



Proactive by Design

GEOTECHNICAL  
ENVIRONMENTAL  
ECOLOGICAL  
WATER  
CONSTRUCTION  
MANAGEMENT



## MEMORANDUM

To: Joseph Martella, RIDEM

From: Dave Rusczyk, GZA

Cc: Kenneth Lento, Rhode Island Energy

Date: October 25, 2022

Re: Site Response Action Report  
Period September 4, 2022 through September 17, 2022  
Former Tidewater Facility  
Pawtucket, Rhode Island  
RIDEM Case No. 95-022 / Site Remediation File No. SR-26-0934

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### SITE ACTIVITIES PERFORMED

- During the reporting period covered by this report, Site activities were associated with the following:
  - On-going work associated with relocation of the existing combined sewer outfall (CSO) by the Narragansett Bay Commission (NBC);
  - On-going installation of electrical equipment in the newly constructed control house by Rhode Island Energy (RI Energy);
  - Fortuitous Partners (Fortuitous) mobilized to the Site and initiated work within the limits of the proposed field for the stadium which included installation of additional piping within the sand filter located on the east side of the field;
  - Installation of plants and wildflower seed mix within the 25-foot coastal buffer by Charter Contracting Company (Charter) on behalf of RI Energy; and,
  - Initial demobilization of Charter equipment.
- Perimeter air monitoring was performed during this reporting period with 4 electrically powered air monitoring stations located around the work activities with the potential to disturb impacted Site materials which was limited to NBC's work area. These stations measured and recorded respirable dust and total volatile organic compounds (TVOC) concentrations continuously 24 hours per day/7 days per week with the following exceptions:
  - Communication between the air monitoring stations and the control system was shutdown between September 3, 2022 and the morning of September 6, 2022 (the Labor Day weekend) to complete software upgrades. No Site work was being performed during the holiday weekend.

As indicated in the attached weekly perimeter air monitoring graphs, no exceedances of the total volatile organic compound (0.5 ppmv) and respirable dust (150  $\mu\text{g}/\text{m}^3$ ) perimeter threshold levels were observed during the monitoring period covered by this report with the exception of the following:

- Sporadic elevated total volatile organic compound (TVOC) concentrations above the 15-minute sustained perimeter threshold level were observed at Station 10 on Saturday,



September 10, 2022. No work was being performed at these times and the source of the isolated elevated TVOC concentration is unclear.

- Repeated isolated elevated spikes in TVOC concentrations above the 15-minute sustained perimeter threshold level were observed at Station 10 on September 13, 2022. These TVOC concentration spikes were attributed to the exhaust of construction equipment idling proximate to the station.
- GZA collected ambient air samples from upwind and downwind locations on September 8 and 15, 2022 for laboratory analysis for benzene, toluene, ethylbenzene, xylenes, and naphthalene. Benzene was detected in the September 15 downwind ambient air sample at a concentration of 7.1 parts per billion volume/volume (ppb v-v) slightly above the Project Action Level of 6.2 ppb v-v. At the time of collection of the September 15 sample, impacted soil disturbing activities were limited to work associated with the relocation of the CSO pipe by NBC. The predominant wind direction was from the north and the summa sample was collected immediately downwind of NBC's work zone. Elevated total volatile organic compound (TVOC) readings were also detected within NBC's immediate work zone on September 15 using hand-held screening equipment and NBC's contractor shutdown work in this area on that day in order to further evaluate options to complete the work in this area. TVOC concentrations were not detected above the perimeter action levels at perimeter air monitoring station (Station 7) downwind of NBC's work and the summa sampling location so the elevated VOC concentrations observed on September 15, 2022 were limited to the area proximate to the immediate work zone. Upon receipt of the September 15, 2022 analytical results, RIDEM was notified of the benzene action level exceedance via electronic transmission on September 23, 2022. The analytical results from the September 8 sample indicated there were no exceedances of the project action levels. The analytical results were posted to the project website and the bulletin boards at the ends of Tidewater Street and Bowles Court and are also attached to this report.

