



March 30, 2023

Mr. Matthew Rigdon
United States Environmental Protection Agency Region 1
5 Post Office Square, Suite 100
Mail Code: LCRD07-2
Boston, Massachusetts 02109-3912

RE: Response to EPA Comments
Preliminary Site Characterization and Self-Implementing Cleanup Plan
Pawtucket 1 No. 107 Substation - Control House
6 Thornton Street
Pawtucket, Rhode Island

Dear Mr. Rigdon:

Below please find responses to the comments received from the United States Environmental Protection Agency (EPA) on November 10, 2022, regarding the *Preliminary Site Characterization and Self-Implementing Cleanup Plan* (Preliminary SIP) dated April 14, 2022, in association with the planned demolition of the above-referenced structure. This Response to EPA Comments is submitted concurrently with the Final Site Characterization and SIP that supplements the responses contained therein.

General Comments:

1. *Please include a hazardous wastes inventory with the final notification, if available.*

The limits of each select waste stream are depicted in the Sampling, Characterization, and Remediation Plan Sets (as detailed in Plan Sets 3 through 7). Details regarding the waste classification are included in Section 6.0 of the *Final Site Characterization and Self-Implementing Cleanup Plan* (Final SIP). As noted on the Plan Sets, although not depicted, painted steel handrails, painted steel stairways, and doors (including door frames) located throughout the Control House are characterized as PCB Remediation Waste. In addition, an inventory of non-building materials present within the Control House that are regulated for disposal as hazardous waste is provided as Table 9.

2. *Due to the presence of sensitive receptors (i.e., schools) near the Site, please include an air quality monitoring plan, as well as potential contingency plans should air quality exceed safe levels within the final notification.*

As part of the on-going, Property-wide remediation project, TNEC has an air monitoring program in place under the Remedial Action Workplan (RAWP) which was approved by the Rhode Island Department of Environmental Management (RIDEM). This air monitoring program was designed to provide continuous (24-hours per day, 7-days a week), real-time measurement of airborne particulate concentrations of certain compounds at the Property. Additionally, throughout the performance of

demolition and/or remediation activities, Coneco will provide additional real-time total dust particulate monitoring outside the work area utilizing visual methods and total dust particulate monitors. No visible dust generation will be permitted during demolition and/or remediation activities. Details regarding the proposed air quality monitoring plan and contingency plans are included in Section 7.3 of the Final SIP.

3. *EPA recommends that TNEC include color-coded figures for each floor showing how wastes will be segregated for waste disposal purposes in the final notification. Please include sampling points, concentration results, and planned cut lines on the figures.*

The final SIP includes color-coded figures for each floor of the building depicting the sampling locations, analytical results, waste disposal classification, and planned cut lines. This information is collectively included in the Sampling and Characterization Plan Sets (Plan Sets 3 through 7).

4. *Within the final Notification, please include a discussion of verification sampling plans. Please also include a figure showing anticipated verification sampling locations.*

A discussion of the proposed post-removal verification sampling is included in Section 7.0 of the Final SIP. The proposed verification sampling locations are depicted in the Sampling, Characterization, and Remediation Plan Sets (Plan Sets 3 through 7).

5. *Due to the extent of contamination within the substation building and given its historical use, EPA recommends providing further justification of any paint or bulk product classified as Excluded PCB Product (EPP).*

Except for the materials characterized as PCB Remediation Waste, TNEC has proposed to manage the bulk materials comprising the Control Building as PCB Bulk Product Waste. This is the result of additional assessment activities and findings completed since the submittal of the Preliminary SIP. An expanded discussion providing further justification to the proposed management of the materials as PCB Bulk Product Waste is included in Section 6.0 of the Final SIP. TNEC notes that materials previously classified as Excluded PCB Product in the April 14, 2022 Preliminary SIP have been proposed for management as PCB Bulk Product Waste in the Final SIP. Materials conservatively proposed for management as PCB Bulk Product Waste are planned to be disposed of at a RCRA Subtitle D landfill permitted to accept such waste (i.e., Waste Management Turnkey or similar).

