



## RHODE ISLAND

### DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT  
235 Promenade Street, Providence, Rhode Island 02908

**ORDER OF APPROVAL – ADDENDUM 3 File**  
**No. SR-26-0934A**  
(Formerly Case No. Case No. 95-022)

August 30, 2022

#### CERTIFIED MAIL

Mr. Kenneth E. Lento  
Project Manager - Site Investigation & Remediation  
Rhode Island Energy  
40 Sylvan Road  
Waltham, MA 02451

RE: Tidewater Coal Gasification  
Tidewater Street  
Pawtucket, Rhode Island  
Plat Map 54B / Lot 826, Plat Map 65B / Lots 645, 647, 649, 662 and portions of Lot 648  
and portions of Plat Map 67B / Lots 11 and 21

Dear Mr. Lento:

Enclosed please find the Order of Approval Addendum 3 (the Addendum 3) for the proposed recommended modifications to the current, ongoing remedial actions at the abovementioned property as described in the 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 (Modifications to Perimeter Air Monitoring Letter), received August 25, 2022, and prepared by GZA GeoEnvironmental, Inc. (GZA). Please review the stipulations of this Order thoroughly to ensure your compliance with the requirements.

If you have any questions regarding this letter or would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 222-2797, ext. 2777109, or by E-mail at [joseph.martella@dem.ri.gov](mailto:joseph.martella@dem.ri.gov).

This Addendum 3 shall be recorded in the land evidence records of the City of Pawtucket within thirty (30) days of execution and a recorded copy returned to the Department within fifteen (15) days of recording.

Sincerely,

Joseph T. Martella II  
Environmental Engineer III  
Office of Land Revitalization & Sustainable Materials Management

cc: Kelly Owens, RIDEM/OLRSMM  
Susan Forcier, Esq., RIDEM/OLS  
Ronald Gagnon, RIDEM/OCTA  
Nick Pisani, RIDEM/OWR/Storm Water  
Neil Personeus, RIDEM/OWR/WQC  
Dr. Michael Byrns PhD, RIDOH/Center for Healthy Homes & Environment  
Tracy A. Silvia, RI CRMC  
Richard Lucia, RI CRMC  
Kathryn Kelly, NBC  
Daniel J. Kroeber, Milone & MacBroon  
Dylan M. Zelazo, Pawtucket Mayor's Office  
Bianca Policastro, Pawtucket Planning  
Michael D. Cassidy, Pawtucket Planning  
Dave Clemente, Director Pawtucket/DPW  
Robert Billington, Blackstone Valley Tourism Council  
Gerard Charbonneau, Chairman, Pawtucket School Committee  
Julie Nora, Ph.D., International Charter School  
Carolyn Sheehan, Blackstone Academy  
Bridget Boucher, Francis J. Varieur Elementary School  
Ms. Monica Huertas, Racial and Environmental Justice Committee Michele  
Leone, Rhode Island Energy  
David J. Rusczyk, GZA  
Lance Hill, Pare

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

In the matter of the application for Remedial Action Approval at:

Tidewater Coal Gasification  
Tidewater Street  
Pawtucket, Rhode Island  
File No. SR-26-0934A

**ORDER OF APPROVAL – ADDENDUM 3**

In the above entitled matter the Rhode Island Department of Environmental Management (the Department) issued to The Narragansett Electric Company d/b/a National Grid (National Grid), in their capacity as Owner and Responsible Party for the remediation of the property located on Tidewater Street (the Site), Pawtucket (Plat 54B / Lot 826, Plat 65B / Lots 662, 645, 647, 649 and portions of Lot 648 and portions of Plat 67B / Lots 11 and 21), an Order of Approval (Order) dated March 5, 2020, and subsequently an Order of Approval Addendum (Addendum 1) dated October 7, 2021, and an Order of Approval Addendum 2 (Addendum 2) dated January 24, 2022.

On August 25, 2022, the Department received a written request from GZA GeoEnvironmental, Inc. (GZA), for approval of modifications to the original Order, Addendum 1, and the Addendum 2 with respect to the ongoing remedial activities at the Site. The following document was submitted by GZA on behalf of Rhode Island Energy (successor to National Grid) regarding the requested modifications:

1. 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, received by the Department on August 25, 2022, and prepared by GZA.