#### ANTICIPATED SITE ACTIVITIES TO BE PERFORMED WITHIN NEXT 2 WEEKS

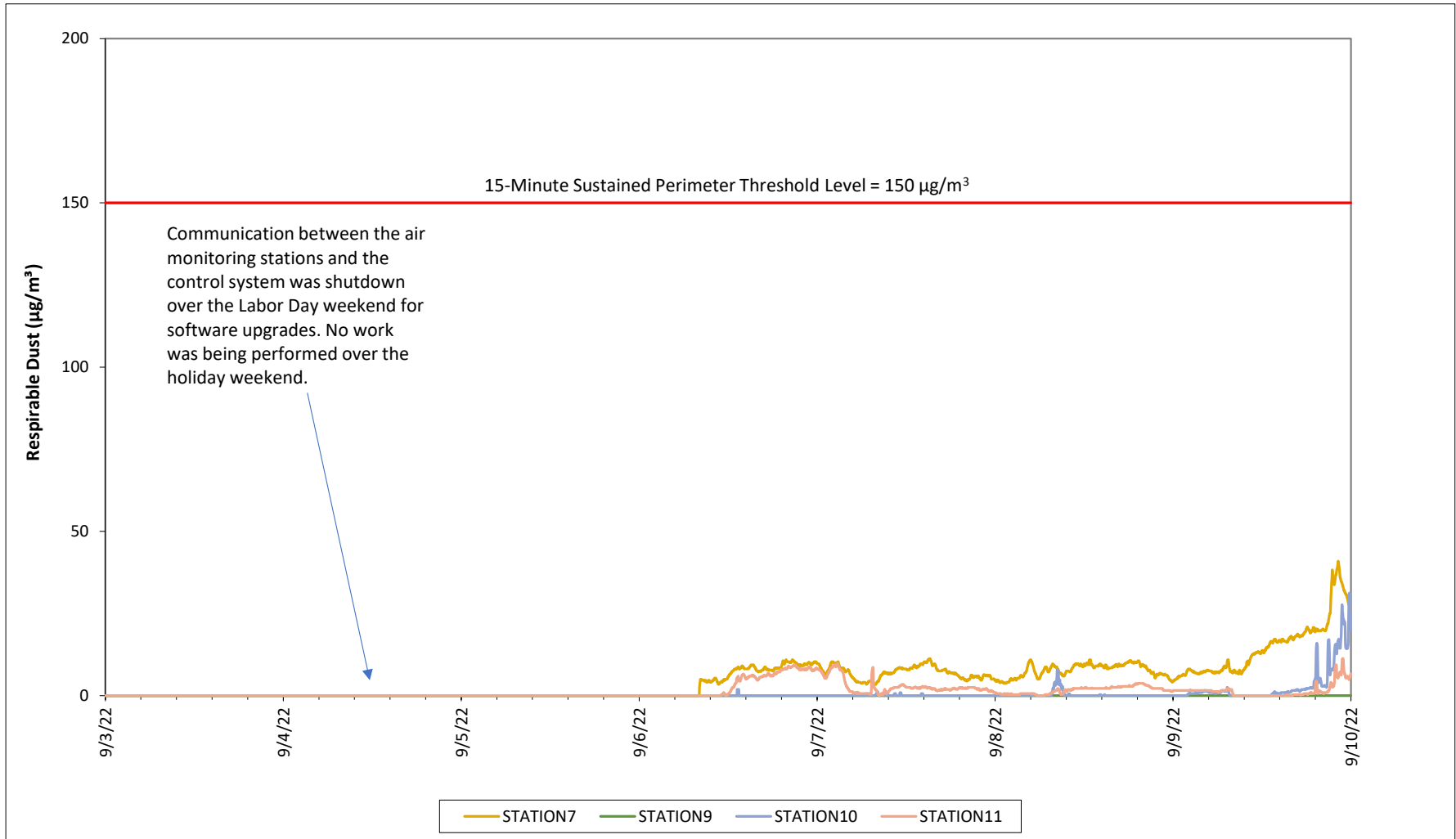
- Completion of the installation of fencing and railing system on the balance of the containment wall.
- On-going CSO relocation work by NBC's contractor.
- On-going installation of electrical equipment within the new control house building by RI Energy.
- On-going installation of the field drainage system by Fortuitous.

Please contact Kenneth Lento at 401-784-4250 if you have any questions or comments.

