



CHARBERT

DIV. OF NFA CORP.

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September 15, 2005



Mr. David Chopy
Supervising Sanitary Engineer
Rhode Island Department of Environmental Management
Office of Compliance and Inspection
135 Promenade Street
Providence, Rhode Island 02908-5767

Re: Charbert ISDS

Dear Mr. Chopy:

This letter is a response to your inquiry to GZA regarding the potential for process wastewater to be discharged to the ISDS at Charbert. As reported in the *Site Investigation Report (SIR)* dated June 2005, process wastewater was observed in the ISDS during replacement of the septic tank. The SIR also stated that Charbert would investigate the source of the observed process wastewater and separate any process wastewater flows from the ISDS.

Since it was first noted, the water in the ISDS septic tank has been visually monitored on a daily basis. This visual monitoring has not resulted in the observation of process wastewater in the ISDS. Given the nature of the dying operations at Charbert the process wastewater is discharged at a temperature of about 180 degrees. Therefore, process wastewater in the ISDS would be observable due to both the high temperature and the color from the process dying operation.

As an initial attempt to locate a connection between the ISDS and process wastewater system, Charbert has conducted four dye studies on four separate occasions. Three of the dye studies involved the introduction of a fluorescent dye into the wastewater drains to evaluate if the dye discharged into the ISDS. Each of these dye studies failed to result in dye in the ISDS system.

The fourth dye study included the introduction of dye into the process wastewater system and supplementing the water flow using large volumes of water from a fire hydrant. This

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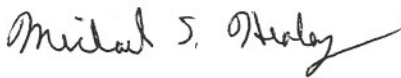
dye study, augmented with addition water flow, also failed to result in dye (or increased flows) discharging into the ISDS.

At present Charbert has scheduled a video camera survey of the ISDS wastewater line starting where the line exits the Plant building. It is hopeful that this more comprehensive method of investigation, which may be supplemented with additional dye studies, should identify the possible cross-connection between the process wastewater and the ISDS systems.

As we discussed yesterday during our phone conversation, determining the location of possible cross-connection in the wastewater systems in a plant such as Charbert can be a difficult task. That is, like similar facilities, the effort is complicated by the long history of industrial use, during which changes to the structures and piping systems have been made; in most cases without formal or even anecdotal information being available. Notwithstanding this difficulty, Charbert will continue to investigate the possible cross-connection and eliminate that connection when it is identified. I will keep you and your office informed of our progress.

I look forward to continuing to work with you to resolve this issue. If you have any questions please do not hesitate to call me at (401) 364-7751 ext 127 or by e-mail at mhealey@charbert.com.

Sincerely



Michael S. Healey, P.G.
Director of Environmental Affairs
Charbert Div or NFA

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Cc: Mr. John Hartley, Principal GZA