Specific Comments:

6. *Page 13, Section 5.2: Paint*
 - a. *Multiple paint samples are noted to have underlying paint layers (e.g., sample PS-206: White Paint Underlain by Yellow Paint). Please confirm that discrete samples were taken of each paint type. Compositing multiple paint layers may introduce dilution.*

Coneco attempted to collect discrete paint samples of each paint type. However, due to the age and nature of the paint layers, collection of discrete paint layer samples where multiple paint layers are present is not feasible. In order to account for potential dilution of PCB concentrations, the total detected PCB concentration for each sample was multiplied by the number of observed paint layers in the sample. In doing so, TNEC's opinion is that the proposed PCB Bulk Product is not being

mischaracterized due to dilution of the sample. The adjusted PCB results and paint characterizations are provided in Table 4 of the Final SIP.

As detailed in Section 6.2 of the Final SIP, paint samples containing PCB concentrations equal to or in excess of 1 mg/kg but less than 50 mg/kg, with the exception of those considered to represent PCB Remediation Waste (as detailed in Section 6.1) are conservatively classified as PCB Bulk Product Waste. These painted bulk materials are conservatively deemed to contain PCBs in excess of 50 mg/kg in consideration of the potential for dilution since multiple layers of paint were observed in representative paint samples.

b. In order to be classified as excluded PCB product [Excluded PCB Product (EPP)], each distinct paint type and usage must be characterized. EPA recommends including additional discussion relating to paint types which have not been characterized with 3 distinct samples and usages (i.e., Brown, Cream, Orange, Silver, Red, Pink, and Tan paints).

As detailed in Section 4.0 of the Final SIP, additional samples were either collected (3 per distinct type) or, due to the limited quantity of the distinct paint type, it was not feasible to collect 3 distinct samples. In situations where 3 distinct samples were not able to be collected, those materials were conservatively classified as PCB Remediation Waste to streamline the characterization process using the most conservative disposal method. However, paint sample PS-28, which is associated with a small amount of red paint located adjacent to a fire extinguisher, that is known to have been applied within the last 20 years and where sufficient volume for three samples was not able to be collected, has been proposed to be conservatively handed as PCB Bulk Product Waste.

c. EPA recommends further justification of EPP characterized items due to the extent of contamination within the substation building and its historical uses. In addition to tracking, porous surfaces (e.g., paint) may act as sinks for airborne PCBs.

TNEC acknowledges that porous materials may act as sinks for airborne PCBs. Based on the findings of additional assessment activities, several materials have been proposed to be managed as PCB Bulk Product. Further discussion of said findings and rationale for this is included in Section 6.0 of the Final SIP.

7. Page 16, Section 5.3:

a. TNEC notes the presence of rubber floor matting in the substation building. EPA recommends sampling any mastics present under rubber floor matting, as mastics have historically been found to be a source of PCBs. Additionally, PCB containing mastics may contaminate underlying flooring.

Mastic was not observed beneath the rubber floor matting in the sampling locations during characterization activities. If mastic is discovered during demolition activities, a minimum of three samples will be collected for laboratory analysis for PCBs. Six concrete floor samples, identified as ICS-02-01, ICS-02-04, ICS-02-23, ICS-02-24, ICS-02-25, and ICS-02-27, were collected from beneath rubber floor matting. Laboratory analytical results for these samples ranged from below the laboratory reporting limit of 0.1 mg/kg to 0.3 mg/kg; therefore, it is TNEC's opinion that unpainted concrete floors located beneath rubber floor matting are not characterized as PCB Remediation

Waste. Should mastic be identified during demolition, concrete samples underlying the mastic would also be collected for characterization.

8. *Page 18, Section 7.1:*

- a. *Under 40 CFR 761.61(a), engineered caps may be used to cover high occupancy areas where bulk PCB remediation waste remains at concentrations >1 ppm and ≤10 ppm. Since the infilled sub-basement has yet to be characterized, the cap would not meet requirements for engineered caps under 40 CFR 761.61(a)(4)(i)(A). Characterization of the infilled sub-basement is required to allow EPA to consider this plan under 40 CFR 761.61(a).*

At this this time TNEC is not requesting EPA to consider this cleanup plan under 40 CFR 761.61(a)(4)(i)(A). An “engineered cap” described in Section 7.2 of the Final SIP is proposed to be installed over the building footprint (following the completion of the building demolition) as part of a Rhode Island Department of Environmental Management (RIDEM)-approved Remedial Action Work Plan (RAWP) to address other contaminants of concern at the property related to a property-wide capping effort.