#### **Attachments:**

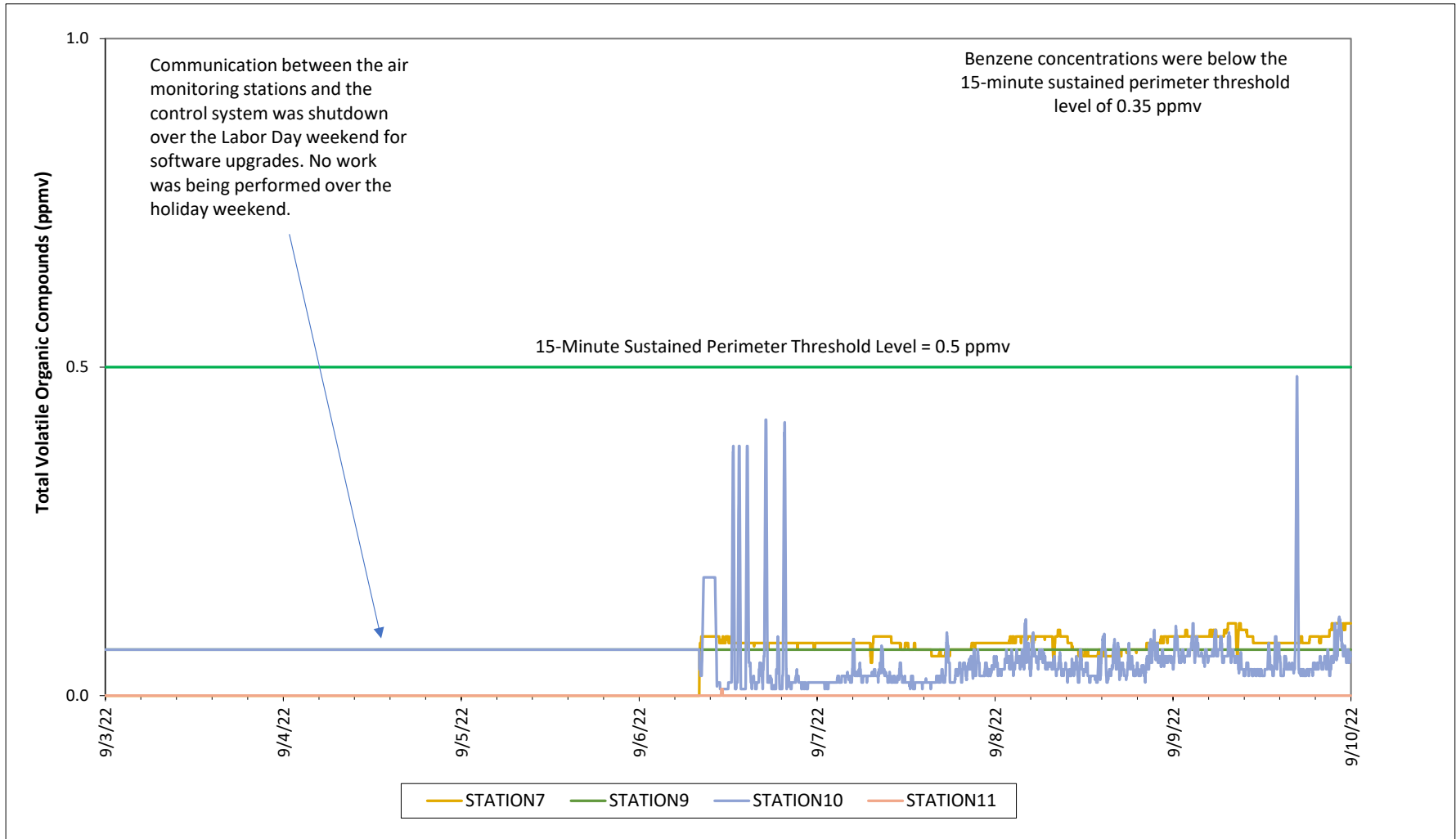
Weekly Perimeter Air Monitoring Results  
Air Monitoring Station Locations  
Weekly Ambient Air Sampling Results

# Prepared for the Businesses and Residents Located Near the Former Tidewater Facility Air Quality Monitoring - Respirable Dust

