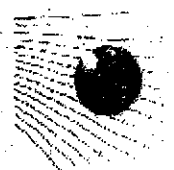


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OEP  
R1-05-001-0461



Nancy  
Grantham/R1/USEPA/US  
07/12/2005 12:30 PM

To Carol Krasauskis/R1/USEPA/US@EPA  
cc Michael Ochs/R1/USEPA/US, Ira Leighton/R1/USEPA/US@EPA,  
Martha Curran/R1/USEPA/US@EPA  
bcc  
Subject control to oep

should have answer prior to the ppa meeting on 7/26  
----- Forwarded by Nancy Grantham/R1/USEPA/US on 07/12/2005 12:29 PM -----



Michael Sullivan  
<michael.sullivan@dem.ri.gov>  
07/12/2005 09:29 AM

To Robert Varney/R1/USEPA/US@EPA  
cc  
Subject

Director Varney: Now that confirmation has occurred I can pick up issues that are of greater importance. A substantive issue which I cannot address without your agency's involvement is that of discharges into water bodies with interstate consequences. Specifically I have just signed some very aggressive permits for Narragansett Bay Commission which owns and operates three large facilities. These new permits set performance targets that we hope become models for all operations that ultimately feed into Narragansett Bay. There are several facilities on the Blackstone River which are permitted by EPA on behalf of Massachusetts that do not appear to have anything approaching what we are asking RI based operations to conform to. This situation leaves me with some difficult situations such as facing the inconsistency of asking one sewerage treatment plant owner to be design, cost and operate at much higher standards and ignoring up gradient polluters. Or setting performance standards at the lowest common denominator which ignores my agency's responsibilities to citizens and environment. I don't find either a terribly attractive alternative. What process can we engage in where EPA on behalf of Narragansett Bay and all citizens of the watershed get us all to a level were we can document that 'we practice what we preach' for the whole watershed? I recognize that you are an exceptionally busy individual but still ask that you assist in this endeavor. The folks from the Blackstone River Corridor are anxious to sign a MOU on MA/RI commitment to the watershed but I cannot sign without seeking improved response upstream. Happy to speak and work with you on this and any other issues of interest and I look forward to speaking with you. Regards, wms

W. Michael Sullivan, Ph.D.  
Director  
Rhode Island Department of Environmental Management

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RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

January 31, 2007

Ken Moraff, Deputy Director  
Office of Ecosystem Protection  
US EPA, Region 1  
1 Congress Street, Suite 1100  
Boston, MA 02114-2023

Dear Mr. Moraff:

I'm writing in response to your January 8<sup>th</sup> letter to Alicia Good of RIDEM and Glenn Haas of MADEP concerning the eutrophication problems that currently existing in Narragansett Bay.

Given the tremendous value of Narragansett Bay to the citizens of Rhode Island and nearby Massachusetts, a top priority of RIDEM is working with RI WWTFs as well as with EPA and Massachusetts officials to reduce excessive levels of nitrogen that are discharged to the Bay, either directly or to the Bay's tributaries. However our concerns regarding pollution sources in Massachusetts are not limited to effects on the Bay.

As you know, during the public comment period for the draft NPDES permits for the Attleborough and North Attleboro WWTF, DEM commented that more stringent discharge limits for Phosphorus and certain metals were necessary to meet water quality standards in the Ten Mile River. However, when the final permit for the North Attleborough WWTF was issued, EPA did not make any changes to the phosphorus or metals limits. I am in the process of reviewing this matter further and will take appropriate action to ensure the protection of RI waters.

Sincerely,

W. Michael Sullivan, Ph.D.  
Director  
RI DEM

cc: Arleen O'Donnell  
Robert W. Varney  
Alicia Good  
Glenn Haas