



September 16, 2016

**VIA HAND DELIVERY & ELECTRONIC MAIL**

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Docket 4634 - 2016 Distribution Adjustment Charge  
Responses to Division Data Requests – Set 3**

Dear Ms. Massaro:

Enclosed please find 10 copies of National Grid's<sup>1</sup> responses to the third set of data requests issued by the Rhode Island Division of Public Utilities and Carriers (Division) on August 26, 2016 in the above-referenced docket.

This filing also contains a Motion for Protective Treatment in accordance with Rule 1.2(g) of the Public Utilities Commission's (PUC) Rules of Practice and Procedure and R.I. Gen. Laws § 38-2-2(4)(B). The Company seeks protection from public disclosure of certain confidential and proprietary information, which is contained in Attachments DIV 3-15a(ii), DIV 3-15a(iii), DIV 3-15a(iv), DIV 3-15a(v), DIV 3-15a-(vi) and DIV 3-15d. In compliance with Rule 1.2(g), the Company has also provided the PUC with the un-redacted, confidential versions of these documents in a sealed envelope marked, **"Contains Privileged and Confidential Materials – Do Not Release"**, and has included redacted copies in the filing.

Also, please note that, due to the size of many of the attachments, the Company has provided many of them on CD-ROM. The CD-ROM has been provided to the PUC and to the Division, and will be made available to the remainder of the service list upon request.

Thank you for your attention to this filing. If you have any questions, please contact Jennifer Brooks Hutchinson at 401-784-7288 or Robert Humm at 401-784-7415.

Very truly yours,

Jennifer Brooks Hutchinson

Robert J. Humm

Enclosures

cc: Docket 4634 Service List  
Leo Wold, Esq.  
Steve Scialabba, Division

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



\_\_\_\_\_  
Joanne M. Scanlon

September 1\*, 2016

Date

**Docket No. 4634 – National Grid –2016 Annual Distribution Adjustment  
Charge Filing (DAC) - Service List as of 8/22/16**

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
Jennifer Brooks Hutchinson, Esq. National Grid 280 Melrose St. Providence, RI 02907	<a href="mailto:Jennifer.hutchinson@nationalgrid.com">Jennifer.hutchinson@nationalgrid.com</a> ;	401-784-7288
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<b>File an original &amp; nine (9) copies w/:</b> Luly E. Massaro, Commission Clerk	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:Patricia.lucarelli@puc.ri.gov">Patricia.lucarelli@puc.ri.gov</a> ;	

Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	
	<a href="mailto:Sharon.ColbyCamara@puc.ri.gov">Sharon.ColbyCamara@puc.ri.gov</a> ;	

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

**RHODE ISLAND PUBLIC UTILITIES COMMISSION**

_____	)	
National Grid	)	
Distribution Adjustment Charge (DAC)	)	
2016	)	Docket No. 4634
_____	)	

**MOTION OF THE NARRAGANSETT ELECTRIC  
COMPANY D/B/A NATIONAL GRID FOR PROTECTIVE  
TREATMENT OF CONFIDENTIAL INFORMATION**

National Grid<sup>1</sup> hereby requests that the Rhode Island Public Utilities Commission (PUC) grant protection from public disclosure of certain confidential and proprietary information submitted in this proceeding, as permitted by PUC Rule 1.2(g) and R.I. Gen. Laws § 38-2-2(4)(B). National Grid also hereby requests that, pending entry of that finding, the PUC preliminarily grant National Grid’s request for confidential treatment pursuant to Rule 1.2(g)(2).

**I. BACKGROUND**

On September 16, 2016, National Grid filed with the PUC its responses to the third set of data requests from the Division of Public Utilities and Carriers (Division) in this docket. Division 3-15(a) requests “supporting invoices for the dollar amounts billed to each project showing wage rates and hours worked for” consulting services referenced in National Grid’s Annual Environmental Report. National Grid is seeking protective treatment for Attachments DIV 3-15a(ii), DIV 3-15a(iii), DIV 3-15a(iv), DIV 3-15a(v),

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

and DIV 3-15a(vi), to that response. Specifically, National Grid is seeking protective treatment for consultant invoices describing work performed by that consultant at the request of National Grid's attorneys relative to potential legal proceedings. In addition, Division 3-15d requests information in connection with contractor services referenced in National Grid's Annual Environmental Report that were procured through a competitive bidding process. National Grid is also seeking protective treatment for the information concerning the competitive bidding process for work at the Pawtucket (Tidewater) manufactured gas plant site contained in Attachment DIV 3-15d.

## **II. LEGAL STANDARD**

Rule 1.2(g) of the PUC's Rules of Practice and Procedure provides that access to public records shall be granted in accordance with the Access to Public Records Act (APRA), R.I. Gen. Laws § 38-2-1, *et seq.* Under APRA, all documents and materials submitted in connection with the transaction of official business by an agency is deemed to be a "public record," unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I. Gen. Laws § 38-2-2(4). To the extent that information provided to the PUC falls within one of the designated exceptions to the public records law, the PUC has the authority under the terms of APRA to deem such information confidential and to protect that information from public disclosure.

In that regard, R.I. Gen. Laws § 38-2-2(4)(B) provides that the following records shall not be deemed public:

Trade secrets and commercial or financial information obtained from a person, firm, or corporation which is of a privileged or confidential nature.

The Rhode Island Supreme Court has held that the determination as to whether this exemption applies requires the application of a two-pronged test set forth in *Providence Journal Company v. Convention Center Authority*, 774 A.2d 40 (R.I. 2001). The exemption applies where the disclosure of information would be likely either (1) to impair the Government's ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained. *See Providence Journal*, 774 A.2d 40.

The first prong of the test assesses whether the information was provided voluntarily to the governmental agency. *Providence Journal*, 774 A.2d at 47. If the answer to the first question is affirmative, then the question becomes whether the information is "of a kind that would customarily not be released to the public by the person from whom it was obtained." *Id.*

### **III. BASIS FOR CONFIDENTIALITY**

Attachments DIV 3-15a(ii), DIV 3-15a(iii), DIV 3-15a(iv), DIV 3-15a(v), and DIV 3-15a(vi) contain material that divulges work performed by National Grid's consultants bearing on potential litigation. Such information is privileged. The public disclosure of this information would disadvantage National Grid and ultimately its customers in a future litigation and should be granted protective treatment by the PUC under its rules.

In addition, Attachment DIV 3-15d contains confidential and proprietary information concerning National Grid's competitive bidding process, including pricing information and bid-evaluation information. This information is proprietary to the bidders, and historically has been maintained as confidential when provided in PUC

filings. Disclosure of this information would impact the competitive position of these parties, and such disclosure would impede National Grid's future ability to obtain bids and/or this type of proprietary information.

#### **IV. CONCLUSION**

For the foregoing reasons, National Grid respectfully requests that the PUC grant its Motion for Protective Treatment.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC  
COMPANY d/b/a NATIONAL GRID**

By its attorneys,

A handwritten signature in blue ink, appearing to read "Jennifer Brooks Hutchinson", with a long horizontal flourish extending to the right.

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Jennifer Brooks Hutchinson, Esq. (#6167)  
Robert J. Humm, Esq. (#7920)  
National Grid  
280 Melrose Street  
Providence, RI 02907  
(401) 784-7415  
Dated: September 16, 2016

Division 3-1

Request:

Re: the 642 Allens Avenue project, please:

- a. Indicate when a closure letter from RIDEM for Phase 1 remedial activities is anticipated;
- b. Provide the results of the Company's semi-annual groundwater/non-aqueous phase liquid gauging and groundwater sampling for each semi-annual gauging for the over the five-year period ended March 31, 2016;
- c. Identify the costs of maintaining the boom in the Providence River over the last year (i.e., April 1, 2015 through March 31, 2016) and explain why continued maintenance of that boom is necessary from an environmental protection perspective;
- d. Identify the costs associated with stockpile management and disposal;
- e. Identify the costs associated with the completion of a supplemental site investigation to address data gaps from the previous site investigation;
- f. Provide an explanation of the nature of the data gaps from the previous site investigation that were addressed by the supplemental site investigation.

Response:

- a. The Company does not know when it will receive an Interim Letter of Compliance (the closure letter for the Phase 1 remedial activities) from RIDEM; however, in the meantime, the Company is working with RIDEM and moving forward with investigation and remediation activities at the Site.
- b. The results of the Company's semi-annual groundwater/non-aqueous phase liquid gauging and groundwater sampling for each semi-annual gauging for the five-year period ending March 31, 2016 are included as Attachment DIV 3-1b, is provided on a CD-ROM.



Division 3-1, page 2

- c. Maintenance was performed on the boom in the Providence River on April 9, 2015 at a total cost of \$9,866.02. Costs incurred by GZA GeoEnvironmental, Inc. (GZA) for oversight of the boom replacement and inspection totaled \$1,726.10. The remaining \$8,139.92 in spend was for Clean Harbors Environmental Services, Inc. (Clean Harbors) to remove and replace the existing boom and hard containment boom. Maintenance was also performed on the boom on November 17, 2015 at a total cost of \$7,544.85 (\$603.05 for GZA and \$6,941.80 for Clean Harbors). However, due to an invoicing issue this Clean Harbors invoice was paid in FY2017. Sheen outbreaks within the cove area continue on a regular basis and the boom is necessary to control this sheen. Additionally, \$1,387.94 (\$1,137.89 for Clean Harbors and \$250.05 for GZA) was incurred on September 4, 2015 for the replacement of the booms within two catch basins in the northwestern corner of the property as a precaution against potential sheen outbreaks.
- d. Total costs associated with stockpile management and disposal were \$47,099.23 (\$39,923.19 for T. Ford Company, Inc. (TFord) and \$7,176.04 for GZA).
- e. Total costs associated with completion of the supplemental Site investigation were \$40,858.88 (\$1,431.78 for TFord; \$34,378.75 for GZA and \$5,048.35 for Clean Harbors).
- f. The supplemental Site investigation was designed to fill data gaps identified during more recent assessment and facility upgrade activities at the Site, and between April 1, 2015 and March 31, 2016, including the completion of surface soil samples, test pits and borings within the former holder 18/21 area. These investigations were completed to evaluate the nature of the soil within and proximate to the footprint of the former holders. The company currently expects the Supplemental SIR to be submitted to RIDEM in 2017.

Division 3-2

Request:

Re: the "Cost Breakdown by Category" for the 642 Allens Avenue project, please:

- a. Detail the Consulting activities for which payments were made during the reporting period;
- b. Identify the organization that provided each consulting service;
- c. Provide copies of all reports, studies, or other documents which communicated the results of activities undertaken or completed by consultants for which payments were made during the reporting period.

Response:

- a. Consulting activities conducted during the reporting period for which payments were made include the following: annual groundwater and semi-annual groundwater/NAPL monitoring; reporting to RIDEM; monthly site visits and monthly NAPL recovery; boom repair/maintenance oversight; review of historic plans and documents for the Site; management of the former Material Handling Area (MHA) stockpile; design of an engineered cap and associated stormwater management system for the former gasholder 18/21 area; conducting supplemental site investigation activities at the Site; environmental support consisting of soil and groundwater management and documentation for several facility projects including: natural gas line repairs and cutoffs; water line repairs at the Holcim property; upgrade of the natural gas regulator stations; fence installation; ice shield upgrade and truck scale upgrades at the LNG plant and health and safety monitoring for gas line leak repair.
- b. GZA GeoEnvironmental, Inc. conducted the services described in Response (a), above, with the exception of the health and safety monitoring for the gas line leak repair which was conducted by Coneco Engineers and Scientists.
- c. The following reports, studies, or other documents were prepared during the reporting period, and are included as Attachment DIV 3-2c, which is provided on a CD-ROM:
  - i. Summary of Gas Line Repair Soil and Groundwater Management Activities, October 15, 2015.
  - ii. Temporary On-site Treated Groundwater Discharge Authorization Request, September 11, 2015.

