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August 25, 2022
GZA File No. 05.0043654.60

Mr. Joseph Martella
Rhode Island Department of Environmental Management
Office of Land Revitalization and Sustainable Materials
235 Promenade Street, 3rd Floor
Providence, Rhode Island 02908

Re: Modifications to Perimeter Air Monitoring Program
Site Remediation File No. SR-26-0934A/Formerly RIDEM Case No. 95-022
Former Tidewater Facility
200 Taft Street
Pawtucket, Rhode Island

Dear Mr. Martella:

GZA GeoEnvironmental, Inc. (GZA), on behalf of The Narragansett Electric Company (TNEC), has prepared this letter to propose modifications to the perimeter air monitoring program at the Former Tidewater Facility (Site) for approval by the Rhode Island Department of Environmental Management (RIDEM).

Implementation of the RIDEM approved Site remedy was initiated in December 2020 and has progressed continuously without delays since initiation. As of the date of this letter, the source area excavations have been completed, the containment wall has been installed, and the engineered caps have been installed through-out the majority of the Site with the exception of two discrete areas: 1) in areas along Tidewater Street where the existing combined sewer outfall (CSO) is actively being relocated by the Narragansett Bay Commission (NBC); and 2) the central portion of the Site in the vicinity of the existing brick electrical substation control house building and the surrounding paved parking areas and driveways. The attached **Drawing 1** depicts the approximate extent of the Site that still needs to be capped.

Completion of the engineered cap in the first area is dependent on completion of the new NBC diversion structure and related activities, which is currently ongoing and anticipated to be completed in December 2022. The engineered cap in the vicinity of the second area is dependent upon the moving of the electrical equipment from the existing brick substation control house building to a newly constructed control house building adjacent to this area (note that the area around the newly constructed control house building has been capped during the first phases of the Site remedy activities) and then the demolition of the brick building. The installation of electrical equipment into the newly constructed control house is currently ongoing but will not be completed until spring of 2023. The demolition of the brick building is not likely to occur until late summer/early fall of 2023. There will be no further intrusive activities around the electrical substation until the brick building is ready for demolition. .

Since intrusive activities that will disturb impacted Site soils will be limited to the northern portion of the Site from early September until the NBC work is complete and based on the results of the perimeter air monitoring program to date since initiation in December 2020, we propose to reduce the number of perimeter air monitoring stations from 9 to 4 stations during this period. These 4 perimeter air monitoring stations will be staged in the northern portion of the Site proximate to the intrusive below grade work activities being performed by NBC as depicted on **Drawing 1**.



Once the NBC work is complete, we will demobilize the air monitoring units and temporarily suspend the monitoring program until intrusive activities are re-initiated. Intrusive activities associated with the Site remedy will not occur until the control house building is scheduled for demolition later in 2023. We will then remobilize the 4 air monitoring units and place them around the substation area during the remainder of the remediation activities. See proposed approximate air monitoring locations on **Drawing 2** during this substation related phase of the work.

Construction of the stadium and supporting infrastructure in the northern portion of the Site is also anticipated to start in the fall of 2022 and extend to the spring of 2024. These stadium related construction activities will be performed above the engineered caps installed by TNEC with the exception of certain excavations related to the installation of the water supply to the stadium and the sanitary sewer discharge from the stadium. These excavations will extend below the engineered caps and will encounter impacted Site materials. These impacted Site materials will either be reused as fill below the engineered caps or disposed off-Site. Due to the limited extent of disturbance and the relatively short duration of these stadium related utility installation activities, perimeter and work zone air quality monitoring will be performed proximate to these excavations using hand-held instruments consistent with the first-tier monitoring program outlined in the April 2011 *Air Quality Monitoring Plan (AQMP)*. Total volatile organic compounds (TVOCs) will be monitored using a portable photoionization detector equipped with a 10.6 eV lamp and particulate dust will be monitored using a DustTrak. The work zone perimeter action limit for TVOCs and dust will be set at 0.1 parts per million (ppm) and 150 µg/m³, respectively, which are consistent with the Site perimeter action limits established in the AQMP.

We trust the information herein is sufficient to allow you to approve these proposed modifications to the air monitoring program. We look forward to continuing to work cooperatively with RIDEM to advance this Site to compliance with the applicable regulations. Should you have any questions or comments regarding the information presented herein, please do not hesitate to contact the undersigned or Kenneth Lento at 617-791-2627.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink, appearing to read 'David Rusczyk'.

David Rusczyk, P.E.

