

PRETREATMENT PROGRAM

ANNUAL REPORT

JANUARY 1, 2020 – DECEMBER 31, 2020



ATTACHMENT VOLUME I

NBC AND PRETREATMENT PROGRAM
SPECIFIC INFORMATION

ATTACHMENT VOLUME I
NARRAGANSETT BAY COMMISSION
AND
PRETREATMENT PROGRAM
SPECIFIC INFORMATION

LISTING OF ATTACHMENT SECTIONS ATTACHMENT VOLUME I

NBC AND PRETREATMENT PROGRAM SPECIFIC INFORMATION

<u>SECTION #</u>	<u>TITLE</u>
1	NBC Public Information – Mailings, Newspaper Articles, Public Notices, Press Releases, Newsletters, and Educational Documents
2	Typical NBC Wastewater Discharge Permits
3	Various Pretreatment Program Documents ~ Spill and Slug Prevention Control Plan Guidance Document ~ Toxic Organic / Solvent Management Plan Guidance Document ~ Significant Industrial User Annual Inspection Checklist ~ NBC Sampling, Reporting, and Chain of Custody Forms
4	Sample Enforcement Letters, Notices, and Orders

ATTACHMENT VOLUME I

SECTION 1

***NBC PUBLIC INFORMATION,
MAILINGS, NEWSPAPER ARTICLES,
AND ADVERTISEMENTS***

***INFORMATIONAL LETTERS TO
USERS***



January 8, 2020

SEPTAGE HAULER
FEE PAID STICKER LETTER 2020

Permit Number: «**PERMIT_NUMBER**»

Dear «TITLE» «LASTNAME»:

Enclosed please find «NUMBER» 2020 Narragansett Bay Commission (NBC) permitted Septage Hauler Identification Sticker(s). Effective January 1, 2020, a sticker must be affixed to the inside windshield of each NBC permitted truck for identification purposes. Vehicles without a sticker will not be permitted to dump at the NBC Septage Receiving Facility.

If you have any questions regarding this matter, please contact the NBC Pretreatment Staff at 461-8848, ext. 490.

Sincerely,

Sulema Martinez
Pretreatment Clerk

Enclosure(s)



March 2, 2020

ENVIRONMENTAL MERIT AWARDS
Mass Mailing - All Users - Both Districts
List Attached

Dear _____ :

The Narragansett Bay Commission (NBC) is proud to announce its twenty-fifth annual NBC Environmental Merit Awards. As you may be aware, each year the NBC honors companies that have gone above and beyond compliance using pollution prevention techniques and approaches, implemented storm water mitigation technologies, and companies that achieved perfect compliance records.

There are three types of Environmental Merit Awards, the Pollution Prevention Award, the Perfect Compliance Award, and the Stormwater Management Award. Companies qualified for a Pollution Prevention Award must be in good standing with the NBC Rules and Regulations and able to demonstrate pollution prevention efforts that have resulted in volume/toxicity reduction of pollutants, commitment to sound environmental management practices, application of pollution prevention efforts for use by other companies, employee participation, extraordinary efforts to go beyond compliance and/or demonstrate innovative approaches to waste management. Companies that are qualified for Stormwater Management Awards must demonstrate stormwater abatement efforts resulting in measurable reduction/elimination of storm flow to the NBC sewer system.

If you would like to nominate your company for an NBC Environmental Merit Award, you can find the application and award criteria on our website using the following link:

<http://narrabay.com/media/1821/2019-env-merit-awards-application.pdf>

Please download the application and return it by March 20, 2020 to:

Jim Kelly
Technical Analysis & Compliance Manager
The Narragansett Bay Commission
One Service Road
Providence, RI 02905
Email: jkelly@narrabay.com
Fax: 401.461-6540

Page 2

If you have any questions, please contact me at 461.8848, ext. 490.

Sincerely,

A handwritten signature in black ink, appearing to read "Kerry M. Britt". The signature is written in a cursive style with a large, prominent initial "K".

Kerry M. Britt
Pretreatment Manager

cc: Jim Kelly



March 6, 2020

PERFECT COMPLIANCE

**Mass Mailing
All SIUs - Both Districts
List Attached**

Dear :

As you may be aware the Narragansett Bay Commission (NBC) Pretreatment staff reviews the files of all Significant Industrial Users (SIUs) as a part of the Pretreatment Annual Report preparation. As a part of this review, a list of SIUs achieving perfect compliance is compiled. These companies did not receive any Notices of Violation during the review period. I would like to take this opportunity to congratulate these companies who achieved perfect compliance with the NBC Rules and Regulations and their permits. They are to be commended for their hard work and efforts to maintain compliance.

A. Harrison & Company, Inc.
Denison Acquisition Company, LLC d/b/a
Denison Pharmaceuticals, LLC
Electrolizing, Inc.
Godfrey & Wing, Inc. d/b/a Impco
Interplex Engineered Products, Inc.
Manchester Street, LLC
Pawtucket Power Associates
Providence Journal Company - Production Facility

Providence Metallizing Company, Inc.
Tanury Industries PVD, Inc.
Technodic, Inc.
Teknicote, Inc.
Teknor Apex Company
Tiffany and Company
Truex, Inc.
Univar USA, Inc.

An advertisement recognizing the achievements of these companies was published in the Providence Journal on February 27, 2020. Aligned herewith is a copy of the advertisement for your reference.

Sincerely,

Kerry M. Britt
Pretreatment Manager

KMB:smb

NARRAGANSETT BAY COMMISSION
Perfect Compliance
in recognition of Significant Industrial User Perfect Compliance in 2019



The Narragansett Bay Commission recognizes these Significant Industrial User companies for perfect regulatory compliance with Pretreatment Program regulations during 2019:

A. Harrison & Company, Inc.	Godfrey & Wing, Inc. dba Impco
Denison Acquisition Company, LLC	Interplex Engineered Products, Inc.
dba Denison Pharmaceuticals, LLC	Prov. Journal Co.
Electrolizing, Inc.	- Production Facility
Manchester Street, LLC	Technicote, Inc.
Pawtucket Power Associates	Technodic, Inc.
Tanury Industries PVD, Inc.	Tiffany and Company
Providence Metallizing	Univar USA, Inc.
Company, Inc.	
Teknor Apex Company	
Truex, Inc.	

Has your company demonstrated extraordinary environmental efforts this year?
 If so, apply for an NBC Environmental Merit Award! Download an application form at www.narrabay.com.