Division 3-3

Request:

Re: the "Cost Breakdown by Category" for the 642 Allens Avenue project, please provide full supporting detail for the "Construction/Disposal/Removal Costs" showing separately costs of each construction, disposal, and removal activity and clearly identifying all costs associated with:

- a. Emergency utility repairs
- b. Stockpile management and disposal
- c. Other activities

Response:

Attachment DIV 3-3 contains a summary of the "Construction/Disposal/Removal Costs" for 642 Allens Avenue during the reporting period.

- a. Attachment DIV 3-3a, which is being provided on a CD-ROM, contains the supporting detail for the "Construction/Disposal/ Removal" for Emergency utility repairs.
- b. Attachment DIV 3-3b, which is being provided on a CD-ROM, contains the supporting detail for the "Construction/Disposal/ Removal" for Stockpile management and disposal.
- c. Attachment DIV 3-3c, which is being provided on a CD-ROM, contains the supporting detail for the "Construction/Disposal/ Removal" for Other activities.

Division Data Request DIV 3-3

Date	Payee	Amount	Description of Service	Response
10/06/15	Clean Harbors Environmental Services, Inc.	\$ 31,846.13	Environmental support for gas line repair	DIV 3-3a
11/15/15	T. Ford Company Inc.	\$ 35,188.51	Relocate stockpiled soil onto Holder 18 footprint	DIV 3-3b
12/15/15	T. Ford Company Inc.	\$ 4,734.68	Management of MGP residuals encountered during building demolition	DIV 3-3b
04/23/15	Clean Harbors Environmental Services, Inc.	\$ 8,132.92	Boom replacement within cove	DIV 3-3c
05/12/15	Clean Harbors Environmental Services, Inc.	\$ 2,599.30	Environmental support for supplemental site investigation	DIV 3-3c
08/05/15	Clean Harbors Environmental Services, Inc.	\$ 979.57	Waste Disposal	DIV 3-3c
09/04/15	Clean Harbors Environmental Services, Inc.	\$ 1,137.89	Boom replacement within catchbasins	DIV 3-3c
09/10/15	Clean Harbors Environmental Services, Inc.	\$ 644.20	Waste Disposal	DIV 3-3c
10/28/15	Clean Harbors Environmental Services, Inc.	\$ 777.12	Waste Disposal	DIV 3-3c
11/25/15	Clean Harbors Environmental Services, Inc.	\$ 5,048.35	Environmental support for supplemental site investigation	DIV 3-3c
12/17/15	Clean Harbors Environmental Services, Inc.	\$ 1,800.23	Waste Disposal	DIV 3-3c
01/20/15	Clean Harbors Environmental Services, Inc.	\$ 1,526.21	Waste Disposal	DIV 3-3c
06/24/15	T. Ford Company Inc.	\$ 1,431.78	Supplemental Site Investigation - Test Pits	DIV 3-3c

TOTAL: \$95,846.89

Division 3-4

Request:

Re: the "Cost Breakdown by Category" for the 642 Allens Avenue project, please provide supporting detail for the "Other Costs" associated with the 642 Allens Avenue project for the reporting period.

Response:

The amount for "Other Costs" associated with the 642 Allens Avenue (Site) project for the reporting period was \$19,550. The entire cost consists of Company labor and burden for management of the Site environmental activities. The Company project management activities performed during this reporting period were associated with oversight of the consultants and contractors performing environmental work at the Site including review of invoices, coordination with Company personnel related to environmental support during planned and emergency projects at the Site, and communications with RIDEM. In addition, project management activities included review of environmental permit applications, monitoring reports, environmental summary reports and disposal documentation.

Division 3-5

Request:

Re: the 170 Allens Avenue project, please provide detailed documentation of the manner in which the dollar amounts of the Cargill reimbursements for costs incurred for the 170 Allens Avenue project were determined including the supporting workpapers, studies and analyses for those determinations.

Response:

Pursuant to a confidential agreement with Cargill, Inc. (Cargill), Cargill reimburses the Company a percentage share of all costs associated with the upland investigation and remediation of the site and certain ancillary costs associated with this project. The invoices to Cargill include charges related to applicable invoices paid by the Company that have been included in this and previous filings. No invoices were sent to Cargill during the reporting period. One invoice was sent to Cargill that covers the reporting period in April 2016 and payment was received in April 2016. This payment will be reflected in the next reporting period submittal.

Please see Attachment DIV 3-6d, which is provided on a CD-ROM in response to Division Data Request 3-6, for the workpapers, studies and analyses that Cargill shared in the costs of preparing.

Division 3-6

Request:

Re: the "Cost Breakdown by Category" for the 170 Allens Avenue project, please:

- a. Detail the Consulting activities for which payments were made during the reporting period;
- b. Identify the credits associated with both Cargill and Rhode Island Hospital;
- c. Identify the organization that provided each consulting service;
- d. Provide copies of all reports, studies, or other documents which communicated the results of activities undertaken or completed by consultants for which payments were made during the reporting period.

Response:

- a. Consulting activities conducted during the reporting period for which payment was made include preparation of environmental land use restriction submittals, groundwater sampling, non-aqueous phase liquid gauging/monitoring/recovery, site inspections, periodic reporting/meetings, cost estimating/evaluations for property use, preparation of Annual Monitoring Report, and project management.
- b. As indicated in response to Division Data Request 3-5, no invoices were sent to Cargill during the reporting period. One invoice was sent to Cargill that covers the reporting period in April 2016 and payment was received in April 2016. This payment will be reflected in the next reporting period submittal.

As indicated in last year's response to Division Data Request 1-6, the Company-owned property was leased to Rhode Island Hospital for satellite parking during two periods of time, between July 1, 2014 and August 31, 2014 and between February 17, 2015 and March 16, 2015. During the first period, the first payment of \$12,000 was inadvertently credited to another account and will be properly credited in the next reporting period filing. The second payment was credited to the project and was included in the previous year's filing. During the second period, the first payment of \$5,200 was credited to the project in the previous year's filing. The second payment of \$5,200 was received in April 2015 and was credited to the project and included in Category 5 as "Other Costs".

Division 3-6, page 2

- c. GZA GeoEnvironmental, Inc. conducted the preparation of environmental land use restriction submittals, groundwater sampling, non-aqueous phase liquid gauging/monitoring/recovery, site inspections, periodic reporting/meetings, cost estimating/evaluations for property use, and preparation of Annual Monitoring Report. EECS, Inc. conducted the project management activities.
- d. The following reports, studies, or other documents were prepared during the reporting period:
- *Monthly Status Report - January 1 through January 31, 2015*, by GZA GeoEnvironmental, Inc., dated March 11, 2015.
  - *Monthly Status Report - February 1 through February 28, 2015*, by GZA GeoEnvironmental, Inc., dated April 17, 2015.
  - *Monthly Status Report - March 1 through March 31, 2015*, by GZA GeoEnvironmental, Inc., dated April 28, 2015.
  - *Monthly Status Report - April 1 through April 30, 2015*, by GZA GeoEnvironmental, Inc., dated June 12, 2015.
  - *Monthly Status Report - May 1 through June 30, 2015*, by GZA GeoEnvironmental, Inc., dated August 14, 2015.
  - *Monthly Status Report - July 1 through July 31, 2015*, by GZA GeoEnvironmental, Inc., dated September 21, 2015.
  - *Monthly Status Report - August 1 through August 31, 2015*, by GZA GeoEnvironmental, Inc., dated October 16, 2015.
  - *Monthly Status Report - September 1 through November 30, 2015*, by GZA GeoEnvironmental, Inc., dated January 13, 2016.
  - *Monthly Status Report - December 1 through December 31, 2015*, by GZA GeoEnvironmental, Inc., dated March 22, 2016.
  - *Annual Monitoring Report - 170 Allens Avenue*, by GZA GeoEnvironmental, Inc., dated March 18, 2016.

Attachment DIV 3-6d, which is being provided on a CD-ROM, contains copies of the reports, studies, or other documents listed above that were undertaken or completed by consultants for which payments were made during the reporting period.



Division 3-7

Request:

Re: the "Cost Breakdown by Category" for the 170 Allens Avenue project, please provide full supporting detail for the "Construction/Disposal/ Removal Costs" showing separately costs of each construction, disposal, and removal activity.

Response:

Please see Attachment DIV 3-7 for supporting detail for the "Construction/Disposal/Removal Costs" showing separately each construction, disposal, and removal activity for the reporting period.

Attachment DIV 3-7

Date	Payee	Invoice Number	Amount	*note 1
4/14/2015	Clean Harbors	1000893352	\$ 1,460.80	
5/21/2015	Clean Harbors	1000940571	\$ 936.60	
Total			\$ 2,395.40	

\*1 Clean Harbors invoice was over accounted by \$2 in FY15  
and was credited this year in FY16

Division 3-8

Request:

Re: the Pawtucket (Tidewater) MGP project please identify the category that costs associated with "maintenance of publicly available sources of information" is assigned.

Response:

GZA GeoEnvironmental, Inc. (GZA) and Potomac Communications Group, Inc. (Potomac) are listed under the Consulting Costs category and Blue Chip Films, LLC (Blue Chip) is listed under the Other Costs category.

GZA prepares the content for the website and bulletin board updates, drafts the initial versions of the site fact sheets, procures and facilitates the translations of the fact sheets into Spanish and Portuguese, and provides CDs/electronic copies of major reports to the local document repository and to RIDEM for its website. In addition, GZA updates the website, which is hosted by Blue Chip. Potomac assists with editing, finalizing, formatting and producing content.

Division 3-9

Request:

Re: the Woonsocket (Hamlet Ave.) MGP project please:

- a. Provide a copy of the referenced recommendation by Company's environment consultant;
- b. Confirm that the full demolition cost associated the removal the regulator station in July 2015 was \$857.

Response:

- a. The referenced recommendation by the Company's environment consultant is attached as Attachment DIV 3-9a, which is being provided on a CD-ROM.
- b. The cost associated with the demolition of the regulator station in July 2015 was not an environmental response cost and, therefore, is not reflected in the Environmental Report. The Construction/Disposal/Removal costs of \$857 are related to two Clean Harbors Environmental Services invoices associated with the delivery of empty 55-gallon drums and subsequent pickup, transport, and disposal of the drums containing soil cuttings and purge water, which were generated as a result of the referenced investigations on the North Holder and substation areas of the site.

Division 3-10

Request:

Re: the PCB Regulated Pipe Abandonment project, please:

- a. Provide full supporting detail for the "Construction/Disposal/Removal Costs" shown in the "Cost Breakdown by Category," including separate itemization of costs of each construction, disposal, and removal activity.
- b. Provide a detailed explanation of the manner in which the Company's accelerated replacement of gas services and mains impacts its incurrence of PCB Regulated Pipe Abandonment costs.

Response:

- a. The supporting detail for the "Construction/Disposal/Removal Costs" shown in the "Cost Breakdown by Category," including separate itemization of costs of each construction, disposal, and removal activity are included in Attachment DIV 3-10a.
- b. The PCB Regulated Pipe Abandonment project tracks costs associated with the removal of gas pipe from throughout the Rhode Island gas system, as well as in-place PCB testing of pipe as required by the U.S. Environmental Protection Agency. As the pipe is removed, the pipe material is brought to a Company facility where the materials are then consolidated, transported off-site, and decontaminated. Any associated condensate and drip water are removed and disposed of from the field by Clean Harbors. The costs included in this project relate to the PCB testing, decontamination, and transport of these materials.

The PCB Regulated Pipe Abandonment costs are directly related to the amount of gas pipe that is removed from the system, which is impacted by numerous factors including:

- The amount of mains and services replaced by the Company. The Company has accelerated its replacement of gas services and mains to improve system reliability;
- The number of leaks repaired. The Company removes portions of pipe during repair of system leaks; and

Division 3-10, page 2

- The increased number of state and public works projects. Many municipalities in the State of Rhode Island have been performing an increased number of infrastructure upgrades and replacements. There have been an increased number of state/city/town projects in public ways, including bridge replacements and the installation of new subsurface utilities (i.e., water, sewer and drainage lines) that require the Company to cover the cost of gas pipe decontamination and disposal.

