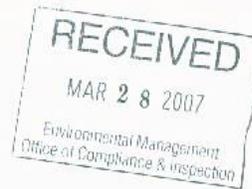


GZA
GeoEnvironmental, Inc.

Engineering and
Science

March 27, 2007
File No. 32795.22-C



Ms. Joan Taylor
Rhode Island Department of Environmental Management
Office of Waste Management
235 Promenade Street
Providence, Rhode Island 02908-5767



Re: Sanitary Sewer and Process Water Cross-Connection Evaluation
Charbert, Division of NFA Corp.
Alton, Rhode Island

Dear Ms. Taylor:

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Providence
Rhode Island
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401-421-4140
Fax: 401-751-8613
www.gza.com

On behalf of our client, Charbert, Division of NFA Corp., GZA GeoEnvironmental, Inc. (GZA) has prepared this letter as a follow-up to our evaluation of the apparent waste water/sanitary cross-connection observed at the Charbert facility located at 299 Church Street in Richmond, Rhode Island.

In section 2.80 of our June 2005 *Site Investigation Report* (SIR), we noted that "... while installing the new septic tank on April 7, 2005, it was observed that colored water was flowing to the septic tank. GZA and Charbert personnel used florescent dye to locate the source of the colored water. Floor drains on the east end of the dye room were determined to be the source. Charbert personnel are re-piping the floor drains to the industrial waste water pump house. This work is anticipated to be completed in the summer of 2005."

When Charbert personnel attempted to locate the connection to the floor drains, however, no physical connections could be found. The waste water flows that went to the sanitary sewer appear to be sporadic and, multiple dye tests were unable to replicate the original dye test results that identified the floor drains as the apparent connection. It was noted that the flows to the septic system appeared to occur when a certain combination of equipment drained simultaneously and did not appear to be related to any one specific drain or piece of equipment.

It is believed that prior to 1992 (installation date of first leachfield), the effluent from the septic tank went to the process water pump house and ultimately the lagoons. As such, the issue of potential cross-connections was of no significance. A bathroom that was located near the production floor may have been connected to both sanitary (ISDS) and waste water systems (lagoons). It is suspected that when multiple pieces of dyeing equipment are drained simultaneously that the process water system may backup and overflow to the sanitary sewer line.

In October 2005, Charbert contracted a line cleaning and video camera inspection company in an effort to locate the cross-connection. A crushed section of pipe, however, prevented the work from meeting its objectives. In November of 2005, the sanitary sewer line from the building to the newly installed septic system was excavated and replaced with new 6-inch schedule 40 piping.

In response to the 2005 release to "Old Lagoon 5," and the inability to locate the cross-connection, in July of 2006, Charbert excavated and replaced the process water collection system and any sanitary sewer lines that were exposed. All existing external piping and manholes where

removed and new cast iron pipe and precast concrete manholes were installed. The cross-connection was not located outside the building. After the new collection system was installed and waste water flow improved, the frequency of large flows of waste water to the sanitary sewer appeared to decrease. A second attempt at video camera inspection was not successful at penetrating the entire sanitary line under the building.



On January 26, 2007, a smoke injection test was performed at the facility. This was accompanied by camera inspection of areas suspected to have a cross-connection. Smoke was injected with a blower connected to the sanitary sewer line cleanout located in the facility's rear maintenance yard. Smoke and air pushed by the fan were observed at multiple points in the production area of the facility. Video camera work showed what appeared to be interconnected box culverts under the floors of the production area. GZA understands that in the 1980's, the original basements and crawl spaces under the facility were filled with sand and a concrete floor poured over the top, making it impractical to determine where the cross-connection is located.

Having drawn the conclusion that the actual location of the cross-connection cannot be reasonably located, Charbert has asked GZA to evaluate alternatives for replacing the sanitary sewer lines and associated plumbing to ensure that process water is not sent to the sanitary sewer system. We anticipate completing our evaluations and estimates in May of 2007, and work to replace the sanitary sewer line to be performed over the December 2007 facility shut down.

We trust that this information fulfills your present needs. Please do not hesitate to call us with any questions or comments regarding this progress report.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.


Stephen Andrus
Environmental Engineer


John P. Hartley
Project Reviewer


Edward A. Summerly, P.G.
Associate Principal

CC: Cynthia Gianfrancesco, RIDEM-OWM
David Chopy, RIDEM-OCI
Mary Morgan, Richmond Town Hall
Clark Memorial Library - Charbert Repository