

Department of Environmental Management  
Office of Water Resources  
State Revolving Fund (SRF) Program

**CATEGORICAL EXCLUSION**

The Office of Water Resources has reviewed the proposed Field's Point System-wide Regulator Improvements- Contract No. 306.10D, as submitted for design by the Narragansett Bay Commission, and has concluded that the resulting construction of the abovementioned qualifies for a CATEGORICAL EXCLUSION in accordance with the requirements of RIGL 46-12.2, as amended, and the "Rules and Regulations for the State Revolving Fund (SRF) Program," dated May 17, 2018. The proposed improvements will not impact the environment either by itself or in combination with other projects, and the environmental information provided has met the statutory intent of the federal Clean Water Act environmental review requirements and is sufficient to issue a CATEGORICAL EXCLUSION.

Project Name: Field's Point System-wide Regulator Improvements- Contract No. 306.10D

SRF Program Number: 24-NB-1-25/1\* (tentative)

Project Location(s): Providence, RI. Five (5) of NBC Combined Sewer Overflow (CSO) regulator sites, Identification Numbers: 023 Pitman Street, 009 Dorrance Street, 036 Silver Spring Street, 045-1 Valley Street, and 213-2 Pleasant Street

Project Description: Most of the work is to occur strictly within pre-existing underground structures, not requiring excavation. The work plans to: install access cleanouts; replace 8-inch gravity sewer pipe at 045-1 Valley Street location involving approximately sixty (60) feet of open cut excavation; create connection between the invert of the Pitman St. sewer and the Seekonk Interceptor (no excavation necessary); adjust weir height at Silver Spring St.; and various retrofits to the Pleasant Street regulator site such as removing obsolete appurtenances and installing a floatables control device.

Anticipated Environmental Impacts: No negative impacts anticipated. Project will improve reliability and efficiency of the 5 identified regulator sites, including reducing frequency of sewer overflows from these structures and improving flow towards the treatment facility. Short-term construction-related impacts are anticipated to be minor and will be mitigated with the below measures.

Required Mitigation Measures: Utilize standard erosion and sedimentation controls, if warranted, and pollution prevention measures for construction sites. Manage construction operations to minimize noise and traffic impact to the surrounding area.

\*DRAFT\* for public review

---

Susan Kiernan, Administrator  
Office of Water Resources

ISSUANCE DATE: \_\_\_\_\_

STATE OF RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF WATER RESOURCES

PUBLIC NOTICE OF INTENT TO ISSUE 2 CATEGORICAL EXCLUSIONS

Whereas, the Director of the Rhode Island Department of Environmental Management has reviewed for approval two requests for a Categorical Exclusion Determination as follows: 1) a request from the **Warwick Sewer Authority** for the "Replacement of Air Ejector Pumping Stations- Northampton, Stanmore, and Lake Shore Road South" project, and 2) a request from the **Narragansett Bay Commission** for the "Fields Point System-wide Regulator Improvements" project, both as proposed, under the authority of Chapters 42-17.1 and 46-12 of the General Laws of Rhode Island, 1956, as amended, and has determined there are no significant environmental impacts associated with either of these projects.

Therefore, the Director of the Rhode Island Department of Environmental Management is hereby giving notice of intent to issue a Categorical Exclusion for the aforementioned projects pursuant to the requirements and authority set forth in Chapter 46-12.2 of the General Laws of Rhode Island, 1956, as amended, and the "Rules and Regulations for the State Revolving Loan Fund (SRF) Program," dated May 2018.

A copy of each of the proposed Categorical Exclusion applications can be found at <http://www.dem.ri.gov/programs/water/finance/state-revolving-fund.php> or obtained by calling (401) 537-4260 weekdays from 8:30 a.m. to 4:00 p.m., or by writing to the RIDEM Office of Water Resources, attention: CWSRF Program, 235 Promenade Street, Providence, RI 02908-5767. All material submitted for review is available for public inspection during the above hours at the above location. Written comments regarding either of the Categorical Exclusions should be sent to the Office of Water Resources within thirty (30) days of the date of this notice.