Attachment DIV 3-10a

Date	Payee	Invoice Number	Amount	Description of Services
6/12/2013	Clean Harbors	1000026916	\$ 2,605.78	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
6/3/2014	Clean Harbors	1000477109	\$ (860.75)	Transport and decontamination of pipe from Prov-Melrose Service Center
3/25/2015	Clean Harbors	1000868432	\$ 565.95	Transport and decontamination of pipe from North Kingstown Service Center
3/25/2015	Clean Harbors	1000868435	\$ 518.10	Transport and decontamination of pipe from Middletown Service Center
3/27/2015	Clean Harbors	1000872683	\$ 4,119.50	Transport and decontamination of pipe from Lincoln Service Center
3/31/2015	Clean Harbors	1000876028	\$ 284.63	Transport and decontamination of pipe from Lincoln Service Center
3/31/2015	Clean Harbors	1000876033	\$ 2,784.38	Transport and decontamination of pipe from Prov-Melrose Service Center
4/3/2015	Clean Harbors	1000882068	\$ 3,580.78	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
4/9/2015	Clean Harbors	1000890260	\$ 3,736.98	Transport and decontamination of pipe from Prov-Dexter St. Service Center
4/9/2015	Clean Harbors	1000890263	\$ 607.20	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
4/23/2015	Clean Harbors	1000904439	\$ 565.95	Transport and decontamination of pipe from North Kingstown Service Center
4/23/2015	Clean Harbors	1000904462	\$ 518.10	Transport and decontamination of pipe from Middletown Service Center
4/23/2015	Clean Harbors	1000904546	\$ 3,487.28	Transport and decontamination of pipe from Lincoln Service Center
4/28/2015	Clean Harbors	1000909985	\$ 4,251.23	Transport and decontamination of pipe from Prov-Melrose Service Center
5/1/2015	Clean Harbors	1000915373	\$ 4,897.48	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
5/13/2015	Clean Harbors	1000931320	\$ 2,942.23	Transport and decontamination of pipe from Prov-Dexter St. Service Center
5/21/2015	Clean Harbors	1000939640	\$ 717.20	Transport and decontamination of pipe from North Kingstown Service Center
5/21/2015	Clean Harbors	1000939645	\$ 653.40	Transport and decontamination of pipe from Middletown Service Center
5/26/2015	Clean Harbors	1000943363	\$ 3,350.88	Transport and decontamination of pipe from Prov-Melrose Service Center
5/27/2015	Clean Harbors	1000944139	\$ 2,689.23	Transport and decontamination of pipe from Lincoln Service Center
6/3/2015	Clean Harbors	1000954437	\$ 7,601.64	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
6/3/2015	Clean Harbors	1000955980	\$ 2,314.95	Transport and decontamination of pipe from Prov-Dexter St. Service Center
6/3/2015	Clean Harbors	1000955983	\$ 2,497.28	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
6/22/2015	Clean Harbors	1000977814	\$ 2,844.99	Transport and decontamination of pipe from Lincoln Service Center
6/22/2015	Clean Harbors	1000977822	\$ 912.38	Transport and decontamination of pipe from Middletown Service Center
6/23/2015	Clean Harbors	1000979211	\$ 988.63	Transport and decontamination of pipe from North Kingstown Service Center
6/26/2015	Clean Harbors	1000984300	\$ 2,905.90	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
6/29/2015	Clean Harbors	1000986289	\$ 2,400.25	Transport and decontamination of pipe from Prov-Dexter St. Service Center
7/2/2015	Clean Harbors	1000991625	\$ 5,023.21	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
7/6/2015	Clean Harbors	1000995166	\$ 2,792.50	Transport and decontamination of pipe from Prov-Melrose Service Center
7/22/2015	Clean Harbors	1001015895	\$ 684.29	Transport and decontamination of pipe from Middletown Service Center
7/22/2015	Clean Harbors	1001015896	\$ 760.54	Transport and decontamination of pipe from North Kingstown Service Center
7/22/2015	Clean Harbors	1001015897	\$ 2,675.86	Transport and decontamination of pipe from Prov-Melrose Service Center
7/22/2015	Clean Harbors	1001015901	\$ 2,503.93	Transport and decontamination of pipe from Lincoln Service Center
7/22/2015	Clean Harbors	1001015912	\$ 2,205.68	Transport and decontamination of pipe from Prov-Dexter St. Service Center
7/24/2015	Clean Harbors	1001018714	\$ 3,758.56	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
7/29/2015	Clean Harbors	1001024293	\$ 2,858.38	Transport and decontamination of pipe from Prov-Dexter St. Service Center
8/11/2015	Clean Harbors	1001042570	\$ 2,713.88	Transport and decontamination of pipe from Lincoln Service Center
8/13/2015	Clean Harbors	1001045829	\$ 760.54	Transport and decontamination of pipe from North Kingstown Service Center
8/13/2015	Clean Harbors	1001045831	\$ 684.29	Transport and decontamination of pipe from Middletown Service Center
8/24/2015	Clean Harbors	1001055397	\$ 2,805.68	Transport and decontamination of pipe from Prov-Melrose Service Center
8/24/2015	Clean Harbors	1001055399	\$ 2,938.09	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
8/25/2015	Clean Harbors	1001058481	\$ 5,146.66	Transport and decontamination of pipe from Warwick Service Center
9/1/2015	Clean Harbors	1001067997	\$ 2,403.70	Transport and decontamination of pipe from Prov-Dexter St. Service Center
9/9/2015	Clean Harbors	1001080288	\$ 760.54	Transport and decontamination of pipe from North Kingstown Service Center
9/9/2015	Clean Harbors	1001080294	\$ 684.29	Transport and decontamination of pipe from Middletown Service Center
9/16/2015	Clean Harbors	1001087863	\$ 4,635.20	Transport and decontamination of pipe from Prov-Melrose Service Center
9/22/2015	Clean Harbors	1001094077	\$ 4,397.81	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
9/23/2015	Clean Harbors	1001095757	\$ 4,549.45	Transport and decontamination of pipe from Prov-Dexter St. Service Center
9/24/2015	Clean Harbors	1001097213	\$ 3,582.63	Transport and decontamination of pipe from Lincoln Service Center
10/2/2015	Clean Harbors	1001108859	\$ 760.54	Transport and decontamination of pipe from North Kingstown Service Center

\*Transfer in March 2016

\*Transfer in June 2015

\*Transferred out in April 2016, therefore reversal is in FY17

10/6/2015	Clean Harbors	1001112560	\$ 2,587.09	Transport and decontamination of pipe from Lincoln Service Center
10/9/2015	Clean Harbors	1001119557	\$ 1,667.79	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
10/13/2015	Clean Harbors	1001121053	\$ 3,800.14	Transport and decontamination of pipe from Prov-Melrose Service Center
10/16/2015	Clean Harbors	1001125263	\$ 2,678.56	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
10/30/2015	Clean Harbors	1001141609	\$ 4,379.02	Transport and decontamination of pipe from Prov-Dexter St. Service Center
11/3/2015	Clean Harbors	1001146944	\$ 1,703.43	Transport and decontamination of pipe from Lincoln Service Center
11/3/2015	Clean Harbors	1001146948	\$ 684.29	Transport and decontamination of pipe from Middletown Service Center
11/3/2015	Clean Harbors	1001146945	\$ 760.54	Transport and decontamination of pipe from North Kingstown Service Center
11/12/2015	Clean Harbors	1001159296	\$ 1,140.26	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
11/16/2015	Clean Harbors	1001162995	\$ 2,466.88	Transport and decontamination of pipe from Prov-Dexter St. Service Center
11/18/2015	Clean Harbors	1001165469	\$ 4,708.53	Transport and decontamination of pipe from Prov-Melrose Service Center
11/23/2015	Clean Harbors	1001170307	\$ 760.54	Transport and decontamination of pipe from North Kingstown Service Center
11/23/2015	Clean Harbors	1001170303	\$ 684.29	Transport and decontamination of pipe from Middletown Service Center
11/23/2015	Clean Harbors	1001170882	\$ 2,627.91	Transport and decontamination of pipe from Lincoln Service Center
12/2/2015	Clean Harbors	1001180906	\$ 3,921.32	Transport and decontamination of pipe from Prov-Melrose Service Center
12/9/2015	Clean Harbors	1001192661	\$ 3,302.05	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
12/14/2015	Clean Harbors	1001195924	\$ 2,445.28	Transport and decontamination of pipe from Prov-Dexter St. Service Center
1/5/2016	Clean Harbors	1001216689	\$ 3,041.33	Transport and decontamination of pipe from Prov-Melrose Service Center
1/5/2016	Clean Harbors	1001216693	\$ 2,942.84	Transport and decontamination of pipe from Lincoln Service Center
1/5/2016	Clean Harbors	1001216705	\$ 684.29	Transport and decontamination of pipe from Middletown Service Center
1/5/2016	Clean Harbors	1001216707	\$ 857.74	Transport and decontamination of pipe from North Kingstown Service Center
1/11/2016	Clean Harbors	1001226166	\$ 4,264.22	Transport and decontamination of pipe from Prov-Dexter St. Service Center
1/18/2016	Clean Harbors	1001233236	\$ 4,155.03	Transport and decontamination of pipe from Lincoln Service Center
1/18/2016	Clean Harbors	1001233298	\$ 562.90	Transport and decontamination of pipe from North Kingstown Service Center
1/18/2016	Clean Harbors	1001233300	\$ 476.93	Transport and decontamination of pipe from Middletown Service Center
1/20/2016	Clean Harbors	1001236601	\$ 2,481.79	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
1/27/2016	Clean Harbors	1001243870	\$ 4,308.28	Transport and decontamination of pipe from Prov-Melrose Service Center
1/28/2016	Clean Harbors	1001244770	\$ 3,427.76	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
1/29/2016	Clean Harbors	1001246139	\$ 4,264.87	Transport and decontamination of pipe from Prov-Dexter St. Service Center
2/15/2016	Clean Harbors	1001267070	\$ 760.54	Transport and decontamination of pipe from North Kingstown Service Center
2/16/2016	Clean Harbors	1001267378	\$ 684.29	Transport and decontamination of pipe from Middletown Service Center
2/16/2016	Clean Harbors	1001267541	\$ 4,591.03	Transport and decontamination of pipe from Lincoln Service Center
2/18/2016	Clean Harbors	1001270594	\$ 2,694.76	Transport and decontamination of pipe from Prov-Melrose Service Center
2/23/2016	Clean Harbors	1001274427	\$ 2,895.86	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
2/24/2016	Clean Harbors	1001276241	\$ 2,074.30	Transport and decontamination of pipe from Prov-Dexter St. Service Center
2/25/2016	Clean Harbors	1001277986	\$ 2,379.29	Transport and decontamination of pipe from Prov-Melrose Service Center
<b>Total</b>			<b>\$ 212,433.77</b>	



Division 3-11

Request:

Re: the "Cost Breakdown by Category" for the PCB Regulated Pipe Abandonment project, please provide full supporting detail for the "Construction/Disposal/ Removal Costs" shown including separate itemization of costs of each construction, disposal, and removal activity.

Response:

Please see the Company's response to Division 3-10.

Division 3-12

Request:

Re: the Thames & Wellington project, please:

- a. Describe the purpose of each referenced facility upgrade and provide a detailed breakdown of the costs associated with those referenced upgrades;
- b. Describe the purpose of each referenced utility upgrade and provide a detailed breakdown of the costs associated with those referenced upgrades;
- c. Provide copies of the referenced "monthly status reports" provided to RIDEM and detail the costs incurred for preparation of those reports;
- d. Provide full supporting detail for the "Consulting Costs" shown in the "Cost Breakdown by Category," including separate itemization of costs of each consulting activity;
- e. Provide full supporting detail for the "Construction/Disposal/ Removal Costs" shown in the "Cost Breakdown by Category," including separate itemization of costs of each construction, disposal, and removal activity;
- f. Provide supporting detail for the "Property Purchases/Settlements/Legal costs for associated with the Thames & Wellington project for the reporting period;
- g. Provide supporting detail for costs associated with the City of Newport's Microtrainer facility.

