



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

April 3, 2014

TO: Current Multi-Sector General Permit (MSGP) permit holders and other facilities who did not submit information to comply with the Letter of Intent

FROM: Eric A. Beck, P.E., Supervising Engineer  
Office of Water Resources

SUBJECT: **MSGP Vessel Pressure Washing Wastewater Letter of Intent – Notice of Non-submittal for February 15, 2014 deadline**

On November 6, 2013 the Department of Environmental Management (“DEM”) sent a notice to all MSGP permittees of Sectors Q (Water Transportation) and R (Ship and Boat Building and Repair Yards). The notice contained a Letter of Intent (LOI) and Certification Statement developed by the DEM. The DEM requested that those facilities that perform pressure washing but intend to eliminate the discharge sign the LOI and return it to the DEM by December 15<sup>th</sup>. As part of the conditions of the LOI the facilities were required to submit a report by February 15, 2014 describing the measures to be taken to eliminate the discharge of vessel pressure washing wastewater from their facility. In a November 25, 2013 joint letter from DEM and RIMTA, the February 15, 2014 submittal requirements required in Part 1 of the LOI were clarified. Below are key points from the 11/25/13 clarification letter:

- The February 15<sup>th</sup> submittal simply asks you to respond to DEM with an indication that you have thought about your options, reviewed the guidance that RIMTA and 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.

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From review of the responses received to date the DEM is hereby notifying your facility that it **did not submit** a report to comply with Part 1 of the LOI. If your facility conducts vessel pressure washing and intends to eliminate the discharge by the deadline contained within the LOI, you must submit the report as described in Part 1 of the LOI within seven (7) days of receipt of this notice.

If you have any questions regarding the above information or your requirements as stated in Part 1 of the Letter of Intent, please contact Aaron Mello at 401-222-4700, extension 7405.

cc: Wendy Mackie, RIMTA (Electronic Copy)  
Joseph Haberek, P.E., DEM/OWR (Electronic Copy)