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August 22, 2016 File No. 03.00033554.90

Via E-Mail and U.S. Mail

Mr. Joseph Martella Rhode Island Department of Environmental Management (RIDEM) Office of Waste Management 235 Promenade Street Providence, Rhode Island 02908

Re: Short Term Response Action Plan (STRAP) Addendum

Dike Access Road 642 Allens Avenue

Providence, Rhode Island

RIDEM Case No. 98-004 / Site Remediation File No. SR-28-1152

Dear Mr. Martella:

On behalf of the Narragansett Electric Company d/b/a National Grid (National Grid), GZA GeoEnvironmental, Inc. (GZA) is pleased to present to the Rhode Island Department of Environmental Management (RIDEM) this addendum to the June 29, 2016 Short Term Response Action Plan (STRAP) for the Dike Access Road Project which was submitted to the Department on July 1, 2016. This addendum has been prepared to address comments received on August 22, 2016 from RIDEM Office of Waste Management.

This STRAP Addendum is subject to the attached Limitations.

STORMWATER INFILTRATION OVER-EXCAVATION ACTIVITIES

As described in the June 29, 2016 STRAP, the proposed dike access road has been designed with an integral stormwater management/treatment system. Stormwater runoff generated from the proposed Site improvements will be collected utilizing swales and directed to a catchbasin. The catchbasin will drain to an engineered stormwater infiltration unit. The Water Quality Volume (WQV) which requires treatment (as defined in the Rhode Island Stormwater Design and Installation Standards Manual; *Stormwater Regulations*) will be conveyed to the stormwater infiltration unit located between the road and the existing LNG containment dike wall and infiltrated. Excess stormwater will overland flow and ultimately discharge to the surrounding surface for infiltration.

The location and design of the proposed infiltration system (i.e., an engineered stormwater infiltration system) was evaluated in accordance with Section 3.2.8 Subsurface Contamination Guidance of the Stormwater Regulations. As described in the June 29, 2016 STRAP, very limited soil or groundwater impacts were detected in the area proposed for stormwater infiltration. However, to be conservative, soil within the proposed unlined stormwater infiltration unit will be over-excavated to the depth of the water table and backfilled with clean imported free draining soil. As part of the proposed over-excavation, a small additional volume of soil will be generated



(approximately 20 cubic yards [CY]). Excavated soil will be managed in accordance with the June 29, 2016 STRAP.

PROPOSED TEMPORARY SOIL BINS RESTORATION

As shown on Figure 4, *Proposed Conditions Plan*, in the June 29, 2016 STRAP, several areas of temporary asphalt paving are proposed as part of the Dike Access Road Project. The Contractor plans to remove the asphalt paving at the end of the Project and restore the area to pre-existing conditions (crushed stone).

GROUNDWATER MONITORING WELL DECOMMISSIONING AND REPLACEMENT

All the wells that were located in the Dike Access Road Project area (RCA-29, RCA-38, RCA-38, VHB-13, ESS RW-1 and ESS RW-2) were decommissioned in late June – early July 2016. Each well was decommissioned in accordance with Appendix 1 of RIDEM's June 2010 Groundwater Quality Rules and as proposed in GZA's letter dated May 26, 2016 to RIDEM. A GZA field engineer was on Site to record well decommissioning activities and a decommissioning log was prepared for each location. We anticipate a summary letter detailing the well decommissioning effort performed will be submitted to RIDEM in the Fall 2016with copies of well decommissioning logs. In addition, copies of well decommissioning logs will be included in the *Short Term Response Action Closure Report*.

After the Dike Access Road project and other facility projects are completed at the Site (currently anticipated to be in 2020, however, the construction window may extend further than the anticipated schedule), select monitoring wells will be replaced/installed and the proposed post-development groundwater monitoring program will be implemented. We currently anticipate that one monitoring well will be replaced (RCA-29R) and two (2) new monitoring wells (GZ-500S and GZ-500D) will be installed at the locations shown on Figure 4, *Proposed Conditions Plan* in the June 29, 2016 STRAP. GZA, on behalf of National Grid, will submit a *Site Investigation Work Plan (SIWP)* with final proposed locations to RIDEM for review and comment prior to performing this work. The SIWP will also include a summary of the proposed groundwater monitoring program, including sampling frequency and parameters.

Should you have any questions or comments regarding the information presented herein, please do not hesitate to contact the undersigned or Amy Willoughby from National Grid at (401) 258-5410.

Very truly yours,

GZA GEOENVIRONMENTAL. INC.

Sophia Narkiewicz, P.E. Assistant Project Manager

Margaret S. Kilpatrick, P.E.

Associate Principal

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Attachment: Limitations

cc: Amy Willoughby, National Grid William Howard, National Grid

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