

March 22, 2013
File No. 05.0043654.20-C



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

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Providence
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401-421-4140
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<http://www.gza.com>

Re: Response to Public Comments
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) has prepared this letter in response to written public comments to the November 26, 2012 draft Public Involvement Plan (PIP) prepared for the Former Tidewater Manufactured Gas Plant (MGP) and Power Plant Site located in Pawtucket, Rhode Island (the Site). These comments were provided to National Grid by the Rhode Island Department of Environmental Management (RIDEM) via a February 21, 2013 notification letter. As indicated in RIDEM's February 21, 2013 notification letter, RIDEM received the following written public comments to the draft PIP: 1) a letter dated January 28, 2013, from Ms. Holly Dygert; and 2) a letter dated February 12, 2013, from Ms. Amelia Rose of the Environmental Justice League of Rhode Island (EJLRI). For your convenience, the comments received are repeated below followed by National Grid's responses in *italics*. The RIDEM notification letter along with the two public comment letters is included as an attachment to this letter.

In addition, per RIDEM's February 2013 notification, attached to this letter are responses to public comments that we received during the January 29, 2013, public meeting held at the Francis Varieur Elementary School. These responses were submitted separately to RIDEM on February 15, 2013. This letter also includes updates to responses to audience comments from the January 29, 2013, meeting which were summarized in the February 15, 2013, submittal and responses to questions related to the PIP provided in an email dated March 6, 2013, from Ms. Holly Dygert. A copy of this March 6, 2013 email is also attached.

January 28, 2013 Letter

1. Comment: The information in the boards should be provided in the three primary languages of the community, which are English, Spanish and Portuguese. I was concerned that National Grid seemed to reject a request made during the interviews for information to be translated into both Spanish and Portuguese. I want to underscore the importance of providing information in the community's languages.

Response: Going forward, National Grid will provide the following documents in English, Spanish and Portuguese: 1) Notification Mailings, 2) Fact Sheets and 3) Executive Summaries that will accompany future reports.

2. Comment: I look forward to the incorporation of the color-coded alert system.

Response: We implemented the color-coded alert system on the bulletin boards during the recent substation upgrade project. The system involves posting different color sheets to indicate when excavation is active (yellow sheet) and not active (blue sheet).



3. Comment: I am very pleased that National Grid has proposed to create a color-coded map of Tidewater site hazards to the public as part of the PIP. Despite years of communications about the hazards on the site, the members of the stakeholder group are still unclear about concentrations of particular hazards, and where they are located. Thus, I am eager to see this map.

Response: We are finalizing the color-coded map for the Tidewater project that illustrates areas of the Site where impacts have been identified in groundwater and soils and we will present it at the upcoming Community Information Session. The final map will also be posted on the National Grid website and the bulletin boards.

4. Comment: In regards to the first concern, I agree with the characterization of a public involvement process laid out on page 1 of the Draft PIP, as “an agreement between the party conducting response actions and the public about how they will share information moving forward, and how the public will be able to comment on plans for assessment and cleanup of the site.” This definition identifies the public as important partner in the remediation process. Since the public’s interests vis-à-vis the remediation process diverge in important ways from those of the property owner, the public must have the ability to shape the remediation, and the precautions that are taken during the remediation process. I am concerned, however, that the Draft PIP construes public participation narrowly, as informing the public about work plans that have already been developed.

For example, on page 8, in describing the process through which a final remediation plan for the site will be determined, the Draft PIP states that RIDEM will issue a Program Letter when it has concluded that “the site has been adequately assessed” in the Site Investigation Report. The Draft PIP continues that “Following receipt of the Program Letter, National Grid will notify [various parties]... that the investigation is complete and that RIDEM has concurred with the recommended remedial alternative... Subsequent to this public notification and following receipt of any public comments, the Department will issue a Remedial Decision Letter formally approving the SIR.” In this description, the identification and approval of a remedial strategy are depicted as occurring apart from public involvement. This negates the role of the public in the decision-making process. Moreover, I believe that it is a mischaracterization of the process through which remediation strategies are determined. It is my understanding that the Program Letter solely certifies that RIDEM has determined that the proposed remedy meets the criteria for an acceptable remedy. I understand that the final determination of a remedy cannot be made until members of the community are given an opportunity to consider the proposal, and to convey their concerns to RIDEM.

The characterization of the process through which a Remedial Action Work Plan (RAWP) is identified and selected in the Draft PIP similarly neglects the role of the public. Though the text states that “Many of the above remedial process steps will be accompanied by public meetings and comment periods” (p.8), I find it disconcerting that the public’s role in shaping the remediation process is not included in National Grid’s description of the decision-making process. This view of public involvement as a process whereby National Grid officials inform the public about the remediation process carries through to other sections of the Draft PIP. For example, in the section on Community Meetings, meetings are depicted as opportunities for National Grid representatives to inform community members about the work that has been and will be undertaken in the site. Though informing the community is crucial for facilitating their

involvement in the process, it is not sufficient. The document also states that meetings will be held “in conjunction with... Departmental approval of the Remedial Action Work Plan; [and]prior to remedy implementation” (p.14). This neglects the crucial role the public will have in shaping the RAWP.

The PIP should be revised to indicate clearly that potential work plans will be presented in community meetings, and that community concerns will be solicited to ensure that the final work plans reflect the concerns and needs of the public. Opportunities for community members to comment on the proposed plans and thereby shape the remediation process should be clearly laid out in the meeting agendas, and in the scheduling of meetings (in relation to RIDEM’s final decisions about work at the site).