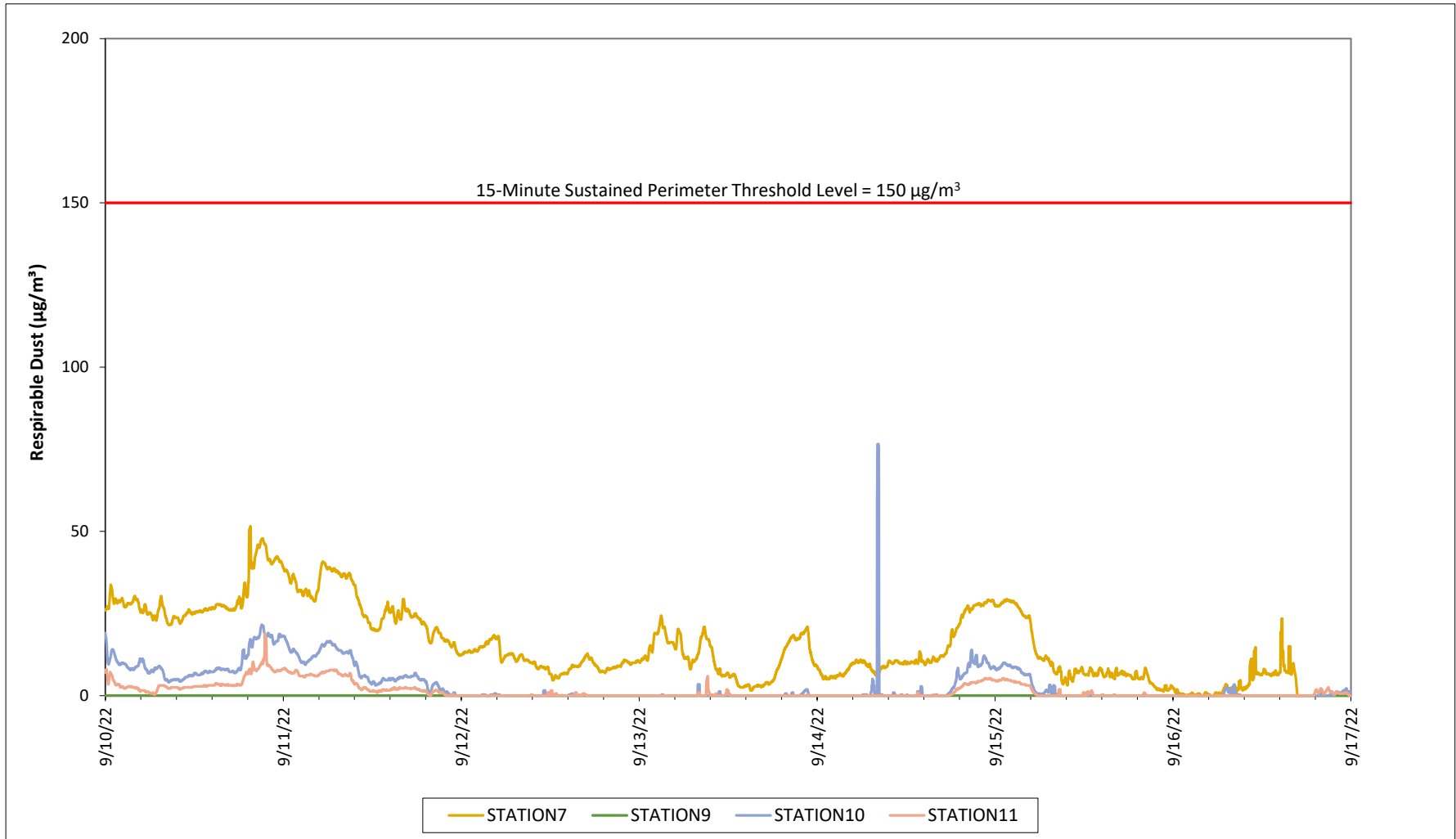


# Prepared for the Businesses and Residents Located Near the Former Tidewater Facility

## Air Quality Monitoring - Total Volatile Organic Compounds

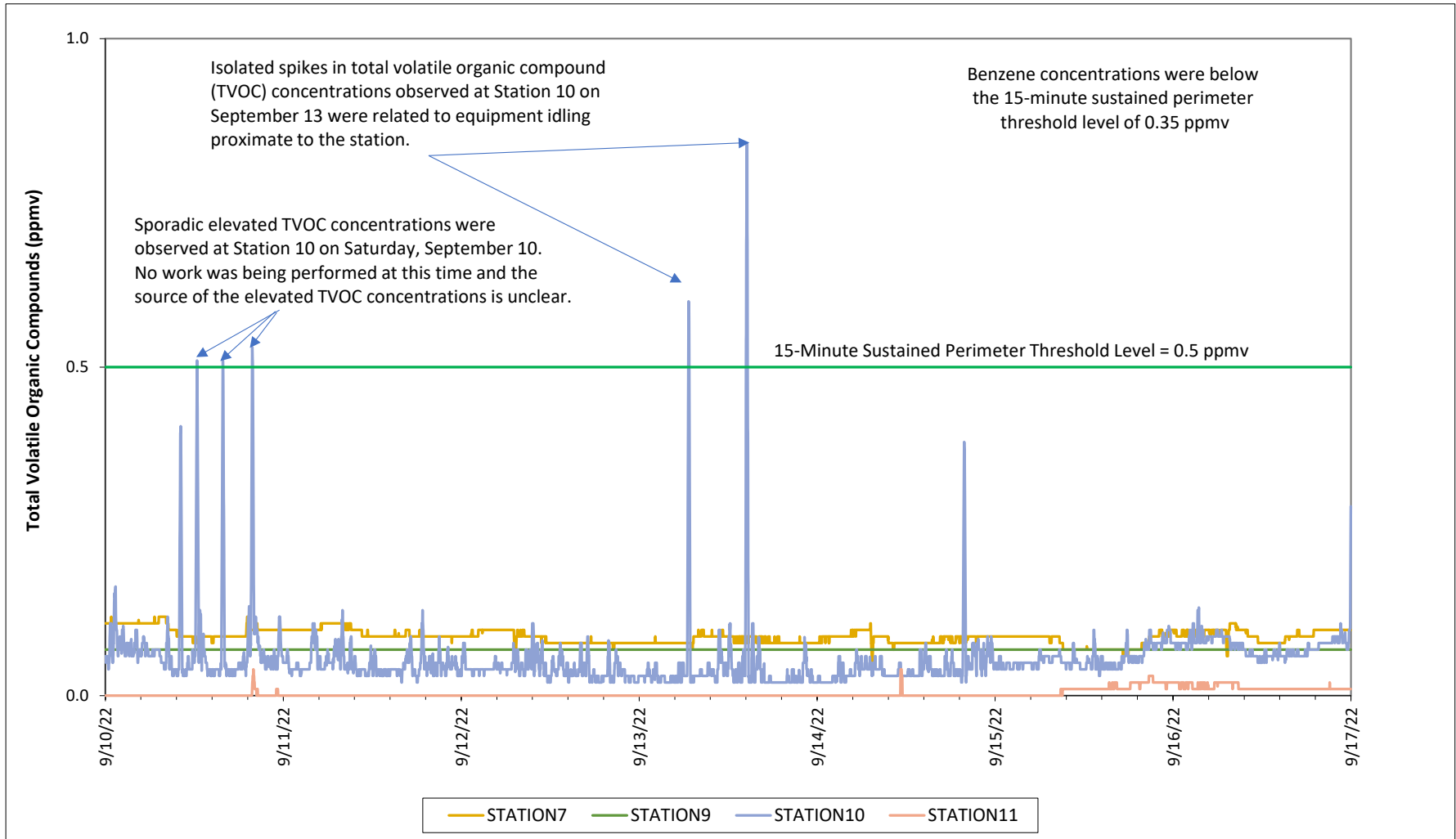


Prepared for the Businesses and Residents Located Near the Former  
Tidewater Facility  
Air Quality Monitoring - Respirable Dust