Sampling of infilled material (i.e., trap rock and soil) located within the Turbine Room at the Control House, as detailed in Section 4.4 of the Final SIP, did not identify concentrations of PCBs in excess of 1 mg/kg. As such, Coneco has classified this infilled material as a non-TSCA regulated materials. This infilled material will be removed to a depth of approximately 4 feet below existing exterior surface grade during Control House demolition activities and properly stockpiled at the Property in accordance with the RIDEM-approved RAWP for the Property. Appropriate characterization samples will then be collected by TNEC and/or a subcontractor to determine if the material is appropriate for re-use at the Property as part of redevelopment activities or requires off-Site disposal/recycling.

As detailed in Section 5.3 of the Final SIP, the structural deterioration of the eastern exterior wall of the Turbine Room presents a significant safety risk and is both a primary cause for the proposed demolition effort as well as a limiting factor for sampling in the immediate vicinity. Subsequent to the demolition of the Control House and removal of infill material to approximately 4 feet below existing exterior surface grade, test pits will be advanced throughout the footprint of the infilled sub-basement to characterize concrete and/or soil which may be present beneath the infilled material in this area. Should regulated concentrations of PCBs be identified in the portion of basement foundation that is proposed to remain in place following the demolition of the Control House, TNEC will notify RIDEM, the EPA Regional PCB Coordinator and/or submit an addendum to this Final SIP and obtain approval to continue cleanup activities.

9. *Sampling, Figures 3 through 8*

- a. *EPA recommends taking additional samples in areas that may be likely to contain PCBs due to tracking. Some examples of areas that EPA recommends further sampling include the northern entrance and staircase in room 9 (figure 3), the bathroom and switchboard room (figure 4), and the doorways to the turbine room and switchboard room (Figure 4).*

Supplemental assessment and investigation activities including the collection of additional concrete samples to assess potential tracking within the above-mentioned locations were conducted by Coneco in December 2022 and January 2023 and are detailed in Section 4.0 of the Final SIP.

- b. *Figure 4: It is unclear whether samples ICS-02-16, ICS-02-17, and ICS-02-18 were taken from the Office 1 floor or ceiling. Please confirm the concrete floor and ceiling sampling within Office 1. Ensure that the extent of concrete floor sampling in Office 1 is sufficient given that the rubber matting has indicated tracking through this area.*

Concrete samples ICS-02-16, ICS-02-17, and ICS-02-18 were taken from the Office 1 ceiling, as clarified on Figure 4B included in the Final SIP.

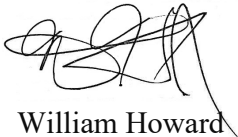
Additional concrete samples (identified as ICS-02-22 through ICS-02-25) were collected from Office 1 (including concrete floor samples in Office 1) during the supplemental assessment and investigation activities in January 2023. Furthermore, the Sampling and Characterization Plan Sets included in the Final SIP have been amended to clarify which samples have been collected from the floors and/or the ceilings.

- c. *Figures 5 and 6: EPA recommends additional sampling of the staircase leading from the third-floor hallway to the turbine room, and nearby areas.*

Supplemental assessment and investigation activities in the Control House including the collection of additional concrete samples from the above detailed locations unless they were conservatively classified as PCB Remediation Waste, in which case additional samples were not collected. This supplemental sampling was conducted by Coneco in January 2023 and is detailed in Section 4.0 of the Final SUP.

Following your review of these comments and the concurrently submitted Final SIP, please contact me at wrhoward@rienergy.com to discuss any questions or concerns that the EPA may have regarding this submittal. Thank you for your attention to this matter.

Sincerely,



William Howard
Lead Environmental Professional

cc: John J. Callahan, Contract Environmental Engineer, TNEC
Kenneth Lento, Site Investigation and Remediation New England, TNEC
Joseph Martella, RIDEM Office of Land Revitalization and Sustainable Materials Management
Michael Burns, Principal Environmental Health Risk Assessment Toxicologist, Rhode Island Department of Health
Katherine Woodward, Project Manager, EPA