Response: We are committed to providing the community with opportunities to review and comment on National Grid’s plans to remediate the Tidewater Site. National Grid will revise the PIP to include a public meeting related to 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 provide further opportunity for the public to comment on the Site remediation process. The public meeting regarding the draft RAWP will be held within 12 months of receipt of the Remedial Decision Letter (RDL – letter issued by RIDEM to formally agree with the findings of the Site Investigation Report). This meeting will be held prior to the submittal of the final RAWP to RIDEM and will provide the public an opportunity to provide comment on the remedial strategy for the Tidewater Site. The process going forward and as outlined in the PIP is intended to provide a means of effective “two-way communication” between the public and National Grid. 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. The process outlined in the PIP, which follows the requirements of the Remediation Regulations, provides the public opportunity to comment on the remedial process; however, it is noted that RIDEM is ultimately responsible for the final remedial analysis and decisions on the final remedial strategy for the Site.

5. Comment: In regards to my second concern, one of the requests most of the interviewees made was for National Grid to make data from air monitoring available in real time to the community. While meeting with representatives from National Grid and RIDEM during the early Fall of 2012, we learned that this was not possible with the particular hand held devices being used to monitor emissions during the current electrical substation upgrade. Moreover, RIDEM representatives at the meeting seemed to concur that the small-scale nature of the work and the limited extent of contaminants in the soil did not warrant the more costly kind of air monitoring technologies that enable real-time posting of readings. I am very concerned to see that the particular scheme we agreed to for monitoring emissions and making the results available to community members during the substation upgrade is replicated in the Draft PIP. National Grid and GZA officials should be clear that the substation upgrade was classified as separate from the remediation process, which is why the work could be completed without presenting it to the public. As we look ahead to the full remediation, the particular air monitoring strategies, and techniques for communicating information about the results of that monitoring to the community, will need to be determined in conversation with the community about the particular threats posed by particular actions.

Response: We will revise the PIP to delete the reference to posting weekly air monitoring data. 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 by the RIDEM. The public will have an opportunity to comment and engage in a conversation about the proposed air monitoring program during the RAWP comment process described above.

February 12, 2013 Letter



1. Comment: Page 2 – The draft PIP states: “This plan is not intended to cover Site activities relative to day-to-day operations of the natural gas regulating facility and electrical substation or other uses of the property by National Grid.” Since community members and parents from nearby schools have already met with GZA, RIDEM, and National Grid regarding substation upgrades and earthwork, especially with regard to improving air monitoring plans in relation to this work, which falls outside the official remediation plan, I would ask that this sentence be clarified to ensure that residents can expect to be informed and be invited to actively participate in the shaping of any plans for the site that would require disturbance to soil or otherwise create a potential public health risk. Some of these activities could be interpreted, potentially, as “day-to-day operations”, and therefore this statement should be clarified to clearly differentiate between actual day-to-day operations and other operations that are not specifically included in the remediation but will disturb soil, create potential emissions, etc.

Response: National Grid will revise the PIP to clarify this sentence as follows: “This plan is not intended to cover Site activities relative to the day-to-day operations, including repair and maintenance of the natural gas regulating facility and electrical substation involving minor soil disturbances (i.e., fence post installation) or other uses of the property by National Grid. Activities at these facilities involving excavations of soils with the potential to create volatile emissions are covered by this PIP. In the event of a facilities emergency requiring immediate soil excavation (utility repair, etc.), National Grid will follow the soil management procedures prepared for the previous natural gas station regulator and electrical substation work (i.e., April 2011 Materials Management Plan and November 2012 Soil Management Plan, respectively). In addition, air monitoring will be completed during these emergency events in accordance with the September 28, 2012, air monitoring summary memorandum submitted to RIDEM to the extent practical.”

2. Comment: Page 17 – The Pawtucket Public Library will serve as a repository for all of the documents and other information related to the site. I suggest posting a sign or poster at the Library itself (not just on the fence at the Tidewater site) to let the general public know that this repository exists.

Response: Information about public repositories for the Tidewater project is posted on the bulletin boards at the end of Tidewater Street and Bowles Court. National Grid will contact the Pawtucket Public Library to inquire about the possibility of posting a sign at the Library and will do so with the Library’s permission.

3. Comment: Page 19 – If there are revisions proposed for the PIP in the future, National Grid will prepare a revised draft for review and approval by the public and RIDEM. National Grid should prepare a summary sheet to list all of the proposed changes/revisions, as well as the final approved revisions, not simply post the proposed revised draft of the full PIP online and in the physical repository (even if the changes/revisions are highlighted in the full document). This summary sheet should be a separate document to make it easy for the public to access, read, and digest the proposed, and then approved, changes.

Response: While future revisions to the PIP will not re-open the draft and public comment period, we will prepare and make available summary sheets of proposed and approved changes/revisions for the public.

