 Block Groups, that fall within the 1 mile radius of the proposed facility. NGLNG incorrectly selects just two block groups (Census Tract 1.0.1, Block Group 1 and Census Tract 6, Block Group 1 as "the block groups closest to the project." While it is true that Census Tract 1.0.1, Block Group 1 is the only block group which contains the project site, it is misleading to state that this block group and Census Tract 6 Block Group 1 are "the block groups closest to the project." Both of these block groups cover a relatively large area, and at their furthest points are much further from the project site than the entirety of other block groups such as Census Tract 1.01 Block Groups 2, 3, and 4; Census Tract 1.02 Block Group 1; and Census Tract 5 Block Groups 1 and 3. When the traffic impacts of the project construction and operation are taken into account, the project activities directly impact the residential census blocks that include Ernest Street, Eddy Street, and Thurbers Ave: Census Tract 1.01 Block Group 3, Census Tract 1.02 Block Group 1, and Census Tract 5 Block Groups 1 and 3.

After incorrectly selecting Census Tract 1.0.1 Block Group 1, and Census Tract 6 Block Group 1 as "the block groups closest to the project", NGLNG emphasizes multiple times that these block groups "have an overall 'minority' population less than the general USEPA guideline of 50 percent" with 'minority' populations of "42.3% and 31.3% respectively, as compared to the city average of 63.3%." This is also a misrepresentation of demographic data, which NGLNG uses to intentionally mischaracterize the area as having "majority White and affluent populations."

NGLNG states that Census Tract 1.01 Block Group 1 has a population of 1,422 people and is 42.3% 'minority' based on data from U.S. Census Bureau, 2009-2013 5-Year American Community Survey. Additional demographic census data available from ProvPlan's Rhode Island

Community Profiles shows that this block group includes College/University Dorm population of 1,1752. This is based on Johnson and Wales University (JWU) building dormitories in the mid to late 2000s. In 2000, this census block group had a population of 682 which was 54% 'minority', by 2010 the addition of 1,175 college students led to a population of 1,812 which was 42.3% 'minority.' This additional data complicates NGLNG's conclusions. First, it was only due to the recent infusion of a majority (~65%) white resident student body that this block group no longer meets the 50% threshold set by USEPA, the remaining long term residential neighborhood is still over the 50% threshold. Furthermore, youth - including college students - should be a group in need of special attention and protection from the harms of negative environmental impacts. NGLNG used misleading data, based on the JWU student body demographics, to claim that there are no environmental justice impacts from the project, when in reality there is both a residential community of color, and a community of undergraduate students, that are directly impacted within Census Tract 1.01 Block Group 1. Both of these groups are EJ populations.

The other area highlighted by NGLNG as being in most directly impacted and less than 50% 'minority' is Census Tract 6 Block Group 1. This block group has a very low population size of 336, and a very large area stretching all the way to the Jewelry District in downtown Providence. The farthest point within this block group is over 1.5 miles away from the proposed project location. ProvPlan Community Profiles Data for this block group_ shows that the majority of the people in it live in group quarters (211 people) or are also college / university dorm residents (94 people), according to 2010 census data. The area includes at least one substance abuse rehabilitation facility, Meeting Street School for children with developmental disabilities (2,750 feet from the facility site), Providence Community Health Center's Chaffee Health Center (2,250 feet from the facility site), and the Hospitals complex including RI Hospital and Women and Infants Hospital (just over 1 mile from the project site). Once again, while NGLNG uses the block group's 'minority' population percentage of 31.3% to conclude that there is no environmental justice impact, in fact this block group contains a large number of very sensitive populations.

Meanwhile, in only focusing on these two block groups (which happen to be the only two block groups within the 1 mile radius from the proposed facility that have overall 'minority' populations less than 50% USEPA threshold), NGLNG excluded other directly impacted census tracts and block groups outlined above. Specifically, in Census Tract 5, the entirety of both block groups 1 and 3 are closer to the project site than large sections than the two block groups highlighted by NGLNG. Census Tract 5 includes the busy intersection of Eddy St and Thurbers Ave which carries the majority of truck traffic in and out of Port of Providence. All trucks leaving the project site and heading south on I-95 travel on residential Eddy Street through this Census Tract. This Census Tract is an asthma hotspot that is tied with the highest asthma rates anywhere in Rhode Island. Block group 1 is 93.7% 'minority' and block group 3 is 97.5% 'minority.' And yet this is omitted from NGLNG's so-called environmental justice "analysis" in order to make false statements, mischaracterize the community they are impacting, and attempt to hide the reality that the proposed project includes large environmental justice impacts and concerns.