A public hearing will be scheduled if, within 10 days of the date of this Notice, DEM receives such a request from twenty-five (25) people, a governmental agency or subdivision, or an association having not less than twenty-five (25) members, and specifying which of the two aforementioned project is of concern. If a public hearing is held, a public notice will be published announcing the date, time, and place of such hearing, to be held at least five (5) days before the end of this thirty (30) day public comment period.

Signed this 15<sup>th</sup> day of August, 2024.



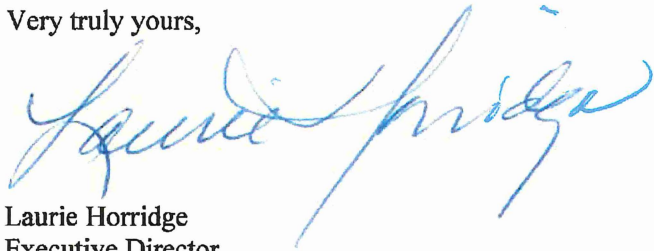
---

Susan Kiernan, Administrator  
Office of Water Resources



If you have any questions or need further information, please feel free to contact Robert M. Baglini, Jr., PE – Engineering Manager of my staff, at (401) 461-8848, extension 442.

Very truly yours,



Laurie Horridge  
Executive Director

Attachments: SRF Application Checklist with Attachments

Cc: David C. Bowen P.E., NBC, Karen Giebink, NBC, Robert Baglini P.E., NBC, Kathryn Kelly P.E., NBC, NBC Files - 306.10D

**Narragansett Bay Commission Contract  
306.10D  
Professional and Technical Consulting Services  
for Narragansett Bay Commission Field's Point System-Wide Regulator Improvements  
Environmental Review Process**

**Description:** The scope of work for this phase of the project involves the Detailed Design resulting from recommendations after a comprehensive condition assessment, alternatives analysis and assessment for improvements to selected Narragansett Bay Commissions (NBC) Combined Sewer Overflow (CSO) regulator sites in need of operational and/or hydraulic improvements. The selected regulator sites for this project correspond to CSO's 009, 023, 036, 045-1, and 213-2. The improvements are warranted to optimize NBC infrastructure and to meet all requirements of the NBC's Rhode Island Pollutant Discharge Elimination System Permits (RI0100072 and RI0100315).

The NBC followed a Qualifications-Based Selection procurement method to solicit professional services for the initial planning phase of this project based on an industry standard selection process, including, but not limited to, the Brooks Architect-Engineers Act. Subsequent design, and construction administration services were listed in the solicitation as an option, if the initial planning phase was completed satisfactorily. As a result, Kleinfelder Northeast, Inc. was awarded the initial services contract, which is now intended to be amended to also include detailed design services.

Final deliverables for this detailed design phase will be complete design plans and construction specification documents prepared by Kleinfelder Northeast, Inc.

There are no foreseen negative environmental impacts associated with this project. Specifically, the proposed project is not anticipated to negatively impact the following:

1. State Guide Plan Consistency: By issuance of this project, the NBC is retaining a consulting firm to conduct a comprehensive evaluation and condition assessment of selected collection system assets. The results of the completed evaluation and assessment services will be used to formulate a program of prioritized improvement recommendations needed to ensure the reliable and efficient performance of the NBC's sewerage system. Detailed design of recommended improvements will be the second phase of this project. This asset-management based approach to NBC's critical wastewater infrastructure is consistent with the Rhode Island State Guide Plan.
2. Clean Air Act. Safe Drinking Water Act: The project, as proposed, will have no adverse impact on air quality or drinking water.
3. National Historic Preservation Act. Archaeological and Historic Preservation Act: The project, as proposed, will have no conflict with regulations contained in National Preservation Acts.
4. Coastal Zone Management Act. Coastal Barriers Resources Act: The project, as proposed, will

have no impact the Coastal Zone Management Act and Coastal Barriers Resources Act.