# Prepared for the Businesses and Residents Located Near the Former Tidewater Facility

## Air Quality Monitoring - Total Volatile Organic Compounds



# Air Monitoring Station Locations - Former Tidewater Facility



Google Earth

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1000 ft



**Prepared by Rhode Island Energy for the Businesses and Residents Located Near the Former Tidewater Facility  
Weekly Ambient Air Sampling Results**

Sample Date	Compounds				
	Benzene	Toluene	Ethylbenzene	Total Xylenes	Naphthalene
	(ppb v/v)				
12-3-20 UP STREAM	0.13	0.22	0.079	0.054	< 0.5
12-3-20 DOWN STREAM	0.13	0.2	0.073	0.05	< 0.5
12-10-20 UP STREAM	0.25	0.23	< 0.2	0.14	< 0.5
12-10-20 DOWN STREAM	0.17	0.2	< 0.2	< 0.7	< 0.5
12-16-20 UP STREAM	0.19	0.2	0.083	0.12	< 0.5
12-16-20 DOWN STREAM	0.13	0.16	0.078	0.094	< 0.5
12-23-20 UP STREAM	0.15	0.16	< 0.2	0.1	< 0.5
12-23-20 DOWN STREAM	0.13	0.11	< 0.2	< 0.7	< 0.5
12-30-20 UP STREAM	0.21	0.22	< 0.2	< 0.7	< 0.5
12-30-20 DOWN STREAM	0.089	< 0.2	< 0.2	< 0.7	< 0.5
1/7/21 UP STREAM	0.29	1.5	0.22	2.1	< 0.5
1/7/21 DOWN STREAM	0.16	0.27	0.086	0.42	< 0.5
1/14/21 UP STREAM	0.43	0.44	< 0.2	0.23	< 0.5
1/14/21 DOWN STREAM	0.4	0.52	0.076	0.3	< 0.5
1-21-21 UPSTREAM	0.15	0.28	0.1	< 0.7	0.24
1-21-21 DOWNSTREAM	0.18	0.23	0.11	0.1	< 0.5
1-28-21 UPSTREAM	0.21	0.19	< 0.2	< 0.7	< 0.5
1-28-21 DOWNSTREAM	0.21	0.17	< 0.2	< 0.7	< 0.5
2-4-21 UPSTREAM	0.2	1.1	0.23	1.4	0.18
2-4-21 DOWNSTREAM	0.23	0.29	0.26	0.29	< 1.1
2-11-21 UPSTREAM	0.19	0.12	< 0.2	< 0.7	< 0.5
2-11-21 DOWNSTREAM	0.17	< 0.2	< 0.2	< 0.7	< 0.5
2-18-21 UPSTREAM	0.46	2.8	0.11	0.25	< 0.5
2-18-21 DOWNSTREAM	0.31	0.42	0.13	0.45	< 0.5
2-25-21 UPSTREAM	< 0.2	0.16	< 0.2	0.16	< 0.5
2-25-21 DOWNSTREAM	0.13	< 0.2	0.081	0.3	< 0.5
3-4-21 UPSTREAM	0.2	0.21	< 0.2	0.18	0.27
3-4-21 DOWNSTREAM	0.15	0.12	< 0.2	0.16	< 0.5
3-11-21 UPSTREAM	0.18	0.17	< 0.2	0.23	0.3
3-11-21 DOWNSTREAM	0.18	0.22	0.23	1.0	< 0.5
3-18-21 DOWNSTREAM	0.44	1.6	0.19	0.67	< 0.5
3-25-21 UPSTREAM	0.17	0.32	0.85	4.1	0.53
3-25-21 DOWNSTREAM	0.33	0.67	0.16	0.57	0.27
4-1-21 UPSTREAM	0.22	0.17	< 0.2	< 0.7	< 0.5
4-1-21 DOWNSTREAM	0.12	0.11	< 0.2	< 0.7	< 0.5
4-8-21 UPSTREAM	0.096	0.12	1.5	8.0	< 0.5
4-8-21 DOWNSTREAM	0.086	0.14	0.086	0.38	0.19
4-15-21 UPSTREAM	0.85	0.57	0.1	0.44	< 0.5
4-15-21 DOWNSTREAM	0.11	0.11	0.26	1.20	< 0.5
4-22-21 UPSTREAM	0.11	< 0.2	< 0.2	< 0.7	< 0.5
4-22-21 DOWNSTREAM	0.11	0.16	< 0.2	< 0.7	< 0.5
4-29-21 UPSTREAM	0.14	0.34	0.11	0.32	0.26
4-29-21 DOWNSTREAM	0.19	0.39	0.11	0.37	0.27
5-6-21 UPSTREAM	0.086	0.15	< 0.2	< 0.7	0.38
5-6-21 DOWNSTREAM	1.0	8.4	0.21	0.69	< 0.5
5-13-21 UPSTREAM	< 0.2	0.36	< 0.2	0.19	0.34
5-13-21 DOWNSTREAM	0.12	< 0.2	< 0.2	< 0.7	< 0.5
5-20-2021 UPSTREAM	0.38	2.5	< 0.2	< 0.7	< 0.5
5-20-2021 DOWNSTREAM	0.16	0.56	0.3	1.40	< 0.5
<b>Project Action Levels</b>	<b>6.2</b>	<b>80</b>	<b>230</b>	<b>23</b>	<b>20</b>



