



EA Engineering, Science, and Technology, Inc., PBC

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15 April 2022

Stephen Curtis
Port Facility Manager/FSO
Waterson Terminal Services, LLC
ProvPort, Inc. / Port of Providence RI
35 Terminal Road
Providence, RI 02905
www.watersonllc.com
401-461-9900 office

Subject: Green Marine Verification Summary Report 2021
Waterson Terminal Services, LLC
Providence, RI
EA Project # 6343802

Dear Mr. Curtis:

EA Engineering, Science and Technology, Inc. PBC (EA) is pleased to submit this Green Marine Verification Summary Report for 2021 Self-Assessment claimed levels to Waterson Terminal Services, LLC (WTS). The report summarizes the results of the Green Marine Verification completed the week of 13 April 2022.

EA thanks you for the opportunity to support WTS. Please contact me with any questions or comments.

Sincerely,

EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC., PBC

A handwritten signature in black ink, appearing to read 'B. Lesinski', is written over a horizontal line.

Brian Lesinski
Green Marine Verifier

cc: File

VERIFIED COMPANY INFORMATION	
Company name	Waterson Terminal Services, LLC
Company address	35 Terminal Road Providence, RI 02905
Company website	www.watersonllc.com
Name and address of the person in charge of the Green Marine Program	Stephen Curtis Port Facility Manager/FSO 401-461-9900 office
Number of employees	22
Number and name/location of terminals/sites or number of vessels participating in the program	Waterson Terminal Services, LLC ProvPort, Inc. / Port of Providence RI 35 Terminal Road Providence, RI 02905
VERIFIER INFORMATION	
Verifier name	Brian C. Lesinski
Verifier address	301 Metro Centre Blvd. Warwick, RI 02886
Phone	401-287-0367
Verification date and time	13 April 2022
Name of persons interviewed during the verification	<ul style="list-style-type: none"> • Stephen Curtis, Facility Manager/Facility Security Officer (FSO) • Chris Waterson, General Manager • Kevin Laiter, AFSO • John Gustus, Director of Operations • Rick Fratus, Stevedoring Manager • Kevin Sorenson, Mechanic
LAST VERIFICATION	
Date of last verification	24 April 2019
Scores reached during last verification	<ol style="list-style-type: none"> 1. Greenhouse Gases and Air Pollutants – 1 2. Spill Prevention – 2 3. Dry Bulk Handling and Storage – 1 4. Community Impacts – 2 5. Environmental Leadership – 2 6. Waste Management – 1
Site/vessel visit yes / no?	Yes – site visit conducted 13 April 2022

1. EXECUTIVE SUMMARY

EA Engineering, Science and Technology, Inc., PBC (EA) was retained by Waterson Terminal Services (hereafter WTS) to conduct a Green Marine Verification in April 2022. The purpose of the verification was to document WTS’s self-claimed levels of Green Marine environmental program progress on its 2021 self-evaluation. The period of review was calendar year 2020-2021. The verification review was performed by Mr. Brian Lesinski with the active participation of WTS employees.

The review consisted of:

- Physical review of the facility;
- Interviews with various WTS employees;
- Observation of employee work practices;
- Review of documented plans, procedures, programs, and training;
- Examination of select facility records and documents; and
- Auditor's professional judgement of management practices.

The review was conducted in conformance with published Green Marine protocols and checklists, and information provided specifically:

- Self-Evaluation Guide and Summary
- Green Marine Smart Guide – Terminals and Shipyards

WTS has sufficiently implemented systems and processes to support the performance levels claimed for all performance indicators 1-6, except for performance indicator 7 – Community Relations, which was not claimed and optional for reporting year 2021. The summary of claimed and verified levels is summarized below:

Green Marine Verification Summary 2021 – Waterson Terminal Services, LLC

Environmental Performance Indicator	Level Claimed	Level Verified	Comments
1) Greenhouse Gases and Air Pollutants	3	2	Level not verified as claimed and reduced to Level 2. Criterion 2.2 initially claimed as NA, but after discussion now applicable and criteria met. However, criterion 1.3.1 not met as annual emission statement not in conformance with Annex 1-A requirements.
2) Spill Prevention and Stormwater Management	4	3	Level 4 not met. 2.4.1 not met. Eight (8) of 8 criteria met (100%) at Level 3.
3) Dry Bulk Handling and Storage	3	2	Level not verified as claimed and reduced to Level 2. Criterion 3.3.2 not met.
4) Community Impacts	2	2	Level verified as claimed. 11 of 15 criteria met (73%). Criterion 4.2.7 should be applicable (not NA as claimed). Level 3 not claimed and no justification provided.
5) Environmental Leadership	2	2	Level verified as claimed.
6) Waste Management	2	2	Level verified as claimed.
7) Community Relations	NA	NA	Optional for 2021.