5. Endangered Species Act: The project, as proposed, shall take place within existing public right-of ways. There will be no adverse impact to endangered species.
6. Transportation Act: The project, as proposed, will not have significant long-term impacts on traffic.
7. Farmland Protection Policy Act: The project, as proposed, will have no impact to farmland.
8. Essential Fish Habitat: The project, as proposed, will have no impact on essential fish habitat.
9. Protection of Wetlands and Flood Plain Management: The proposed project is not anticipated to impact Wetlands or Flood Plain Management requirements.
10. Wild and Scenic Rivers Act: The project, as proposed, will not have an impact on wild or scenic rivers.

The Narragansett Bay Commission respectfully requests that a Categorical Exclusion be granted for this project.

The following are the proposed design improvements for each site for inclusion in the final design based on primary and secondary recommendations from the Design Concept Report of the prior Study Phase.

**Pitman Street**

The proposed improvement is to create a connection between the invert of the Pitman Street sewer and the crown of the Seekonk Interceptor.

**Dorrance Street**

The proposed improvement is to provide an access cleanout on the connector pipe near its connection to the downstream interceptor for improved maintenance.

**Silver Spring Street**

The proposed improvement is to perform weir height adjustments (adding brick and block) at the location of the existing weir at Silver Spring Street and Metcalf Street. *Kleinfelder will provide the new designed weir height, but we anticipate that the construction work will be coordinated and completed by the Commission's staff.* Also, the proposed improvements will include an access cleanout on the connector pipe near its connection to the downstream interceptor for improved maintenance.

**Valley Street**

The proposed improvements are to replace the existing connector pipe with a new PVC pipe (anticipated to be an 8-inch) and provide a new access cleanout near its connection to the downstream interceptor for improved maintenance.

**Pleasant Street**

The proposed improvements are to:

- Remove the existing cast iron grate in the inlet chamber.
- Replace the 8-inch connector pipe from the Diversion Chamber to the Grit Chamber with a larger connection.
- Remove the sluice gate and other obsolete appurtenances from the regulator structure.
- Abandon the unused chambers.
- Installation of floatables control within the grit chamber.

**Assumption:** The proposed access cleanout improvements mentioned above will be designed as a standard detail that can be applied to the specific locations above as well as other locations throughout the NBC collections system.

The 60% documents will include:

- a. 60% Design Drawings
  - I. Cover Sheet
  - II. Sheet List and Keyplan
  - III. General Notes and Legend
  - IV. Existing Conditions Plans
  - V. Geotechnical Notes and Details
  - VI. Civil General Notes and Legend
  - VII. Proposed Plans
  - VIII. Detail Sheets
  - IX. Traffic Management Plans

## Paquet, Jenny (DEM)

---

**From:** Caruolo, Michael <mcaruolo@narrabay.com>  
**Sent:** Friday, June 21, 2024 12:21 PM  
**To:** Paquet, Jenny (DEM)  
**Cc:** Kiernan, Sue (DEM); McCormick, Sean (DEM); Pinto, Alex (DEM)  
**Subject:** Re: SRF Application for Design Contract 306.10D

### This Message Is From an External Sender

This message came from outside your organization.

Report Suspicious

Hi Jenny,

I'm out of the office today but can get you more details next week, if needed.

The application coverletter has the length of sewer on Valley, I believe it's about 60' total to be replaced.

As far as Pitman St, I don't know the distance, but please note that all work at this site will be isolated to within the existing pipelines and there is no excavation planned.

I will follow up next week with the distance to the Seekonk River, but in meantime hope this is some help.