Vincent J. Meselella, Chairman • Laurie A. Horridge, Executive Director
 One Service Road, Providence, RI 02905
 401-461-8848 • www.narrabay.com



March 9, 2020

**MASS MAILING ALL SIUs
Field's Point and Bucklin Point
List Attached**

Dear _____ :

The R. I. DEM requires the Narragansett Bay Commission (NBC), prior to submission of its Annual Pretreatment Report, to notify all significant industrial users annually if their firm was classified as a Significant Industrial User (SIU) during that report year. Therefore, this letter is to notify you that your firm was classified as a SIU during 2019, since one or more of the following criteria applied to your firm:

1. Firm is subject to Federal EPA categorical standards;
2. Firm discharges an average process waste stream of 5,000 gallons per day (0.005 MGD) or more;
3. Firm contributes a process waste stream which is 5% or more of the average dry weather hydraulic or organic capacity of the NBC treatment facility to which the firm discharges;
4. Firm has reasonable potential to adversely affect the POTW's operation, or has the potential for violating any pretreatment standard or requirement.

In accordance with EPA and NBC regulations and the terms of NBC Wastewater Discharge Permits, SIUs must comply with various site specific requirements and must also comply with the EPA reporting requirements outlined in 40§CFR part 403.12. Site specific requirements may include (1) development, implementation, and maintenance of Toxic Organic Solvent Management and Spill & Slug Prevention Control Plans, (2) monitoring of process effluent, and (3) maintenance of logbooks, manifests, and associated paperwork. Reporting requirements may include (1) immediate notification of any spill or slug discharge, (2) twenty-four hour notification of any effluent violation, (3) submission of effluent monitoring reports within thirty days from the end of the month in which monitoring is required, or within thirty days from the sampling date, (4) submission of properly completed and signed Self-Monitoring Compliance Reports with each wastewater analysis, (5) notification of any changes in operation, and (6) submission of any other document by the NBC specified date.

Please refer to your discharge permit to ensure that you are in full compliance with the specific aforementioned requirements that apply to your facility. I recommend that you have regular meetings with all levels of employees at your firm to discuss the environmental regulations and your specific permit requirements and to develop ways to maintain full compliance. I recommend that you form Employee Awareness Programs, since so often your existing employees with the “hands on” responsibilities may see a better way to produce your product or to achieve and maintain compliance. I also encourage your firm to develop Environmental Management Systems (EMS) to provide your firm the environmental focus needed to ensure compliance with today's complex environmental regulations and issues. Avoiding non-compliance is a hard job requiring the participation of every employee from the hourly worker to the owner or CEO. The hard work of all employees is necessary to ensure that the name of your firm is never published in the annual Public Notice in the Providence Journal for being in Significant Non-Compliance (SNC) with NBC and EPA regulations.

The NBC Pollution Prevention staff of the Technical Analysis & Compliance Section is available to assist you with pollution prevention measures to help your firm achieve and maintain full compliance with environmental regulations. This technical assistance program is free and confidential. Contact James Kelly at 461-8848, ext. 262 to find out more about the NBC Pollution Prevention Program.

The NBC wishes you well at your efforts to comply with the NBC and EPA regulations throughout 2020. If you have any questions regarding this letter or the NBC Pretreatment Program in general, feel free to contact the engineer or technician responsible for regulating your firm at 461-8848, ext. 490.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kerry M. Britt".

Kerry M. Britt
Pretreatment Manager

KMB:smb

cc: Pretreatment Engineers/Technicians



March 13, 2020

MASS MAILING

Categories 11 through 59 - Both Districts

List Attached

Dear _____ :

This informational form letter is being sent to all industrial firms regulated by the Narragansett Bay Commission (NBC) Pretreatment Program to educate our users about EPA Regulations regarding Significant Non-Compliance. Federal general pretreatment program regulations require the NBC to annually publish a list of all industrial users that violate any of the EPA Significant Non-Compliance Criteria listed below:

SIGNIFICANT NON-COMPLIANCE CRITERIA

- A. Chronic violations of wastewater discharge limits, defined here as those in which 66% or more of all of the measurements taken during a six-month period exceed (by any magnitude) a numerical Pretreatment Standard or Requirement for the same pollutant parameter;
- B. Technical Review Criteria (TRC) violations, defined here as those in which 33% or more of all the measurements for each pollutant parameter taken during a six-month period equal or exceed the product of a numerical Pretreatment Standard or Requirement multiplied by the applicable TRC value (TRC = 1.4 for BOD, TSS, fats, oil, and grease and 1.2 for all other pollutants except pH);
- C. Any other violation of a pretreatment effluent limit (daily maximum or long-term average) that the Commission determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of Commission personnel or the general public);
- D. Any discharges of a pollutant that has caused imminent endangerment to human health, welfare or the environment or has resulted in the Commission's exercise of its emergency authority to halt or prevent such a discharge;

- E. Failure to meet, within 90 days after the scheduled date, a compliance milestone contained in a Commission notification, permit or enforcement order, for starting construction, completing construction or attaining final compliance;
- F. Failure to provide, within 30 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, self-monitoring compliance reports and reports on compliance with compliance schedules;
- G. Failure to accurately report non-compliance;
- H. Any other violation or group of violations which the Commission determines has adversely effected the operation or implementation of the Pretreatment Program.

The EPA requires that the NBC must review each industrial user file every three (3) months for SNC criteria A and B referenced above, evaluating the user's previous six (6) month compliance status as can be seen from the enclosed EPA graphic. **If an industrial user exceeds the compliance percentages specified in the SNC criteria A or B, even for just one quarterly evaluation period, the user is in significant non-compliance and must be listed in the newspaper.** The compliance percentages specified in SNC criteria A and B are calculated for each sample location specified in your Wastewater Discharge Permit. The NBC still reviews each user file annually to determine the user's compliance status with EPA criteria C through H. This EPA data evaluation method clearly shows how important it is for an industrial user to sample early and often during each quarterly data review period, especially for any parameters which your firm may periodically experience excursions above the discharge limits. Sampling early and often each quarterly review period will ensure that you are not listed as a violator for criteria A and B.

SUBMIT ALL REPORTS BY THE DUE DATE SPECIFIED BY THE NBC. The name of your firm will automatically be published in the newspaper as being in SNC for criteria F if any NBC requirement is not satisfied within thirty (30) days of the due date. Notify the NBC within twenty-four (24) hours of becoming aware of any sampling violation and immediately begin to resample for any parameters in violation (except for BOD and TSS). This is required by your discharge permit and is clearly stated on the Self-Monitoring Compliance Report form that must accompany each analyses. Please do not hesitate to contact the NBC Pollution Prevention staff of the Technical Analysis & Compliance Section (TAC) if your firm is experiencing compliance problems and would like assistance with pollution prevention measures. The NBC TAC staff is available to provide FREE technical assistance to your firm. For information regarding how pollution prevention assistance can help your firm achieve and maintain compliance, contact James Kelly at 461-8848, ext. 262.