WTS joined Green Marine in 2018 and completed its initial verification in 2019. Based upon this verification, WTS continues to build and improve upon its environmental program performance. WTS improved its rating levels for four (4) performance indicators 1, 2, 3 and 6. Performance indicators 1, 2, and 3 were reduced one level from self-claimed levels, but indicators 1 and 2 still increased from their 2019 initial rating. Commendables noted during the verification include:

- WTS leadership's interest, enthusiasm, and commitment to position WTS as an environmental steward in the stevedore community on the east coast;
- Sharing the results prior Green Marine verification report with stakeholders through WTS's website and promoting Green Marine involvement;
- Organization of supporting documentation including the Green Marine "playbook" organized by performance indicator provided efficient review of requirements;
- Leadership involvement in various EPA Port Initiative and local advocacy organizations including the City of Providence Near Port Community and Providence Resilience Partnership through financial and voluntary commitments for port infrastructure and neighborhood improvements;
- Established transparency and open lines of communication with public stakeholders through published phone numbers and web site contact process;
- Processes to engage community and other stakeholders through web site and integration of Green Marine commitments and program links on the WTS website;
- Phase out of coal bulk terminal import in 2017 and on-going/planned infrastructure improvements associated to position operations in the wind power industry on the eastern seaboard (Orsted partnership);
- Recent application into National Grid Fleet Assessment Program to define fleet conversation recommendations;
- Secure EPA Diesel Emission Reduction Act (DERA) funding for Port and cost-share agreements for partners;
- Partnership with City of Providence, environmental regulatory agencies, and Save The Bay (NGO) concerning the restoration of an adjacent brownfield and integration into an Urban Coastal Greenway.
- Formation of Pollution Prevention and Preventive Maintenance Teams to address regulatory permit and management plan requirements, as well as monitor and develop improvements.

Recommendations from this verification review include:

- Continue to share the results of this verification report with stakeholders through WTS's website and actively developing actions plans;
- Complete an environmental compliance audit of WTS operations to serve as baseline for continual improvement and support elevated levels of Green Marine Performance Indicator 5 – Environmental Leadership requirements.
- Completing additional inventories and assessments discussed to further baseline waste and greenhouse gas generating operations and activities using Green Marine Annex guidance;
- Expand the current annual Safety training to incorporate specific environmental awareness training on topics such as stormwater, waste management, recycling, spill response, etc. and complete required annual training per management plans/permits.
- Further evaluate petroleum, oil, and lubricant (POL) use and management.
- Identify all waste streams and material recycling/reuse efforts to define landfill diversion percentage and opportunities for improvement;

- Finalize incident identification and reporting procedure, train, and communicate with staff to support complaint and environmental reporting requirements; develop log for tracking;
- Document Preventive Inspection & Maintenance program to detail workflow and requirements in accordance with Annex 2-B;
- Terminal Tariff No. 008, Part 360 - Consent to the Terms clearly notes that “parties using the ProvPort facility are required to abide by all applicable city, state and federal regulations including, but not limited to; OSHA, USCG, EPA, DEM, DHS, DOT and will be held responsible for any violations of these regulations.” As a majority of ProvPort area is managed by WTS tenants as the terminal operator, WTS should seek expanded opportunities to engage with tenants and promote environmental commitments for operations under their influence.

The verifier wishes to thank WTS and its employees for making the verification process most enjoyable. Of note I would recognize the preparedness of the facility employees, flexibility in scheduling, accessibility of the requested documentation, and engagement of senior leadership in the review.

Disclaimer on Use of Verification Report

This report was specifically developed for use by WTS. The process by which this verification review was conducted is consistent with generally acceptable environmental auditing practices and the best professional judgement of the verifier. The verifier used established checklists/protocols supplied by Green Marine and information from WTS. Protocols were based on Green Marine Environmental Program requirements. It should be understood that the review consisted of evaluating a sample of facility environmental practices and documentation and was conducted in a short time span relative to the review period. Efforts were directed toward validating claimed environmental programs, management practices, and performance during the period of review. This verification report should not be interpreted as a guarantee of compliance with all applicable or relevant environmental legal obligations and WTS requirements.