



**Letter Response to STRAP Public Comments**

October 6, 2017

**File No. SR -28-1152**

Formerly Case No. 98-004

Amy A. Willoughby  
Lead Environmental Scientist  
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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 Meeting Summary, Response to Public Comments and Additional Clarifications, Short Term Response Action Plan (STRAP): Proposed Liquefaction Project, STRAP Addendum: Holcim Driveway, 121 Terminal Road / 125 Terminal Road / 642 Allens Avenue, Providence, Rhode Island (Response to Public Comments), which was submitted on October 5, 2017, by GZA Geoenvironmental, Inc. (GZA) in accordance with Sections 6.00 and 7.00 of the Remediation Regulations. The Department has reviewed the Response to Public Comments with regard to responses to comments and questions on 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, and therefore did not require responses from National Grid under this regulatory process. A copy of this letter is being sent to the Federal Energy Regulatory Commission (FERC) which has authority over the siting and federal licensing of the liquefaction facility. Certain other comments and questions required responses from the Department and are addressed below.

Because many of the comments and questions were repeated by commenters, the Department is addressing each applicable topic in a response, rather than repeating the same response numerous

times throughout this document.

1. Various comments and/or statements received indicating that the speaker or submitter of the comment is in opposition to the permitting, construction and/or operation of National Grid's proposed Liquefaction Facility.
  - a. While the permitting of the Liquefaction Facility is outside the scope of the Department's STRAP permitting process, the Department acknowledges that a significant percentage of comments from the public and community indicated a clear opposition to the overall Liquefaction project. Public comments regarding the permitting of the Liquefaction Facility should be addressed to the appropriate permitting authority for that project which is the FERC, under Docket #CP 16-121-000, [www.ferc.gov](http://www.ferc.gov). That would include all questions about the chosen location of the facility and concerns about the design, construction, and operational safety of the facility. This letter and all the public comments received by the Department have been submitted to the FERC.
2. Suggestions, requests and/or demands that the Department stop the Liquefaction Facility project by not issuing a STRAP Approval to National Grid for the remediation of the Liquefaction project area.
  - a. Under the Remediation Regulations, the Department's authority over a contaminated Site is limited to jurisdictional releases of hazardous materials to soil and/or groundwater at that subject Site. The property at 642 Allens Avenue, Providence, became a regulated Site in the Department's Site Remediation Program because of historic releases of hazardous materials to soil and groundwater on the property, primarily related to the property's former usage as a Manufactured Gas Plant (MGP). As such, the Department's authority, under the Remediation Regulations, is specifically limited to the investigation and remediation of those jurisdictional releases to the Site soil and groundwater, and does not extend to facility siting issues or reviews which are federally regulated by the FERC. The Department acknowledges and understands that the opponents of the Liquefaction Facility hope to prevent the Liquefaction project by requesting that the Department not issue a Liquefaction STRAP Approval. However, it is the position of the Department that it does not have the discretion to refuse to allow a Responsible Party to remediate its property, nor does it have the ability to arbitrarily refuse to approve a remedy if that remedy is consistent with the requirements of the Remediation Regulations, even if there is significant public opposition to the proposed post-remediation reuse of the property. As stated in the above response, the appropriate agency to address questions, comments, concerns and opposition to the Liquefaction Facility Project is the FERC.
3. Questioning why the Department claims that it has no say in what National Grid does with the Site, and that considering the final use of the Site cannot be part of the Department's decision on the STRAP, since Remediation Regulation Rule 7.07.C (Community Meetings), indicates *"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.”*