Response:

- a. One minor facility project was performed at the Thames and Wellington Site during the reporting period: installation of protective bollards at the Thames Street entrance to the Wellington Condominiums. The costs within this reporting period related to the above project were for environmental support during the project implementation. The environmental support costs are considered an environmental remediation expense because of the presence of manufactured gas plant (MGP)-impacted soil and groundwater within the project area. Costs incurred for the oversight and documentation of the work (GZA, \$762.64) and disposal of excess soil from the work (Clean Harbors, \$949.51) totaled \$1,712.15.

Division 3-12, page 2

- b. One utility upgrade project was supported at the Thames and Wellington Site during the reporting period: planning support for the proposed City of Newport Microstrainer

Facility/Sewer Force Main Project. All costs within this reporting period related to the above project were for project planning and field observations of test borings, which a contractor for the City of Newport completed. The environmental support costs are considered an environmental remediation expense because of the presence of manufactured gas plant (MGP)-impacted soil and groundwater within the area of the project. Costs incurred for the planning support of the activities were \$28,569.25.

- c. Copies of the monthly status reports are included as Attachment DIV 3-12c and include status reports covering the months of February 2015 through February 2016. Costs incurred for the preparation and submittal of the reports for this reporting period totaled \$4,523.71.
- d. For the reporting period, "Consulting Costs" (GZA) totaled \$54,037.32 for the reporting period and included:
- \$5,638.87 for meetings/conference calls;
  - \$5,908.91 for routine Site monitoring, including non-aqueous phase liquid (NAPL) gauging and recovery, annual groundwater monitoring and inspection of the engineered cap;
  - \$199.63 Remedial Alternative Evaluation;
  - \$4,523.71 for monthly reporting to RIDEM;
  - \$762.64 for environmental support for the protective bollard installation; \$28,569.25 for environmental support for City of Newport Sewer Force Main upgrade; and
  - \$8,434.31 for consulting services related to legal support.
- e. For the reporting period, "Construction/Disposal/ Removal Costs" (Clean Harbors) totaled \$2,523.35 for the transport and disposal of drums related to test borings completed in support of the City of Newport sewer upgrade and the minor facility project at the Thames and Wellington Site. Contractor costs (New England Boring Contractors) totaled \$1,785, which represents the environmental support costs related to test borings completed for the City of Newport Sewer force main upgrade. The City of Newport paid the drilling costs and the Company paid for the incremental environmental costs associated with the management of MGP-impacted material.

Division 3-12, page 3

- f. No property purchases or settlements were made during the reporting period. Legal fees in the amount of \$49,991.26 were paid to Hinckley Allen LLP during the 12 months ending March 31, 2016.
- g. All consulting costs within the reporting period related to the City of Newport Microstrainer Facility/Sewer Force Main Project were associated with project planning and field observations of test borings, which a contractor for the City of Newport completed. GZA costs incurred for the planning support of the activities was \$28,569.25. Contractor environmental support costs totaled \$3,358.84 (\$1,785 for New England Boring Contractors for incremental environmental costs related to drilling and \$1,573.84 for Clean Harbors transport and disposal of drums related to the drilling). The environmental support costs are considered an environmental remediation expense due to the presence of MGP-impacted soil and groundwater within the project area.

## MEMO

**TO:** Joseph Martella- RIDEM

**FROM:** Meg Kilpatrick – GZA  
Jim Clark - GZA

**CC:** Amy Willoughby – National Grid (*sent via email*)  
Kathy Anderson – Wellington (*sent via email*)

**DATE:** February 5, 2015

**FILE NO.:** 03.0033327.00-C

**RE:** Monthly Status Report – January 1 through January 31, 2015  
Former Providence Gas Co. Manufactured Gas Plant  
Wellington Avenue and Thames Street  
Newport, Rhode Island  
*RIDEM Case No. 2006-055*



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

### *Sent via email*

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The following summarizes response actions completed at the above-referenced property (Site) for the period January 1, 2015 through January 31, 2015 followed by a summary of future work.

#### SITE ACTIVITIES PERFORMED

No on-Site activities were performed by GZA during the period January 1, 2015 to January 31, 2015.

#### FUTURE WORK/SCHEDULE

GZA is preparing an *Annual Monitoring Report* which summarizes the results of monitoring and inspection activities performed in 2013. We currently anticipate this report will be submitted to RIDEM in early 2015. GZA also anticipates performing Site-wide groundwater elevation monitoring, Site-wide non-aqueous phase liquid (NAPL) gauging and Site outfall evaluations in April 2015.

We trust that this information meets your needs. Please feel free call me at 401-427-2719 or Amy Willoughby at 781-907-3644 if you have any questions.

## MEMO

**TO:** Joseph Martella- RIDEM

**FROM:** Meg Kilpatrick – GZA  
Jim Clark - GZA

**CC:** Amy Willoughby – National Grid (*sent via email*)  
Kathy Anderson – Wellington (*sent via email*)

**DATE:** March 12, 2015

**FILE NO.:** 03.0033327.00-C

**RE:** Monthly Status Report – February 1 through February 28, 2015  
Former Providence Gas Co. Manufactured Gas Plant  
Wellington Avenue and Thames Street  
Newport, Rhode Island  
*RIDEM Case No. 2006-055*



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

### *Sent via email*

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Response actions completed at the above-referenced property (Site) for the period February 1, 2015 through February 28, 2015 are described below, followed by a summary of anticipated future work.

#### SITE ACTIVITIES PERFORMED

No on-Site activities were performed by GZA during the period February 1, 2015 to February 28, 2015.

#### FUTURE WORK/SCHEDULE

GZA is preparing an *Annual Monitoring Report* which summarizes the results of monitoring and inspection activities performed in 2013. We currently anticipate this report will be submitted to RIDEM in early/mid 2015. GZA also anticipates performing Site-wide groundwater elevation monitoring, Site-wide non-aqueous phase liquid (NAPL) gauging and Site outfall evaluations in April 2015.

We trust that this information meets your needs. Please feel free call me at 401-427-2719 or Amy Willoughby at 781-907-3644 if you have any questions.

## MEMO

**TO:** Joseph Martella- RIDEM

**FROM:** Meg Kilpatrick – GZA  
Jim Clark - GZA

**CC:** Amy Willoughby – National Grid (*sent via email*)  
Kathy Anderson – Wellington (*sent via email*)

**DATE:** April 7, 2015

**FILE NO.:** 03.0033327.00-C

**RE:** Monthly Status Report – March 1 through March 31, 2015  
Former Providence Gas Co. Manufactured Gas Plant  
Wellington Avenue and Thames Street  
Newport, Rhode Island  
*RIDEM Case No. 2006-055*



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

### *Sent via email*

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Response actions completed at the above-referenced property (Site) for the period March 1, 2015 through March 31, 2015 are described below, followed by a summary of anticipated future work.

#### SITE ACTIVITIES PERFORMED

No on-Site activities were performed by GZA during the period March 1, 2015 to March 31, 2015.

#### FUTURE WORK/SCHEDULE

GZA is preparing an *Annual Monitoring Report* which summarizes the results of monitoring and inspection activities performed in 2013. We currently anticipate this report will be submitted to RIDEM in mid-2015. GZA also anticipates performing Site-wide groundwater elevation monitoring, Site-wide non-aqueous phase liquid (NAPL) gauging and Site outfall evaluations in April/May 2015.

We trust that this information meets your needs. Please feel free call me at 401-427-2719 or Amy Willoughby at 781-907-3644 if you have any questions.

## MEMO

**TO:** Joseph Martella- RIDEM

**FROM:** Meg Kilpatrick – GZA  
Jim Clark - GZA

**CC:** Amy Willoughby – National Grid (*sent via email*)  
Kathy Anderson – Wellington (*sent via email*)

**DATE:** May 7, 2015

**FILE NO.:** 03.0033327.00-C

**RE:** Monthly Status Report – April 1 through April 30, 2015  
Former Providence Gas Co. Manufactured Gas Plant  
Wellington Avenue and Thames Street  
Newport, Rhode Island  
*RIDEM Case No. 2006-055*



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

### *Sent via email*

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Response actions completed at the above-referenced property (Site) for the period April 1, 2015 through April 30, 2015 are described below, followed by a summary of anticipated future work.

### SITE ACTIVITIES PERFORMED

On April 17, 2015, GZA was onsite to observe the property owner's excavation of two, approximately 8-inch diameter, 2 foot deep post holes adjacent to the Wellington Condominium Thames Street entrance. Excavation spoils were placed into a 55-gallon drum and disposed at a National Grid-approved facility.

No other on-Site activities were performed by GZA during the period April 1, 2015 to April 30, 2015.

### FUTURE WORK/SCHEDULE

GZA is preparing an *Annual Monitoring Report* which summarizes the results of monitoring and inspection activities performed in 2013. We currently anticipate this report will be submitted to RIDEM in mid-2015. GZA also anticipates performing Site-wide groundwater elevation monitoring, Site-wide non-aqueous phase liquid (NAPL) gauging and Site outfall evaluations in May/June 2015.

We trust that this information meets your needs. Please feel free call me at 401-427-2719 or Amy Willoughby at 781-907-3644 if you have any questions.



## MEMO

**TO:** Joseph Martella- RIDEM

**FROM:** Meg Kilpatrick – GZA  
Jim Clark - GZA

**CC:** Amy Willoughby – National Grid (*sent via email*)  
Kathy Anderson – Wellington (*sent via email*)

**DATE:** June 24, 2015

**FILE NO.:** 03.0033327.00-C

**RE:** Monthly Status Report – May 1 through May 31, 2015  
Former Providence Gas Co. Manufactured Gas Plant  
Wellington Avenue and Thames Street  
Newport, Rhode Island  
*RIDEM Case No. 2006-055*



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

### *Sent via email*

---

Response actions completed at the above-referenced property (Site) for the period May 1, 2015 through May 31, 2015 are described below, followed by a summary of anticipated future work.

### SITE ACTIVITIES PERFORMED

On May 27 and 28, 2015, New England Boring (NEB) performed two soil borings (identified as LBG-1 and LBG-2) using hollow-stem auger drilling techniques, within Wellington Avenue adjacent to the Site, on behalf of the City of Newport (the City), to support the City's planned sewer line upgrade project. The Louis Berger Group (LBG) provided oversight on behalf of the City. Boring locations are shown on the attached field sketch and the borings were advanced to approximately 20 feet below ground surface (bgs). GZA was on-Site to observe the work on behalf of National Grid and ensure proper management of any materials exhibiting former MGP residuals during drilling. The area around each boring was lined with polyethylene sheeting to contain any impacts.

Consistent with previous explorations and observations made during construction activities in Wellington Avenue, no MGP impacted materials were observed in boring LBG-2 located adjacent to the southeastern portion of the Newport Site. Soil cuttings from this boring were used as borehole backfill. MGP impacts (coal tar) were observed in boring LBG-1, located proximate to the southwestern portion of the Newport Site. Consistent with previous observations in this area, impacts consisted of a strong odor from 0-2 feet bgs, coal tar coated soil with a slight odor from 5 to 7 feet bgs and coal tar stained soil with a slight odor from 7 to 15 feet bgs. Boring logs prepared by GZA for LBG-1 and LBG-2 are attached.



Soil cuttings from LBG-1 were placed into a 55-gallon drum and disposed at a National Grid-approved facility and the borehole was subsequently backfilled with sand. Prior to demobilizing from the Site, NEB constructed a polyethylene lined decontamination area on the Microstrainer facility and the drilling tools were decontaminated withalconox and clean water. Decontamination water and decontamination material (polyethylene sheeting, etc.) was transferred into a 55-gallon drum and disposed at a National Grid-approved facility.

No other on-Site activities were performed by GZA during the period May 1, 2015 to May 31, 2015.