4. Comment: In response to concerns raised by residents living on Thornton Street, immediately adjacent to the site, regarding natural gas odors and the possibility of air impacts from the groundwater contamination, I suggest addressing these issues at the poster session National Grid is hosting in the near future. In particular, addressing the issue of vapor intrusion into homes and schools should be a top priority. EJLRI receives technical assistance through an EPA program that

assists organizations and community residents in understanding technical information related to Brownfields contamination and remediation. Upon her review of the draft remedial plan submitted to RIDEM by National Grid, our consultant from the New Jersey Institute of Technology recommended the following:

VAPOR INTRUSION INVESTIGATION



Some of the chemicals (volatile compounds) identified at the site have the potential to travel through the soil as vapors. These vapors may then move up through the soil into nearby buildings, contaminating indoor air. Therefore, if a vapor intrusion investigation has not been completed, a vapor intrusion investigation is recommended to determine whether the occupants of neighboring buildings are at risk for exposure to VOCs due to vapor intrusion.

We will be submitting a final version of the consultant's review at the appropriate time (when public comments are being accepted on the SIR/recommended remedial alternative), but I wanted to share this recommendation because it speaks directly to concerns raised by residents at the last meeting.

Response: We understand that nearby neighbors are concerned about vapor intrusion. Based on a number of factors – the way groundwater is distributed and moves at the Site, the way contaminants are distributed at the Site, and the distance from off-Site buildings to the nearest Site impacts- the potential for vapor intrusion into off-Site buildings, including the residences on Thornton Street or the neighboring schools, has not been identified as a potential pathway of concern for the Tidewater Site. We say this for several reasons:

- *The majority of soil and groundwater impacts are located at least 50 feet away from the nearest Thornton Street residences and the schools.*
- *The portion of the Site that is nearest the residences along Thornton Street is an area where historical operations did not occur and significant impacts (VOCs or others) have not been detected in this area.*
- *In addition to the distance from Site impacts, the residences along Thornton Street and all three of the schools are located hydraulically upgradient of the Site – in other words, groundwater from the Site flows “downhill” towards the river, not towards the homes on Thornton Street or the schools. Therefore, the potential for migration of Site impacts towards Thornton Street and the schools is not a concern.*

Our conclusion is also supported by:

- *The March 2003 proposed revisions to the Connecticut Department of Environmental Protection (CTDEP) volatilization criteria, which references vapor intrusion guidance documents prepared by US Environmental Protection Agency (EPA).¹ This guidance indicates that volatilization criteria are applicable to impacts within 30 feet (both depth and lateral distance) from a structure.*
- *RIDEM's guidance document entitled “Evaluation of Vapor Intrusion Potential for Proposed RI School Sites,” dated September 2012.² This RIDEM guidance document outlines a step-by-step process for evaluating the potential for vapor intrusion to migrate*

¹ RIDEM has not yet developed any vapor intrusion criteria and therefore has incorporated the State of Connecticut's volatilization criteria, available here:

http://www.ct.gov/deep/cwp/view.asp?a=2715&q=458652&deepNav_GID=1626

² RIDEM developed this guidance document in September 2012, available here:

<http://www.dem.ri.gov/programs/benviron/waste/pdf/skulvapr.pdf>

from the subsurface into an existing or proposed building to be used as a school. Using this guidance document and the understanding of subsurface impacts and groundwater flow direction information, an evaluation for the potential for vapor intrusion into the off-Site schools and residences is not considered warranted.



Finally, National Grid's predecessor owners conducted a soil gas survey surrounding the Francis J. Varieur School in 1996. The survey consisted of 28 sampling points adjacent to the school to ascertain whether the potential existed for the migration of vapors from the surrounding soils into the school. No VOCs were detected in the samples, with the exception of two soil gas samples which detected low levels of trichloroethylene (TCE). TCE is not a contaminant associated with historic MGP and power plant operations and is not associated with the Tidewater Site. Subsequent indoor air samples were collected from within the school for TCE analysis. Those samples did not detect any TCE.

At this time, National Grid does not plan on having a specific poster board regarding vapor intrusion at the community outreach session. However, we will be willing to discuss the issue should anyone have any questions about vapors. In addition, we would be happy to discuss this issue further with representatives of the New Jersey Institute of Technology (NJIT) if you wish.

To address the question regarding natural gas odors in the neighborhood, National Grid will have a representative available from gas operations at the Community Outreach Session to discuss the natural gas odor concerns raised by the community.

Natural gas is typically "odorless" from the well head. Federal and State law mandates that gas must be detectable by a person with an average sense of smell. As a result, pipeline operators and in some cases distribution system operators inject a malodorous material called mercaptan, commonly referred to as "odorant". Federal law also mandates that odorant added to a pipeline must not be harmful to people, pipe or other devices. National Grid does has several Level 3 gas leaks (defined as a non-hazardous leak; periodic monitoring required) in the neighborhood. Level 3 leaks do not present a risk to public health or safety. National Grid is continuing to monitor the leaks and is adhering to the strict Federal and State standards.

5. Comment: The draft PIP is strong overall, but lacks specifics on how to best engage parents at the local schools. Principals at the schools may not be the best, or only, individuals to notify regarding upcoming work, air monitoring results, public meeting notices, etc. In fact, they can be bottlenecks for getting information out to the wider school community. Suggestions raised at the meeting to engage the Pawtucket Schools Superintendent, the school committee, etc. are all very good, but also are not enough to get through to individual parents. Signs or posters with general information posted at the front offices of the schools adjacent to the site would be a good start (and/or at student pick-up locations), as well as providing copies of public notices to all parents via their child's backpacks, as suggested by the principal at Varieur Elementary, would also help ameliorate this problem. Not all notices need to be sent home via backpacks, but any public meeting announcements should be, as should an initial introductory letter or handout with an overview of the site history and current status, including who to contact for more information. National Grid should work with the principals at the three schools to send this introductory info sheet/letter home with all students as soon as possible.