- a. To clarify, particularly with respect to item 2, the Department does consider the use, reuse and/or end use of a Site when a Site remedy is proposed. The remedy must be consistent with the proposed usage of the Site, and the proposed Site usage often dictates what the final remedy will be, and what future activities will be restricted at the Site (e.g. restrictions from drinking impacted Site groundwater, restricting residential usage, prohibiting disturbance of impacted Site soil without prior Department approval, long-term monitoring, maintenance, periodic inspection and reporting for all engineered control caps to insure they remain in good condition, etc.). The Department does not have the authority to control or change a Site’s current or proposed usage, as long as that usage is compliant with the Remediation Regulations. That authority typically rests with the local zoning board, other municipal offices, and local, state and/or federal facility permitting authorities as applicable (e.g. Public Utilities Commission [PUC], FERC, etc.).
4. The following question about specific statements made by the Department at the August 9, 2017, community meeting, concerning the limits to the Department’s authority. *“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 7.07).”*
    - a. The statement 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”* is accurate. The Site Remediation Program can review and approve the investigation and remediation of a property. It cannot dictate the current use or end use of that property, other than to periodically monitor that any restrictions on the usage of the property, which may be part of a Department approved remedy, are being followed. Regarding the second sentence above, National Grid’s need to follow the Remediation Regulations has never been in question. The roles of the Department and FERC regarding the Liquefaction Facility Project admittedly did take several months to sort out. The Department may deny an applicant’s proposal if it is deficient or not compliant with the Remediation Regulations. During the public comment period, technical comments on the proposed remedy are solicited and are considered by the Department and the Responsible Party. However, the Department is not obliged to automatically require the originally proposed remedy to be modified to an alternative remedy if the proper implementation of the original remedy will result in compliance with the Remediation Regulations.

5. What is the Department’s role in the review of National Grid’s Liquefaction Facility

Project and how can the public participate in the decision-making process?

- a. The Department's OWM has a role reviewing, commenting on and approving the remedy for the Liquefaction Facility project Area through the Liquefaction STRAP. The public may participate in that process by commenting on the technical feasibility aspects of the proposed Liquefaction STRAP remedy. Many comments were received during the public comment period for the STRAPs. All of the substantive technical comments were either addressed by National Grid in the previously referenced Response to Public Comments, or are addressed in this document as applicable. The OWM does not have a role in planning, reviewing or approving the actual Liquefaction Facility project, and therefore cannot facilitate the community's participation in that specific decision making process through the limited STRAP review and approval process. However, the community still has the opportunity to participate in the FERC process which has a bearing on whether or not the project is approved.
6. Various comments and/or questions asking why National Grid is allowed to separate the Liquefaction Facility Project discussion from the soil and groundwater remediation?
    - a. The Department acknowledges that the construction of a Liquefaction Facility and the pre-construction remediation of the proposed location of said Facility are clearly related to the same end goal of constructing an operational Liquefaction Facility. There are, however, two separate and distinct ongoing regulatory processes involved. The state lead remediation permitting process to address the remediation of soil and groundwater located in the proposed Liquefaction Facility Area, and the federal FERC lead facility permitting process to address the siting, design, construction, operation and related permitting of the actual facility. FERC has the ultimate say about whether or not the Liquefaction Facility can be built. Each of these processes has its own regulatory path and public participation components. That is why National Grid is allowed to separate the discussion of the merits of placing a Liquefaction Facility on the 642 Allens Avenue property, from the discussion of the related remediation of that property. The remediation of the property is the subject of this letter. The scope of the Department's regulatory authority under the Remediation Regulations, and therefore its regulatory authority over National Grid, is specifically limited to the remediation of soil and groundwater for this project.
  7. Various comments and/or statements indicating that the speaker or writer objected to the location, format, timing, lack of childcare, and/or degree of accessibility for the July 13, 2017, Technical Information Session and Public Meeting held at the Providence Public Safety Complex, 325 Washington Street, Providence.
    - a. In response to numerous comments expressing concerns about the first public meeting, a second public meeting with a different format, time of day and location, was scheduled and held on August 9, 2017, at the Open Table of Christ Church, 1520 Broad Street, Providence. Notifications for the meeting were provided in multiple languages with explanations for how to request translation services. There

is no provision or requirement in the Remediation Regulations that the responsible party provide child care at public meetings.

