

February 15, 2013
GZA File No. 05.0043654.20-C

Mr. Joseph Martella
Rhode Island Department of Environmental Management
Office of Waste Management
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Providence, Rhode Island 02908



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Providence
Rhode Island
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Re: *Meeting Summary - January 29, 2013*
Draft Public Involvement Plan
Former Tidewater MGP and Power Plant Site
Pawtucket, Rhode Island
RIDEM Case No. 95-022

Dear Mr. Martella:

On behalf of our client, The Narragansett Electric Company d/b/a National Grid (National Grid), GZA GeoEnvironmental Inc. (GZA) is pleased to provide the attached summary of the January 29, 2013 public meeting associated with the Former Tidewater Manufactured Gas Plant (MGP) and Power Plant Site located in Pawtucket, Rhode Island (the Site). The purpose of the public meeting was to discuss public comments to the draft Public Involvement Plan (PIP) which was submitted to the Department on November 26, 2012.

Should you have any questions or comments regarding the information presented herein, please do not hesitate to contact the undersigned or Michele Leone at 781-907-3651.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink, appearing to read 'M. Kilpatrick', is written over a faint, light blue rectangular background.

Margaret S. Kilpatrick, P.E.
Senior Project Manager
401-421-4140 – margaret.kilpatrick@gza.com

Attachment: Summary of Meeting

CC: Ms. Michele Leone, National Grid
Ms. Elizabeth Stone, RIDEM

Summary of Meeting
 DRAFT Public Involvement Plan (PIP)
 Former Tidewater Facility
 Pawtucket, Rhode Island

January 29, 2013 6 PM
 Francis J. Varieur Elementary School
 486 Pleasant Street
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- **Introduction to Meeting – Michele Leone (National Grid Representative)**
- **Presentation of DRAFT PIP dated November 26, 2012 – Elizabeth Stone (Rhode Island Department of Environmental Management or RIDEM) and Meg Kilpatrick, P.E. (GZA GeoEnvironmental, Inc.)**

The presentation included a summary of the Draft Public Involvement Plan (PIP) for the former Tidewater Facility (the Site). The draft PIP was developed based on input from the public provided during the community interviews completed in June 2012, as well as input from RIDEM. It provides a blueprint for keeping the public informed during the site cleanup process. It also presents how the public can participate in the process and comment on the project. A PIP is a living document and can be amended to reflect additional issues or challenges that may arise during the cleanup process.

National Grid submitted a draft PIP to RIDEM on November 26, 2012. The draft PIP has four components: 1) public notice, 2) fact sheets and enhanced communications, 3) community meetings and 4) information repositories. The four components are presented in the below table.

<p><u>Public Notice:</u></p> <ul style="list-style-type: none"> • Mailing List (used to announce public meetings, distribute fact sheets, information about availability of reports, etc.) • Email List (optional) • Sign up at www.tidewatersite.com • Or, send request to National Grid 	<p><u>Fact Sheets and Enhanced Communications:</u></p> <ul style="list-style-type: none"> • Fact Sheets (used to inform of development of new information and/or achievement of significant milestones) • Informational Bulletin Boards (end of Tidewater Street and Bowles Court) • Phone Message Alert System during excavation
<p><u>Community Meetings:</u></p> <ul style="list-style-type: none"> • Encourages equal participation by all to create an atmosphere of constructive, open dialogue • Proposed Schedule and Objective of Public Meetings • Evening meeting time • Francis J. Varieur School (preferred venue) 	<p><u>Information Repositories:</u></p> <ul style="list-style-type: none"> • Publicly Accessible Site File: RIDEM Case No. 95-022 www.dem.ri.gov/topics/fileview/htm • Publicly Accessible Websites: www.tidewatersite.com www.dem.ri.gov/benviron/waste/tide/htm • Local Information Repository: Pawtucket Library (13 Summer St) Bulletin Boards: Tidewater St & Bowles Ct

Following the public comment period for the draft PIP, National Grid will provide a response to comments and revise the PIP as necessary for submittal to RIDEM for final review and approval.