**Prepared by Rhode Island Energy for the Businesses and Residents Located Near the Former Tidewater Facility  
Weekly Ambient Air Sampling Results**

Sample Date	Compounds				
	Benzene	Toluene	Ethylbenzene	Total Xylenes	Naphthalene
	(ppb v/v)				
5-27-21 UPSTREAM	0.095	0.12	0.45	2.10	0.4
5-27-21 DOWNSTREAM	0.075	0.094	< 0.2	< 0.7	< 0.5
6-3-21 UPSTREAM	< 0.2	0.16	< 0.2	< 0.7	< 0.5
6-3-21 DOWNSTREAM	0.075	0.11	< 0.2	< 0.7	< 0.5
6-10-21 UPSTREAM	< 0.2	< 0.2	< 0.2	< 0.7	< 0.5
6-10-21 DOWNSTREAM	< 0.2	< 0.2	< 0.2	< 0.7	< 0.5
6-17-21 UPSTREAM	0.64	0.6	0.48	0.66	0.64
6-17-21 DOWNSTREAM	0.12	0.12	0.16	< 0.7	< 0.5
6-24-21 UPSTREAM	< 0.2	0.17	< 0.2	< 0.7	< 0.5
6-24-21 DOWNSTREAM	< 0.2	0.45	0.19	0.82	< 0.5
7-1-21 UPSTREAM	1.10	7.9	0.12	0.39	< 0.7
7-1-21 DOWNSTREAM	0.13	0.74	< 0.2	0.29	< 0.7
7-8-21 UPSTREAM	< 0.2	0.29	< 0.2	0.38	0.29
7-8-21 DOWNSTREAM	< 0.2	< 0.2	< 0.2	< 0.7	< 0.5
7-15-21 UPSTREAM	0.10	0.28	< 0.2	0.32	< 0.5
7-15-21 DOWNSTREAM	0.14	0.37	0.31	1.5	< 0.5
7-22-21 UPSTREAM	0.27	0.3	< 0.2	< 0.7	< 0.5
7-22-21 DOWNSTREAM	0.30	0.33	< 0.2	< 0.7	< 0.5
7-29-21 UPSTREAM	0.22	0.26	0.1	0.56	0.19
7-29-21 DOWNSTREAM	0.099	0.23	< 0.2	< 0.7	< 0.5
8-5-21 UPSTREAM	0.70	1.2	< 0.2	0.17	< 0.5
8-5-21 DOWNSTREAM	0.310	0.53	< 0.25	< 0.88	< 0.63
8-12-21 UPSTREAM	0.19	0.18	< 0.2	< 0.7	0.2
8-12-21 DOWNSTREAM	1.2	0.7	< 0.2	0.31	< 0.5
8-19-21 UPSTREAM	0.66	6.2	1.2	3.50	< 1.6
8-19-21 DOWNSTREAM	0.21	0.24	< 0.2	0.11	< 0.5
8-26-21 UPSTREAM	0.34	0.73	0.22	0.90	0.18
8-26-21 DOWNSTREAM	0.34	0.63	0.24	0.87	0.31
9-1-21 UPSTREAM	0.17	0.34	< 0.2	< 0.7	< 0.5
9-1-21 DOWNSTREAM	0.18	0.35	< 0.2	0.19	< 0.5
9-9-21 UPSTREAM	0.12	0.22	< 0.2	0.28	< 0.5
9-9-21 DOWNSTREAM	< 0.2	0.89	< 0.2	< 0.7	0.42
9-16-21 UPSTREAM	0.14	0.26	0.11	0.31	0.3
9-16-21 DOWNSTREAM	0.11	0.26	< 0.2	0.28	< 0.5
9-23-21 UPSTREAM	< 0.2	0.12	< 0.2	< 0.7	< 0.5
9-23-21 DOWNSTREAM	< 0.2	0.12	< 0.2	< 0.7	< 0.5
9-30-21 UPSTREAM	0.17	0.37	0.23	0.66	< 0.51
9-30-21 DOWNSTREAM	0.086	0.21	< 0.2	< 0.7	< 0.5
10-7-21 UPSTREAM	0.24	0.55	0.14	0.41	< 0.5
10-7-21 DOWNSTREAM	< 0.2	0.42	0.11	0.16	< 0.5
10-14-21 UPSTREAM	0.19	0.40	< 0.2	< 0.7	< 0.5
10-14-21 DOWNSTREAM	0.34	0.89	0.23	0.75	< 0.5
10-22-21 UPWIND	0.14	0.32	< 0.2	< 0.7	< 0.5
10-22-21 DOWNWIND	0.13	0.39	< 0.2	0.43	< 0.5
10-28-21 UPWIND	0.41	0.14	0.46	0.10	< 0.5
10-28-21 DOWNWIND	0.18	0.43	< 0.2	< 0.70	< 0.5
11-4-2021 UPWIND	0.20	0.31	< 0.2	< 0.70	< 0.5
11-4-2021 DOWNWIND	0.14	0.23	< 0.2	< 0.7	< 0.5
11-11-21 UPWIND	0.23	0.45	0.17	0.51	0.35
11-11-21 DOWNWIND	0.31	0.69	0.18	0.56	< 0.5
11-18-21 DOWNWIND	0.14	0.29	< 0.2	< 0.7	< 0.5
11-18-2021 UPWIND	0.29	0.54	0.32	0.26	2.4
11-23-21 DOWNWIND	0.13	0.24	< 0.2	0.33	< 0.5
11-23-21 UPWIND	0.27	1.0	< 0.2	0.30	0.23
12-02-21 DOWNWIND	0.28	0.82	0.22	1.0	0.95
12-02-21 UPWIND	0.36	0.67	< 0.2	0.42	< 0.5
12-9-21 DOWNWIND	0.17	0.27	< 0.2	< 0.7	< 0.5
12-9-21 UPWIND	0.18	0.39	0.13	0.43	< 0.5
<b>Project Action Levels</b>	<b>6.2</b>	<b>80</b>	<b>230</b>	<b>23</b>	<b>20</b>