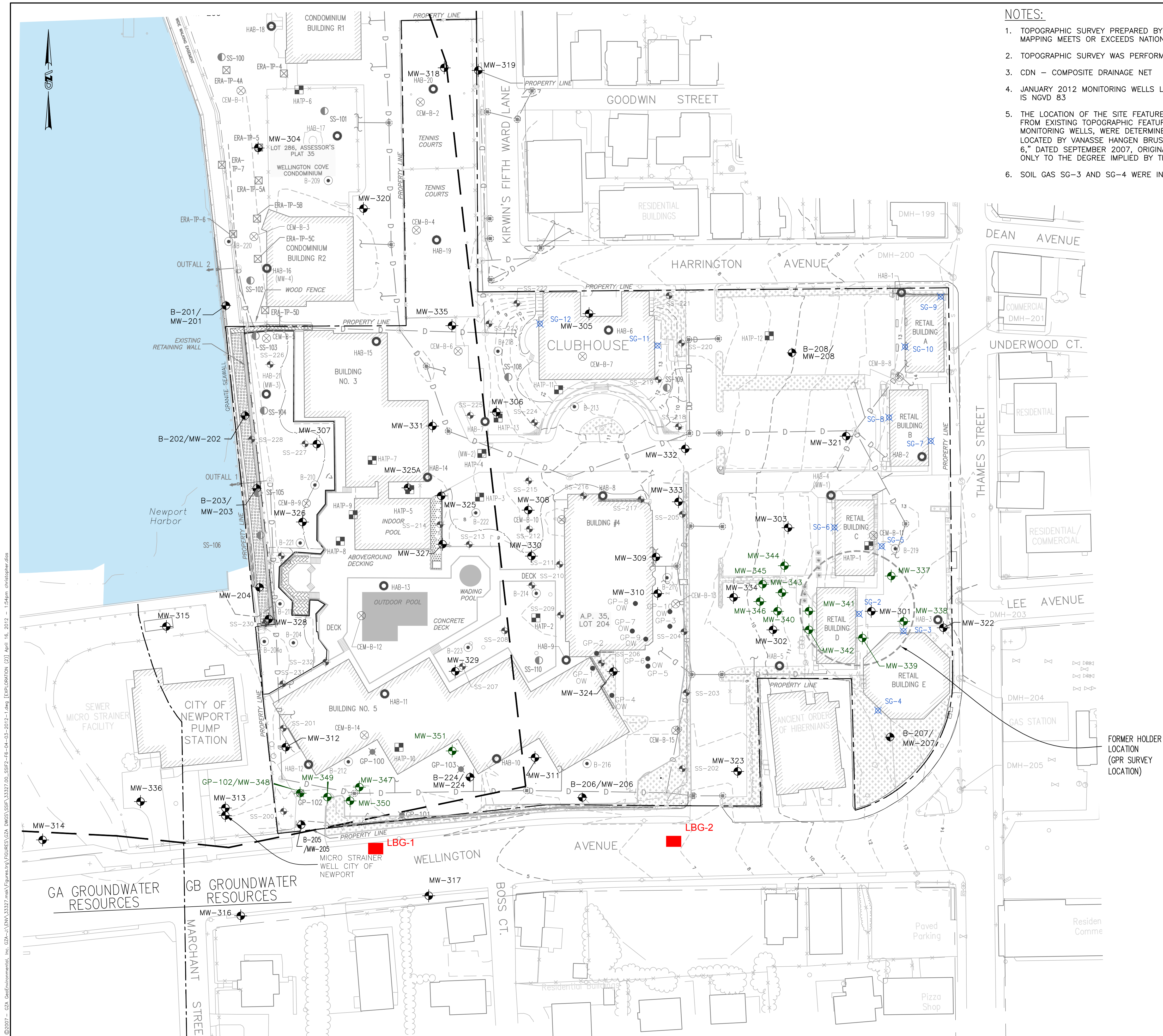
#### FUTURE WORK/SCHEDULE

GZA is preparing an *Annual Monitoring Report* which summarizes the results of monitoring and inspection activities performed in 2013. We currently anticipate this report will be submitted to RIDEM in mid-2015. GZA also anticipates performing Site-wide groundwater elevation monitoring, Site-wide non-aqueous phase liquid (NAPL) gauging and Site outfall evaluations in June/July 2015.

We trust that this information meets your needs. Please feel free call me at 401-427-2719 or Amy Willoughby at 781-907-3644 if you have any questions.

Attachments: Field Sketch  
Boring Logs





- NOTES:
1. TOPOGRAPHIC SURVEY PREPARED BY COL EAST, INC. PO BOX 347, NORTH ADAMS, MA 01247 IS FROM PHOTOGRAPHY. MAPPING MEETS OR EXCEEDS NATIONAL MAP ACCURACY STANDARDS. DATUM IS NGVD-1983 NAD-1988
  2. TOPOGRAPHIC SURVEY WAS PERFORMED BY T FORD COMPANY, INC. DURING MAY 2011.
  3. CDN - COMPOSITE DRAINAGE NET
  4. JANUARY 2012 MONITORING WELLS LOCATED BY GZA GEOENVIRONMENTAL INC. USING RTK GPS SURVEY EQUIPMENT. DATUM IS NGVD 83
  5. THE LOCATION OF THE SITE FEATURES AND GZA SOIL EXPLORATIONS, WERE APPROXIMATELY DETERMINED BY LINE OF SIGHT, FROM EXISTING TOPOGRAPHIC FEATURES AND PHOTOGRAMMETRIC METHOD IMAGE OVERLAY. LOCATION OF THE GZA MONITORING WELLS, WERE DETERMINED BY SURVEY USING A TOTAL STATION. ALL OTHER BORING AND TESTING WERE LOCATED BY VANASSE HANGEN BRUSTLIN, INC., AND WERE TRANSFERRED TO GZA BY AUTOCAD DRAWING ENTITLED "FIGURE 6," DATED SEPTEMBER 2007, ORIGINAL SCALE 1"=40', DRAWING NO. 6. THESE DATA SHOULD BE CONSIDERED ACCURATE ONLY TO THE DEGREE IMPLIED BY THE METHOD USED.
  6. SOIL GAS SG-3 AND SG-4 WERE INSTALLED AS TEMPORARY SOIL GAS PROBES ON FEBRUARY 10, 2012.

**LEGEND**


- NEWLY INSTALLED VINYL FENCING
- SUBJECT SITE PROPERTY LINE (APPROXIMATE)
- EXISTING CONTOURS
- LIGHT POLE
- GZA MONITORING WELL LOCATION, INSTALLED BETWEEN JANUARY 3 AND 13, 2012
- GZA SURFACE SOIL LOCATION COMPLETED BETWEEN JULY 24 AND 25, 2008
- GZA SOIL GAS PROBE LOCATION SAMPLED ON FEBRUARY 13, 2012 AND FEBRUARY 13, 2012
- GZA GEOPROBE BORING LOCATION PERFORMED JANUARY 3, 2012
- GZA MONITORING WELL LOCATION INSTALLED BETWEEN APRIL 21, 2008 AND JULY, 25 2008
- VHB BORING LOCATION
- VHB BORING/MONITORING LOCATION
- VHB SURFACE SOIL LOCATION
- CEM SAMPLE LOCATION
- HALEY & ALDRICH TEST PIT LOCATION
- HALEY & ALDRICH BORING LOCATION
- ERA TEST PIT LOCATION
- GEOPROBE LOCATION MAY, 2009
- OW INDICATES OBSERVATION WELL INSTALLED
- 200 FOOT CRMC LIMIT LINE
- EXISTING CATCH BASIN
- DRAINAGE MANHOLE
- SEWER MANHOLE
- UTILITY MANHOLE
- DRAINAGE PIPE
- SEWER PIPE


REMEDIAL ALTERNATIVE EVALUATION		EXPLORATION LOCATION PLAN	
WELLINGTON & THAMES FMGP NEWPORT, RHODE ISLAND		PROJECT NO. 33327.00	
FIGURE NO. 2		DATE MAR. 2012	
PROJ. MGR.	TRG	DESIGNED BY: RAC	DATE
REVIEWED BY: JC	OPERATOR: CRD		
GZA GeoEnvironmental, Inc. Engineers and Scientists 530 BROADWAY PROVIDENCE, RHODE ISLAND 02909 (401) 421-4140 (401) 751-8613		REV. NO.	DESCRIPTION
		BY	DATE

THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY NATIONAL GRID OR THE NATIONAL GRID'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA AND NATIONAL GRID. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA AND NATIONAL GRID, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA AND NATIONAL GRID.



### TEST BORING LOG

 <b>GZA</b> <b>GeoEnvironmental, Inc.</b> <i>Engineers and Scientists</i>		<b>National Grid</b> <b>Wellington MGP</b> <b>Newport, Rhode Island</b>		<b>EXPLORATION NO.:</b> LGB-1 <b>SHEET:</b> 1 of 2 <b>PROJECT NO:</b> 33327 <b>REVIEWED BY:</b>									
<b>Logged By:</b> Ryan DaPonte <b>Drilling Co.:</b> New England Boring <b>Foreman:</b> Norm		<b>Type of Rig:</b> Truck <b>Rig Model:</b> D70 <b>Drilling Method:</b> SA	<b>Boring Location:</b> See Plan <b>Ground Surface Elev. (ft.):</b> <b>Final Boring Depth (ft.):</b> 21 <b>Date Start - Finish:</b> 5/27/2015 - 5/27/2015		<b>H. Datum:</b> <b>V. Datum:</b>								
<b>Hammer Type:</b> Safety Hammer <b>Hammer Weight (lb.):</b> 140 <b>Hammer Fall (in.):</b> 30 <b>Auger or Casing O.D./I.D Dia (in.):</b>		<b>Sampler Type:</b> SS <b>Sampler O.D. (in.):</b> 2.0 <b>Sampler Length (in.):</b> 24 <b>Rock Core Size:</b>		<b>Groundwater Depth (ft.)</b> <table border="1"> <tr> <th>Date</th> <th>Time</th> <th>Water Depth</th> <th>Stab. Time</th> </tr> <tr> <td>5/27/15</td> <td></td> <td>11</td> <td></td> </tr> </table>		Date	Time	Water Depth	Stab. Time	5/27/15		11	
Date	Time	Water Depth	Stab. Time										
5/27/15		11											
Depth (ft)	Casing Blows/ Core Rate	Sample						Sample Description and Identification (Modified Burmister Procedure)	Remark	Field Test Data	Depth (ft.)	Stratum Description	Elev. (ft.)
		No.	Depth (ft.)	Pen. (in)	Rec. (in)	Blows (per 6 in.)	SPT Value						
1		S-1	0-2	24	14	19 8 7 6	15	S-1 : Brown fine to coarse SAND, some fineto coarse Gravel, little Silt, strong coal tar odor, Fill	1			FILL	
2													
3													
4													
5		S-2	5-7	24	20	5 1 8 12	9	S-2 : Loose, gray medium to fine SAND, some Silt, trace Gravel, coal tar impacted (coated), slight coal tar odor			5		
6													
7		S-3	7-9	24	22	13 17 12 13	29	S-3 : Medium dense, gray medium to fine SAND, some Silt, trace Gravel, coal tar stained, slight coal tar odor				SAND AND SILT	
8													
9		S-4	9-11	24	19	12 13 9 9	22	S-4 : Medium dense, gray medium to fine SAND, some Silt, trace Gravel, coal tar stained, slight coal tar odor					
10													
11		S-5	11-13	24	22	1 10 11 18	21	S-5 : Medium dense, gray medium to fine SAND, some Silt, trace Gravel, coal tar stained, slight coal tar odor, wet					
12													
13		S-6	13-15	24	8	7 11 24 15	35	S-6 : Very dense, gray medium to fine SAND, some Silt, trace Gravel, coal tar stained, slight coal tar odor, wet					
14													
15													
<b>REMARKS</b> 1 - Borings were conducted on behalf of the City of Newport and directed by the Louis Berger Group. GZA was on-Site for observation only, on behalf of National Grid.													
See Log Key for explanation of sample description and identification procedures. Stratification lines represent approximate boundaries between soil and bedrock types. Actual transitions may be gradual. Water level readings have been made at the times and under the conditions stated. Fluctuations of groundwater may occur due to other factors than those present at the times the measurements were made.											<b>Exploration No.:</b> <b>LGB-1</b>		