Response: We provide notifications to those on the mailing/email list, which includes the principals of the neighboring schools. If the principals need assistance in distributing these notifications, we would be happy to help. 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 encourages all parents/community members to sign up so that they can receive information directly from National Grid. Any interested party is also welcome to contact National Grid's Project Manager, Michele Leone, directly at 781-907-3651.



With permission of the neighboring schools, National Grid will post a sign on how to obtain information regarding the Site at the front office of each school. National Grid has prepared an updated fact sheet which was distributed on March 4, 2013, through the mailing and email lists, as well as via door-to-door flyers to the neighboring community. This fact sheet included information about the former Tidewater facility, recent activities at the Site, public involvement activities and next steps for the Site. The fact sheet accompanied a notification letter regarding the date, time and place of the upcoming Community Outreach Session. National Grid distributed this notification package to the schools on March 6, 2013, to be sent home with the students via backpacks. National Grid will continue to work with the principals about sending mailing list items (flyers, fact sheets and public notifications) in multiple languages home with the students via backpacks.

6. Comment: Lastly, I would like to ask National Grid, GZA, and RIDEM to respond to how phytoremediation might play into the overall remediation strategy for this site, and/or if this approach has been discussed at all in relation to the Tidewater Site.

Response: We considered phytoremediation but concluded that it is not a feasible remedial alternative for the following reasons:

- *The depth of the treatment zone is limited by the depth of the root material of the plants.*
- *The contaminants at the former Tidewater facility are located at depth greater than two feet below the ground which is too deep for phytoremediation.*
- *The nature of certain impacts at the Tidewater Site, including separate phase product (in other words, coal tar or oils), are not amenable to treatment via phytoremediation. Due to these limitations, phytoremediation is not deemed appropriate as a potential remedial alternative for the former Tidewater facility.*

Updates to Responses to Comments from the January 29, 2013 Public Meeting
Open Comments and Questions Received:

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

National Grid will continue to make every effort to use brief and nontechnical terminology in communications with members of the public. In an effort to meet this request, National Grid has hired a communications consultant to assist in the preparation of documents.

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 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 the property. 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 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 indicated that it would consider the request and provide a formal response in the response to comments on the PIP.



The following additional response was prepared by RIDEM and provided to National Grid following the January 2013 public meeting. National Grid was not involved in preparation of this response or involvement in the Southern Union Case.

“In June 2012, the U.S. Supreme Court remanded an \$18-million sentence against the owners of New England Gas in a case that stemmed from the 2004 mercury spill at a Pawtucket housing project. The ruling puts at question the \$12 million in damages that were to have gone to Rhode Island environmental groups (the majority of which were to be managed by the Rhode Island Foundation, in order to fund grants in environmental education, remediation, conservation, and children's health). The remaining \$6 million was a fine. The Supreme Court case hinged on circumstances that require juries -- not judges -- to set penalties after criminal convictions, so the ruling does not change the 2008 conviction of Texas-based Southern Union Co. for illegal storage of the hazardous material that belonged to a former subsidiary. But the ruling means the Supreme Court remanded the case for further proceedings in US District Court (RI) consistent with this opinion. The June 2012 Supreme Court Decision can be found at <http://www.supremecourt.gov/opinions/11pdf/11-94a1b2.pdf> . The US District Court heard oral arguments in December 2012 in an attempt to determine how to properly proceed with the case from here. DEM has received no additional information on this matter from the Court since the hearing in December 2012. “ – Communications from RIDEM

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.

National Grid will contact its Natural Gas Division to find out more information about this concern. Representatives from National Grid will be available during the March 27, 2013 community outreach meeting to discuss public concerns regarding the natural gas operations at the Tidewater facility.

In addition, refer to the response above for Comment 4 of the February 12, 2013 comment letter regarding “natural gas odors.”

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.

Refer to the response above for Comment 4 of the February 12, 2013 comment letter regarding “vapor intrusion investigation.”

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.

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 understands that Cape Verdean is a dialect of Portuguese. Based on discussions with a translation service, we also understand that documents translated in Portuguese should be understood by people who speak Cape Verdean. Therefore, National Grid does not plan to provide documents in Cape Verdean. If a community member requires assistance or translation other than Spanish and Portuguese, please contact Michele Leone at National Grid.

National Grid has added Oak Hill Nursing Home to the door to door flyer distribution list during the March 4, 2013 mailing.

March 6, 2013 Email

(1) National Grid should develop separate communication materials for schools – and provide enough copies to give place one in each student’s backpack.

National Grid will continue to work with the principals to get materials out to parents via backpacks. To avoid confusion in disseminating this information, National Grid will work directly with the principals and other stakeholders.

(2) School principals want to review all of the fliers/documents that will be sent to parents before NG makes copies, translates, or finalizes the communication, to make sure they communicate effectively. Julie Nora (ICS) and Carolyn Sheehan (Blackstone Valley) made this suggestion.

National Grid will work with the principals to ensure that they are comfortable with the documents we provide to them for distribution.

(3) Neighbors also want to review materials before NG sends out communications to neighborhood – point person can be Amelia Rose at EJ League who can send out draft to list of neighbors and collate comments/suggestions within one week and send back to NG for finalization (worry is that the communications are too wordy and will not be read).

