

November 25, 2013

TO:

Current Multi-Sector General Permit (MSGP) permit holders

Sector Q (Water Transportation)/ Sector R (Ship & Boat Building and Repair Yards)

FROM:

Eric A. Beck. P.E., Supervising Engineer

Office of Water Resources

Ron Gagnon, P.E., Chief

Office of Customer and Technical Assistance

Michael Keyworth, Legislative Chairperson

Rhode Island Marine Trades Association

SUBJECT:

MSGP Vessel Pressure Washing Wastewater Letter of Intent - Clarification of

submittal requirements for February 15, 2014 deadline

The RI DEM Office of Water Resources, Office of Customer and Technical Assistance, and the Rhode Island Marine Trades Association are jointly issuing this clarification regarding the February 15, 2014 submittal requirements contained in the Letter of Agreement that was issued November 6, 2013.

The February 15th submittal simply asks you to respond to RI DEM with an indication that you have thought about your options, reviewed the guidance that RIMTA and RI DEM have made available, completed a preliminary evaluation of your options and selected an option to pursue. The submittal does not need to contain detailed design information, but must provide a narrative description on how you intend to apply the guidance and what option has been chosen. The submittal should contain a brief milestone schedule that indicates a timely path towards compliance.

If you would like to continue the activity after August 2014 with-out interruption and you are considering an option that will include construction, there are lead times associated with working with contractors, designers, vendors, building and permitting officials, and it is necessary to start the process now. The required submittal should demonstrate that you have started the process and identified a potential option that would allow you to eliminate the discharge and continue operations seamlessly. Please be aware that the submittal of the plans to pursue a specific option does not in any way preclude the owner from selecting a different option to comply with the August deadline after further consideration and evaluation.

For further information regarding systems how to comply with guidance document entitled "Pressure Washing Guidance for RI Marinas" that is posted on the DEM website at the following address: http://www.dem.ri.gov/programs/benviron/assist/. Please contact Mike Keyworth at RIMTA by phone at 401-246-1600 or by email at mkeyworth@byv.com.

If you would like to schedule a meeting to discuss your options to eliminate the discharge or need additional guidance, you may contact Ron Gagnon, P.E., Chief of the DEM's Office of Customer and Technical Assistance at 401-222-4700 x7500.

cc:

Wendy Mackie, RIMTA Joseph Haberek, P.E., DEM/OWR Jeff Willis, CRMC

Angelo Liberti, P.E., DEM/OWR Marisa Desautel, Esq., DEM/Legal Beverly Migliore, DEM/OCTA