8. Comment indicating that the Public Meeting should be run by the public.
  - a. Under the Remediation Regulations, National Grid, as the Responsible Party, is responsible for holding the public meeting about the STRAP under the PIP.
9. Comment suggesting the Site should be made into a Superfund Site.
  - a. 642 Allens Avenue, Providence, is already a Site listed in the Department's Site Remediation Program, subject to investigation and remediation in accordance with the Remediation Regulations.
10. Various comments and/or statements questioning why the Public Involvement Process was delayed and/or why it took so long to hold a public meeting?
  - a. The Department received a petition requesting that a Public Involvement Plan (PIP) be developed for the 642 Allens Avenue, Providence, Site on August 31, 2016. On September 6, 2016, the Department issued a Public Involvement Plan Process Initiation Letter to National Grid requesting that they develop a PIP. On September 26, 2016, Hinkley Allen, on behalf of National Grid, submitted a legal memorandum to the Department indicating that while the 642 Allens Avenue, Providence, Site was subject to the requirements of the Remediation Regulations, including the requirement to prepare a PIP, the Liquefaction Facility Project was subject to regulation under the FERC which preempted the Remediation Regulations. On October 21, 2016, the Department issued a Letter to National Grid acknowledging the FERC preemption of the Remediation Regulations with regard to, and limited to, the Liquefaction Facility Project. On October 26, 2016, National Grid submitted their first draft PIP (which did not include the Liquefaction Facility Project). Between October 2016 and mid-January 2017, it was the Department's understanding that the FERC oversight of the Liquefaction Facility Project would include FERC review and approval of any remediation plans for impacted soil and groundwater in the proposed Liquefaction Facility area. On February 10, 2017, No LNG in PVD submitted a letter to the Department requesting, in part, that the Department "*Require National Grid LNG to obtain a Short Term Remedial Action Plan (STRAP) as originally intended for oversight of soil disturbance from construction, while holding the STRAP subject to the conditions of the Public Involvement Plan.*" After several discussions involving the Department, FERC and National Grid, FERC issued a letter to National Grid on April 4, 2017, indicating that they would like National Grid to proceed with preparation and submittal of a STRAP to the Department for the Liquefaction Facility Project. National Grid agreed to comply with FERC's suggested approach, and while reserving their rights regarding the statutory and preemption questions, on May 12, 2017, they submitted a draft STRAP for the Liquefaction Project subject to Department review, the PIP, the public participation process and a public meeting. On June 9, 2017, the final PIP was submitted by National Grid (which did include the Liquefaction Facility

Project). The finalization of the PIP had been delayed for several months because the scope of the document, specifically whether it would include the Liquefaction Facility STRAP, needed to be resolved. The scope of the public meetings were limited to the items under the jurisdiction of the Remediation Regulations. The Department acknowledges public frustration with the limited scope of the public meetings and lack of discussion of the Liquefaction Facility or any related topic outside the jurisdiction of the Remediation Regulations, and suggests that any remaining Liquefaction Facility concerns be directed to the FERC while they are accepting public comments, at [www.ferc.gov](http://www.ferc.gov).

11. Various comments indicating National Grid should either clean up the entire 642 Allens Avenue site or leave it alone and not disturb the impacted soil or groundwater.
  - a. The Department cannot deny a property owner's plan to clean up their property simply because the proposed end use is unpopular with the community. In addition, it is not uncommon for the Department to allow for Site remedies to be conducted in a phased or prioritized approach, with the understanding that remediation of the entire property will eventually be completed, as is the case here. This is most often the case when dealing with the remediation of an active facility, or in a situation where requiring the completion of the entire remediation of the Site at the same time would result in unreasonable or overly burdensome logistical difficulties, or impose otherwise unnecessary additional administrative process and delays on the Responsible Party.
12. Various comments suggesting that the Department should require National Grid to clean up the Site to the maximum extent possible.
  - a. Under the Department's Remediation Regulations, a Responsible Party is required to remediate a Site to a degree that is consistent with the Site's current and foreseeable future usage. In this case, the current and proposed continued future usage of the Site is as an active Liquefied Natural Gas (LNG) Terminal facility. That usage is consistent with the definition of Industrial/Commercial Activity in Rule 3.39 of the Remediation Regulations. Therefore, National Grid is required to provide a remedy that is consistent with Industrial/Commercial usage, which is what they have proposed in the Liquefaction STRAP.
13. Various comments indicating National Grid's Liquefaction Facility Project does not qualify for a STRAP or that a STRAP is not an appropriate form of approval, referencing Rule 3.18 which states "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."
  - a. Emergency Actions and Short-Term Response Actions are separate and distinct remedial activities. While Rule 3.18 indicates an Emergency or Short-Term Response Action are activities undertaken immediately following the discovery of a Release of Hazardous Material, non-emergency Short-Term Response Actions

have routinely been addressed through the usage of STRAPs. It is the Department's position that the phrase "*immediately following the discovery of a Release of Hazardous Material*" used in Rule 3.18 was intended to primarily refer to Emergency Actions, and not to limit the applicability of Short-Term Response Actions where implementation of a Short-Term Response Action under a Department approved STRAP would otherwise be a reasonable approach to remediation of a portion of a Site. Several STRAPs have already been successfully initiated and completed at the subject Site, and STRAPs are regularly used state-wide to achieve remedial objectives on other Sites.