**Prepared by Rhode Island Energy for the Businesses and Residents Located Near the Former Tidewater Facility  
Weekly Ambient Air Sampling Results**

Sample Date	Compounds				
	Benzene	Toluene	Ethylbenzene	Total Xylenes	Naphthalene
(ppb v/v)					
12-16-21 DOWNWIND	0.15	0.21	< 0.2	0.38	0.89
12-16-21 UPWIND	0.13	0.16	< 0.2	< 0.7	< 0.5
12-22-21 DOWNWIND	0.27	0.39	< 0.2	< 0.7	< 0.5
12-22-21 UPWIND	0.29	0.47	0.12	< 0.5	< 0.5
12-29-21 UPWIND	0.19	0.28	< 0.2	< 0.7	< 0.5
12-29-21 DOWNWIND	0.26	0.53	0.19	1.0	< 0.5
01-05-2022 UPWIND	0.28	0.38	0.14	0.38	0.2
01-05-2022 DOWNWIND	0.40	1.10	0.16	0.5	0.71
1-13-22 UPWIND	0.49	0.91	0.15	0.59	< 0.5
1-13-22 DOWNWIND	0.83	1.40	0.19	0.79	< 0.5
1-20-22 DOWNWIND	0.18	0.32	0.11	0.34	0.17
1-20-22 UPWIND	0.14	1.40	< 0.2	< 0.7	< 0.5
UPWIND 012722	0.24	0.26	< 0.2	< 0.7	< 0.5
DOWNWIND 012722	0.30	1.0	< 0.2	0.4	< 0.5
2/3/22 UPWIND	0.27	0.50	0.1	0.28	< 0.5
2/3/22 DOWNWIND	0.30	0.49	0.12	0.46	0.22
2-10-22 UPWIND	0.17	0.27	< 0.2	< 0.7	< 0.5
2-10-22 DOWNWIND	0.19	0.22	< 0.2	< 0.7	< 0.5
2-17-22 UPWIND	< 0.2	0.11	< 0.2	< 0.7	< 0.5
2-17-22 DOWNWIND	0.18	0.66	0.26	1.5	1.1
2-24-22 UPWIND	< 0.2	0.11	< 0.2	< 0.7	0.17
2-24-22 DOWNWIND	< 0.2	< 0.2	< 0.2	< 0.7	< 0.5
3-03-22 UPWIND	0.11	< 0.2	< 0.2	< 0.7	< 0.5
3-03-22 DOWNWIND	0.14	< 0.2	< 0.2	< 0.7	< 0.5
3-10-22 UPWIND	0.16	0.31	0.13	0.4	0.26
3-10-22 DOWNWIND	0.14	0.18	< 0.2	< 0.7	< 0.5
3-17-22 UPWIND	0.22	0.61	0.14	0.49	< 0.5
3-17-22 DOWNWIND	0.19	0.25	< 0.2	0.12	< 0.5
3-24-22 UPWIND	0.18	< 0.3	< 0.3	< 1.1	< 0.75
3-24-22 DOWNWIND	< 0.2	< 0.2	< 0.2	< 0.7	< 0.5
3-31-22 UPWIND	0.14	0.22	< 0.2	< 0.7	< 0.5
3-31-22 DOWNWIND	0.17	0.37	0.12	0.40	< 0.5
4-7-22 UPWIND	0.11	0.16	< 0.2	< 0.7	< 0.5
4-7-22 DOWNWIND	0.15	0.24	< 0.2	< 0.7	< 0.5
4-15-22 UPWIND	0.13	0.29	< 0.2	0.095	< 0.5
4-15-22 DOWNWIND	0.095	0.19	0.1	< 0.7	< 0.5
4-20-22 UPWIND	0.19	0.22	0.13	0.42	< 0.5
4-20-22 DOWNWIND	0.13	0.14	< 0.2	< 0.7	0.18
4-26-22 UPWIND	< 0.2	< 0.2	< 0.2	< 0.7	< 0.5
4-26-22 DOWNWIND	0.22	0.13	< 0.2	< 0.7	< 0.5
5-4-22 UPWIND	0.11	0.22	< 0.5	< 0.7	< 0.5
5-4-22 DOWNWIND	0.11	0.24	< 0.5	< 0.7	< 0.5
5-12-22 UPWIND	< 0.2	0.11	< 0.2	< 0.7	< 0.5
5-12-22 DOWNWIND	< 0.21	0.10	< 0.21	< 0.75	< 0.54
5-19-22 UPWIND	0.13	0.63	< 0.2	< 0.7	0.18
5-19-22 DOWNWIND	0.15	0.30	< 0.2	< 0.7	< 0.5
5-26-22 UPWIND	0.14	0.14	< 0.2	< 0.7	< 0.5
5-26-22 DOWNWIND	< 0.2	0.12	< 0.2	< 0.7	< 0.5
6/2/22 DOWNWIND	0.074	0.17	< 0.2	< 0.7	0.26
6/2/22 UPWIND	< 0.2	0.14	< 0.2	< 0.7	< 0.5
6-10-22 UPWIND	0.17	0.31	< 0.2	< 0.7	< 0.5
6-10-22 DOWNWIND	0.25	0.61	< 0.2	< 0.7	< 0.5
6-16-22 UPWIND	0.43	1.20	< 0.2	< 0.7	< 0.5
6-16-22 DOWNWIND	< 0.2	0.13	< 0.2	< 0.7	< 0.5
6-23-22 UPSTREAM	< 0.2	< 0.2	< 0.2	< 0.7	0.19
6-23-22 DOWNSTREAM	0.16	0.72	< 0.2	0.31	< 0.5
6-30-22 UPWIND	< 0.2	0.17	< 0.2	< 0.7	0.2
6-30-22 DOWNWIND	0.12	0.24	< 0.2	< 0.7	< 0.5
7-7-22 UPWIND	0.077	0.29	< 0.2	< 0.7	< 0.5
7-7-22 DOWNWIND	0.20	0.87	< 0.2	0.21	< 0.5
<b>Project Action Levels</b>	<b>6.2</b>	<b>80</b>	<b>230</b>	<b>23</b>	<b>20</b>