Thanks,  
Mike Caruolo

Sent from my Verizon, Samsung Galaxy smartphone  
Get [Outlook for Android \[aka.ms\]](#)

---

**From:** Paquet, Jenny (DEM) <Jenny.Paquet@dem.ri.gov>  
**Sent:** Friday, June 21, 2024 9:15:32 AM  
**To:** Caruolo, Michael <mcaruolo@narrabay.com>  
**Cc:** Kiernan, Sue (DEM) <sue.kiernan@dem.ri.gov>; McCormick, Sean (DEM) <Sean.McCormick@dem.ri.gov>; Pinto, Alex (DEM) <alex.pinto@dem.ri.gov>  
**Subject:** Re: SRF Application for Design Contract 306.10D

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Hi Michael,

Some of my coworkers may be able to help process this application while I'm out.

Could you please let us know the distances involved for ultimate construction on some of these:

- the distance between Pitman Street Sewer and the Crown of the Seekonk interceptor, and
- the length / distance for the new connector pipe anticipated for Valley Street?



The other sites appear to be eligible for Cat Ex, but we need more info on extent and nature of construction work in order to tell on the above two.

Thank you,  
Jenny

---

**From:** Caruolo, Michael <mcaruolo@narrabay.com>  
**Sent:** Thursday, June 20, 2024 9:28 AM  
**To:** Paquet, Jenny (DEM) <Jenny.Paquet@dem.ri.gov>  
**Subject:** SRF Application for Design Contract 306.10D

Good morning, Jenny,

Attached is the SRF Application for the design component of NBC's Project 306.10D - NBC Field's Point System-Wide Regulator Improvements.

It appears that the first attempt at sending this to you (last month) somehow failed, as it was hung up in my inbox.

Please confirm receipt and let me know if you have any questions or if you would like the original hardcopy delivered to RIDEM Offices.

Thank you,

--Mike Caruolo  
401-461-8848 x 357

---

CONFIDENTIALITY NOTICE: This electronic mail transmission and any documents accompanying this electronic mail transmission is intended by the Narragansett Bay Commission (NBC), for the use of the named addressee(s) to which it is directed and may contain information that is privileged, or otherwise confidential. It is not intended for transmission to, or receipt by, anyone other than the named addressee(s) (or a person authorized to deliver it to the named addressee[s]). It should not be copied or forwarded to any unauthorized persons. If you have received this electronic mail transmission in error, please delete it from your system without copying or forwarding it and notify the sender of the error by reply e-mail or by calling the Narragansett Bay Commission at 401-461-8848, so our address record can be corrected.

---

CONFIDENTIALITY NOTICE: This electronic mail transmission and any documents accompanying this electronic mail transmission is intended by the Narragansett Bay Commission (NBC), for the use of the named addressee(s) to which it is directed and may contain information that is privileged, or otherwise confidential. It is not intended for transmission to, or receipt by, anyone other than the named addressee(s) (or a person authorized to deliver it to the named addressee[s]). It should not be copied or forwarded to any unauthorized persons. If you have received this electronic mail transmission in error, please delete it from your system without copying or forwarding it and notify the sender of the error by reply e-mail or by calling the Narragansett Bay Commission at 401-461-8848, so our address record can be corrected.

## Paquet, Jenny (DEM)

---

**From:** Caruolo, Michael <mcaruolo@narrabay.com>  
**Sent:** Monday, June 24, 2024 7:38 AM  
**To:** Paquet, Jenny (DEM)  
**Cc:** Kiernan, Sue (DEM); McCormick, Sean (DEM); Pinto, Alex (DEM)  
**Subject:** RE: SRF Application for Design Contract 306.10D

---

**This Message Is From an External Sender**

This message came from outside your organization.

