



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

June 5, 2013

Mr. Barney S. Heath
Assistant Director of Planning and Redevelopment
Pawtucket Planning & Development
Benjamin Chester Building
175 Main Street
Pawtucket, RI 02860

RE: Concerns raised by the public
Potential trichloroethylene (TCE) vapors in soil gas near Francis J. Varieur School
486 Pleasant Street
Pawtucket, Rhode Island 02860

Dear Mr. Heath:

On November 9, 2011, the Rhode Island Department of Environmental Management (the Department) 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 an efficient manner.

As you are aware, the Department is currently overseeing National Grid's investigation and cleanup of the former Tidewater Manufactured Gas Plant (MGP) site, located on Tidewater Street, Pawtucket, Rhode Island. On March 22, 2012, the Department's Office of Waste Management (OWM) received a written request in the form of a petition from the community, submitted in accordance with Rule 7.07.E (Public Involvement Plans) of the 2011 Remediation Regulations, that a Public Involvement Plan (PIP) be developed and approved for the Tidewater Site. A draft PIP has been developed and is under Department review. In addition to development of the PIP document, a number of public outreach and informational meetings have been conducted. Concerns about potential vapor intrusion from the Tidewater Site to nearby buildings (schools, residences and apartments) were raised at a recent Tidewater public meeting held on March 27, 2013. In response to these concerns, National Grid proposed a soil gas investigation of their property, and on May 2, 2013, submitted a draft Supplemental Site Investigation Work Plan for Soil Gas Sampling and Analysis.

On May 9, 2013, the Department hosted a meeting with representatives of National Grid, their environmental consultant GZA GeoEnvironmental, Inc. (GZA), Amelia Rose, Director of the Environmental Justice League of Rhode Island (EJLRI), several community members of the Tidewater Stakeholders' Group, and Elizabeth Limbrick of the New Jersey Institute of Technology's (NJIT) Technical Assistance for Brownfields Program. Ms. Limbrick was hired by the EJLRI, utilizing funding from the US Environmental Protection Agency (EPA), to provide independent Technical Assistance to Brownfield (TAB) communities under the USEPA TAB Grant, in this case to assist the

Tidewater Stakeholders' Group. It should be noted that the Tidewater Stakeholders' Group is composed of parents of students attending the nearby International Charter School, Blackstone Academy and Varieur School, local residents, and other members of the community that are interested in the ongoing investigation and eventual cleanup activities at the Tidewater Site, and is not otherwise associated with the Tidewater Site property or National Grid.

The general consensus at the May 9, 2013, meeting was that National Grid should conduct their soil gas investigation,. However, questions also arose about a soil gas investigation conducted on the Varieur School property in 1996 which detected low concentrations of trichloroethylene (TCE) in soil gas in two (2) locations near the school building out of 28 total locations on the school property. Subsequent indoor air samples were collected and TCE was not detected in indoor air in the school, but the analytical detection limit used was significantly higher than what would have been used had the samples been collected today.

TCE is not a contaminant associated with MGP sites and it has not been found at the Tidewater Site. The Tidewater Site is adjacent to the eastern boundary of the Varieur School property and is hydraulically downgradient of the school building. While National Grid has agreed to conduct a soil gas investigation of their Tidewater property to determine if there are any potential vapor issues that could possibly impact neighboring properties, they do not currently have any responsibility or obligation to investigate the potential presence of TCE on the Varieur School property.

Members of the Tidewater Stakeholders' Group, the EJLRI and NJIT have expressed their desire that additional testing of soil gas and indoor air at the Varieur School be conducted using the stricter detection limits that would provide conclusive data regarding the potential presence of TCE vapors under and inside the school building. The Department acknowledges that there are economic considerations involved with hiring an environmental consultant, collecting appropriate soil gas and indoor air samples, and having the samples analyzed by a laboratory. Since the EPA has provided the Tidewater Stakeholders' Group and the EJLRI with services from the NJIT through the USEPA TAB Grant, the Department would suggest that the City of Pawtucket consider contacting the EPA Environmental Justice Office and the EPA Removals Team to determine if they may be able to extend similar assistance to the City in this matter.

The Department remains very willing and committed to working cooperatively with the City of Pawtucket throughout the resolution of these concerns. If you have any questions regarding this letter or would like the opportunity to meet with Department personnel to discuss the City's plans to evaluate or assess the property, please contact me by telephone at (401) 222-2797, extension 7109 or by e-mail at joseph.martella@dem.ri.gov.

Sincerely,



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Office of Waste Management

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