TEST BORING LOG															
 <b>GZA</b> <b>GeoEnvironmental, Inc.</b> <i>Engineers and Scientists</i>						<b>National Grid</b> <b>Wellington MGP</b> <b>Newport, Rhode Island</b>				<b>EXPLORATION NO.:</b> LGB-1 <b>SHEET:</b> 2 of 2 <b>PROJECT NO:</b> 33327 <b>REVIEWED BY:</b>					
<b>Logged By:</b> Ryan DaPonte <b>Drilling Co.:</b> New England Boring <b>Foreman:</b> Norm						<b>Type of Rig:</b> Truck <b>Rig Model:</b> D70 <b>Drilling Method:</b> SA		<b>Boring Location:</b> See Plan <b>Ground Surface Elev. (ft.):</b> <b>Final Boring Depth (ft.):</b> 21 <b>Date Start - Finish:</b> 5/27/2015 - 5/27/2015			<b>H. Datum:</b> <b>V. Datum:</b>				
<b>Hammer Type:</b> Safety Hammer <b>Hammer Weight (lb.):</b> 140 <b>Hammer Fall (in.):</b> 30 <b>Auger or Casing O.D./I.D Dia (in.):</b>						<b>Sampler Type:</b> SS <b>Sampler O.D. (in.):</b> 2.0 <b>Sampler Length (in.):</b> 24 <b>Rock Core Size:</b>		Groundwater Depth (ft.)							
								Date		Time		Water Depth		Stab. Time	
								5/27/15				11			
Depth (ft)	Casing Blows/ Core Rate	Sample No.	Depth (ft.)	Pen. (in)	Rec. (in)	Blows (per 6 in.)	SPT Value	Sample Description and Identification (Modified Burmister Procedure)			Remark	Field Test Data	Depth (ft.)	Stratum Description	Elev. (ft.)
16		S-7	15-17	24	5	5 7 11 12	18	S-7 : WEATHERED BEDROCK						WEATHERED ROCK	
17		S-8	17-19	24	12	8 14 16 11	30	S-8 : Very dense, gray medium to fine SAND, some Silt, trace Gravel, wet					17		
18															
19		S-9	19-21	24		8 11 20 11	31	S-9 : Very dense, gray medium to fine SAND, some Silt, trace Gravel, wet						SAND AND SILT	
20															
21								End of exploration at 21 feet.					21		
22															
23															
24															
25															
26															
27															
28															
29															
30															
<b>REMARKS</b>															
See Log Key for explanation of sample description and identification procedures. Stratification lines represent approximate boundaries between soil and bedrock types. Actual transitions may be gradual. Water level readings have been made at the times and under the conditions stated. Fluctuations of groundwater may occur due to other factors than those present at the times the measurements were made.												<b>Exploration No.:</b> <b>LGB-1</b>			

### TEST BORING LOG

<b>GZA</b> <b>GeoEnvironmental, Inc.</b> <i>Engineers and Scientists</i>		<b>National Grid</b> <b>Wellington MGP</b> <b>Newport, Rhode Island</b>		<b>EXPLORATION NO.:</b> LGB-2 <b>SHEET:</b> 1 of 2 <b>PROJECT NO:</b> 33327 <b>REVIEWED BY:</b>											
<b>Logged By:</b> Ryan DaPonte <b>Drilling Co.:</b> New England Boring <b>Foreman:</b> Norm		<b>Type of Rig:</b> Truck <b>Rig Model:</b> D70 <b>Drilling Method:</b> SA	<b>Boring Location:</b> See Plan <b>Ground Surface Elev. (ft.):</b> <b>Final Boring Depth (ft.):</b> 21 <b>Date Start - Finish:</b> 5/27/2015 - 5/27/2015		<b>H. Datum:</b> <b>V. Datum:</b>										
<b>Hammer Type:</b> Safety Hammer <b>Hammer Weight (lb.):</b> 140 <b>Hammer Fall (in.):</b> 30 <b>Auger or Casing O.D./I.D Dia (in.):</b>		<b>Sampler Type:</b> SS <b>Sampler O.D. (in.):</b> 2.0 <b>Sampler Length (in.):</b> 24 <b>Rock Core Size:</b>	<b>Groundwater Depth (ft.)</b>												
			<b>Date</b>	<b>Time</b>	<b>Water Depth</b>	<b>Stab. Time</b>									
			5/27/15		7										
Depth (ft)	Casing Blows/ Core Rate	Sample No.	Depth (ft.)	Pen. (in)	Rec. (in)	Blows (per 6 in.)	SPT Value	Sample Description and Identification (Modified Burmister Procedure)	Remark	Field Test Data	Depth (ft.)	Stratum Description	Elev. (ft.)		
1		S-1	0-2	24	18	11 5 5 4	10	S-1 : (0-12") Brown, fine to coarse SAND and fine to coarse Gravel, little Silt, Fill (12"-24") Brown fine to coarse SAND and fine to coarse Gravel, trace Silt, (imported fill)	1		FILL				
2															
3															
4															
5		S-2	5-7	24	16	20 10 10 12	20			S-2 : Gray medium to fine SAND, some Silt, little fine to coarse Gravel, moist			5	SILT	
6															
7		S-3	7-9	24	16	6 15 18 23	33	S-3 : Gray medium to fine SAND, some Silt, little fine to coarse Gravel, wet			WEATHERED BEDROCK/SILT				
8															
9		S-4	9-11	24	10	23 24 28 36	52	S-4 : Gray medium to fine SAND, some Silt, little fine to coarse Gravel, wet		9					
10															
11		S-5	11-13	24	12	26 36 30 29	66	S-5 : Gray medium to fine SAND, some Silt, little fine to coarse Gravel, wet			WEATHERED BEDROCK/SILT				
12															
13		S-6	13-15	18	12	13 63 100	R	S-6 : Gray medium to fine SAND, some Silt, little fine to coarse Gravel, wet			WEATHERED BEDROCK/SILT				
14															
15												15			
<b>REMARKS</b>		1 - Borings were conducted on behalf of the City of Newport and directed by the Louis Berger Group. GZA was on-Site for observation only, on behalf of National Grid.													
See Log Key for explanation of sample description and identification procedures. Stratification lines represent approximate boundaries between soil and bedrock types. Actual transitions may be gradual. Water level readings have been made at the times and under the conditions stated. Fluctuations of groundwater may occur due to other factors than those present at the times the measurements were made.										<b>Exploration No.:</b> <b>LGB-2</b>					

### TEST BORING LOG



National Grid  
Wellington MGP  
Newport, Rhode Island

EXPLORATION NO.: LGB-2  
SHEET: 2 of 2  
PROJECT NO: 33327  
REVIEWED BY:

Logged By: Ryan DaPonte  
Drilling Co.: New England Boring  
Foreman: Norm

Type of Rig: Truck  
Rig Model: D70  
Drilling Method:  
SA

Boring Location: See Plan  
Ground Surface Elev. (ft.):  
Final Boring Depth (ft.): 21  
Date Start - Finish: 5/27/2015 - 5/27/2015

H. Datum:  
V. Datum:

Hammer Type: Safety Hammer  
Hammer Weight (lb.): 140  
Hammer Fall (in.): 30  
Auger or Casing O.D./I.D Dia (in.):

Sampler Type: SS  
Sampler O.D. (in.): 2.0  
Sampler Length (in.): 24  
Rock Core Size:

#### Groundwater Depth (ft.)

Date	Time	Water Depth	Stab. Time
5/27/15		7	

Depth (ft)	Casing Blows/ Core Rate	Sample						Sample Description and Identification (Modified Burmister Procedure)	Remark	Field Test Data	Depth (ft.)	Stratum Description	Elev. (ft.)
		No.	Depth (ft.)	Pen. (in)	Rec. (in)	Blows (per 6 in.)	SPT Value						
16													
17		S-7	17-19	17		25 81 100	R	S-7 : Gray medium to fine SAND, some Silt, little fine to coarse Gravel, wet					
18													
19													
20													
21													
22								End of exploration at 21 feet.					
23													
24													
25													
26													
27													
28													
29													
30													

#### REMARKS

See Log Key for explanation of sample description and identification procedures. Stratification lines represent approximate boundaries between soil and bedrock types. Actual transitions may be gradual. Water level readings have been made at the times and under the conditions stated. Fluctuations of groundwater may occur due to other factors than those present at the times the measurements were made.

Exploration No.:  
LGB-2

## MEMO

**TO:** Joseph Martella- RIDEM

**FROM:** Meg Kilpatrick – GZA  
Jim Clark - GZA

**CC:** Amy Willoughby – National Grid (*sent via email*)  
Kathy Anderson – Wellington (*sent via email*)

**DATE:** July 20, 2015

**FILE NO.:** 03.0033327.00-C

**RE:** Monthly Status Report – June 1 through June 30, 2015  
Former Providence Gas Co. Manufactured Gas Plant  
Wellington Avenue and Thames Street  
Newport, Rhode Island  
*RIDEM Case No. 2006-055*



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

### *Sent via email*

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Response actions completed at the above-referenced property (Site) for the period June 1, 2015 through June 30, 2015 are described below, followed by a summary of anticipated future work.

#### SITE ACTIVITIES PERFORMED

No on-Site activities were performed by GZA during the period June 1, 2015 to June 30, 2015.

#### FUTURE WORK/SCHEDULE

GZA is preparing an *Annual Monitoring Report* which summarizes the results of monitoring and inspection activities performed in 2013. We currently anticipate this report will be submitted to RIDEM in mid-2015. GZA also anticipates performing Site-wide groundwater elevation monitoring, Site-wide non-aqueous phase liquid (NAPL) gauging and Site outfall evaluations in August/September 2015.

We trust that this information meets your needs. Please feel free call me at 401-427-2719 or Amy Willoughby at 781-907-3644 if you have any questions.



## MEMO

**TO:** Joseph Martella- RIDEM

**FROM:** Meg Kilpatrick – GZA  
Jim Clark - GZA

**CC:** Amy Willoughby – National Grid (*sent via email*)  
Kathy Anderson – Wellington (*sent via email*)

**DATE:** August 13, 2015

**FILE NO.:** 03.0033327.00-C

**RE:** Monthly Status Report – July 1 through July 31, 2015  
Former Providence Gas Co. Manufactured Gas Plant  
Wellington Avenue and Thames Street  
Newport, Rhode Island  
*RIDEM Case No. 2006-055*



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

### *Sent via email*

---

Response actions completed at the above-referenced property (Site) for the period July 1, 2015 through July 31, 2015 are described below, followed by a summary of anticipated future work. Note that the 2013 Annual Monitoring Report was submitted to RIDEM in July 2015.

#### SITE ACTIVITIES PERFORMED

No on-Site activities were performed by GZA during the period July 1, 2015 to July 31, 2015.

#### FUTURE WORK/SCHEDULE

We anticipate performing Site-wide groundwater elevation monitoring, Site-wide non-aqueous phase liquid (NAPL) gauging and Site outfall evaluations in September/October 2015.

We trust that this information meets your needs. Please feel free call me at 401-427-2719 or Amy Willoughby at 781-907-3644 if you have any questions.

## MEMO

**TO:** Joseph Martella- RIDEM

**FROM:** Meg Kilpatrick – GZA  
Jim Clark - GZA

**CC:** Amy Willoughby – National Grid (*sent via email*)  
Kathy Anderson – Wellington (*sent via email*)

**DATE:** September 4, 2015

**FILE NO.:** 03.0033327.00-C

**RE:** Monthly Status Report – August 1 through August 31, 2015  
Former Providence Gas Co. Manufactured Gas Plant  
Wellington Avenue and Thames Street  
Newport, Rhode Island  
*RIDEM Case No. 2006-055*



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

### *Sent via email*

---

Response actions completed at the above-referenced property (Site) for the period August 1, 2015 through August 31, 2015 are described below, followed by a summary of anticipated future work.

#### SITE ACTIVITIES PERFORMED

No on-Site activities were performed by GZA during the period August 1, 2015 to August 31, 2015.

#### FUTURE WORK/SCHEDULE

We anticipate performing Site-wide groundwater elevation monitoring, Site-wide non-aqueous phase liquid (NAPL) gauging, Site-wide groundwater sampling and soil gas monitoring, annual cap evaluation, Oxygen Release Compound (ORC) sock change-out in Former Holder Area and Site outfall evaluations in November 2015.

