DRYWELL CLOSURE PLAN APPROVAL LETTER File No. SR -28-1152

March 23, 2020

Formerly Case No. 98-004

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 January 8, 2019, the Rhode Island Department of Environmental Management's (the Department) Office of Waste Management (OWM) re-codified 250-RICR-140-30-1, the <u>Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases</u> (the <u>Remediation Regulations</u>) consistent with the RI Administrative Procedures Act. 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.

The Department has received and reviewed the following documents submitted on behalf of National Grid, which together describe a plan for closing a drywell at the Site:

- 1. Proposed Drywell Closure Plan, Fields Point Liquefaction Project, 642 Allens Avenue, Providence, Rhode Island, received by the Department on February 19, 2020, and prepared by GZA GeoEnvironmental, Inc. (GZA); and
- 2. <u>Bottom Sediment Sampling and Analysis, Proposed Drywell Closure Plan, Fields Point Liquefaction Project, 642 Allens Avenue, Providence, Rhode Island, received by the Department on March 10, 2020, and prepared by GZA.</u>

The proposed drywell closure plan involves closing the drywell in place by the following procedures:

- Remove/demolish the existing manhole cover, ring, and 3-inch diameter inlet pipe (demolish approximately top 6-7 inches of the structure);
- Dispose of concrete debris and scrap metal from the manhole cover and pipe removal at a licensed disposal facility;

- Fill the bottom of the drywell with clean backfill or flowable fill up to 12-inches from the final grade; and
- Cap to existing grade the top 12-inches of the drywell with concrete. Seal any inlet or outlet pipes with concrete as necessary.

Based upon our review, the Department approves the drywell closure plan outlined in the above referenced documents, with the condition that Site soils are not to be used as backfill for the drywell closure. Any proposed changes to the Department approved drywell closure plan shall be preapproved by the Department and reported to the Department by telephone within one (1) working day and in writing within five (5) business days.

It is the Department's intent that all conditions set forth in this Drywell Closure Plan Approval Letter shall remain in full force and effect unless specifically altered by the Department in writing. Further, this letter continues to place primary responsibility for the construction, operation, and maintenance and monitoring of the approved drywell closure plan and its associated implementation on the National Grid. As the Responsible Party and Performing Party, National Grid is expected to implement the drywell closure plan outlined in the above referenced documents in an expeditious and professional manner that prevents non-compliance with this letter and said plan, and protects human health and the environment.

This Drywell Closure Plan Approval Letter does not remove your obligation to obtain any necessary permits from other local, State, and/or Federal agencies.

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

RIDEM Office of Waste Management

Authorized by,

Kelly J. Owens Supervising Engineer

RIDEM Office of Waste Management

Kelly J. Owens

Cc: Craig Roy, RIDEM/OWR/GWD Program

Sara Haupt, GZA