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National Grid will hold a community outreach session in March 2013 to present information about the Site in an informal poster-board type setting. Following this session, National Grid will hold the initial community meeting within 60 days after receipt of the Program Letter from RIDEM (issued following RIDEM’s formal review of the Site Investigation Report submitted by National Grid). The schedule of community meetings follows, and National Grid encourages participation by all to create an atmosphere of constructive, open dialogue.

ACTIVITY	TIME PERIOD
Community Outreach Session	Within 60 days of Draft PIP Meeting (March 2013)
Initial Community Meeting	Within 60 days of receipt of Program Letter – during SIR Public Comment Period
Public Meeting on DRAFT Remedial Action Approval Plan (RAWP)	Within 12 months of receipt of Remedial Decision Letter
Submit RAWP for RIDEM Approval	Within 6 months of DRAFT RAWP Meeting
Public Meeting prior to initiation of remedy	Minimum of 30 days prior to start of remediation
Public Meetings during remediation	Meeting schedule to be presented for discussion purposes once remedial schedule is developed and approved by RIDEM
Public Meeting upon completion of the remedy	Within 30 days following completion of remediation

A copy of the presentation associated with the January 29, 2013 Draft PIP meeting is posted on the National Grid Tidewater website (www.tidewatersite.com).

Questions and Comments Session: *(Responses provided in italics)*

National Grid provided a brief summary of written public comments received to date on the DRAFT PIP.

- Public requested that Portuguese (in addition to Spanish) be included as languages for documents requiring translation.

National Grid stated that going forward, the following document types will be provided in English, Spanish and Portuguese: 1) Notification Mailings, 2) Fact Sheets and 3) brief Executive Summaries which will accompany future reports.

- Public requested that color-coded alert system be implemented on the bulletin boards.

National Grid stated that the color-coded alert system has been implemented on the bulletin boards during the recent excavation project. The system involves posting different color sheets to indicate when excavation is active (yellow sheet) and not active (blue sheet).

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- Public requested color-coded map of Tidewater Site contaminants.

National Grid stated that the color-coded map for the Tidewater project is being finalized and will be presented at the upcoming Community Information Session. The final map will also be posted on the National Grid website and the bulletin boards.

- Public expressed concern that current Draft PIP does not take into account the public's role in providing input into the remediation process.

National Grid reinforced that the process going forward and as outlined in the PIP is intended to provide a means of effective "two-way communications" between the public and National Grid. National Grid stated that the Initial Community Meeting (which will follow RIDEM's review of the Site Investigation Report) will provide the public an opportunity to provide comment on the conceptual remedial strategy for the Tidewater Site. In addition, National Grid indicated that the current draft of the PIP has been modified to include a public meeting on the draft Remedial Action Work Plan (RAWP – the document that will be submitted to RIDEM to present the details of how the remedy will be implemented) to further provide an opportunity for the public to comment on the Site cleanup process.

- Public expressed concern that current Draft PIP does not consider air monitoring during the remediation of the Tidewater Site.

National Grid stated that the air monitoring plans for full-scale remediation of the Tidewater Site have not been developed as the final remedy for the project has not been approved. National Grid stated that the public will have an opportunity to comment and present their concerns during future public meetings, which National Grid will incorporate into the air monitoring plan for the final remediation.

Audience member relayed concern that draft PIP references weekly posting of air monitoring data and that inclusion of this language will set a precedent for future air quality monitoring.

National Grid stated that the PIP will be modified to delete reference to the posting of weekly air monitoring data.

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Open Comments and Questions Received:

1. Audience member enquired about date for the Community Outreach Session.

The current schedule is to have the Community Outreach Session in mid to late March 2013.