We trust that this information meets your needs. Please feel free call me at 401-427-2719 or Amy Willoughby at 781-907-3644 if you have any questions.

## MEMO

**TO:** Joseph Martella- RIDEM

**FROM:** Meg Kilpatrick – GZA  
Jim Clark - GZA

**CC:** Amy Willoughby – National Grid (*sent via email*)  
Kathy Anderson – Wellington (*sent via email*)

**DATE:** October 13, 2015

**FILE NO.:** 03.0033327.00-C

**RE:** Monthly Status Report – September 1 through September 30, 2015  
Former Providence Gas Co. Manufactured Gas Plant  
Wellington Avenue and Thames Street  
Newport, Rhode Island  
*RIDEM Case No. 2006-055*



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

### *Sent via email*

---

Response actions completed at the above-referenced property (Site) for the period September 1, 2015 through September 30, 2015 are described below, followed by a summary of anticipated future work.

#### SITE ACTIVITIES PERFORMED

No on-Site activities were performed by GZA during the period September 1, 2015 to September 30, 2015.

#### FUTURE WORK/SCHEDULE

We anticipate performing Site-wide groundwater elevation monitoring, non-aqueous phase liquid (NAPL) gauging, groundwater sampling and soil gas monitoring, the annual cap evaluation, Oxygen Release Compound (ORC) sock change-out in Former Holder Area and Site outfall evaluations in November 2015.

We trust that this information meets your needs. Please feel free call me at 401-427-2719 or Amy Willoughby at 781-907-3644 if you have any questions.

## MEMO

**TO:** Joseph Martella- RIDEM

**FROM:** Meg Kilpatrick – GZA  
Jim Clark - GZA

**CC:** Amy Willoughby – National Grid (*sent via email*)  
Kathy Anderson – Wellington (*sent via email*)

**DATE:** November 10, 2015

**FILE NO.:** 03.0033327.00-C

**RE:** Monthly Status Report – October 1 through October 31, 2015  
Former Providence Gas Co. Manufactured Gas Plant  
Wellington Avenue and Thames Street  
Newport, Rhode Island  
*RIDEM Case No. 2006-055*



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

### *Sent via email*

---

Response actions completed at the above-referenced property (Site) for the period October 1, 2015 through October 31, 2015 are described below, followed by a summary of anticipated future work.

#### SITE ACTIVITIES PERFORMED

No on-Site activities were performed by GZA during the period October 1, 2015 to October 31, 2015.

#### FUTURE WORK/SCHEDULE

We anticipate performing Site-wide groundwater elevation monitoring, non-aqueous phase liquid (NAPL) gauging, groundwater sampling and soil gas monitoring, the annual cap evaluation, Oxygen Release Compound (ORC) sock change-out in Former Holder Area and Site outfall evaluations in late 2015.

We trust that this information meets your needs. Please feel free call me at 401-427-2719 or Amy Willoughby at 781-907-3644 if you have any questions.

## MEMO

**TO:** Joseph Martella- RIDEM

**FROM:** Rick Carlone – GZA  
Jim Clark - GZA

**CC:** Amy Willoughby – National Grid (*sent via email*)  
Kathy Anderson – Wellington (*sent via email*)

**DATE:** December 10, 2015

**FILE NO.:** 03.0033327.00-C

**RE:** Monthly Status Report – November 1 through November 30, 2015  
Former Providence Gas Co. Manufactured Gas Plant  
Wellington Avenue and Thames Street  
Newport, Rhode Island  
*RIDEM Case No. 2006-055*



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

### *Sent via email*

---

Response actions completed at the above-referenced property (Site) for the period November 1, 2015 through November 30, 2015 are described below, followed by a summary of anticipated future work.

#### SITE ACTIVITIES PERFORMED

No on-Site activities were performed by GZA during the period November 1, 2015 to November 30, 2015.

#### FUTURE WORK/SCHEDULE

We anticipate performing Site-wide groundwater elevation monitoring, non-aqueous phase liquid (NAPL) gauging, groundwater sampling and soil gas monitoring, the annual cap evaluation, Oxygen Release Compound (ORC) sock change-out in Former Holder Area and Site outfall evaluations in late 2015 or early 2016.

We trust that this information meets your needs. Please feel free call me at 401-427-2719 or Amy Willoughby at 781-907-3644 if you have any questions.

## MEMO

**TO:** Joseph Martella- RIDEM

**FROM:** Rick Carlone – GZA  
Jim Clark - GZA

**CC:** Amy Willoughby – National Grid (*sent via email*)  
Kathy Anderson – Wellington (*sent via email*)

**DATE:** January 6, 2016

**FILE NO.:** 03.0033327.00-C

**RE:** Monthly Status Report – December 1 through December 31, 2015  
Former Providence Gas Co. Manufactured Gas Plant  
Wellington Avenue and Thames Street  
Newport, Rhode Island  
*RIDEM Case No. 2006-055*



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

### *Sent via email*

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Response actions completed at the above-referenced property (Site) for the period December 1, 2015 through December 31, 2015 are described below, followed by a summary of anticipated future work.

#### SITE ACTIVITIES PERFORMED

No on-Site activities were performed by GZA during the period December 1, 2015 to December 31, 2015.

#### FUTURE WORK/SCHEDULE

We anticipate performing Site-wide groundwater elevation monitoring, non-aqueous phase liquid (NAPL) gauging, groundwater sampling and soil gas monitoring, the annual cap evaluation, Oxygen Release Compound (ORC) sock change-out in Former Holder Area and Site outfall evaluations in early 2016.

We trust that this information meets your needs. Please feel free call me at 401-427-2719 or Amy Willoughby at 781-907-3644 if you have any questions.

## MEMO

**TO:** Joseph Martella- RIDEM

**FROM:** Rick Carlone – GZA  
Jim Clark - GZA

**CC:** Amy Willoughby – National Grid (*sent via email*)  
Kathy Anderson – Wellington (*sent via email*)

**DATE:** February 5, 2016

**FILE NO.:** 03.0033327.00-C

**RE:** Monthly Status Report – January 1 through January 31, 2016  
Former Providence Gas Co. Manufactured Gas Plant  
Wellington Avenue and Thames Street  
Newport, Rhode Island  
*RIDEM Case No. 2006-055*



530 Broadway  
Providence  
Rhode Island  
02909  
401-421-4140  
Fax: 401-751-8613  
<http://www.gza.com>

### *Sent via email*

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Response actions completed at the above-referenced property (Site) for the period January 1, 2016 through January 31, 2016 are described below, followed by a summary of anticipated future work.

#### SITE ACTIVITIES PERFORMED

No on-Site activities were performed by GZA during the period January 1, 2016 to January 31, 2016.

#### FUTURE WORK/SCHEDULE

We anticipate performing Site-wide groundwater elevation monitoring, non-aqueous phase liquid (NAPL) gauging, groundwater sampling and soil gas monitoring, the annual cap evaluation, Oxygen Release Compound (ORC) sock change-out in Former Holder Area and Site outfall evaluations in early-mid 2016.

We trust that this information meets your needs. Please feel free call me at 401-427-2776 or Amy Willoughby at 781-907-3644 if you have any questions.

Division 3-13

Request:

Re: Miscellaneous MGP Program Costs, please provide supporting detail for the dollar amounts shown for Miscellaneous MGP Program Costs, and describe the purpose of each activity for which those costs were incurred.

Response:

Attachment DIV 3-13 includes the supporting detail for the dollar amounts shown for the Miscellaneous MGP Program Costs, and describes the purpose of each activity for which those costs were incurred.



Attachment DIV 3-13

*EMPLOYEE LABOR*

<u>Month</u>	<u>Activities Performed</u>	<u>Total Labor</u>
April, 2015	Program management and financial management	\$1,043.99
May, 2015	Program management and financial management	\$1,203.82
June, 2015	Program management and financial management	\$2,047.61
July, 2015	Program management, financial management and preparation of the annual environmental report	\$1,718.49
August, 2015	Program management, financial management and response to Division Requests	\$1,518.88
September, 2015	Program management, financial management and response to Division Requests	\$4,615.71
October, 2015	Program management and financial management	\$1,012.96
November, 2015	Program management and financial management	\$2,525.18
December, 2015	Program management and financial management	\$951.03
January, 2016	Program management and financial management	\$1,227.18
February, 2016	Program management and financial management	\$891.25
March, 2016	Program management and financial management	\$1,117.69

Totals: \$19,873.79

*Notes:*

1. *Program management:* Tasks include the preparation of the Annual Environmental Report for the Gas Services, preparation of Responses to the Division Requests, reporting and updates to management, and attendance at staff meetings and other MGP-related meetings.
2. *Financial management:* Tasks include analyst review of invoices, processing and tracking of invoices, filing of invoices, review and management of consultant and contractor proposal and change invoices, annual budgeting, monthly budget review and quarterly budget forecasting.

Attachment DIV 3-13

*EMPLOYEE EXPENSES*

<u>Month</u>	<u>Employee Expenses</u>
July, 2015	\$20.83
August, 2015	\$4.20
September, 2015	\$11.64
October, 2015	\$33.60
December, 2015	\$8.25
January, 2016	\$1,499.42
February, 2016	10.50

Totals: \$1,588.44

*Notes:*

1. Employee Expenses: Employee expenses are for general travel, including tolls, and vehicle charges, which are associated with employee use of their personal vehicles to drive to the MGP sites (or other related locations such as the RI Department of Environmental Management offices) associated with RI-Gas. All vehicle charges associated with RI-Gas MGP sites are carried under this general work order.

Attachment DIV 3-13

*OUTSIDE SERVICES*

Month	Vendor Name	Invoice Number	Amount	Description
June, 2015	EECS INC.	354	\$556.50	Contract project and financial management activities
June, 2015	EECS INC.	358	\$3,560.50	Contract project and financial management activities
August, 2015	EECS INC.	361	\$1,643.00	Contract project and financial management activities
September, 2015	EECS INC.	363	\$1,961.00	Contract project and financial management activities
October, 2015	EECS INC.	367	\$2,703.00	Contract project and financial management activities
December, 2015	EECS INC.	375	\$1,281.50	Contract project and financial management activities
January, 2016	EECS INC.	382	\$1,007.00	Contract project and financial management activities
August, 2014	GZA GEOENVIRONMENTAL INC.	0691308	-\$900.00	Reallocation of FY15 filing support to specific sites
June, 2015	GZA GEOENVIRONMENTAL INC.	0704317	\$915.00	Reallocation of FY15 filing support to specific sites <sup>1</sup>

Total: \$12,727.50

<sup>1</sup> The Consulting Costs table in the FY16 filing erroneously assigned this charge to Potomac

Division 3-14

Request:

Re: the "Insurance Recovery Activities" addressed on page 14 of 18 of the Environmental Report, please provide a detailed itemization of costs included in the \$53,634 of "Property Purchases/Settlements/Legal costs as well as the reasons for the Company's incurrence of those costs."

Response:

Attachment DIV 3-14 contains a breakdown by invoice of the total Property Purchase/Settlements/Legal costs in the amount of \$56,673 incurred in support of the Company's insurance recovery activities.

The costs were incurred by the Company for the environmental insurance recovery activities, and include legal fees and expenses related to *OneBeacon America Insurance Company v. The Narragansett Electric Company*, Commonwealth of Massachusetts, County of Suffolk, Superior Court, Civil Docket No. SUCV2005-03086, and *The Narragansett Electric Company v. American Home Assurance, et al.*, United States District Court for the Southern District of New York, Case No. 11 CIV 8299, in which the Company is pursuing insurance coverage for liabilities or potential liabilities associated with the environmental remediation of numerous sites.

