

Sent via electronic mail to: terry.gray@dem.ri.gov

June 27, 2025

Terry Gray, Executive Director
Rhode Island Department of Environmental Management
235 Promenade St.
Providence, RI 02908

Director Gray,

Save The Bay, on behalf of its members and supporters, is writing to strongly urge the Rhode Island Department of Environmental Management (RIDEM) to strengthen its testing and monitoring requirements associated with contaminated water treatment and discharge from Revolution Wind's excavation and construction activities at Quonset Point.

Starting in June, 2024, Revolution Wind has self-reported major exceedances of its water quality discharge limitations. In fact, 70% of the exceedances were *more than 100% over the acceptable limits*, and those included unlawful and significant pollutant discharges into Narragansett Bay. Significantly, discharges of zinc, arsenic and total phenols were *over 1000% beyond the discharge limits*.

We understand that RIDEM has initiated enforcement actions against Revolution Wind for these exceedances, resulting in multiple modifications to improve Revolution Wind's on-site water treatment processes. However, considering Revolution Wind's numerous exceedances, causing wholly unacceptable violations to Rhode Island's water quality standards, Save The Bay strongly urges RIDEM to hold Revolution Wind more accountable by increasing its discharge monitoring and testing *prior* to discharging into Narragansett Bay, rather than at the point and time of discharge.

Prior to Revolution Wind obtaining its RIDEM remediation permit (renewed in October, 2024) to conduct excavation and construction to connect its offshore wind export cable to the substation located at Quonset Point, RIDEM, the landowner (Quonset Development Corporation [QDC]), and Revolution Wind knew, based on the history of use of the location, including a capped landfill, that its operations would be unearthing contaminated sediments and exposing contaminated groundwater. Revolution Wind's ability to lawfully discharge to QDC's MS4 stormwater discharge outfalls depends on Revolution Wind's ability to fully and adequately treat the contaminated groundwater encountered during its construction and excavation work. Over 25 major water quality discharge exceedances show that Revolution Wind is failing to meet the rigorous and well-defined standards, to the detriment of Narragansett Bay.

Wastewater discharges into Narragansett Bay, contaminated with levels of metals and hydrocarbon byproducts that exceed limits *by over 100% to 1000%*, could pose multiple extreme risks to the Bay, and both the humans and marine flora and fauna which contact and rely upon it, including:

- 1) Immediate exposure to marine life threatening benthic, nektonic, and planktonic populations of marine flora and fauna potentially resulting in mortality, impacting their growth and reproduction, and detrimentally impacting the biodiversity and abundance of the Bay;
- 2) Potential human consumption of benthic mollusks, arthropods, and finfish having been exposed to or having absorbed these harmful chemicals through the marine food chain, as a result of the robust marine fisheries economy which Rhode Island takes great pride in;
- 3) Direct exposure to humans engaged in primary contact with Narragansett Bay along the beaches and residential coastline down-bay of the outfalls.

It is well within RIDEM's regulatory authority to mitigate these risks by requiring Revolution Wind to conduct additional pre-discharge monitoring and testing either as part of its remediation permit, or as a requirement included in its enforcement actions against Revolution Wind to prevent toxic pollutants from entering Narragansett Bay.

Revolution Wind's pollution discharge exceedances pose a threat to the health of the Bay, the population that relies upon it, and the ecosystem it supports, and the technology is readily available to achieve compliance with the law. Therefore, we strongly urge RIDEM to require Revolution Wind to commit to improved onsite water treatment and additional and vigilant monitoring and testing to ensure that any future discharge into the waters of Narragansett Bay are well within permissible water quality limits.

Sincerely,



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