Save as PDF

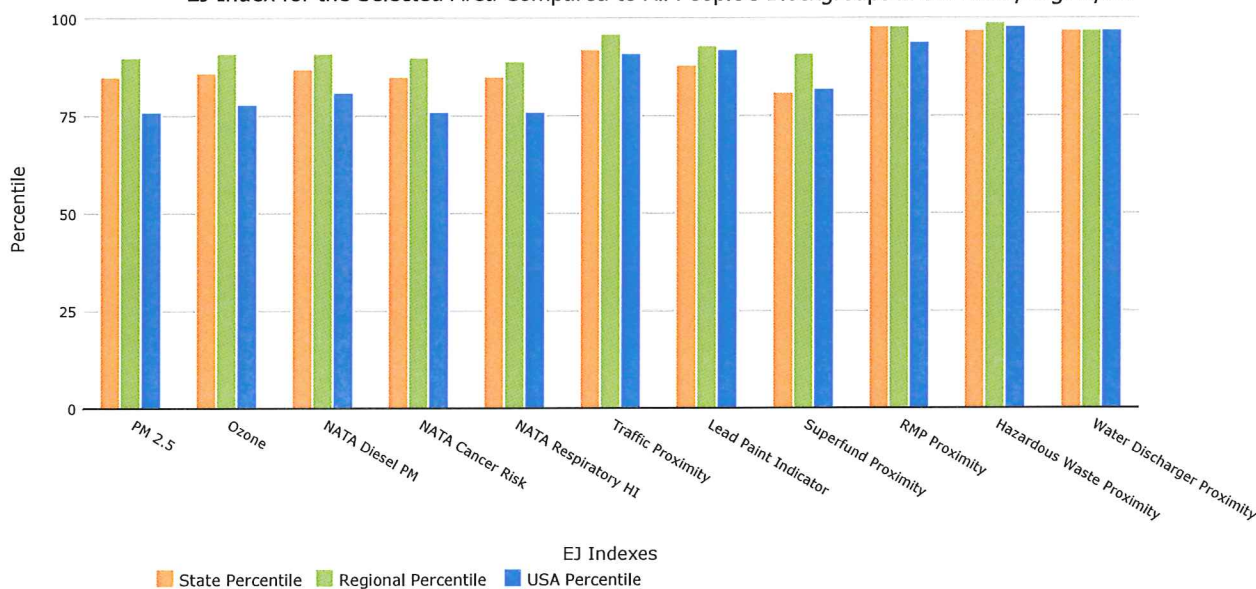


EJSCREEN Report (Version 2016)
0.5 mile Ring Centered at 41.795673,-71.397639
RHODE ISLAND, EPA Region 1
Approximate Population: 3,717
Input Area (sq. miles): 0.79



Selected Variables	Percentile in State	Percentile in EPA Region	Percentile in USA
EJ Indexes			
EJ Index for Particulate Matter (PM 2.5)	85	90	76
EJ Index for Ozone	86	91	78
EJ Index for NATA* Diesel PM	87	91	81
EJ Index for NATA* Air Toxics Cancer Risk	85	90	76
EJ Index for NATA* Respiratory Hazard Index	85	89	76
EJ Index for Traffic Proximity and Volume	92	96	91
EJ Index for Lead Paint Indicator	88	93	92
EJ Index for Superfund Proximity	81	91	82
EJ Index for RMP Proximity	98	98	94
EJ Index for Hazardous Waste Proximity*	97	99	98
EJ Index for Water Discharger Proximity	97	97	97

EJ Index for the Selected Area Compared to All People's Blockgroups in the State/Region/US



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

Comment No. 63

7-13-17

First Community STRAP Meeting

Verbal Comment – 642 Allens Ave., Providence – STRAP Comment

Man at Meeting not wishing to formally submit comments

- 1) Locating the community meeting in the Providence Safety Complex is an inappropriate location for the meeting and a second meeting in a more appropriate location should be scheduled.
- 2) Asked if contaminants such as dioxin were ever assessed and if not, would the proposed Soil Management Plan (SMP) and capping remedy address that contaminant if it were present?