PLEASE NOTE THAT THE NBC DOES NOT WANT TO PUBLISH THE NAME OF ANY FIRM, BUT WE MAY HAVE NO CHOICE. On February 27, 2020, the names of nine (9) firms from both districts were published in an advertisement in the Providence Journal due to their SNC status. These firms were billed by the NBC for the reimbursement cost for this public notice. A copy of this public notice is enclosed for your information. Only you can ensure that the name of your firm is not published for being in Significant Non-Compliance with NBC and EPA regulations. Please feel free to contact the Pollution Prevention staff of the Technical Analysis & Compliance Section if the NBC can be of assistance with your compliance endeavors. Good luck maintaining full compliance during 2020.

If you should have any questions regarding this letter or the permit requirements specific to your facility, contact the engineer or technician that regulates your firm at 461-8848, ext. 490.

Sincerely,

A handwritten signature in black ink, appearing to read "Kerry M. Britt". The signature is fluid and cursive, written in a professional style.

Kerry M. Britt
Pretreatment Manager

KMB:smb

Enclosures

cc: Pretreatment Engineers and Technicians



SIGNIFICANT NON-COMPLIANCE CRITERIA

- (a) Chronic Violations of Wastewater discharge limits, defined here as those in which 66% or more of all of the measurements taken during a six (6) month period exceed (by any magnitude) a numerical Pretreatment Standard or Requirement for the sample pollutant parameter;
- (b) Technical Review Criteria (TRC) violations, defined here as those in which 33% or more of all measurements for each pollutant parameter taken during a six (6) month period equal or exceed the product of a numerical Pretreatment Standard or Requirement multiplied by the applicable TRC (TRC = 1.4 for oil and grease and 1.2 for all other pollutants except pH);
- (c) Any other violation of a pretreatment effluent limit (daily maximum or long-term average) that the Narragansett Bay Commission (NBC) determines has caused, alone or in combination with other discharges, interference or pass through, including endangering the health of NBC personnel or the general public;
- (d) Any discharges of a pollutant that has caused imminent endangerment to human health, welfare of the environment or has resulted in the NBC's exercise of its emergency authority to halt or prevent such a discharge;
- (e) Failure to meet, within ninety (90) days after the scheduled date, a compliance milestone contained in a permit or enforcement order for completing construction or attaining final compliance;
- (f) Failure to provide, within thirty (30) days after the due date, required reports such as baseline monitoring reports, ninety (90) day compliance reports, Self-Monitoring Compliance Reports, and reports on compliance with compliance schedules;
- (g) Failure to accurately report noncompliance;
- (h) Any other violation or group of violations which the NBC determines will adversely affect the operation or implementation of the Pretreatment Program.

EXPLANATION OF SIGNIFICANT NON-COMPLIANCE (SNC) CRITERIA

SNC Criteria A 66 % or more of measurements are in violation of effluent standards for any six (6) month review period.

Example: Firm samples for copper ten (10) times in the six (6) month evaluation period of January 1 through June 30. Copper results are as follows:

(1)	1.16 ppm	-	In Compliance	(6)	1.21 ppm	-	Violation
(2)	2.34 ppm	-	Violation	(7)	4.35 ppm	-	Violation
(3)	1.26 ppm	-	Violation	(8)	1.40 ppm	-	Violation
(4)	2.31 ppm	-	Violation	(9)	2.17 ppm	-	Violation
(5)	0.87 ppm	-	In Compliance	(10)	0.91 ppm	-	In Compliance

The discharge limit for copper is 1.20 ppm, 7 out of 10 samples exceed this limit, therefore 70% of the copper samples are in violation, resulting in the firm being in SNC for copper for Criteria A.

SNC Criteria B Technical Review Criteria - 33% or more of measurements for the six (6) month review period exceed the limit multiplied by the TRC value. The TRC value = 1.2 for all parameters except oil and grease, where the TRC = 1.4

Example: For copper the TRC value multiplied by the copper limit = $1.2 \times 1.2 = 1.44$. Using the same results for copper as given in the example above:

<u>Measurements</u>	<u>Copper TRC Limit</u>	<u>In Compliance With TRC Limit?</u>
(1) 1.16 ppm	1.44 ppm	Yes
(2) 2.34 ppm	1.44 ppm	No
(3) 1.26 ppm	1.44 ppm	Yes
(4) 2.31 ppm	1.44 ppm	No
(5) 0.87 ppm	1.44 ppm	Yes
(6) 1.21 ppm	1.44 ppm	Yes
(7) 4.35 ppm	1.44 ppm	No
(8) 1.40 ppm	1.44 ppm	Yes
(9) 2.17 ppm	1.44 ppm	No
(10) 0.91 ppm	1.44 ppm	Yes

The TRC limit for copper, 1.44 is exceeded four (4) out of ten (10) samples in the review period, therefore, 40% exceedence of the TRC limit occurred, resulting in the firm being in SNC for Criteria B.

SNC Criteria C Any violation of a pretreatment effluent limit that has caused interference or pass-through of NBC facilities.

Example: A firm dumps an electroplating tank containing copper and cyanide. These toxic chemicals kill the microorganism at the NBC Wastewater Treatment facility, interfering with NBC operations. The firm is in SNC for Criteria C.

Example: A firm discharges a concentrated red dye containing copper. The red color passes through the NBC Wastewater Treatment facility, discoloring the receiving waters of Narragansett Bay. The firm is in SNC for Criteria C.

SNC Criteria D Discharging a pollutant that has caused imminent endangerment to human health or the environment.

Example: A firm dumps a degreasing solvent such as trichloroethylene into the sewer. Toxic chemical odors are evolved and enter nearby homes, businesses and endangers sewer workers. The firm is in SNC for Criteria D.

Example: An automotive repair facility dumps gasoline into the sewer creating toxic odors and explosive conditions in the sewer system. The firm is in SNC for criteria D.

SNC Criteria E Failure to meet, within ninety (90) days after a scheduled completion date, a compliance milestone...

Example: The firm, required by a compliance order, compliance schedule, permit or other document, fails to achieve a compliance milestone such as installing a pretreatment system, by the required date and exceeds the compliance milestone deadline by more than ninety (90) days. The firm is in SNC for Criteria E.

