REGION 1
BOSTON, MA 02109

March 17, 2026

Sent via e-mail

Amy A. Willoughby
Manager Environmental Projects
Rhode Island Energy
aawilloughby@rienergy.com

RE: Woonsocket Substation - Nasonville Substation 115kV Transmission Line Project

Ms. Willoughby–

The United States Environmental Protection Agency (US EPA) and the Rhode Island Department of Environmental Management (RIDEM), collectively referred to herein as "the Agencies", are in receipt of your February 12, 2026 submittal titled "Woonsocket Substation - Nasonville Substation 115kV Transmission Line Project" which includes a Health and Safety Plan (HASP), Soil Management Plan (SMP), and Dewatering and Water Management Plan for the proposed utility work in an easement adjacent to the L&RR Superfund Site ("Site") located in North Smithfield, Rhode Island. The Agencies would like to thank you for your prompt attention to this matter and for providing the documents requested by the Agencies for review.

The Agencies have the following comments for review and consideration:

General:

1. The Agencies must be notified at least one week prior to the start of work within site boundaries and provide a construction schedule. While operations within the Site are being performed, the Agencies shall be provided weekly updates on any changes to the work schedule and/or changes to on-site presence for the following week, along with a summary of the weeks completed work and data collected indicative of a release.
2. A final report shall be submitted within 90 days of completion of the work within site boundaries which outlines all activities performed, summarizes dewatering and soil management activities performed, and includes copies of all data collected including, but not limited to, landfill gas monitoring, PID/4 gas meter monitoring, and soil and water characterization analytical results.
3. The Agencies shall immediately be notified of any significant issues, including, but not limited to, exceedances of landfill gas concentrations outlined in the HASP, discovery of unexpected contaminants/debris, on-site injuries, or other unanticipated events. Notification should be made via email to Cunningham.joseph@epa.gov or by phone to (617) 918-1458.

4. While acknowledged in the HASP, the Agencies would like to reiterate that this work is being performed adjacent to a Federally regulated RCRA Subtitle C hazardous waste landfill and within the bounds of an active Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Superfund Site, and site workers are likely to encounter contaminated and potentially hazardous soil, groundwater and vapors. It is the policy of the Agencies to not approve or comment on health and safety plans and it is the responsibility of Rhode Island Energy and their contractors to ensure site work is performed consistent with State and Federal law and in a manner which protects site workers and does not contribute to the release or migration of regulated materials on or off-site. Please be aware that under CERCLA, Rhode Island Energy and/or its contractors may be subject to joint and severable liability if it is determined that site activities contributed to the release, migration or additional exposure of on-site contaminants.
5. Rhode Island Energy and their contractors should be aware that multiple remedial activities are ongoing at the Site, including, but not limited to, modification of RCRA Subtitle C Landfill gas vent system, monitoring of groundwater and surface water, as well as installation of groundwater wells and injection of strong oxidants into to the subsurface as outlined in the 2021 Record of Decision for the Site. While there does not appear to be any overlap in the location of activities, in the event a conflict arises, the Potentially Responsible Party (PRP), the performing parties, as well as their contractors, shall have priority.
6. Please be aware that representatives of the Agencies may be on-site to observe soil movement, removal, dewatering, and other construction activities. The Agencies will notify you at least 24 hours in advance of any site visit.

Soil Management Plan:

7. Soil screening using a PID/4 gas meter should occur at a minimum of 1 ft intervals during soil excavation, boring, or drilling activities, biased towards areas which exhibit field evidence of contamination. The screening interval may be extended to 5 ft intervals if two consecutive readings do not exceed 20 ppm, however, if any soil in between this extended interval exhibits field evidence of contamination, readings must be collected.
8. Soil which exceeds the screening threshold should be stored on-site for no longer than 30 days. Soil which does not exceed the screening threshold may be stockpiled on-site for up to 60 days.
9. Any soil which is excavated must either be returned to the same excavation or be disposed of in accordance with the CERCLA Off-Site Rule for disposal 42 U.S.C. § 9621(d)(3) and 40 C.F.R. § 300.440.

Water Management Plan:

10. The Agency notes that the assumptions about volume of dewatering appears to be based upon a soil boring B-4 installed in AOC-2. However, it should be noted that this location is at a significantly higher elevation than the area outlined for work in AOC-1, and that depth to groundwater varies significantly across the site, and work conducted within AOC-1, most notably in the vicinity of structures 16 and 17, are likely to encounter groundwater < 3 feet from the surface, and may require significant dewatering, water storage, and disposal or treatment capabilities. Please be aware that this area contains significant groundwater

contamination and any groundwater that is removed or otherwise caused to flow to the surface must be collected and either disposed of at an approved facility or treated on site. Off-site disposal must be performed in accordance with the CERCLA Off-Site Rule for disposal 42 U.S.C. § 9621(d)(3) and 40 C.F.R. § 300.440. On-site treatment and infiltration require Agency approval and must be pre-approved.

Sincerely,

JOSEPH CUNNINGHAM

Digitally signed by JOSEPH CUNNINGHAM
Date: 2026.03.17 15:46:05 -04'00'

Joe Cunningham, PE
Remedial Project Manager
Superfund & Emergency Response Division
United States Environmental Protection Agency

ECC: Trevor Moulton, RI DEM
Paul Kulpa, RI DEM
Gregory Schultz, RI Division of Public Utilities & Carriers (RIDPUC)