2. Audience member enquired about what March 2013 Community Outreach Session consist of.

The Community Outreach Session will consist of an informal meeting where information will be presented on poster boards to the public. The poster boards will include a variety of topics, including such things as "What is an Manufactured Gas Plant?" history of the Tidewater Site, findings of the investigations, demonstrations of field equipment, description of current National Grid operations at the property, etc. Each poster board will be manned by a representative from National Grid and/or GZA to answer questions. RIDEM will also be present to answer questions from the public.

3. Audience member expressed concern about when to know when things are going on at the Site; specifically, when to leave kids inside.

Information regarding excavation at the Site is provided through the mailing/email list, posted to the bulletin boards and posted to the Tidewater websites. The National Grid website will also be updated to include the color-coded alert system information (active and no active excavation). National Grid will also inform school principals of the schedule of work.

4. Audience member stated that he is a parent and emphasized that it is important to remember that parents have no way to obtain information about the Site.

National Grid provides notifications to those on the mailing/email list, which includes the principals of the neighboring schools. Due to privacy issues, National Grid does not have access to student/parent information. National Grid will continue to work with the school principals in developing an effective way to communicate with the parents. The best way to find out information currently is to sign-up to the Tidewater mailing/email list via the National Grid website. National Grid requested that audience members tell other parents/community members about this and encourage them to sign up so that they can receive information directly from National Grid.

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- Audience member stated that parents from the International Charter School want a way for the information to be communicated to the parents.

National Grid will continue to work with the school principals in developing an effective way to communicate with the parents. National Grid encouraged parents to sign-up for the mailing and/or email lists, as well as visit the National Grid website, to obtain information.

- Audience member stated that he/she feels that the parents have no way to determine what is going on at the site and suggested possibly implementation of additional bulletin boards.

The bulletin boards were installed at locations proximate to the Tidewater site, as well as accessible and visible to the schools. The two site bulletin boards are located close to each of the neighboring schools. National Grid will look into the possible installation of additional bulletin boards, as well as continuing to work with the school principals in developing an effective way to communicate with the parents.

- The principal from Blackstone Academy stated the community has various levels of technical understanding and that disseminating information about the Tidewater Site is difficult.

In the future, National Grid will prepare simple executive summaries for major report submittals. In preparing these summaries, National Grid will make every effort to use brief and nontechnical terminology in communications to the public. In the near future, National Grid will prepare an executive summary for the recent Site Investigation Report as well as an updated Fact Sheet which will be distributed through the mailing lists, as well as placed into the information repositories. National Grid will also continue to work with the school principals in developing an effective way to communicate information to the parents.

- Audience member stated that, as a parent, the 2- hour notice provided through the phone message alert system was not enough. In addition, notification regarding the Tidewater site needs to be provided to more parties, such as elected officials and School Committee(s). A presentation of information would be warranted.

The mailing list established for the Tidewater project does include local elected officials as well as school representatives, including the Principals of the Blackstone Academy, International Charter School and Francis J. Varieur School, as well as the Superintendent of schools for the City of Pawtucket. National Grid would be happy to include members of the School Committee on the mailing list, upon receipt of their contact information. National Grid also is willing to meet with

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members of the school and local government to present information about the Tidewater site and answer any questions that they may have.

9. Audience member requested that technical documents be translated into “everyone speak” language.

National Grid is attempting to do this and will continue to try to produce documents that are better understood by the public.

10. Audience member asked when RIDEM will be ready to review the Site Investigation Report (SIR).

Joseph Martella of RIDEM provided details regarding the regulatory process under the RIDEM Remediation Regulations. He indicated that the Public Involvement Plan must be finalized and in place before RIDEM’s review of the SIR can begin.

Audience member enquired about the timing of this review and if the spring would seem reasonable.

RIDEM indicated that it may be possible but reiterated that PIP must be finalized before the review of the SIR begins.

11. Audience member requested that live translators be provided at public meetings.

National Grid would be happy to provide translators, if requested by the public in advance of the meetings. Future notifications will include language regarding the availability of translators upon request by the public.