SNC Criteria F Failure to submit documents within thirty (30) days from the due date.

Example: A firm is required to sample in May and the compliance report is due by June 30. The report is submitted to the NBC on July 31, thirty one (31) days past the due date, therefore the firm is in SNC for Criteria F.

SNC Criteria G Failure to accurately report non-compliance.

Example: A firm is required to continuously record the pH of their effluent and to report the results monthly to the NBC on a monitoring report form. During the annual NBC inspection of the firm, the pH charts are reviewed and it is determined that low and high effluent pH violations have not been reported. The firm is in SNC for Criteria G and could face additional enforcement action for falsification of monitoring reports.

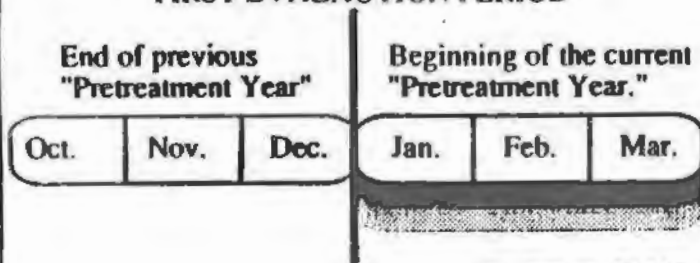
SNC Criteria H Any violation that adversely effects the operation or implementation of the pretreatment program.

Example: A firm refuses to allow access to NBC inspectors or harasses the NBC inspectors while performing their duties. The firm would be in SNC for Criteria H.

Determination of Industrial User (IU) Significant Noncompliance (SNC)

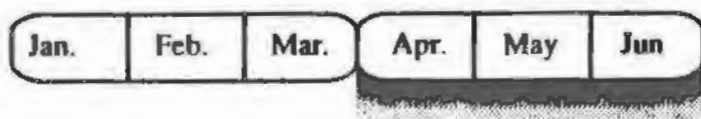
1. The POTW (in conjunction with the Approval Authority) must establish its "Pretreatment Year."
2. At the end of each quarter, POTWs and States should evaluate their IU's compliance status for the two criteria which are evaluated on a six month time frame (i.e., the "A" and "B" criteria - 403.8(f)(2)(vii)(A) and (B)) as illustrated below. The example below assumes a "Pretreatment Year" equal to the calendar year.

FIRST EVALAUTION PERIOD



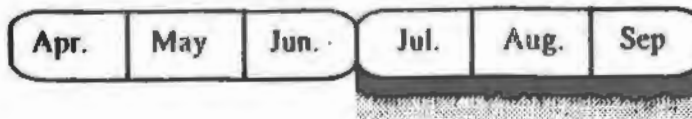
3. At the end of the first quarter (March 30th in our example), the POTW must evaluate the data from an industrial user for the previous six months (e.g., beginning with October 1 of the previous "Pretreatment Year" as in our example). Likewise, the POTW must evaluate six months of data at the end of each subsequent quarter (e.g., June 30th, September 30th, and December 31st).

SECOND EVALUATION PERIOD



4. At the end of the "Pretreatment Year," the POTW must summarize the compliance status of its industrial users over the reporting period and report on this compliance status to the Approval Authority. The POTW must publish all industrial users which were identified in SNC during the "Pretreatment Year," unless the IU was previously published for violations which occurred solely in the last quarter of the previous "Year."

THIRD EVALUATION PERIOD



FOURTH EVALUATION PERIOD



End of the current "Pretreatment Year."



The Narragansett Bay Commission

PUBLIC NOTICE

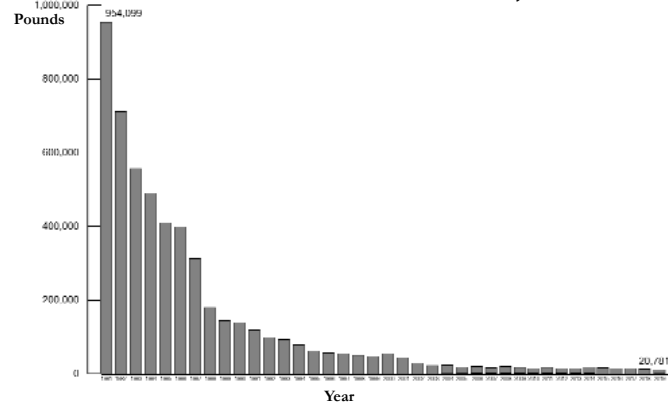
Firms in Significant Non-Compliance

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGULATION 40 C.F.R. 403.8(f) (2) (vii) and Article 10 of the Narragansett Bay Commission, Rules and Regulations require the NBC to publish annually the names of all industrial users in Significant Non-Compliance (SNC) with pretreatment standards and other pretreatment requirements during the preceding year. Companies deemed to be in Significant Non-Compliance are those industrial users who have violated any of the Significant Non-Compliance criteria listed, as defined by Article 2 of the NBC Rules and Regulations during the time period from October 1, 2018 through December 31, 2019. The parameter for which a company was not in compliance and/or the specific administrative deficiency are listed after the company name. The number(s) in parentheses correspond to the type of SNC criteria specified below. Some of the firms listed below may have been issued an Administrative Order in which administrative and/or civil penalties may have been assessed. Many of the companies listed have made significant progress toward correcting the violation and may now be in compliance.

Significant Non-Compliance Criteria:

- (1) Chronic violations of wastewater discharge limits, defined here as those in which 66% or more of all of the measurements taken during a six-month period exceed (by any magnitude) a numerical Pretreatment Standard or Requirement for the same pollutant parameter;
- (2) Technical Review Criteria (TRC) violations, defined here as those in which 33% or more of all the measurements for each pollutant parameter taken during a six-month period equal or exceed the product of a numerical Pretreatment Standard or Requirement multiplied by the applicable TRC value (TRC = 1.4 for BOD, TSS, fats, oil, and grease and 1.2 for all other pollutants except pH);
- (3) Any other violation of a pretreatment effluent limit (daily maximum or long-term average) that the Commission determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of Commission personnel or the general public);
- (4) Any discharges of a pollutant that has caused imminent endangerment to human health, welfare or the environment or has resulted in the Commission's exercise of its emergency authority to halt or prevent such a discharge;
- (5) Failure to meet, within 90 days after the scheduled date, a compliance milestone contained in a Commission notification, permit or enforcement order, for starting construction, completing construction or attaining final compliance;
- (6) Failure to provide, within 30 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, self-monitoring compliance reports and reports on compliance with compliance schedules;
- (7) Failure to accurately report noncompliance;
- (8) Any other violation or group of violations which the Commission determines has adversely effected the operation or implementation of the Industrial Pretreatment Program. •