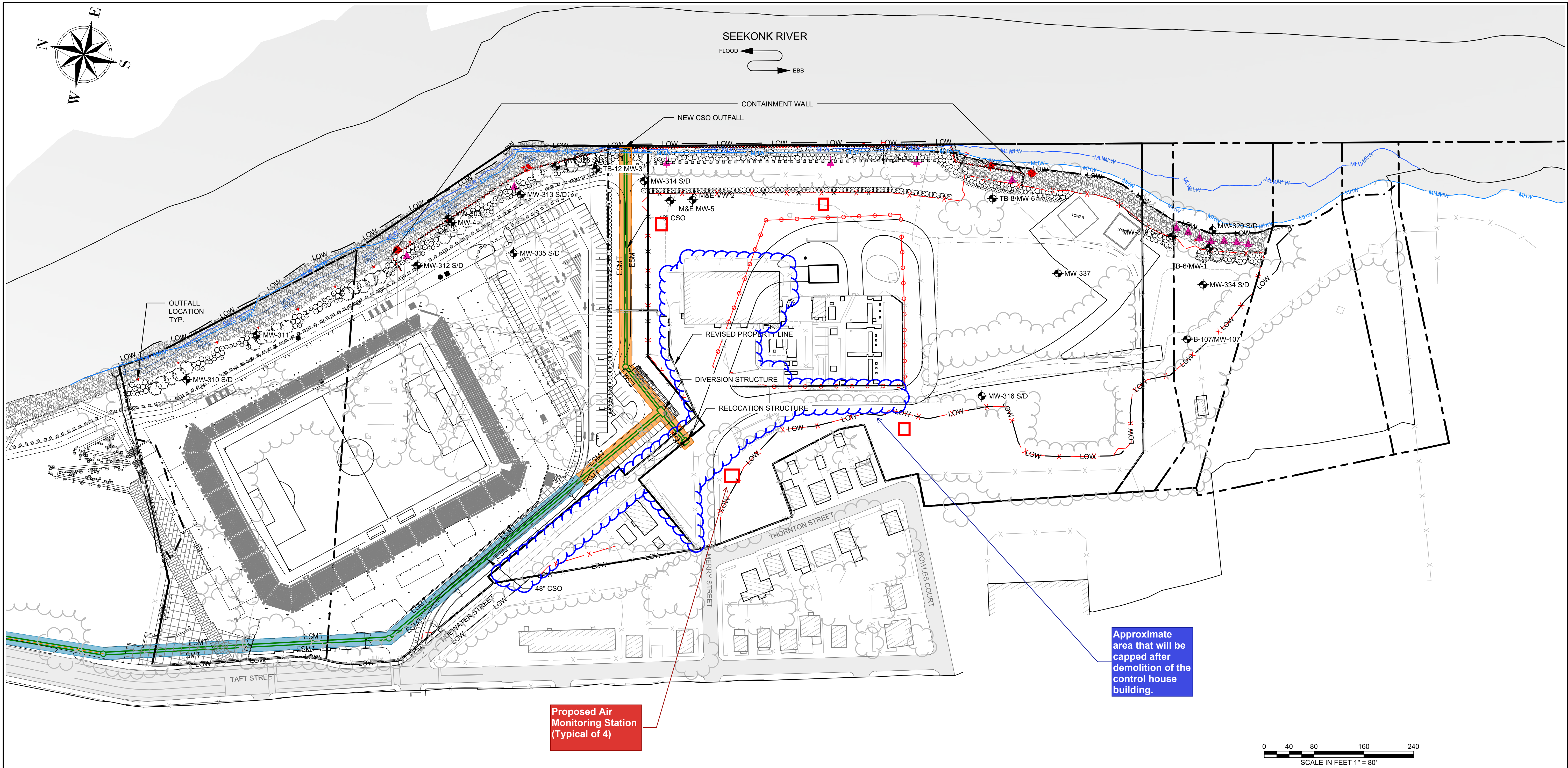
Associate Principal

860-858-3110 - david.rusczyk@gza.com

cc: Mr. Kenneth Lento, Rhode Island Energy

Attachments: Drawing 1: Site Plan
 Drawing 2: Site Plan – Air Monitoring Station Locations After Demolition of Control House

G:\A-1\ENV\43654.40\CAD\01_CURRENT\PLANS\2021-07-21-RIDEM CHANGE-REPORT\01-SITE PLANNING 50 OVERALL FINAL CONDITIONS PLAN AUGUST 5, 2021 4:37PM SCOTT BUXTON





Proposed Air
Monitoring Station
(Typical of 4)

Approximate
area that will be
capped after
demolition of the
control house
building.

LEGEND

- EXISTING MONITORING WELL
- NEW MONITORING WELL
- NEW RECOVERY WELL
- NEW CSO MANHOLE
- OUTFALL LOCATION
- NEW DRAIN MANHOLE
- EXISTING OUTFALL EXTENSION
- NEW FENCING SUBSTATION
- NEW FENCING SECURITY
- CSO MICRO TUNNEL
- CSO OPEN CUT EXCAVATION

0 40 80 160 240
SCALE IN FEET 1" = 80'

NO.	ISSUE/DESCRIPTION			BY	DATE
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FORMER TIDEWATER FACILITY PAWTUCKET, RHODE ISLAND					
SITE PLAN - AIR MONITORING STATION LOCATIONS AFTER DEMOLITION OF CONTROL HOUSE					
PREPARED BY:		PREPARED FOR:			
		GZA GeoEnvironmental Inc. Engineers and Scientists www.gza.com			
PROJ MGR: DJR	REVIEWED BY: MJP	CHECKED BY: DJR		DRAWING	
DESIGNED BY: TRG	DRAWN BY: SAB	SCALE: AS SHOWN		2	
DATE: JULY 2021	PROJECT NO. 43654.40	REVISION NO.		SHEET NO. 1 OF 4	