Subject to the conditions herein, the above listed document, in addition to the documents listed in the Order, Addendum 1, and Addendum 2, describe a plan to remediate existing contamination pursuant to Rhode Island General Laws 23-19.14-1 et seq. and 250-RICR-140-30-1, the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations), in accordance therewith.

Based on review of the above referenced document, the Department has concluded that a modification to the prior orders is warranted.

It is the Department's intent that this "Addendum 3" continues to place primary responsibility for the construction, operation, maintenance, and monitoring of the approved Remedial Action Work Plan (RAWP) and its associated implementation on Rhode Island Energy. As the Responsible Party and Performing Party, Rhode Island Energy is expected to implement the RAWP in an expeditious and professional manner that prevents non-compliance with the original Order, Addendum 1, Addendum 2, this Addendum 3, and the RAWP, and is protective of human health and the environment. For the convenience of Rhode Island Energy and its contractors and consultants, the changes made to the original Order, Addendum 1 and Addendum 2 by this

Addendum 3 have been highlighted below.

Upon consideration thereof, the Department of Environmental Management's Office of Land Revitalization and Sustainable Materials Management (LRSMM) approves said plan or means to remediate contamination through this Addendum 3 provided that:

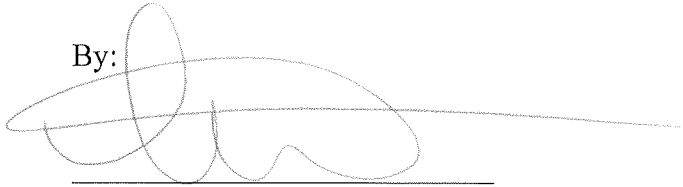
1. All conditions set forth in the Order of Approval dated March 5, 2020, Addendum 1 dated October 7, 2021, and Addendum 2 dated January 24, 2022, shall remain in full force and effect unless specifically altered by this Addendum 3.
2. Because most of the intrusive activities associated with the Site remediation/redevelopment have been completed, the number of perimeter air monitoring stations shall be reduced from 9 to 4 stations. During the period that the Narragansett Bay Commission (NBC) is actively working onsite to relocate the existing combined sewer outfall (CSO), the 4 perimeter air monitoring stations shall be staged in the northern portion of the Site proximate to the intrusive below grade work activities being performed by NBC. During the period after NBC completes its intrusive work, while there is no intrusive work being performed, the air monitoring units may be demobilized from the Site and the active air quality monitoring program may be temporarily suspended until intrusive activities are re-initiated. Additional intrusive activities associated with the Site remedy are not proposed to occur until the control house building is scheduled for demolition later in 2023. Prior to the start of this work, the 4 air monitoring units shall be remobilized to the Site and placed around the substation area, and the active air quality monitoring program shall be reinitiated throughout the remainder of the remediation activities.
3. Construction of the stadium and supporting infrastructure in the northern portion of the Site is 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 installed engineered caps except for 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. The impacted Site materials will either be reused as fill below the engineered caps or will be properly disposed off-Site. Due to the limited extent of disturbance and the relatively short duration of the 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) and particulate dust will be monitored at the work zone perimeter with action limits consistent with the Site perimeter action limits established in the AQMP.

The original Order, Addendum 1, Addendum 2, and this Addendum 3 shall remain in full force and effect provided said RAWP is implemented in a manner satisfactory to the Department of Environmental Management. Failure to comply with all points outlined in the Department approved RAWP and stipulated in the Order, Addendum 1, Addendum 2, and this Addendum 3 shall result in the revocation of the Order of Approval and may result in the issuance of a Notice of Violation against the Performing Party.

The original Order, Addendum 1, Addendum 2, and this Addendum 3 shall be subject to modification or revocation in accordance with law.

Entered as the Order of the Department of Environmental Management this 30<sup>th</sup> day of August, 2022.

By:



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Matthew D. DeStefano  
Deputy Administrator  
Office of Land Revitalization & Sustainable Materials Management  
Department of Environmental Management