Report Suspicious

Good morning, Jenny,

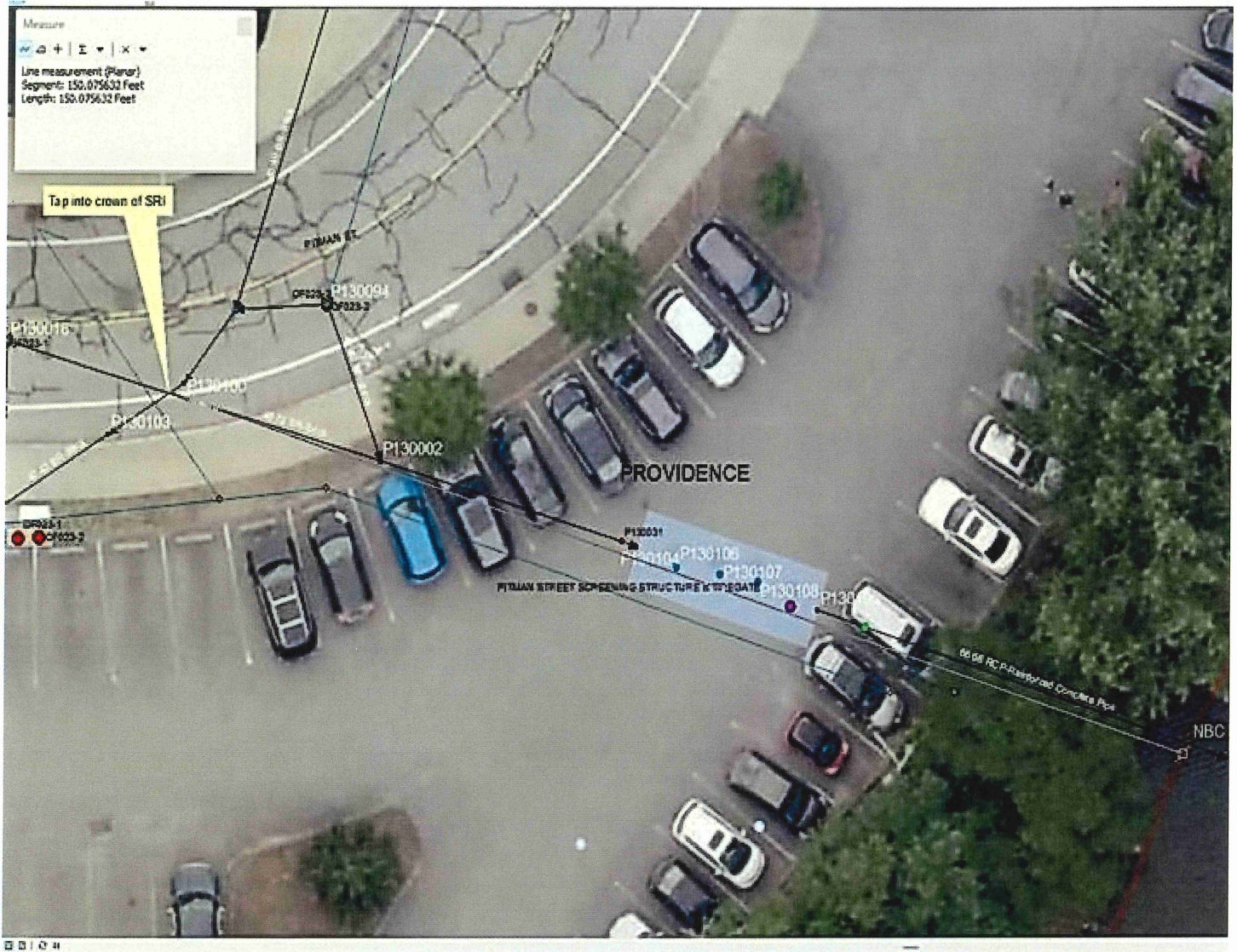
Based on NBC GIS/RIGIS it appears that the distance from the Seekonk Rivers edge to the point where the tap-in will occur is approximately 150'.

I'm not entirely familiar with all criteria for a Cat. Ex., but as previously stated, all work shall take place within the existing NBC CSO Pipe/Seekonk River Interceptor and there is no excavation planned at this location.

Please let me know if you have any additional questions.