Total Metals Influent to Field's Point WWTF, 1981-2019



THE NARRAGANSETT BAY COMMISSION IS COMMITTED TO PROTECTING THE STATE'S TWO LARGEST WASTEWATER TREATMENT FACILITIES AND NARRAGANSETT BAY FROM TOXIC DISCHARGES. This is accomplished by the issuance of discharge permits to commercial and industrial sewer users. These discharge permits specify the level of pollutants that can be discharged in a facility's wastestream and may require a firm to conduct wastewater monitoring to verify compliance with discharge limits, to implement a Spill Control Plan and/or Toxic Organic/Solvent Management Plan, and to install pretreatment equipment. Various reporting and record keeping requirements may also be written into discharge permits. The firms listed in this public notice violated one or more of the significant non-compliance criteria specified above. The Commission is required by the RI DEM and the US EPA to annually publish the names of all firms violating any of these criteria. Therefore, firms must be sure to comply with all the terms specified in their discharge permit to ensure that the name of their firm is not listed in this annual public notice. The NBC offers FREE technical assistance to firms located in the NBC service area through its non-regulatory Pollution Prevention assistance program. For information on how the NBC can help your firm achieve and maintain compliance, contact the NBC Technical Analysis and Compliance Section at 461-8848/TDD 461-6549 to schedule a free Pollution Prevention audit.

Most businesses located in the NBC district are to be commended for the fine job they have done treating their process discharges to remove toxic pollutants. In 1981, local industries discharged 954,099 pounds of heavy metals such as copper, nickel and zinc and 80,440 pounds of cyanide to the Field's Point Wastewater Treatment Facility. Since 1981, the total metals and cyanide loadings to the Field's Point facility have been reduced by 97.8% and 98.7% respectively. Similar toxic loading reductions have been observed at the NBC Bucklin Point facility.

The Narragansett Bay Commission will continue to lead in wastewater treatment, environmental protection, and environmental education to ensure a cleaner Narragansett Bay for all to enjoy.

Bucklin Point Service Area

Company Name	Violations Cited	Present Status
Lincoln Maroon Group, LLC dba Lincoln Fine Ingredients	O&G (2)	Firm is now in compliance
Pawtucket R & D Manufacturing, Inc.	Failure to submit report on time (6)	Report has been received
Cumberland Cintas Corporation	Failure to submit report on time (6)	Report has been received

Field's Point Service Area

Company Name	Violations Cited	Present Status
Providence Bella's Jewelry	Failure to submit report on time (6)	Report has been received
Mark Precision, Inc.	Failure to submit report on time (6)	Report has been received
Nickel, Brass and Copper Wire, LLC	Failure to submit report on time (6)	Report has been received
Providence Specialty Products, LLC	O&G (1, 2) Failure to submit reports on time (6)	Firm is still out of compliance Reports have been received An Administration Order was issued requiring the firm to comply with NBC discharge limit and submit reports on time.
Tower Manufacturing Corporation	Failure to submit report on time (6)	Report has been received
United Stated Postal Service - Providence VMF	Failure to submit report on time (6)	Report has been received



March 26, 2020

COVID-19 MASS MAILING
All IUs - Both Districts
List Attached

Dear _____ :

In response to Rhode Island Governor's COVID-19 State of Emergency that became effective on March 9, 2020, the Narragansett Bay Commission (NBC) Pretreatment office is open with a reduced staff as well as remotely. At this time, the NBC is required to fully run the Pretreatment Program. We understand that many companies are operating on a reduced basis or not open at this time due to COVID-19. If you are unable to satisfy your reporting requirements outlined in your Wastewater Discharge Permit, please respond to this letter by sending an email to pretreat@narrabay.com stating the reason you are unable to meet the requirements. This email will be placed in your file and satisfy your reporting requirements.

If you are conducting your process operations, you must continue to comply with all terms of your permit including properly operating your pretreatment equipment, performing required self-monitoring and pH recording. At this time, to reduce exposure risk to you, your employees, and NBC staff, you should submit PDFs of these reports via email to pretreat@narrabay.com. Hard copies of the reports will be required to be submitted once the State of Emergency has been lifted.

If you have any questions regarding this letter, please contact the Pretreatment Office at 401.461.8848, ext. 490 or by email at pretreat@narrabay.com.

Sincerely,

Kerry M. Britt
Pretreatment Manager

cc: Jennifer Harrington, Esq
Holly R. Ialongo, Esq



May 8, 2020

MASS MAILING REINSTATING INSPECTIONS

All SIUs - Both Districts

List Attached

Dear «Title» «Last_Name»:

As you are aware, the Narragansett Bay Commission (NBC) is required to comply with the permit that was issued by the RI Department of Environmental Management (DEM). This permit requires the NBC to fully implement an Industrial Pretreatment Program which includes inspecting and monitoring industrial users. During the Governor's COVID-19 State of Emergency, inspection and monitoring activities were suspended in order to protect your staff as well as NBC staff and comply with social distancing protocols.

Beginning May 9, 2020, the Governor plans to slowly begin to reopen the state in a phased approach. The Pretreatment Program will begin to conduct inspections and monitoring activities in order to comply with our permit. For the foreseeable future, Pretreatment and Environmental Monitoring staff will coordinate with you to schedule inspections and sampling of your facility. In order to minimize the impact on your facility, the NBC will attempt to conduct these activities on the same day. Pretreatment staff will coordinate this with you.

During all inspections, NBC staff will wear proper personal protective equipment (PPE) including face masks and gloves and ensure they comply with social distancing protocols set by the CDC and your facility. Please let us know if there is additional PPE you require. By working together, there should be minimal disruption to your business while ensuring compliance with all regulatory mandates.

If you have any questions regarding this letter, please contact the Pretreatment Office at 401.461.8848, ext. 490, or by email at pretreat@narrabay.com.

Sincerely,

Kerry M. Britt
Pretreatment Manager

cc: Jennifer Harrington, Esq
Holly R. Ialongo, Esq

July 16, 2020

LETTER TO SEPTAGE HAULERS

Dear «TITLE» «LASTNAME»:

As you are aware the Narragansett Bay Commission (NBC) Septage Receiving Station is open for you to discharge your septage loads. In order to keep NBC staff as well as your staff safe during the COVID-19 pandemic all drivers discharging at the station must wear face masks while outside of the vehicle. Furthermore, the office including the restroom remains closed to the public.