National Grid is working with a communications consultant in order to make mailings more easily understood by the community in response to this concern. Given this, National Grid will not be providing drafts of our communications to the neighbors prior to distribution. We continue to appreciate the community’s input on the communications and welcome suggestions on how to further improve this process.

(4) Hold regular meetings with a core group of residents and school personnel to give NG/GZA a chance to communicate in a smaller group setting – in addition to the larger public meetings that happen less frequently. This will help increase communication with the most committed/involved residents and school officials who will be ambassadors to other residents and the wider school community to generate their interest and involvement. Also will make larger public meetings less adversarial and more productive because it won’t be the first time people are hearing about a certain issue or proposal.

National Grid designed the public involvement plan (PIP) to involve all community members and interested parties. National Grid believes that the large number of public meetings and the commitment to schedule additional meetings on an as-needed basis pre-empts the need for smaller, stakeholder meetings. Community members are strongly encouraged to contact Michele Leone at any time throughout the site cleanup process by calling 781-907-3651 or via email at michele.leone@nationalgrid.com should they have questions or comments.



(5) Translation at larger public meetings should be made available regardless of whether someone contacts NG to say they are coming to a meeting – this would help build trust with the neighborhood and principals could guarantee to parents that interpretation would be available at public meetings no matter what.



At all public meetings, translation assistance will be provided for non-English speaking individuals, upon request. Requests can be made to Michele Leone by calling 781-907-3651 or via email at michele.leone@nationalgrid.com.

(7) NG should create bookmarks with all relevant contact information as well as instructions for how people can get on the email/phone notification lists. These will be helpful to hand out in the neighborhood and at the schools and would be more likely to be read and communicate effectively – rather than a long letter.

National Grid has created magnets with the requested information which will be available at the upcoming community information session.

A bulleted summary of the proposed revisions to the PIP, as discussed above, is attached to this letter.

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 "Margaret S. Kilpatrick".

Margaret S. Kilpatrick, P.E.
Senior Project Manager

A handwritten signature in blue ink, appearing to read "John P. Hartley".

John P. Hartley
Consultant/Reviewer

A handwritten signature in blue ink, appearing to read "James J. Clark".

James J. Clark, P.E.
Principal

Attachments: February 21, 2013 Notification of Public Comments Received
February 15, 2013 Summary of Meeting
March 6, 2013 Email
Summary of Proposed Revisions to PIP

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

FEBRUARY 21, 2013

NOTIFICATION OF PUBLIC COMMENTS RECEIVED



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

February 21, 2013

Ms. Michele V. Leone
Manager, New England Site Investigation & Remediation
National Grid
40 Sylvan Road
Waltham, MA 02451-1120

RE: Tidewater Manufactured Gas Plant (former)
Tidewater Street
Pawtucket, Rhode Island

Dear Ms. Leone:

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.

In the matter of the above referenced "Site" (as defined in the Industrial Property Remediation and Reuse Act), and in accordance with Rule 7.07.E (Public Involvement Plans) of the 2011 Remediation Regulations, the Department's Office of Waste Management (OWM) has received the following documents concerning public comments on the draft Public Involvement Plan (PIP):

1. Letter from Holly Dygert to the Department, Re: Tidewater Site Public Involvement Plan, dated January 27, 2013, and received via e-mail on January 28, 2013; and
2. Comments re: Draft Public Involvement Plan, Former Tidewater Facility and Former Power Plant, Tidewater and Merry Streets, Pawtucket, Rhode Island, prepared by the Environmental Justice League of Rhode Island (EJLRI), received via e-mail on February 12, 2013.

In addition, National Grid received several comments at the public meeting for the draft PIP held on January 29, 2013.

Please review these submitted comments along with those received at the public meeting and prepare written responses to each of them as appropriate. A completed document, incorporating responses all of the comments, must be submitted to the Department for review and approval.

All correspondence regarding this Site should be sent to the attention of:

Joseph T. Martella II – Senior Engineer
RIDEM / Office of Waste Management
235 Promenade Street
Providence, RI 02908

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.

Sincerely,



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

Attachments: January 27, 2013, Letter from Holly Dygert to the Department;
February 12, 2013, Comments re: Draft Public Involvement Plan

Cc: Kelly J. Owens, RIDEM.OWM
Elizabeth Stone, RIDEM/OOD
Barbara Morin, RIDEM/OAR
Barney S. Heath, Pawtucket Planning & Development
Alan Tenreiro, Chairman, Pawtucket School Committee
Deborah Cylke, Superintendent, City of Pawtucket School Department
Julie Nora, Ph.D, International Charter School
Carolyn Sheehan, Blackstone Academy
Edna Coia, Francis J. Varieur Elementary School
Amelia Rose, EJLRI
Margaret S. Kilpatrick, GZA

January 27, 2013

Mr. Joseph Martella II, Senior Engineer
RIDEM Office of Waste Management
Site Remediation Program

Re: Tidewater Site Public Involvement Plan

Dear Mr. Martella,

I am very pleased that RIDEM has implemented a public involvement mechanism to ensure that members of the community who may be exposed to hazards are involved in the remediation process. I reviewed National Grid's draft Public Involvement Plan (PIP) for the Tidewater Site, and I am also very pleased with many of the actions National Grid has proposed to take to ensure that those potentially impacted by the work at Tidewater are informed of the work. I am writing to communicate my suggestions for strengthening the proposed PIP. These suggestions are aimed, first, to optimize the ability of those who could be impacted by the site's hazards to access information about the nature of these hazards and about potential routes of exposure, and, second, to ensure that they are able to influence the process in accordance with their particular concerns.