14. Comment referencing Rule 6.01 (Emergency or Short-Term Response Actions) of the Remediation Regulations which indicates "*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.*" Then suggesting that "*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.*"

a. The phrase "*increases the potential for harm*" is referring to harm from a jurisdictional release to the environment of hazardous materials that is being remediated during an Emergency Action or Short-Term Response Action, and indicating that the threat of harm from those hazardous materials following the remediation should not be greater than it was before the remediation. Properly implemented erosion, sedimentation, dust and vapor monitoring and control procedures conducted under the final Department approved STRAP should be sufficient to limit significant increased potential for short-term harm during STRAP activities involving the disturbance of impacted soil or groundwater. There should be no long-term increased potential for harm once the STRAP work is completed and any remaining impacted soil is controlled under an engineered cap preventing any future exposure and associated risk.

15. Similar comments to the previous one regarding increasing the potential for harm, either short-term or long-term, to human health or the environment, from potential extreme weather events, a 100-year coastal storm or area flooding during remedial and /or construction activities.

a. As indicated in the previous response, properly implemented erosion, sedimentation, dust and vapor monitoring and control procedures conducted under the final Department approved STRAP should be sufficient to limit significant increased potential for short-term harm during STRAP activities involving the disturbance of impacted soil or groundwater during remedial activities. (Please also see National Grid's Response to Public Comments, Attachment K, page 14, Response 53, and Attachment M, page 4, Response paragraphs 2 - 5, for additional clarification regarding National Grid's procedures during earthwork activities and preparation for extreme weather events).

16. Similar comments to the previous one regarding increasing the potential for harm, either short-term or long-term, to human health or the environment, from potential seismic activity and or potential gas leaks during remedial and/or construction activities, as well as potential increased harm or possible negative impacts from placement of a Liquefaction Facility at the Site and long-term risks and hazards related to climate change associated with human consumption of fossil fuels.
- a. While these are certainly significant safety issues and valid public and community concerns, they extend outside the jurisdictional authority and regulatory limits of the Department operating under the Remediation Regulations. The phrase “*increases the potential for harm*” is referring to harm from the jurisdictional hazardous materials that are being remediated during the Emergency Action or Short-Term Response Action, and indicating that the threat of harm from those hazardous materials following the remediation should not be greater than it was before the remediation. Questions and concerns related to the safety and operation of the existing LNG Facility, or construction, design and operation of the proposed Liquefaction facility, should be addressed to the appropriate regulatory authority (e.g. PUC, FERC, Occupational Safety and Health Administration [OSHA], etc.). The Department, under the Remediation Regulations, does not have the authority to control or change a Site’s current or proposed usage.
17. Comments indicating the Remediation Regulations don’t do anything if the Department can’t stop the Liquefaction Facility Project, and implying that the Department does not consider the community’s safety concerns and objections to the project to be genuine.
- a. The Department considers the community’s safety concerns and objections to the project to be genuine. It is the Department’s position, however, that requests to prevent the Liquefaction Facility Project extend outside the Department’s jurisdictional authority and regulatory limits under the Remediation Regulations, and therefore outside the current public process. Objections to the project fall under the FERC’s jurisdiction.
18. Comments questioning if STRAP permits are limited to 90 days, then how can the proposed longer duration project be allowed under a STRAP?
- a. Under Rule 6.06 (Emergency Permit Duration) of the Remediation Regulations, “*Emergency Permits shall not exceed ninety (90) days in duration.*” There is no corresponding duration limit for STRAP Approvals.
19. Comments indicating “*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.*”
- a. Under the Remediation Regulations, a Responsible Party may propose a Human Health Risk Assessment to evaluate the risk associated with leaving a Site in its unremediated state, rather than implementing a traditional “clean up” remedy. Site specific factors (assumptions about the usage, activities, potential exposure



pathways, etc.), are then used to mathematically evaluate the potential exposure risk to users of the Site to justify the no action remedy. A Human Health Risk Assessment is not applicable for 642 Allens Avenue because National Grid is not proposing to leave the Site in an un-remediated state, or to leave impacted soil uncapped. Placing an engineered control cap over impacted soil will eliminate the direct exposure pathway, and therefore eliminate the associated human health risk from exposure.