To ensure adequate social distancing, the following procedure must be followed when providing a sample of the load to be tested for pH:

1. Upon arrival at the station, collect a sample from the truck. At this time the NBC Operator will be in the office.
2. Pour the sample in the container provided.
3. Return to the truck.
4. The NBC Operator will take the sample and test it for pH.
5. The NBC Operator will return to the office and notify the driver the sample is approved.
6. The driver will then proceed to discharge as normal.

Please note the office including the restroom is closed to the public.

If you have any questions, please contact the Pretreatment Office at 401.461.8848 ext. 490.

Sincerely,

Kerry M. Britt
Pretreatment Manager

Cc: Michael Caruolo – NBC



October 6, 2020

MASS MAILING

Fuel Oil Users

List Attached

Dear _____ :

As you know the heating season is here. Fuel oil that is discharged to the sewer can have a significant impact on the Narragansett Bay Commission (NBC) Wastewater Treatment Facilities. These impacts may include fouling equipment, interfering with normal treatment operations, and in severe cases can pass through the treatment facility and adversely impact Narragansett Bay. Below are two pictures of the impact a recent #6 fuel oil spill had on the Bucklin Point facility. Although the spill had no impact on the bay, the oil fouled equipment at the treatment facility, resulting in over \$100,000 in cleanup costs that were incurred by the company that inadvertently discharged the oil.



The company responsible for the spill was not aware that they were losing oil into the sewer. This is one of the main reasons for the NBC permitting boiler facilities and requiring firms to implement self-inspection programs. As you prepare your heating system, it is important to review the conditions set forth in your Wastewater Discharge Permit. These conditions are designed to help you discover and quickly stop an oil leak. Also, it is important to inspect the entire heating system including preheaters and piping and perform any necessary maintenance prior to starting up the boiler.

Please contact the Pretreatment Office at (401) 461-8848, ext. 490 if you have any questions.

Sincerely,

Kerry M. Britt
Pretreatment Manager

cc: PT Engineers/Technicians



November 19, 2020

**MASS MAILING
HOLIDAY SHUTDOWN LETTER
All IU and SIU (Categories 11 thru 59)
List Attached**

Dear _____ :

It is that time of year as the holiday season is here! Many companies close for vacation and maintenance activities during this time. We would like to take this opportunity to remind you that the Narragansett Bay Commission (NBC) is here to help industry maintain compliance. Pretreatment staff may conduct a brief inspection of your facility throughout this month to meet with our regulatory contacts, answer waste disposal questions, and provide general assistance. If you should have any questions regarding the proper disposal of any wastes generated from maintenance activities or would like to make modifications to your processes during the shutdown, please contact our office and we will be happy to assist you.

During and prior to the industry holiday shutdown, the NBC routinely monitors the sewer system to ensure that illegal dumping of waste does not occur and to catch illegal dumpers. Violators are subject to enforcement action which could result in civil and/or criminal penalties and termination of sewer use privileges. The attorney fees and fines associated with such an enforcement action will greatly outweigh the cost of proper disposal of waste. In general, industries within the NBC service area are to be commended for their progress to date in reducing the toxic loadings to the NBC treatment facilities and Narragansett Bay. Please feel free to contact the NBC Pretreatment Office at 461-8848, ext. 490 should you need assistance.

Sincerely,

Kerry M. Britt
Pretreatment Manager

KMB:smb

Enclosure

cc: Pretreatment Engineers and Technicians



Narragansett Bay Commission

Electroplaters, Metal Finishers, Chemical Processing Firms and Other Industries:

Vacation Shutdown Prohibited Sewer Discharges

Typically many industries shut down their operation for a period of time during the holiday months. Past operating experiences in the Narragansett Bay Commission (NBC) District have shown that large quantities of toxic and hazardous wastes have been indiscriminately dumped in significant quantities into the sewer as part of an industry's "clean-up" procedure prior to their shutdown. This usually occurs in the last two weeks of June and throughout the month of July, as well as in December. Pursuant to Title 46 Chapter 25 of the Rhode Island General Laws, the NBC has adopted regulations which prohibit the discharge of wastes which could:

- create a fire or explosion (example: solvents such as trichloroethylene, xylene or gasoline);
- cause corrosive damage to our facilities (example: acids or bases);
- hinder the flow or causes obstructions to our facilities (example: fats, waxes, greases, oils, solids);
- result in an excessive hydraulic/pollutant flow rate (example: slug discharge from the dumping of plating or other baths);
- interfere with treatment facility operations (example: dumping cyanide or heavy metal containing solutions) and;
- cause pass through of the wastewater treatment facility (example: dumping of dyes or pigments).

Other wastes are also regulated specifically by type of waste and concentration by the NBC's Rules and Regulations. Copies of these regulations may be obtained at the NBC's Pretreatment office. In addition, it is illegal to discharge any non-sanitary wastewaters into the NBC sewer system prior to being issued a discharge permit. Please dispose of spent solutions properly. It is less costly than being caught illegally disposing of these wastes. Industries found to be in violation of the NBC's Rules and Regulations may be subject to a fine of up to \$25,000 per violation per day and/or up to thirty (30) days of imprisonment. In general, industries located in the NBC service area are to be commended for the fine job to date at reducing toxic discharges to the sewer. In 1981, local industries discharged 954,099 pounds of heavy metals such as copper, nickel, and zinc, and 80,440 pounds of cyanide to the Field's Point Treatment Facility. A portion of these toxics would eventually pass through the treatment plant and enter Narragansett Bay. There has been a 97.0% reduction in heavy metal discharges to the Field's Point Facility since 1981. The cyanide loadings to this treatment facility were also reduced by 97.6% over this same period. This impressive reduction in toxic discharges by industry has also been noted at the Bucklin Point Wastewater Treatment Facility. The level of toxics entering Narragansett Bay from the NBC facilities has been similarly reduced.

The NBC will continue to be a leader in the field of wastewater treatment and environmental protection to ensure a cleaner Narragansett Bay for all to enjoy. For more information on the proper disposal of wastes from your facility, contact the pretreatment program staff at 461-8848 ext. 490 / TDD 461-6549.

Vincent J. Mesolella, *Chairman*

Laurie A. Horridge, *Executive Director*

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1/7/2020

Two projects off Newport Avenue mean 80 jobs for Pawtucket



A rendering shows a planned new solar-powered office building near the old Building #19 off Narragansett Park Drive in Pawtucket.

