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DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

July 25, 2007

CERTIFIED MAIL

Mr. Michael S. Healey, P.G.
Director of Environmental Affairs
Charbert, Division of NFA Corp.
299 Church Street
Alton, RI 02894



Re: Interim Approval for the construction of and discharge to the Area 1 RIB
Charbert, Division of NFA Corp., 299 Church Street, Richmond, RI
UIC File No. 000014

Dear Mr. Healey:

The RIDEM Office of Water Resources (OWR), UIC Program has received and reviewed the following submissions:

- "Proposal to Construct a Rapid Infiltration Bed for the Disposal of Process Wastewater", dated April 14, 2006;
- "Response to RIDEM's May 12, 2006 comments on RIBs Proposal", dated January 12, 2007, submitted by GZA GeoEnvironmental, Inc. on behalf of Charbert, Division of NFA Corp.;
- "Interim Submission, UIC Application for Wastewater Discharge", dated June 25, 2007, submitted by GZA GeoEnvironmental, Inc. on behalf of Charbert, Division of NFA Corp.;

The submissions propose to construct a Rapid Infiltration Basin (RIB) to the south of Lagoon No. 3 (Area 1) and the discharge to the RIB of up to 50,000 gallons per day of wastewater from Lagoon No. 3. The construction of this RIB will allow the Department to further evaluate the effectiveness of the proposed wastewater disposal system prior to receiving the final system modification submission. The plan as outlined in the referenced documents is approved with the following conditions:

1. This is an interim approval to allow solely for the construction and discharge to the RIB to be installed in Area 1. This approval does not supercede UIC Program Order of Approval No. 1108 issued December 3, 1992, which still remains in full force and effect.

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2. Any modification of the proposed construction and discharge to the Area 1 RIB as outlined in the above referenced documents requires approval of the Department prior to implementation.
3. Site groundwater and wastewater monitoring at minimum shall be performed as follows:
 - a. Pump House effluent shall continue to be monitored as required under UIC Order of Approval No.1108 issued December 3, 1992, with the addition of analytical testing for dissolved chromium and bis(2-Ethylhexyl)Phthalate.
 - b. Groundwater monitoring wells MW-1A (GP-29), MW-2A, MW-3 (RIZ-15), MW-4A, MW-5B (GP-30) and MW-6 (RIZ-20) shall continue to be monitored as required under UIC Order of Approval No.1108 issued December 3, 1992, with the addition of analytical testing for total chromium, dissolved chromium, bis(2-Ethylhexyl)Phthalate, and TPH.
 - c. Proposed groundwater monitoring wells RCW-1, RCW-2, RCW-3, RCW-4 and RCW-5 shall be sampled prior to initial discharge to the Area 1 RIB, and after initiation of discharge at 2 months, 4 months, 6 months and quarterly thereafter and analytically tested for VOCs, EPA method 8260, TPH, total chromium, dissolved chromium, and bis(2-Ethylhexyl)Phthalate.
 - d. Proposals to change the monitoring must be made in writing and approved in writing by the Department. Note that the Department reserves the right to request the installation and/or sampling of additional groundwater monitoring wells, if deemed necessary.
4. Analytical monitoring results for groundwater samples collected from proposed monitoring wells RCW-1 through RCW-5, shall be submitted to the UIC Program within 30 days of sample collection. Upon commencement of quarterly monitoring, submissions shall be in accordance with the requirements of Order of Approval No.1108 issued December 3, 1992.
5. A summary of daily process wastewater flow volumes from Lagoon No. 3 to the Area 1 RIB shall be submitted to the UIC Program on the same schedule as the groundwater monitoring results collected from proposed monitoring wells RCW-1 through RCW-5.
6. All material generated during maintenance of the RIBs and lagoons must be disposed of properly in accordance with appropriate state, local and federal rules and requirements.

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7. The UIC Program must be notified at least 3 working days prior to the initiation of discharge activities.
8. The UIC Program shall be immediately notified of any unexpected site or discharge incidents and/or problems.
9. This correspondence does not remove your obligation to obtain any necessary permits from other state, local or federal agencies.

In accordance with the schedule contained within Charbert's "Interim Submission, UIC Application for Wastewater Discharge", dated June 25, 2007, the Department anticipates that construction of the Area 1 RIB will be completed on or about 3 weeks after issuance of this approval. Approximately 4 weeks after completion of Area 1 RIB construction, it is expected that Charbert will submit to the Department a final plan for completion of the modified wastewater disposal system. In accordance with the July 25, 2005 Consent Agreement between Charbert and the Department, upon submission to the Department of the final plan, Charbert must comply with the public notification requirements contained within Section C(4)(e) of the Consent Agreement.

If you have any questions regarding this correspondence, please contact Craig Roy of the UIC Program at (401) 222-4700, ext. 7604.

Sincerely,



Russell Chateauf, P.E.
Chief of Groundwater and Wetlands Protection
Office of Water Resources

Xc: E. Panciera, OWR
T. Simpson, OWR
D. Chopy, OC&I
E. Summerly, GZA Geo Environmental, Inc.
file