12. Audience member spoke about historical mercury spill and lasting impact on concern from neighborhood. Audience member enquired about money from court settlement and publicly available information regarding mercury spill. He requested that information about the mercury spill, as it pertains to the history of the Tidewater Site, be included on the website and presented during the poster board session.

National Grid did not own the property when the mercury spill took place in 2004 and was not involved in the cleanup, court proceedings or settlement. Southern Union was the party solely responsible for cleanup of the mercury incident. National Grid purchased the property from

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Southern Union but did not acquire Southern Union's liability for the mercury issues on the property. The mercury contamination from the 2004 spill has been cleaned up and removed from the property. In addition, the buildings have been checked for mercury and no mercury is currently stored on-site. National Grid stated that the files associated with the mercury spill are public information and can be reviewed through RIDEM.

The audience member further requested that information on the mercury spill be posted on the National Grid website.

National Grid explained that it was not liable for the mercury release was not involved in the cleanup, court proceedings or settlement. Southern Union was the party solely responsible for cleanup of the mercury incident. National Grid indicated that it would consider the request and provide a formal response in the response to comments on the PIP.

13. Audience member concerned about Tidewater flyer that he received on his door from Environmental Justice League. The flyer depicted biohazard marker and list of chemicals with associated acute health hazards. Audience member relayed information about members of his household and neighbors being diagnosed with cancer and is concerned about what he is being exposed to at his home as he lives on Thornton Street located right next to site. He stressed that he wants to know if he is safe.

National Grid stressed that the Site is fenced and locked to keep people off of the property. Under normal site conditions, the Site is safe to the community- in other words, there is no potential for airborne contaminants. During times of excavation, when soil is dug up and moved around, there is a potential for airborne contaminants. During soil excavation, National Grid follows an air quality monitoring program which has received public input and has been reviewed and approved by RIDEM. The results of this monitoring are posted to the bulletin boards as well as the Tidewater websites. This program was followed during the recent electrical substation upgrade project. The majority of excavation associated with this project is complete, with the exception of minor fence post installations and minor excavations associated with properly decommissioning equipment. Air data from this project did not show sustained exceedances of the thresholds (defined as being held over a 5-minute time period) at any time. A few transient exceedances of the thresholds were noted during the work which were not associated with the excavation activities (i.e., transient exceedances due to weather interference (rain), movement of trash material, orange peel, etc.) .

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Audience member asked whether there are emissions coming from the site without moving the soil? Also, audience member wanted to know about indoor air monitoring and whether or not they should be concerned about migration/volatilization into buildings on Thornton Street.

Contaminants from the site are not getting into the air (i.e., volatilizing) from the soil and groundwater under normal conditions (i.e., no soil being moved or disturbed). The majority of surface soils at Site are indicative of urban fill – soils which would typically be found in urban or city environments and exhibit low levels of contaminants. The majority of impacts are found below the ground surface (deeper than 2 feet) in the soils, at or below the groundwater table. In addition, the majority of soil, groundwater and separate phase product (oil) impacts are found where the historical Manufactured Gas Plant and Power Plant operations took place, primarily along the river area between Winter Street and the land behind the Max Read Field. The area where the residences are located along Thornton Street are in an area where historical operations did not occur and do not have elevated levels of observed impacts. This area is also located upgradient of the site – groundwater from the Site flows “downhill” towards the river, not towards the homes on Thornton Street. Based on this information, National Grid believes that the buildings on Thornton Street are unaffected by the migration and/or volatilization from impacts on the Tidewater Site.

The drawbacks to indoor air testing were also discussed, as this type of testing typically will pick up standard house hold products and chemicals, such as paint, cleaners, etc., which cannot be differentiated from possible site contaminants.