**Prepared by Rhode Island Energy for the Businesses and Residents Located Near the Former Tidewater Facility  
Weekly Ambient Air Sampling Results**

Sample Date	Compounds				
	Benzene	Toluene	Ethylbenzene	Total Xylenes	Naphthalene
(ppb v/v)					
7-14-22 UPWIND	< 0.2	0.35	< 0.2	< 0.7	< 0.5
7-14-22 DOWNWIND	0.10	0.22	< 0.2	< 0.7	< 0.5
7-21-22 UPWIND	0.14	0.21	< 0.2	< 0.7	0.33
7-21-22 DOWNWIND	1.0	2.5	0.48	1.9	< 0.3
7-28-22 UPWIND	0.087	0.15	< 0.2	< 0.7	< 0.5
7-28-22 DOWNWIND	0.13	0.23	< 0.2	< 0.7	< 0.5
8-4-22 UPWIND	0.13	0.31	< 0.2	< 0.7	< 0.5
8-4-22 DOWNWIND	0.17	0.26	0.13	< 0.7	0.3
8-11-22 UPWIND	0.22	0.33	0.10	0.34	< 0.5
8-11-22 DOWNWIND	0.37	0.30	0.11	0.17	< 0.5
8-19-22 UPWIND	< 0.20	0.22	< 0.20	0.36	< 0.5
8-19-22 DOWNWIND	0.11	0.45	< 0.20	0.29	< 0.5
8-25-22 Downwind	0.09	0.44	< 0.2	< 0.7	< 0.5
8-25-22 Upwind	0.29	0.47	< 0.2	< 0.7	< 0.5
9-2-22 Upwind	< 0.2	0.15	< 0.2	< 0.7	< 0.5
9-2-22 Downwind	0.35	0.34	< 0.2	< 0.7	< 0.5
9-8-22 Upwind	0.092	0.21	< 0.2	< 0.7	< 0.5
9-8-22 Downwind	1.20	0.44	< 0.2	< 0.7	< 0.5
9-15-22 Upwind	< 0.2	0.15	< 0.2	< 0.7	< 0.5
9-15-22 Downwind	<b>7.1</b>	2.9	2.3	2.0	4.6
<b>Project Action Levels</b>	<b>6.2</b>	<b>80</b>	<b>230</b>	<b>23</b>	<b>20</b>

**Notes:**

1. The Project Action Levels are consistent with the Air Quality Monitoring Plan developed for the Site.
2. Air samples are collected in stainless steel summa canisters over an approximately 8-hour period.
3. Air samples are analyzed by EuroFins TestAmerica of Burlington, VT.
4. Results and action levels are listed in parts per billion volume/volume (ppb v/v).
5. An upstream ambient air sample was not collected on March 18, 2021 due to a problem with the sampling equipment.
6. A bold and gray shaded value exceeds the Project Action Levels. The 9/15/2022 Downwind sample was collected directly downwind of NBC's active work area. Volatile organic compound concentrations at the perimeter limit were below the project action levels.