



SHORT-TERM RESPONSE ACTION APPROVAL LETTER  
File No. SR -28-1152  
Formerly Case No. 98-004

August 25, 2016

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. A Short-Term Response Action Approval Letter is a document used by the Department to approve limited remedial actions pursuant to Section 6.00 of the Remediation Regulations at contaminated sites that do not involve the use of complex engineered systems or techniques (i.e., groundwater pump and treat systems, soil vapor extraction systems, etc.).

In the matter of the above-referenced property (the Site), the OWM is in receipt of the following final documentation submitted pursuant to the Remediation Regulations in response to the reported release at the Site:

1. Short Term Response Action Plan (STRAP), Dike Access Road, 642 Allens Avenue, Providence, Rhode Island, received by the Department on July 1, 2016, and prepared by GZA GeoEnvironmental, Inc. (GZA); and
2. Short Term Response Action Plan (STRAP) Addendum, Dike Access Road, 642 Allens Avenue, Providence, Rhode Island, received by the Department on August 22, 2016, and prepared by GZA.

Together these documents fulfill the requirements of Section 6.00 (Emergency or Short-term Response) of the Remediation Regulations.

The Short Term Response Action Work Plan addresses the planned construction of a new containment dike access road for the Liquefied Natural Gas (LNG) facility at the site, and requires installing erosion and sedimentation controls, grading and off-Site disposal of excess materials and installation of an engineered cap in disturbed areas. The three (3) Department approved engineered caps include an Asphalt Engineered Cap (approximately 16,000 ft<sup>2</sup>) consisting of 8-inches of imported aggregate base; 4-inches of base course asphalt overlain with 2-inches of top course; and either of two (2) Gravel Engineered Caps (approximately 23,000 ft<sup>2</sup> total) consisting of either a non-woven geotextile overlain by at least 12-inches of imported granular fill or at least 24-inches of imported granular fill. The construction of the engineered caps will require on-Site infiltration of treated stormwater via an engineered underground treatment/infiltration unit. All existing fill underneath the proposed Cultech stormwater management/treatment unit's location will be excavated to the groundwater table and replaced with clean fill. Excavated fill will be properly disposed of off-site at an appropriately licensed facility. The portion of the dike berm to be disturbed for the new access road will be sampled prior to initiation of work and any excess material from the dike will also be characterized for offsite disposal purposes. In addition, the new access road project will also include installation of retaining structures, the installation of new utilities (new water line, new drain line and new underground electrical conduit) and the installation of some new fencing. All new utility excavations will be finished with a gravel engineered cap. The portion of the existing engineered cap that is disturbed during the work will also be restored with a gravel engineered cap. Best management practices will be implemented for dust, odor & organic vapor control, as well as performance of perimeter dust & total volatile organic compound (TVOC) vapor monitoring during remedial activities.

At this time, the OWM offers its concurrence with the proposed remedial action for the property. The OWM approves the STRA Work Plan provided that all activities and procedures detailed in the STRA Work Plan are strictly adhered to.

The Performing Party shall notify all abutting property owners, tenants, easement holders, the municipality, and any community well suppliers associated with any well head protection areas which encircle the site, that the Short-Term Remedial Action is complete and make available to them the findings of the Short-Term Response Report submitted in accordance with Rule 6.06 II of the Remediation Regulations. Please submit a draft notification to the Department via E-mail for review and approval prior to distribution.

Within thirty (30) days of completion of all the abovementioned remedial work outlined in the STRA Work Plan, please submit a STRA Closure Report in accordance with Rule 6.09 inclusive of any disposal documentation and laboratory sampling analysis to the OWM for review and approval.

This Short Term Response Action Approval Letter does not remove your obligation to obtain

any other necessary permits from other local, State, or Federal agencies. The OWM shall require at least forty-eight (48) hours notice in advance of any remedial work.

If you have any questions regarding this letter or would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 222-2797, ext. 7109, or by E-mail at joseph.martella@dem.ri.gov.

Sincerely,



Joseph T. Martella II  
Senior Engineer  
Office of Waste Management

Authorized by,



Kelly J. Owens  
Supervising Engineer  
Office of Waste Management

cc: Ronald Gagnon, RIDEM/OCTA  
Gregory Swift, RIDEM/OWR  
Rich Lucia, RI CRMC  
Margaret Kilpatrick, GZA