By **ETHAN SHOREY**, Valley Breeze Managing Editor

PAWTUCKET – A pair of development projects approved by the Pawtucket City Planning Commission last month would help create and retain some 80 jobs in the city.

The projects include:

- A 40,000-square-foot industrial building to function as the new home of M & G Trucking operations at 444 Narragansett Park Drive, keeping an estimated 40 jobs in the city as M & G plans a move from its School Street location;
- And a 120,000-square-foot data storage and office building next to the former Building #19 at 0 Narragansett Park Drive, with accessory ground-mounted solar canopies, a project expected to bring another 40 jobs to the city.

Assistant Director of Planning and Redevelopment Jay Rosa said the City Planning Commission approved both proposed development projects after a development plan review on Dec. 19. They

are both subject to conditions, he said, or essentially the completion of final site engineering work and state permits.

Both projects would be located near a major new lifestyle center from Carpionato off Narragansett Park Drive and Newport Avenue. That project is in progress.

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The 444 Narragansett Park Drive project from Gansett Parking LLC would be located on 7.48 acres and features a 40,000-square-foot industrial structure. The Narragansett Bay Commission acquired M & G's previous 804 School St. property to complete combined sewer overflow cleanup for Pawtucket and Central Falls.

"Each year, the 64 (combined sewer overflows) in the NBC District release an estimated 2.2 billion gallons of untreated combined sewage into the bay and its tributaries, namely the Blackstone, Moshassuck, Providence, Seekonk,

Woonasquatucket, and West Rivers," states the commission's website.

Those overflows pose pollution and public health risks because they involve residential, commercial and industrial wastes, and other pollution washed or dumped into storm drains, it adds.

The trucking center project received a required special use permit from the Pawtucket Zoning Board on Dec. 16. The Planning Commission then unanimously recommended conditional approval requiring ongoing coordination on site engineering with the Department of Public Works, R.I. Department of Environmental Management, and the Planning Department, said Rosa.

The new structure for commercial freight trucking operations would include office space, 14 loading bays, and five repair bays.

For the 0 Narragansett Park Drive project, NP Development Partners proposed to build a three-story data storage and office building covering 120,000 square feet of gross floor area on 8.76 acres of land in the asphalt sea around the old Building #19. The proposal includes roof-mounted solar panels and accessory solar canopies over the rear parking area.

The solar infrastructure is intended to primarily service the building operations of data storage, heating, cooling, etc., said Rosa, with potential to sell excess electric energy back to National Grid.

The building would include 30,000 square feet of data storage center space and 12 office units averaging 7,000 square feet apiece.

The project received a required use variance from the Zoning Board on Aug. 26, 2019. The Planning Commission voted unanimously in favor of the proposed development, with the requirement that final approval be conducted at a public meeting with the commission.

The project still requires final site stormwater management approval from the RIDEM.

PROVIDENCE Journal

Highlights of Raimondo's budget proposal

By Katherine Gregg

Journal Political Writer

By Patrick Anderson

Journal Staff Writer

Posted Jan 16, 2020 at 5:00 PM

Updated Jan 16, 2020 at 5:00 PM

- *Total spending would rise from \$9.9 billion to a record-high \$10.2 billion

- *State would legalize recreational marijuana for sale at a network of state-run stores

- *Minimum wage would increase from \$10.50 to \$11.50 an hour on Oct. 1

- *Five years would be added onto the timeline for the car-tax phaseout championed by House Speaker Mattello

- *Real-estate transfer taxes would increase on the sale of high-end homes and commercial properties

- *The cigarette tax would rise by 35 cents, to the highest state tax in the nation at \$4.60 a pack. New sales taxes would apply to hunting, trapping and shooting ranges; courier, interior design, computer systems design; lobbying and courier services

- *The 7% sales tax would be reinstated on the sale of wine and spirits, coupled with a reduction in the excise tax

- *There would be a three-stage increase in resident and nonresident hunting and fishing license fees, with the hunting and freshwater fishing license fees paid by residents going from \$18 to \$27 by 2027, and deer permits from \$12.50 to \$15 over the same span

- *\$16.9 million would be "scooped" from the reserves of the Rhode Island Resource Recovery Corporation, the Rhode Island Student Loan Authority, the Rhode Island Health & Educational Building Corporation, the Rhode Island

Infrastructure Bank, the Narragansett Bay Commission and Rhode Island Housing

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Narragansett Bay Commission Employee Recognized By U.S.EPA for Outstanding Service

Wednesday, February 26, 2020

GoLocalProv Business Team

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The U.S. Environmental Protection Agency has honored Paul Desrosiers for his work maintaining the **Narragansett Bay Commission's (NBC)** Wastewater Treatment Facilities.

Desrosiers, who is an operator of the Narragansett Bay Commission clean water facilities at Field Point and Bucklin Point, was honored by EPA's New England office with a 2019 Regional Wastewater Treatment Plant Operator of the Year Excellence Award for his outstanding work over decades operating and maintaining the Narragansett Bay Commission's facilities.

"Paul's professionalism, his knowledge, and his commitment to the environment have been instrumental to the improvement in the water quality of Narragansett Bay," said NBC Chairman Vincent Mesoletta. "Everyone who enjoys the bay has been affected by his work." Daniel Deziel, regional administrator of EPA's New England Office, remarked, "We are proud to acknowledge Mr. Desrosiers outstanding contributions to help protect public health and water quality for so many years and to give her the credit he deserves."



VIEW LARGER +

Paul Desrosiers PHOTO: Narragansett Bay Commission

The EPA Regional Wastewater Awards Program recognizes personnel in the wastewater field who have provided invaluable public service managing and operating wastewater treatment facilities throughout New England. The Rhode Island Department of Environmental Management was instrumental in Desrosiers nomination.



The EPA Regional Wastewater Treatment Plant Excellence Award was established to recognize and honor the employees of publicly owned wastewater treatment plants for their commitment to improving water quality with outstanding plant operations and maintenance.

The Narragansett Bay Commission also received two awards from the National Association of Clean Water Agencies: a National Environmental Achievement Award for Public Service for the NBC's Earth Day River Clean-Up Grant Program and the Utility of the Future Award for pioneering innovative technologies and cutting-edge practices, with a focus on resource recovery, efficiency, and sustainability.