I appreciate that National Grid solicited comments from the community through the interview process in June of 2012, and provided a synthesis of the suggestions in the *Draft PIP*. National Grid has already acted on many of these suggestions, and has integrated many of them into the proposed PIP. The community bulletin boards – with announcements and the results of weekly air monitoring – are very useful communication tools. I look forward to the incorporation of the color-coded alert system. The information in the boards should be provided in the three primary languages of the community, which are English, Spanish and Portuguese. I was concerned that National Grid seemed to reject a request made during the interviews for information to be translated into both Spanish and Portuguese. I want to underscore the importance of providing information in the community's languages.

I am very pleased that National Grid has proposed to create a color-coded map of Tidewater site hazards to the public as part of the PIP. Despite years of communications about the hazards on the site, the members of the stakeholder group are still unclear about concentrations of particular hazards, and where they are located. Thus, I am eager to see this map. I am also pleased that National Grid is proposing a Community Outreach (poster) Session, and possibly a tour of the site.

While I am generally satisfied with the strategies National Grid has proposed to convey information to the public, I have two main concerns. The first is that the *Draft PIP* largely neglects the public's role in shaping the remediation process. The second is that the particular

strategy for monitoring air quality that was agreed on for the electrical substation upgrade is included in the *Draft PIP* as the plan for the remediation.

In regards to the first concern, I agree with the characterization of a public involvement process laid out on page 1 of the *Draft PIP*, as “an agreement between the party conducting response actions and the public about how they will share information moving forward, and how the public will be able to comment on plans for assessment and cleanup of the site.” This definition identifies the public as important partner in the remediation process. Since the public’s interests vis-à-vis the remediation process diverge in important ways from those of the property owner, the public must have the ability to shape the remediation, and the precautions that are taken during the remediation process. I am concerned, however, that the *Draft PIP* construes public participation narrowly, as informing the public about work plans that have already been developed.

For example, on page 8, in describing the process through which a final remediation plan for the site will be determined, the *Draft PIP* states that RIDEM will issue a Program Letter when it has concluded that “the site has been adequately assessed” in the Site Investigation Report. The *Draft PIP* continues that “Following receipt of the Program Letter, National Grid will notify [various parties]... that the investigation is complete and that **RIDEM has concurred with the recommended remedial alternative**... Subsequent to this public notification and following receipt of any public comments, the Department will issue a Remedial Decision Letter formally approving the SIR.” In this description, the identification and approval of a remedial strategy are depicted as occurring apart from public involvement. This negates the role of the public in the decision-making process. Moreover, I believe that it is a mischaracterization of the process through which remediation strategies are determined. It is my understanding that the Program Letter solely certifies that RIDEM has determined that the proposed remedy meets the criteria for an acceptable remedy. I understand that the final determination of a remedy cannot be made until members of the community are given an opportunity to consider the proposal, and to convey their concerns to RIDEM.

The characterization of the process through which a *Remedial Action Work Plan* (RAWP) is identified and selected in the *Draft PIP* similarly neglects the role of the public. Though the text states that “Many of the above remedial process steps will be accompanied by public meetings and comment periods” (p.8), I find it disconcerting that the public’s role in shaping the remediation process is not included in National Grid’s description of the decision-making process. This view of public involvement as a process whereby National Grid officials inform the public about the remediation process carries through to other sections of the *Draft PIP*. For example, in the section on Community Meetings, meetings are depicted as opportunities for National Grid representatives to inform community members about the work that has been and will be undertaken in the site. Though informing the community is crucial for facilitating their involvement in the process, it is not sufficient. The document also states that meetings will be held “in conjunction with... Departmental approval of the *Remedial Action Work Plan*; [and]

prior to remedy implementation” (p.14). This neglects the crucial role the public will have in shaping the RAWP.

The *PIP* should be revised to indicate clearly that potential work plans will be presented in community meetings, and that community concerns will be solicited to ensure that the final work plans reflect the concerns and needs of the public. Opportunities for community members to comment on the proposed plans and thereby shape the remediation process should be clearly laid out in the meeting agendas, and in the scheduling of meetings (in relation to RIDEM’s final decisions about work at the site).

In regards to my second concern, one of the requests most of the interviewees made was for National Grid to make data from air monitoring available in real time to the community. While meeting with representatives from National Grid and RIDEM during the early Fall of 2012, we learned that this was not possible with the particular hand held devices being used to monitor emissions during the current electrical substation upgrade. Moreover, RIDEM representatives at the meeting seemed to concur that the small-scale nature of the work and the limited extent of contaminants in the soil did not warrant the more costly kind of air monitoring technologies that enable real-time posting of readings. I am very concerned to see that the particular scheme we agreed to for monitoring emissions and making the results available to community members during the substation upgrade is replicated in the *Draft PIP*. National Grid and GZA officials should be clear that the substation upgrade was classified as separate from the remediation process, which is why the work could be completed without presenting it to the public. As we look ahead to the full remediation, the particular air monitoring strategies, and techniques for communicating information about the results of that monitoring to the community, will need to be determined in conversation with the community about the particular threats posed by particular actions.

In closing, I want to reiterate my support for the PIP process that RIDEM has adopted, and that National Grid has begun to develop. I look forward to continuing to work with RIDEM and National Grid to develop an effective plan for ensuring optimal public involvement.