The findings of the drilling program in Max Read Field were also discussed. Results of the explorations indicated the presence of visually impacted soil at depths greater than 2 feet in a limited area on the eastern portion of the field. The soils at depth are not accessible (i.e., they are covered with 2 feet of visually non-impacted soil which would need to be removed). The exploration program was conducted with knowledge by the City of Pawtucket and the City is aware of the findings of the investigation.

14. Audience member commented on gas smell at Thornton and Merry Streets and whether or not they are safe or being exposed to natural gas (or its additives).

The odor that the audience member says he smelled is likely associated with mercaptan. Natural gas by itself is odorless. Mercaptan is an odorant that is added to natural gas so the gas can easily be detected. It is carried with the natural gas stream.

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National Grid will contact their Natural Gas Division to find out more information about this concern.

15. Amelia Rose of the Environmental Justice League of Rhode Island (EJLRI) introduced herself and her agency to the audience. She indicated that EJLRI had access to funds from the US Environmental Protection Agency (USEPA) and could be used as a resource to the community. She also suggested that National Grid have a poster board regarding vapor intrusion during the Community Informational Session to educate the public.

National Grid will consider adding a poster board regarding vapor intrusion to the Community Informational Session.

RIDEM also added that the potential for volatilization of contaminants from the site is not supported by the results of the recent air monitoring program (hand held field instruments) which is being followed as part of the electrical substation project.

16. Audience member commented on concern regarding interfacing with the schools and the community. They suggested providing information about the site at a 4-6th grade comprehension level. Also, they requested that National Grid inform Shea High School about the impacts on the Max Read Field as they use the athletic field for sport activities.

National Grid will look into this request and get back to the public. In the future, National Grid will prepare simple executive summaries for major report submittals. In preparing these summaries, National Grid will make every effort to use brief and nontechnical terminology in communications to the public. In the near future, National Grid will prepare an executive summary for the recent Site Investigation Report as well as an updated Fact Sheet which will be distributed through the mailing lists, as well as placed into the information repositories. National Grid will also continue to work with the school principals in developing an effective way to communicate information to the parents. Also, National Grid will consider adding Shea High School to the mailing list.

17. Audience member suggested that Cape Verdean be added as a language to the translation list. Also suggested that Oak Hill Nursing Home be added to the distribution list.

National Grid will consider adding Cape Verdean to the translation list. National Grid will also consider adding Oak Hill Nursing Home to the mailing list.

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18. Audience member enquired why this is the first Public Involvement Plan in RI and what is typically done in Massachusetts?

RIDEM indicated that the Remediation Regulations were recently modified in November 2011 to include a formal Public Involvement process, similar to that established in Massachusetts. This is the first PIP in Rhode Island due to the recent change in the regulations. Massachusetts has had a PIP process in place for at least 20 years.

19. Audience member inquired if the site is “safe,” why all the concern?

RIDEM indicated that the Site is under the State’s guidance for a reason – there are soil and groundwater impacts at the site which do pose a certain level of exposure risk. RIDEM stressed that the fencing is also there for a reason – to prevent people from entering the Site. RIDEM also gave the example of different levels of exposure at the Site – i.e., on-site workers who are excavating soils (potential high exposure risk) versus people off-site at or near the fence line (low potential exposure risk).

20. Audience member enquired if wildlife could present an exposure risk via soil disturbance (i.e., burrowing, digging) on site.

GZA performs weekly site walks to inspect and document the conditions at the Site. There has not been evidence of significant soil disturbance by wildlife at the Site. In the future, we will continue to monitor soil disturbance.

21. Audience member requested status on South Washout Area repair.

The earthwork associated with the South Washout Area has not been completed. National Grid will continue to work with the City to have this work completed.

22. Audience member enquired when the public will receive a response to comments.

The schedule presented in the presentation was revisited. A summary of today’s meeting will be provided within 10 business days (by 2/12/2013). Written comments on the draft PIP from the public should be provided to RIDEM within 10 business days (by 2/12/2013). RIDEM indicated that an extension to the public comment period may be requested in writing. Timing for response to written comments will be based on how many comments are received.