Thank you,

--Mike Caruolo  
401-461-8848 x 357



**From:** Caruolo, Michael <mcaruolo@narrabay.com>  
**Sent:** Friday, June 21, 2024 12:21 PM  
**To:** Paquet, Jenny (DEM) <Jenny.Paquet@dem.ri.gov>  
**Cc:** Kiernan, Sue (DEM) <sue.kiernan@dem.ri.gov>; McCormick, Sean (DEM) <Sean.McCormick@dem.ri.gov>; Pinto, Alex (DEM) <alex.pinto@dem.ri.gov>  
**Subject:** Re: SRF Application for Design Contract 306.10D

Hi Jenny,

I'm out of the office today but can get you more details next week, if needed.

The application coverletter has the length of sewer on Valley, I believe it's about 60' total to be replaced.

As far as Pitman St, I don't know the distance, but please note that all work at this site will be isolated to within the existing pipelines and there is no excavation planned.

I will follow up next week with the distance to the Seekonk River, but in meantime hope this is some help.

## **Paquet, Jenny (DEM)**

---

**From:** Pinto, Alex (DEM)  
**Sent:** Wednesday, June 26, 2024 9:30 AM  
**To:** Paquet, Jenny (DEM); Haberek, Joseph (DEM); Kiernan, Sue (DEM); Talley, Sophia (DEM); McCormick, Sean (DEM)  
**Subject:** FW: SRF Application for Design Contract 306.10D

All,

NBC sent me a copy of the design report for the proposed CSO regulator improvements under this contract. See a summary of concerns identified in the report below. Concerns include improving hydraulic capacity at some of the regulators to accommodate future planned development and high I/I flows. Therefore, this project will require facilities planning – either an amendment to NBC’s existing CSO abatement planning documents or a separate, stand-alone facilities plan. Also, since the project is to address increased flows, I believe it does not qualify for a Cat Ex and an Environmental Assessment/FONSI will be required.

I will let NBC know that they need to prepare a facilities plan and environmental assessment. Fortunately, it looks like the design report can be easily tweaked into a facilities planning document.

Alex

### Pitman Street Regulator (023)

*The primary concern at the Pitman Street regulator is hydraulic capacity, and maintenance concerns are secondary. High infiltration and inflow have been observed within the regulator’s service area, and planned development upstream of the regulator will increase the required hydraulic capacity at this location.*

### Dorrance Street Regulator (009)

*The Dorrance site was originally identified as potentially having insufficient hydraulic capacity to accommodate future built-out, but through the course of this evaluation the focus has shifted to maintenance problems as the primary concern at this site. Significant buildout is anticipated in the service area of this regulator which could make capacity a bigger problem in the future.*

### Silver Spring Street Regulator (036-2)

*The primary concern at this regulator site was originally identified as maintenance, with hydraulics of secondary concern. This site is in an area with anticipated upstream development, aging infrastructure, and high infiltration and inflow; however, hydraulic capacity was not believed to be a problem at this site at the onset of this study.*

### Valley Street Regulator (045-1)

*The primary concern at this site is maintenance-related, with no current hydraulic capacity concerns.*

### Pleasant Street Regulator (213-2)

*The primary concern at this site is maintenance-related, with no current hydraulic capacity concerns.*

**From:** Caruolo, Michael <mcaruolo@narrabay.com>  
**Sent:** Monday, June 24, 2024 7:38 AM  
**To:** Paquet, Jenny (DEM) <Jenny.Paquet@dem.ri.gov>

## Paquet, Jenny (DEM)

---

**From:** Pinto, Alex (DEM)  
**Sent:** Thursday, July 25, 2024 7:59 AM  
**To:** Caruolo, Michael  
**Cc:** Paquet, Jenny (DEM); Bowen David  
**Subject:** RE: SRF Application for Design Contract 306.10D

Hi Mike,

Per the federal regulations below (and attached to the SRF funding application) the project can qualify for a Categorical Exclusion and will not require facilities planning if NBC provides documentation that the project is primarily maintenance-related, will result in only a "minor expansion" of capacity, and does not have the primary purpose of upgrading infrastructure for the purposes of future development.

Please provide documentation explaining that the project goals are consistent with the above circumstances. DEM will then review the documentation to determine if the project is eligible for a Categorical Exclusion.