Sincerely,



Holly Dygert
16 Minto Street
Providence, RI 02908
(401) 272-1748



**Environmental
Justice League of
Rhode Island**

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February 12, 2013

Joseph Martella, Project Manager
RIDEM
Office of Waste Management
235 Promenade Street
Providence, RI 02908

Comments re: Draft Public Involvement Plan, Former Tidewater Facility and Former Power Plant, Tidewater and Merry Streets, Pawtucket, Rhode Island

Dear Mr. Martella,

I am submitting the following comments on behalf of the Environmental Justice League of Rhode Island (EJLRI) regarding the draft Public Involvement Plan (PIP) prepared by GZA on behalf of their client, National Grid, the responsible party for the Tidewater Site.

I have listed a few specific comments first, followed by more general suggestions for the PIP overall.

Page 2 – The draft PIP states: “This plan is not intended to cover Site activities relative to day-to-day operations of the natural gas regulating facility and electrical substation or other uses of the property by National Grid.” Since community members and parents from nearby schools have already met with GZA, RIDEM, and National Grid regarding substation upgrades and earthwork, especially with regard to improving air monitoring plans in relation to this work, which falls outside the official remediation plan, I would ask that this sentence be clarified to ensure that residents can expect to be informed and be invited to actively participate in the shaping of any plans for the site that would require disturbance to soil or otherwise create a potential public health risk. Some of these activities could be interpreted, potentially, as “day-to-day operations”, and therefore this statement should be clarified to clearly differentiate between actual day-to-day operations and other operations that are not specifically included in the remediation but will disturb soil, create potential emissions, etc.

Page 17 – The Pawtucket Public Library will serve as a repository for all of the documents and other information related to the site. I suggest posting a sign or poster at the Library itself (not just on the fence at the Tidewater site) to let the general public know that this repository exists.

Page 19 – If there are revisions proposed for the PIP in the future, National Grid will prepare a revised draft for review and approval by the public and RIDEM. National Grid should prepare a summary sheet to list all of the proposed changes/revisions, as well as the final approved revisions, not simply post the proposed revised draft of the full PIP online and in the physical repository (even if the changes/revisions are highlighted in the full document). This summary sheet should be a separate document to make it easy for the public to access, read, and digest the proposed, and then approved, changes.

In response to concerns raised by residents living on Thornton Street, immediately adjacent to the site, regarding natural gas odors and the possibility of air impacts from the groundwater contamination, I suggest addressing these issues at the poster session National Grid is hosting in the near future. In particular, addressing the issue of vapor intrusion into homes and schools should be a top priority. EJLRI receives technical assistance through an EPA program that assists organizations and community residents in understanding technical information related to Brownfields contamination and remediation. Upon her review of the draft remedial plan submitted to RIDEM by National Grid, our consultant from the New Jersey Institute of Technology recommended the following:

VAPOR INTRUSION INVESTIGATION

Some of the chemicals (volatile compounds) identified at the site have the potential to travel through the soil as vapors. These vapors may then move up through the soil into nearby buildings, contaminating indoor air. Therefore, if a vapor intrusion investigation has not been completed, a vapor intrusion investigation is recommended to determine whether the occupants of neighboring buildings are at risk for exposure to VOCs due to vapor intrusion.

We will be submitting a final version of the consultant's review at the appropriate time (when public comments are being accepted on the SIR/recommended remedial alternative), but I wanted to share this recommendation because it speaks directly to concerns raised by residents at the last meeting.

The draft PIP is strong overall, but lacks specifics on how to best engage parents at the local schools. Principals at the schools may not be the best, or only, individuals to notify regarding upcoming work, air monitoring results, public meeting notices, etc. In fact, they can be bottlenecks for getting information out to the wider school community. Suggestions raised at the meeting to engage the Pawtucket Schools Superintendent, the school committee, etc. are all very good, but also are not enough to get through to individual parents. Signs or posters with general information posted at the front offices of the schools adjacent to the site would be a good start (and/or at student pick-up locations), as well as providing copies of public notices to all parents via their child's backpacks, as suggested by the principal at Varieur Elementary, would also help ameliorate this problem. Not all notices need to be sent home via backpacks, but any public meeting announcements should be, as should an initial introductory letter or handout with an overview of the site history and current status, including who to contact for more information. National Grid should work with the principals at the three schools to send this introductory info sheet/letter home with all students as soon as possible.

Lastly, I would like to ask National Grid, GZA, and RIDEM to respond to how phytoremediation might play into the overall remediation strategy for this site, and/or if this approach has been discussed at all in relation to the Tidewater Site.

Sincerely,

A handwritten signature in cursive script that reads "Amelia Rose". The signature is written in dark ink and is positioned below the word "Sincerely,".

Amelia Rose, Director

FEBRUARY 15, 2013

SUMMARY OF MEETING

GZA
GeoEnvironmental, Inc.

*Engineers and
Scientists*

February 15, 2013
GZA File No. 05.0043654.20-C

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



530 Broadway
Providence
Rhode Island
02909
401-421-4140
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<http://www.gza.com>

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 light blue horizontal line.

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
 Pawtucket, Rhode Island

- **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.

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
Pawtucket, Rhode Island

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.

