



STRAP COMMENT LETTER

October 6, 2017

File No. SR -28-1152

Formerly Case No. 98-004

Amy A. Willoughby
Lead Environmental Scientist
New England Site Investigation & Remediation Group
National Grid
40 Sylvan Road, E3.691
Waltham, MA 02451

RE: Providence Gas Co. – AA
A.k.a. Former New England Gas Company MGP property
642 Allens Avenue, Providence, Rhode Island
Plat Map 56 / Lot 5, Plat Map 101 / Lot 1

Dear Ms. Willoughby:

The Rhode Island Department of Environmental Management's (the Department) Office of Waste Management (OWM) has reviewed the Short Term Response Action Plan (STRAP), Proposed Liquefaction Project, 121 Terminal Road / 642 Allens Avenue, Providence, Rhode Island, RIDEM Case No. 98-004 / Site Remediation File No. SR-28-1152, FERC Docket No. CP16-121-000 (Liquefaction STRAP), for the above referenced property (the Site), which was submitted on May 12, 2017, by GZA Geoenvironmental, Inc. (GZA) in accordance with Section 6.00 of the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations).

After careful review of the Liquefaction STRAP, the Department requires a response to the attached comments, questions, and concerns about the submittal, which must be fully addressed in writing to receive a Short Term Response Action Plan Approval.

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. 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

cc: Ronald Gagnon, RIDEM/OCTA
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Margaret S. Kilpatrick, GZA

DEPARTMENT COMMENTS

October 6, 2017

Liquefaction STRAP, dated May 12, 2017
Providence Gas Co. – AA
642 Allens Avenue, Providence, Rhode Island

1. Page 4, Section 3.1 (Project Description):
 - a. Please clarify the planned order of proposed remedial events, including raising the level of the STRAP Area, pre-drilling/driving piles, installing underground utilities, removing existing groundwater monitoring wells, reinstalling replacement monitoring wells, installing engineered caps and implementing related restoration activities, etc.).
 - b. The third paragraph indicates “*Note the majority of the Project Work Site will be raised approximately 9 to 11 feet above existing grade.*” This seems to contradict other references to the very limited amount of strictly non-intrusive work proposed to be completed in the Project Work Site. Please clarify this discrepancy.
 - c. What are the planned dimensions of the temporary laydown area?
 - d. Will any regulated materials be stored in the temporary laydown area, and if so, how?
 - e. Please provide a site figure showing the proposed location and layout of the temporary laydown area.
2. Page 4, Section 3.2 (Former MGP Structures) - Are there any known or suspected subsurface former MGP structures that may still contain MGP residuals such as coal tar, which may be disturbed during construction or predrilling?
3. Page 8, first sentence – The referenced Site Piling Plan is in Appendix D, not Appendix C, please correct this.
4. Page 13, Section 6.1 (Excavated Soil Reuse) - Please clarify how and where any soils which exhibit excessive visual or olfactory evidence of contamination will be segregated and temporarily stored until off-Site disposal/recycling is done. Please provide a site figure showing the proposed management/storage locations. If appropriate, this item may be included on the site figure requested in comment 1.e above.
5. Page 14, Section 6.3 (Soil Disposal/Recycling) - Please clarify how and where excess soils described in this section will be segregated and temporarily stored until off-Site disposal/recycling occurs. Please provide a site figure showing the proposed management/storage locations. If appropriate, this item may be included on the site figure requested in comment 1.e above.

6. Page 14, Section 6.4 (Import Sampling) - Please clarify how and where imported soil material described in this section will be segregated and temporarily stored. Please provide a site figure showing the proposed management/storage locations. If appropriate, this item may be included on the site figure requested in comment 1.e above.
7. Page 15, Section 6.6 (Required Air Monitoring and Controls) - Please include a copy of Attachment N, Clarification to the Proposed Air Monitoring Program for STRAP Activities, STRAP Proposed Liquefaction Project, 121 Terminal Road/642 Allens Avenue, Providence, Rhode Island, from the October 5, 2017, Response to Public Comments, in the final STRAP Addendum.
8. Page 16, Section 6.7 (Decontamination Protocol) – Indicates that “*If sediment is tracked out of the Project Site, the sediment must be removed by sweeping, shoveling, or vacuuming by the end of the work day.*” Please revise this section to indicate that any regulated material tracked out of the Project Site shall be removed and appropriately managed promptly and completely.
9. Page 16, Section 6.8 (Soil Stockpile Management Requirements) - Please provide a site figure showing the proposed locations of the temporary soil stockpile area, the central soil stockpile area, and the long-term soil, construction material and/or debris stockpile areas referenced in this Section. If appropriate, this item may be included on the site figure requested in comment 1.e above.
10. Page 17, Section 6.11 (Monitoring Well Re-Installation) – Section 4.4 (Groundwater and NAPL Measurements) indicated that Light Non-Aqueous Phase Liquid (LNAPL) has been historically detected in the STRAP Area at thicknesses ranging from trace amounts to 3.58 feet, in nine (9) monitoring wells. This section indicates that only three (3) replacement monitoring wells are proposed. Please clarify the reason for decreasing the number of potential future LNAPL monitoring/recovery wells. Please be advised that the final remedy for the Site will likely include some form of long-term LNAPL gauging and recovery in addition to groundwater monitoring.
11. Regarding Drawing 4 (Completed Remedial Activities) and Drawing 6 (Proposed Final Conditions Plan), please clarify plans for areas within the proposed Project Work Site that have not been subject to prior remediation and capping, and do not currently have an existing equivalent cap, but are not identified on Drawing 6 as being subject to proposed capping. Please be advised that any unremediated areas on the Site, that are not subject to remedial activities under the Liquefaction STRAP, shall be subject to remediation under the anticipated Site Investigation Report (SIR) Addendum for the remainder of the Site.
12. Please provide certification that the STRAP and STRAP Addendum were prepared under the supervision of a Registered Professional Engineer in the State of Rhode Island, stamped by that engineer.
13. Please submit a STRAP Addendum that addresses the abovementioned comments on or before October 11, 2017.