Let me know if you have any questions.

Thanks,  
Alex

### § 6.204 Categorical exclusions and extraordinary circumstances.

- (a) A proposed action may be categorically excluded if the action fits within a category of action that is eligible for exclusion and the proposed action does not involve any extraordinary circumstances.
  - (1) Certain actions eligible for categorical exclusion require the Responsible Official to document a determination that a categorical exclusion applies. The documentation must include: A brief description of the proposed action; a statement identifying the categorical exclusion that applies to the action; and a statement explaining why no extraordinary circumstances apply to the proposed action. The Responsible Official must make a copy of the determination document available to the public upon request. The categorical exclusions requiring this documentation are listed in paragraphs (a)(1)(i) through (a)(1)(v) of this section.
    - (i) Actions at EPA owned or operated facilities involving routine facility maintenance, repair, and grounds-keeping; minor rehabilitation, restoration, renovation, or revitalization of existing facilities; functional replacement of equipment; acquisition and installation of equipment; or construction of new minor ancillary facilities adjacent to or on the same property as existing facilities.
    - (ii) Actions relating to existing infrastructure systems (such as sewer systems; drinking water supply systems; and stormwater systems, including combined sewer overflow systems) that involve minor upgrading, or minor expansion of system capacity or rehabilitation (including functional replacement) of the existing system and system components (such as the sewer collection network and treatment system; the system to collect, treat, store and distribute drinking water; and stormwater systems, including combined sewer overflow systems) or construction of new minor ancillary facilities adjacent to or on the same property as existing facilities. This category does not include actions that: involve new or relocated discharges to surface or ground water; will likely result in the substantial increase in the volume or the loading of pollutant to the receiving water; will provide capacity to serve a population 30% greater than the existing population; are not supported by the state, or other regional growth plan or strategy; or directly or indirectly involve or relate to upgrading or extending infrastructure systems primarily for the purposes of future development.

## Paquet, Jenny (DEM)

---

**From:** Caruolo, Michael <mcaruolo@narrabay.com>  
**Sent:** Wednesday, August 14, 2024 4:43 PM  
**To:** Paquet, Jenny (DEM)  
**Cc:** Bowen, David; Pinto, Alex (DEM)  
**Subject:** RE: SRF Application for Design Contract 306.10D

### This Message Is From an External Sender

This message came from outside your organization.

Report Suspicious

Hi Jenny, please see the NBC's Project 306.10D goals statement in response to your request. If you need any additional information or have any questions, please feel to contact me anytime.

Thank you,  
Mike Caruolo  
401-461-8848 x 357

The primary focus and immediate impact resulting from the proposed work related to NBC Project 306.10D is to improve maintenance and operations of select collection system assets. Consequently, these upgrades may result in slight changes in hydraulic operations of the sewer system at some locations. These minor changes will not involve new or relocated discharges to surface or groundwater, or additional volume or pollutant loadings to receiving waterbodies or the NBC WWTF's servicing these areas. Furthermore, the proposed improvements are not intended to extend infrastructure systems for the purpose of increasing capacity to accommodate future development.

**From:** Paquet, Jenny (DEM) <Jenny.Paquet@dem.ri.gov>  
**Sent:** Wednesday, August 14, 2024 10:07 AM  
**To:** Caruolo, Michael <mcaruolo@narrabay.com>  
**Cc:** Bowen, David <dbowen@narrabay.com>; Pinto, Alex (DEM) <alex.pinto@dem.ri.gov>  
**Subject:** RE: SRF Application for Design Contract 306.10D

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Hi Mike,

I hope your vacation was refreshing!

I'm just sending a reminder that I need a written statement from NBC speaking to what Alex asks for below, in order for me to process 306.10D federal financing application as a Cat Ex. This is because the application/project description currently acknowledges the project is partly to accommodate future development and needed increases to hydraulic capacity, which would trigger an EA.

Please let me know if you have any questions.