MARCH 6, 2013

EMAIL

Margaret Kilpatrick

From: Dygert, Holly <hdygert@ric.edu>
Sent: Wednesday, March 06, 2013 3:39 PM
To: Leone, Michele (Michele.Leone@nationalgrid.com); Margaret Kilpatrick
Cc: joseph.martella@dem.ri.gov; Amelia Rose (amelia.rose@ejlri.org); jenrossi3@gmail.com
Subject: Tidewater Site communications, follow-up suggestions
Attachments: PIP Recommendations Tidewater Community Group.doc

Dear Michele and Meg,

We held a meeting last week with members of the Tidewater community (school officials, parents of school children, and members of the neighborhood) to follow-up on National Grid's recent public meeting. One of the primary concerns expressed was that the language used in the outreach efforts was not accessible to most people. I personally spoke with a woman in the neighborhood who said that she keeps going to these meetings, but she doesn't understand anything that is said. I also noted that one of the attendees prefaced his comments at the meeting with, "I know I sound ignorant, but..." The school administrators, parents and residents had several suggestions of ways to make the communications more effective. We've compiled those suggestions – I am attaching the list and pasting it below.

As a college professor, I am constantly charged with translating expert knowledge into language that is accessible, often to kids coming right out of high school. I'm happy to compile a list of terms that are hard for non-specialists to understand (e.g., remedy, remediation, cap, program letter, abutter, action limits...). The list of definitions that National Grid provided in a former communication is a step in the right direction, but it would be better to replace those specialized terms with more accessible alternatives.

On a different note, can you tell me if you've been able to figure out what the source of the gas smell is that the resident at the public meeting complained about? I've heard multiple people complain about intermittent gas smells over the last couple of years.

Sincerely,

Holly Dygert

PIP Recommendations for the Tidewater Site March 6, 2013

Issues of concern that people would like to be addressed at the poster session:

Gas Smells – What is this? What are potential impacts?

Differences among remedial alternatives – what options does National Grid have and why are they choosing one option over another?

What are potential future uses of this land/site after remediation? Will National Grid still own the site? Have there been discussions with City of Pawtucket?

What are the implications for neighbors' health based on what kinds of contaminants are at the site?

Further Suggestions for Effectively Communicating with the Public (in preparation for the poster session):

National Grid should develop separate communication materials for schools – and provide enough copies to give place one in each student's backpack.

School principals want to review all of the fliers/documents that will be sent to parents before NG makes copies, translates, or finalizes the communication, to make sure they communicate effectively. Julie Nora (ICS) and Carolyn Sheehan (Blackstone Valley) made this suggestion.

Neighbors also want to review materials before NG sends out communications to neighborhood – point person can be Amelia Rose at EJ League who can send out draft to list of neighbors and collate comments/suggestions within one week and send back to NG for finalization (worry is that the communications are too wordy and will not be read).

Hold regular meetings with a core group of residents and school personnel to give NG/GZA a chance to communicate in a smaller group setting – in addition to the larger public meetings that happen less frequently. This will help increase communication with the most committed/involved residents and school officials who will be ambassadors to other residents and the wider school community to generate their interest and involvement. Also will make larger public meetings less adversarial and more productive because it won't be the first time people are hearing about a certain issue or proposal.

Translation at larger public meetings should be made available regardless of whether someone contacts NG to say they are coming to a meeting – this would help build trust with the neighborhood and principals could guarantee to parents that interpretation would be available at public meetings no matter what.

Community members recommend that they be permitted to have their own poster/table at the poster session in addition to what NG/GZA are preparing.

NG should create bookmarks with all relevant contact information as well as instructions for how people can get on the email/phone notification lists. These will be helpful to hand out in the neighborhood and at the schools and would be more likely to be read and communicate effectively – rather than a long letter.

SUMMARY OF PROPOSED CHANGES TO PIP

Summary of Proposed Changes to the Public Involvement Plan (PIP)

Based on Public Comments Received

Former Tidewater Facility

Pawtucket, Rhode Island

- Revise to state that National Grid will provide the following in English, Spanish and Portuguese:
 - Notification Mailings
 - Fact Sheets
 - Brief Executive Summaries which will accompany future reports.
- Revise the PIP to change the time period for the public meeting related to the Remedial Action Work Plan (RAWP). As revised, the public meeting regarding the RAWP will be held on the draft version of the RAWP prior to submittal to RIDEM.
- Revise the PIP to delete the reference of posting of weekly air monitoring data.
- Clarify definition of day-to-day uses of the Site that do not fall under the jurisdiction of the PIP. Revise the sentence in the PIP to state “This plan is not intended to cover Site activities relative to the day-to-day operations, including repair and maintenance of the natural gas regulating facility and electrical substation involving minor soil disturbances (i.e., fence post installation) or other uses of the property by National Grid. Activities at these facilities involving excavations of soils with the potential to create volatile emissions are covered by this PIP. In the event of a facilities emergency requiring immediate soil excavation (utility repair, etc.), National Grid will follow the soil management procedures prepared for the previous natural gas station regulator and electrical substation work (i.e., April 2011 Materials Management Plan and November 2012 Soils Management Plan, respectively). In addition, air monitoring will be completed during these emergency events in accordance with the September 28, 2012 air monitoring summary memorandum submitted to RIDEM to the extent practical.”
- Add a summary sheet of proposed revisions and with final approved revisions as an appendix to the PIP.
- Update PIP regarding how National Grid will work with the three neighboring schools to send information (i.e., fact sheets, public notifications, flyers) home to the students.