20. Who is responsible to pay for the investigation and remediation of the property?
- a. Under the Remediation Regulations, National Grid, as the owner of the property, is the Responsible Party for all investigation and remediation of the Site, and is therefore responsible for the related costs.
21. Various comments indicating that National Grid's Liquefaction Facility Project will create an imminent hazard when the impacted soil and groundwater are disturbed, potentially impacting community health and safety; that National Grid does not have a comprehensive plan for the safe remediation of the Site; and questions asking why the Department would allow National Grid to disturb the Site when there are known hazardous materials in the ground?
- a. The property at 642 Allens Avenue, Providence, is a contaminated Site in the Department's Site Remediation Program, with documented releases of hazardous materials to the soil and groundwater. National Grid, as the owner of the property, is the Responsible Party for the investigation and remediation of the Site. Part of the remediation process requires the Responsible Party to submit a work plan to the Department explaining how they are proposing to remediate the subject Site. There are many methods that can be employed to ensure that remedial activities that involve the disturbance of contaminated materials are done in a protective way that minimizes risk to the workers, Site employees and the neighboring community. The Department reviews submitted work plans to make sure that the proposed work will be done in a manner consistent with the requirements of the Remediation Regulations, and will be protective of human health and the environment.
22. The request that an independent environmental monitor be allowed on Site throughout the construction period of the STRAPs, that the monitor report to the No LNG in PVD coalition, and that the No LNG in PVD coalition be reimbursed on a weekly basis for the cost of the independent monitor.
- a. There is no provision or requirement in the Remediation Regulations, for an independent environmental monitor. However, National Grid will provide weekly monitoring result summaries, which will be posted by the Department on its web site, and the Department will conduct oversight, including periodic Site visits, to observe the STRAP work.
23. Comment indicating the Department should require National Grid to provide copies of all air monitoring results to the No LNG in PVD coalition on a daily basis.

- a. National Grid will be providing the Department with a summary of the air monitoring results on a weekly basis and the monitoring results will be posted on the Department's dedicated web page for the 642 Allens Avenue, Providence, Site <http://www.dem.ri.gov/programs/wastemanagement/site-remediation/Providence-Gas-Co.php>. The summary shall include an indication of any detected exceedances of any action levels and a complete description of how the detected exceedances were responded to and how the causes were controlled or resolved.
24. Ecological concerns raised indicating that the project area may be located in potential habitat for a federally listed threatened species, may potentially affect 19 migratory bird species, and therefore requesting that an Ecological Risk Assessment be conducted per Rule 8.05 of the Remediation Regulations.
  - a. Evaluation of ecological environmental impacts and concerns, including potential impacts to endangered and threatened species, are considered by the FERC during their environmental document preparation process, as part of their ongoing project permitting process, and does not warrant duplication at the state level.
25. Questions about the language in the PIP indicating that the Site is not located in an Environmental Justice (EJ) Focus Area and concerns that the requirements of Rule 7.07.B (fact sheets and enhanced communication), Rule 1.04 (Environmental Justice and Public Involvement) and Rule 7.01.D (sign requirements) do not apply.
  - a. While the Site was determined to not be in an EJ Focus Area, National Grid has proactively been completing the enhanced notification and communication activities that would otherwise have been required consistent with EJ areas per the Remediation Regulations, including hosting public meetings with translation services available, providing and distributing meeting notices and project fact sheets in multiple languages (per Rule 7.07.B), and committing to post informational signs at the project Site perimeter (per Rule 7.17.D).
26. Questions about how the community can be meaningfully involved in the decision-making process under the Remediation Regulations, including decisions related to Rule 7.04 (development of at least two remedial alternatives), and Rule 7.09 (Remedy Selection), as they apply to community opposition to the LNG Facility (National Grid's selected remedy) and community demands for remedial alternatives that include 1) no action (not allowing for construction) and 2) full and comprehensive remediation of the entire property.
  - a. Rules 7.04 (Development of Remedial Alternatives), and 7.09 (Remedy Selection), are not applicable to Short Term Response Actions. Technical comments on the proposed remedial alternative are however considered by the Department and the Responsible Party. Proposed remedial alternative 1) no action (not allowing for construction), is not consistent with the intent of the Remediation Regulations to encourage remediation of hazardous material releases. Regarding proposed remedial alternative 2) full and comprehensive remediation of the entire property, it is the Department's understanding that a comprehensive Site Investigation Report

(SIR) Addendum is planned to be submitted later this year or in early 2018, which is the next step in the cleanup process and should present remedial alternatives to address all outstanding areas of the 642 Allens Avenue Site.

