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Via E-Mail and U.S. Mail

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

Re: Former Tidewater Facility

200 Taft Street

Pawtucket, Rhode Island

RIDEM Case No. 95-022 / Site Remediation File No. SR-26-0934

Dear Mr. Martella:

As discussed during our March 13, 2019 call, GZA GeoEnvironmental, Inc. (GZA) has prepared this letter on behalf of The Narragansett Electric Company d/b/a National Grid (National Grid) describing certain modifications to the subsurface containment wall design described in our June 2018 Remedial Action Workplan (RAWP) for the former Tidewater Facility located in Pawtucket, Rhode Island (herein referred to as the Site).

As described in the RAWP, the Tidewater remedy includes among other activities the installation of a subsurface containment wall designed to mitigate potential migration of non-aqueous phase liquid (NAPL) impacts to the Seekonk River coupled with manual recovery of observed NAPL from a network of monitoring and recovery wells. The subsurface containment wall was proposed to consist of two sections (a north and a south section) with an approximately 220-foot gap between each section proximate to the electric transmission towers. The north section of the containment wall is approximately 1,100-feet long extending across the Former Gas Plant Area (FGPA) and the Former Power Plant Area (FPPA) where the majority of the observed NAPL impacts have been observed. The southern section of the containment wall was proposed to be approximately 180 feet long extending from the southern electric transmission tower across the northern portion of the South Fill Area (SFA). The attached Figure 1 depicts the layout of the containment wall as presented in the RAWP.

Subsequent to the preparation of the RAWP, GZA's licensed soil scientist performed a survey of the Site as part of the remedy design and permitting process. Based on this survey, the southern section of the containment wall is located within a tidal wetland area. In addition, we have also recently become aware of the potential presence of



electrical distribution submarine cables proximate to the south transmission tower. These submarine cables reportedly extend from a vault on the Site, below the river and to the eastern shore of the Seekonk River. These cables were used to provide electrical power to the east side of the river prior to construction of the transmission towers. The attached Figure 2 depicts the layout of the containment wall as presented in the RAWP, including the edge of the tidal wetland, the approximate location of the vault for the submarine cables, and the approximate layout of the submarine cables within the Seekonk River.

Due to the presence of the tidal wetland and the submarine cables, we have re-evaluated the plan for addressing the limited NAPL observed in this area with the southern section of the containment wall. Since July 2011, GZA has performed NAPL gauging and recovery activities at the Site on an approximately quarterly basis. The observations made during these activities indicate NAPL impacts are limited to the presence of dense non-aqueous phase liquid (DNAPL)1 within 3 of the 12 monitoring wells (MW-1, MW-320S and MW-320D) in the SFA. As indicated in attached cross sectional profiles B-B' and G-G' (Figures 6 and 11 from the January 2011 Site Investigation Data Report), with the exception of monitoring wells MW-318S and MW-318D, these NAPL detections are generally consistent with the limited extent of visible soil impacts previously observed in this area during the various rounds of environmental investigations. Monitoring wells MW-318S and MW-318D are located approximately 60 feet to the north of monitoring well MW-1 and visible soil impacts were also observed at this location similar to those observed at monitoring wells MW-1, MW-320S, MW-320D. However, NAPL has not been observed within these 2 monitoring wells to date. Given these observations, the southern section of the containment wall was designed to address the observed measurable DNAPL impacts within monitoring wells MW-1, MW-320S and MW-320D. However, as indicated on Figure 2, monitoring well MW-1 is located at the top of the riverbank (outside the wetlands) and DNAPL has only been periodically observed within this well at trace levels (less than 0.01 feet) since July 2011. DNAPL has also been observed at monitoring wells MW-320S and MW-320D within the wetlands at the bottom of the riverbank. DNAPL thicknesses within monitoring well MW-320S have ranged from trace levels (less than 0.01 feet) to 2.5 feet; however, as a result of quarterly recovery efforts, the observed DNAPL thicknesses within monitoring well MW-320S decreased to trace levels in 2018. DNAPL thicknesses in well MW-320D have historically ranged from approximately 1 foot to 14.5 feet. The DNAPL within this deeper monitoring well is viscous and recovery efforts with a peristaltic pump to date have not been successful in removing the DNAPL from this well. We also note that groundwater monitoring wells act as collection points for NAPL and therefore the thickness measured within wells is often significantly greater than what is actually present in the subsurface. Consistent with the relatively immobile nature and the observed viscosity of the DNAPL in this area, GZA has not observed the presence of sheens in the waterfront area adjacent to monitoring wells MW-320S/D.

If the southern section of the containment wall was installed as currently described in the RAWP, the tidal wetlands would be severely impacted during the installation process. In addition, the wall would have to be shortened at a minimum to avoid the subsurface electrical infrastructure still in place at the site. In an effort to minimize impacts to the tidal wetlands in this portion of the Site and due to concerns regarding installation

¹ Note, LNAPL has not been historically observed within the SFA.



of a steel sheet containment wall proximate to the submarine cables, we propose to replace the southern section of the containment wall with a row of seven (7) 4-inch diameter recovery wells installed approximately at the mid-slope of the riverbank. This well based recovery system is adequate to address the limited NAPL observed in this area of the Site. The recovery wells will be spaced approximately every 20 feet between well couplets farther up the slope where NAPL impacts were not observed during previous investigation activities (i.e., MW-318S/D and MW-319S/D). The bottom of each new well screen will be set at an elevation consistent with monitoring well MW-320D (Elevation -18.1 NAVD 88). In addition, the riverbank will be re-graded to create a uniform slope from the top of the riverbank to the edge of the tidal wetlands and capped with a reactive core mat as a precaution to mitigate the potential migration of NAPL to the shallow river sediments. The approximate layout of these recovery wells and a preliminary grading plan for the riverbank is attached as Figure 3. We will also evaluate the use of alternative recovery techniques to remove the observed DNAPL at monitoring well MW-320D as well as any observed DNAPL that may collect in these proposed recovery wells.

We believe this alternative approach is still protective of the environment based on the viscous and immobile nature of the DNAPL in this area and will also minimize impacts to the tidal wetlands and risks associated with the existing submarine cable. We therefore request your approval of this alternative approach.

Should you have any questions or comments regarding the information presented herein, please do not hesitate to contact the undersigned or Kenneth Lento from National Grid at (781) 907-3655.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

David Rusczyk, P.E. Associate Principal James J. Clark, P.E. Senior Principal

Attachments: Figure 1: Overall Site Plan

Figure 2: Original Proposed Layout of South Section of Containment Wall Figure 3: Proposed Alternative to the South Section of Containment Wall

Figure 6: Cross Sectional Profile B-B' Figure 11: Cross Sectional Profile G-G'

cc: Kenneth Lento, National Grid