Vendor	Invoice Date	Invoice Number	Invoice Amount
Covington & Burling	11/18/2014	60658427	\$ 141.03
Covington & Burling	2/28/2015	60667011	\$ 335.74
Covington & Burling	3/13/2015	60669217	\$ 19.94
Covington & Burling	3/16/2015	60669426	\$ 4,042.38
Covington & Burling	4/28/2015	60671252	\$ 8,137.78
Covington & Burling	4/28/2015	60674197	\$ 15.57
Covington & Burling	5/31/2015	60677430	\$ 2,287.23
Covington & Burling	6/11/2015	60678326	\$ 1,829.16
Covington & Burling	7/9/2015	27663	\$ 151.90
Covington & Burling	7/14/2015	60682102	\$ 500.76
Covington & Burling	8/17/2015	60687467	\$ 261.99
Covington & Burling	9/9/2015	60690572	\$ 2,544.62
Covington & Burling	9/9/2015	60690604	\$ 2,093.37
Covington & Burling	10/20/2015	60693368	\$ 288.40
Covington & Burling	10/20/2015	60693369	\$ 1,902.75
Covington & Burling	11/12/2015	60696812	\$ 528.84
Covington & Burling	11/19/2015	60696813	\$ 3,654.92
Covington & Burling	11/23/2015	60697064	\$ 8,522.07
Covington & Burling	12/21/2015	60700563	\$ 421.47
Covington & Burling	12/22/2015	60700562	\$ 477.00
Covington & Burling	12/22/2015	60700631	\$ 7,417.13
Covington & Burling	1/29/2016	60704155	\$ 2,684.59
Covington & Burling	1/29/2016	60704156	\$ 1,702.51
Covington & Burling	2/16/2016	60705683	\$ 17.55
Covington & Burling	2/16/2016	60705684	\$ 947.26
Covington & Burling	2/16/2016	60705686	\$ 831.93
Covington & Burling	3/9/2016	60707973	\$ 218.07
Covington & Burling	3/9/2016	60707975	\$ 3,934.80
Covington & Burling	3/14/2016	60708712	\$ 230.85
Covington & Burling	3/14/2016	60708713-D1	\$ 295.65
Sally & Fitch	8/13/2015	28034	\$ 63.60
Sally & Fitch	9/17/2015	28267	\$ 154.80
Sally & Fitch	10/16/2015	28547	\$ 4.80
Sally & Fitch	1/15/2016	29241	\$ 3.80
Sally & Fitch	2/19/2016	29503	\$ 8.00

**Total \$ 56,672.26**

Division 3-15

Request:

Re: the "Consulting Costs" included in page 18 of the Annual Environmental Report, please:

- a. Provide supporting invoices for the dollar amounts billed to each project showing wage rates and hours worked for the referenced Consulting services;
- b. Identify which of the dollar amounts identified by contractor represent "Consulting Costs" and which represent "Construction/Disposal/Removal Costs.";
- c. Identify each project for which contractor services were not obtained through competitive bidding and explain why competitive procurement processes were not employed for each project identified;
- d. For all projects for which contractor services were obtained through competitive bidding procedures, provide copies of the competitive bids received and the data and analyses upon which the Company relied to evaluate each bid.

Response:

- a. Regarding the "Consulting Costs" included on page 18 of the Annual Environmental Report, the supporting invoices are included in the following attachments:
  - Attachment DIV 3-15a(i) – 642 Allens Ave, Providence, RI
  - Attachment DIV 3-15a(ii) – 170 Allens Ave, Providence, RI (**Confidential**)
  - Attachment DIV 3-15a(iii) – Pawtucket (Tidewater) MGP, RI (20% of invoice dollars charged to the Company) (**Confidential**)
  - Attachment DIV 3-15a(iv) – Woonsocket (Hamlet Ave) MGP (20% of invoice dollars charged to the Company; Task 5 of GZA invoices excluded and charged to another Company department) (**Confidential**)
  - Attachment DIV 3-15a(v) – Thames & Wellington, Newport (**Confidential**)
  - Attachment DIV 3-15a(vi) – Miscellaneous MGP, RI (**Confidential**)
  - Attachment DIV 3-15a(vii) – East Providence Holder

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Regarding the "Contractor Costs" included on page 19 of the Annual Environmental Report, the supporting invoices are included in the following attachments:

- Attachment DIV 3-15a(viii) – 642 Allens Ave, Providence, RI
- Attachment DIV 3-15a(ix) – 170 Allens Ave, Providence, RI
- Attachment DIV 3-15a(x) – Pawtucket(Tidewater) MGP, RI (20% of invoice dollars charged to the Company)
- Attachment DIV 3-15a(xi) – PCB Regulated Pipe Abandonment
- Attachment DIV 3-15a(xii) – Woonsocket (Hamlet Ave) MGP (20% of invoice dollars charged to the Company)
- Attachment DIV 3-15a(xiii) – Thames & Wellington, Newport
- Attachment DIV 3-15a(xiv) – MSR Program
- Attachment DIV 3-15a(xv) – East Providence Holder

The supporting invoices include hourly rates and the hours worked. Attachment DIV 3-15a(ii), Attachment DIV 3-15a(iii), Attachment DIV 3-15a(iv), Attachment DIV 3-15a(v) and Attachment DIV 3-15a(vi) contain confidential and proprietary business information. Accordingly, the Company is providing a confidential version of these attachments to the PUC subject to a Motion for Protective Treatment, and has provided redacted copies of these attachments for the public filing. Due to the voluminous nature of these attachments, Attachments DIV 3-15(a)(i) through (xv) are being provided on CD-ROM. The confidential versions of Attachments DIV 3-15a(ii), DIV 3-15a(iii), DIV 3-15a(iv), DIV 3-15a(v) and DIV 3-15a(vi) are also being provided on a separate CD-ROM marked "Confidential."

- b. The information on page 18 of the Annual Environmental Report and included in the above Attachments DIV 3-15a(i) through (vii) is for "Consulting Costs" only. The information on page 19 of the Annual Environmental Report and included in the above Attachments DIV 3-15a (viii) through (xv) is for "Construction/Disposal/Removal Costs" only.

Division 3-15, page 3

- c. For environmental work, the Company procures two types of services: consulting services and contractor services. For the consulting services, the Company uses Master Service Agreements (MSAs). In 2008 and 2009, National Grid conducted a 12-month, multi-step, competitive request for proposal (RFP) process to select a small number of environmental consulting firms to provide high-quality, cost-effective environmental consulting services for National Grid in New England. The result of the RFP process was the extensive negotiation and award of MSAs with four "Preferred Firms" to provide these services in New England, including Rhode Island. The negotiated rates, mark-up and volume discounts were held for a two-year period (approximately August 1, 2009 through July 31, 2011). The MSAs were re-negotiated in 2012 and most firms agreed to hold the original 2009 rates for one additional one-year period (terminating on or about July 31, 2013). The remaining firms received small rate increases. Periodic reviews are conducted of vendor agreements, including performance, compliance and price. The reviews result in reasonable and cost competitive market adjustments, when required. Contract Amendments are utilized to implement current specifications and requirements, for example, updated Safety Specifications. This is a joint effort between Procurement and Environmental stakeholders. Current contracts are valid through March 2018 with unit pricing established.

Whenever possible, environmental contractor work relating to environmental response activities is subject to a competitive bid selection process. Exceptions to this requirement are situations such as implementing short-term response actions where there is insufficient time for a competitive bid process or smaller value jobs (typically <\$75K). For smaller value jobs and waste disposal/treatment, the Company has negotiated Blanket Contracts with agreed upon rates for performance of work on Company projects. These vendors include Environmental Soil Management, Inc. (thermal treatment of impacted soils), Clean Harbors Environmental Services (waste disposal, emergency response, small environmental projects), T. Ford Company, Inc. (small value environmental projects), and Citiworks (fencing repair).



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- d. The Company had one construction project during fiscal year 2016 for which contractor services were procured through a separate competitive bidding process. This project involved asbestos and hazardous materials removal and demolition associated with three vacant buildings and miscellaneous associated structures and aboveground piping associated with the former manufactured gas plant (MGP) operations located at the Pawtucket (Tidewater) MGP site. The information containing the three competitive bids received, the initial bid evaluation, the clarification questions/answers and the best and final offers for the two short-listed bidders, the bid re-evaluations, and the project award, which constitute all of the data and analyses upon which the Company relied to evaluate each bid, is attached as Attachment DIV 3-15d, which is being provided on CD-ROM. Because the entirety of this information is deemed confidential, a redacted version of the "confidential" attachment is not being provided. Accordingly, the Company is providing this information to the PUC subject to a Motion for Protective Treatment.

Division 3-16

Request:

Re: pages 18 and 19 of the Annual Environmental Report, please provide similar breakdowns by project for each of the following categories:

- a. Regulatory Oversight Costs (RIDEM/EPA/NBC);
- b. Property Purchases/Settlements/Legal;
- c. Other Costs (includes Company labor, materials & expenses).

Response:

- a. There were no costs incurred for Regulatory Oversight Costs (RIDEM/EPA/NBC).
- b. Attachment DIV 3-16b provides the breakdown for Property Purchases/Settlements/Legal.
- c. Attachment DIV 3-16c provides the breakdown for Other Costs (includes Company labor, materials & expenses).

Property Purchases/Settlements/Legal			
Site	Legal Vendor Name	Purpose of Legal Costs	Costs
560 Thames Street, Newport, RI	HINCKLEY ALLEN & SNYDER LLP	Outside legal services	\$2,236.50
Insurance Litigation Haz Waste - NEG	COVINGTON & BURLING LLP	Insurance recovery support	\$56,285.94
	SALLY & FITCH LLP	Insurance recovery support	\$386.90
Newport (Thames & Wellington)	HINCKLEY ALLEN & SNYDER LLP	Outside legal services	\$49,991.26
Providence (170 Allens Ave) MGP	HINCKLEY ALLEN & SNYDER LLP	Outside legal services	\$9,140.50
Tidewater (Pawtucket, RI) MGP - NEG	HINCKLEY ALLEN & SNYDER LLP	Outside legal services	\$2,832.90

Other Costs				
Site	Cost Category	Vendor Name	Purpose of Other Costs	Costs
E. Providence (First)	Company Labor	N/A	Site/financial management	\$13,540.90
General NEG SIR	Company Labor	N/A	Program/financial management and PUC	
		N/A	Filing/Responses to Division requests	\$19,807.79
	Employee Expenses	N/A	Travel costs associated with RI Gas sites	\$1,588.44
	Other Expenses	N/A	OSHA HAZWOPER training expense	\$66.00
Hamlet Ave (Woonsocket) MGP - NEG	Other	N/A	Tax credit	(\$431.44)
Mercury Regulators	Company Labor	N/A	Program/financial management	\$550.89
	Transportation	N/A	Company vehicle costs associated with program	\$51.96
Newport (Thames & Wellington)	Company Labor	N/A	Site/financial management	\$19,451.94
	Transportation	N/A	Travel costs	\$42.80
PCB Regulator - Pipe Abandonment	Company Labor	N/A	Program/financial management	\$279.71
	Transportation	N/A	Company vehicle costs associated with program	\$25.98
Providence (170 Allens Ave) MGP	Company Labor	N/A	Site/financial management	\$312.18
	Other Expenses	N/A	Lease payment received from Rhode Island Hospital	(\$5,200.00)
	Other Expenses	PROVIDENCE WATER	Water bill	\$13.57
Providence (642 Allens Ave.) MGP	Company Labor	N/A	Site/financial management	\$19,549.71
Tidewater (Pawtucket, RI) MGP - NEG	Other Expenses	BLUE CHIP FILMS LLC	Tidewater website maintenance	\$522.50
	Other Expenses	CITY OF PAWTUCKET	Reimbursement of 50% of City's costs associated with joint Master Plan development per agreement	\$7,539.40

Notes:

1. Site Management: Tasks include site project management activities, including oversight of consultants and contractors performing environmental work, review of invoices, coordination with Company personnel related to environmental support during planned and emergency projects, communications with RIDEM, and review of permit applications, monitoring reports, environmental summary reports and disposal documentation.
2. Program Management: Tasks include the preparation of the Annual Environmental Report for the Gas Services, preparation of Responses to the Division Requests, reporting and updates to management, and attendance at staff meetings and other MGP-related meetings.
3. Financial Management: Tasks include analyst review of invoices, processing and tracking of invoices, filing of invoices, review and management of consultant and contractor proposal and change invoices, annual budgeting, monthly budget review and quarterly budget forecasting.