27. What state agency or branch of state government works with the FERC regarding decisions about whether these projects are wanted in Rhode Island?

- a. The FERC operates as an independent federal agency with specific jurisdiction for energy facility siting determinations. The FERC has identified the U.S. Department of Transportation (U.S. DOT), the Rhode Island Coastal Resources Management Council (RI CRMC), and the Department as cooperating agencies regarding specific limited portions of this project, in the preparation of the Environmental Assessment (EA) for the Liquefaction Project.

28. Various comments and concerns raised regarding the potential for contaminants in soil to be released into the air in the form of dust or vapors during soil disturbance remedial activities or when the existing engineered cap is disturbed. How were the perimeter air monitoring Action Levels for total Volatile Organic Compounds (TVOC) and Respirable Dust (PM<sub>10</sub>) determined? Are those numbers adequate to protect the health of children?

- a. After receiving a request for assistance reviewing National Grid's proposed air monitoring plans, the following response was provided to the Department by a representative of the Rhode Island Department of Health (RI DOH):

The PM<sub>10</sub> Action Level is based on the United States Environmental Protection Agency's National Ambient Air Quality Standard (NAAQS) for that pollutant. The NAAQS is exceeded if the 24-hour average concentration of PM<sub>10</sub> is over 150 µg/m<sup>3</sup>. Since the National Grid Action Level will be triggered if PM<sub>10</sub> level is 150 µg/m<sup>3</sup> for only five minutes, the Action Level is considerably more stringent than the NAAQS. Note that NAAQS are set at levels designed to protect all people, including children and other sensitive individuals.

Setting the TVOC Action Level was less straightforward, because there is no NAAQS for TVOC and because TVOC is made up of a number of different substances which are not equally toxic. TVOC are present everywhere in all indoor and outdoor air. The Action Level was set at a level that is higher than normal background levels but which is very unlikely to be associated with toxic effects. Note that the TVOC Action Level for this site (1 ppm for a five-minute period) is considerably more stringent than the hazardous waste site clean-up Action Level used by the New York Department of Environmental Conservation (5 ppm as a 15-minute average).<sup>i</sup>

Note also that both PM<sub>10</sub> and TVOC will be measured at the perimeter of the site, considering wind direction and the location of neighborhoods. Since pollutant concentrations decrease as you move away from a source, the actual concentrations in nearby neighborhoods will be lower than those at the perimeter location.

29. Why will National Grid's monitoring and pollution-control measures cease after the STRAP projects are finished?

- a. The monitoring and pollution-control measures that National Grid is implementing are specific to the remedial work and disturbance of regulated soil and groundwater described in the STRAP, and therefore will not be required once remediation of the soil and groundwater is completed. National Grid will be required to apply for a minor source air pollution control permit from the Department's Office of Air Resources prior to the start of facility construction, and if approved will regulate and control the allowable air emissions from facility construction activities and facility operation.

Comments on the draft STRAPs will be issued separately. If you have any questions regarding this letter, please contact me by telephone at (401) 222-2797, extension 7109 or by e-mail at [joseph.martella@dem.ri.gov](mailto:joseph.martella@dem.ri.gov).

Sincerely,



Joseph T. Martella II  
Senior Engineer  
Rhode Island DEM  
Office of Waste Management

cc: Ronald Gagnon, RIDEM/OCTA  
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<sup>i</sup> NY State Department of Environmental Conservation, DER-10/Technical Guidance for Site Investigation and Remediation, May 2010. [http://www.dec.ny.gov/docs/remediation\\_hudson\\_pdf/der10.pdf](http://www.dec.ny.gov/docs/remediation_hudson_pdf/der10.pdf)