Related Articles

- [Narragansett Bay Commission Earns Regional Wastewater Treatment Plant Excellence Award](#)
- [Narragansett Bay Commission Adding Solar, Will Be Nearly 100% Renewable](#)
- [Narragansett Bay Commission to Hold Watershed Conference at Goddard Park](#)
- [Narragansett Bay Commission Receives National Budget Award](#)
- [Narragansett Bay Commission's Wins National Environmental Education Award](#)
- [LIVE: Narragansett Bay Commission's Mesoella on Pursuing Providence Water Sale](#)
- [Narragansett Bay Commission, RIDEM Announce Consent Agreement on CSO](#)
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News Releases from Region 01

EPA Recognizes Providence, R.I. Wastewater Treatment Operator for Excellence

03/13/2020

Contact Information:

John Senn (senn.john@epa.gov)

(617) 918-1019

BOSTON – Paul Desrosiers of Providence, R.I., was honored recently by the US Environmental Protection Agency (EPA) for his work maintaining the Narragansett Bay Commission's Wastewater Treatment Facilities and for his commitment to improving water quality.

Desrosiers, who is an operator of the Narragansett Bay Commission facilities at Fields Point and Bucklin Point, was honored by EPA's New England office with a 2019 Regional Wastewater Treatment Plant Operator of the Year Excellence Award for his outstanding work over the years in operating and maintaining the Narragansett Bay Commission's facilities.

"The professionals operating wastewater treatment plants, as well as the municipalities and the state environmental agencies that support them, play a very important role in keeping our communities and environment healthy by protecting water quality," **said EPA New England Regional Administrator Dennis Deziel.** "We are proud to

acknowledge Mr. Desroseirs' outstanding contributions to help protect public health and water quality for so many years and to give him the credit he deserves."

The EPA Regional Wastewater Awards Program recognizes personnel in the wastewater field who have provided invaluable public service managing and operating wastewater treatment facilities throughout New England. The Rhode Island Department of Environmental Management was instrumental in the plant's nomination.

The EPA Regional Wastewater Treatment Plant Excellence Award was established to recognize and honor the employees of publicly owned wastewater treatment plants for their commitment to improving water quality with outstanding plant operations and maintenance. Especially with the smaller facilities, conscientious operators and staff continue to perform exceptionally with limited resources. EPA's New England office formally recognized Desrosiers for his work during the annual New England Water Environment Association Conference in Boston last month.

[Contact Us](#) to ask a question, provide feedback, or report a problem.

Development Plans for South Quay Waterfront Conflict

ecori.org/government/2020/3/23/plans-conflict-to-develop-south-quay-on-waterfront

Tim Faulkner

March 23, 2020



RI Waterfront Enterprises LLC bought the South Quay property, outlined in yellow, last June and has a plan to turn the site into a mixed-used entertainment venue and port. (Live Nation)

East Providence wants to develop neglected land the Narragansett Bay Commission wants to take by eminent domain

By TIM FAULKNER/[ecoRI News staff](#)

EAST PROVIDENCE, R.I. — The 30-plus acre gravel-covered parcel that juts into the Providence River like the tooth of a jack-o-lantern continues to serve as a symbol of poor coastal management and questionable business development.

The South Quay (pronounced key) was created some 40 years ago, when the Coastal Resources Management Council (CRMC) allowed the Providence & Worcester Railroad to infill acres of the harbor to create a ship-to-rail terminal. The foundation for the artificial landmass was constructed, but the port was never built. The lot has sat mostly idle ever since, with brush and other signs of nature taking root. But the approval to forfeit a portion of upper Narragansett Bay is considered one of CRMC's worst decisions.

Save The Bay hoped that after decades of neglect, the land would be restored to its natural state. But instead it has been included in the city's 300-acre [Waterfront Special Development District](#) and was listed for sale to developers.

In recent months, South Quay has served as a [temporary dumping ground](#) for dewatering of the dredging slurry taken from the Providence River.

RI Waterfront Enterprises LLC bought the property last June for \$4.5 million and, with the entertainment company Live Nation, [offered a plan](#) to turn the site into a mixed-used entertainment venue and port. Plans for the amphitheater have yet to materialize, but RI Waterfront Enterprises is pushing forward with a staging area for offshore wind construction. Nearby Bold Point Park (outlined in blue in the above image) already hosts outdoor events and concerts.

That South Quay concept was taking shape until the property appeared on the [Jan. 21 agenda](#) of the State Properties Committee meeting as a site to be condemned and taken by eminent domain. As a quasi-public state agency, the Narragansett Bay Commission (NBC) has the authority to invoke the land-taking. The Providence-based wastewater treatment facility is considering using the site to permanently landfill 600,000 cubic tons of rock and debris, called tunnel muck, from construction of the third phase of the NBC's [combined sewer overflow project](#). This 2-mile-long wastewater holding tunnel will be built 200 feet beneath Central Falls and Pawtucket along the Seekonk River.

Work on the NBC's latest pollution-control project is expected to last about 12 months, beginning with tunnel boring in late 2022 or early 2023.

East Providence is fighting the land-taking at the Statehouse through two bills ([H7946](#) and [S2346](#)). The legislation prohibits NBC from claiming any land within the city's Waterfront Special Development District unless approved by the mayor and the [Waterfront](#)

Commission.

At a March 10 Statehouse hearing for the House bill, Mayor Bob DaSilva called the offshore wind staging project “a once-in-a-lifetime investment by private capital ... to build a lay-down area for the wind industry” and “a lynch pin that will help drive further development of the waterfront.”

DaSilva said he felt blindsided by the fact that the NBC didn’t inform the city of its intentions to claim the land.

NBC chairman Vincent Meselella said if the South Quay isn’t available, wastewater ratepayers or the state will have to pay \$35 million to have the tunnel muck sent to a landfill. He also promised to sell the property back to the owner after the the debris dumping is completed.

“One way or the other they are going to get their property back,” Meselella said. “But the only condition is they are going to get it back in much better condition than they gave it to us.”

Michael Donegan, an attorney for RI Waterfront Enterprises, noted that the offshore wind terminal can’t wait for the the tunnel work to end. He also noted that the muck contains naturally occurring arsenic that will runoff into Narragansett Bay.

“If you let this happen, it kills that project,” Donegan said.

Members of the House and Senate judiciary committees sympathized with East Providence for the lack of public notice about the land-taking, but they noted the complicated legal precedent created by giving municipal entities veto power over the state’s long-held authority to exercise eminent domain.

Meanwhile, the Rhode Island Commerce Corporation recently awarded \$100,000 to RI Waterfront Enterprises as an economic-stimulus grant to study the South Quay as a port facility. The Site Readiness award was one of 15 totaling \$800,000 to bolster 300 acres in the state for potential development.

Both the House and Senate version of the bill were held for further study.

R.I. wastewater treatment plants' scourge: 'Flushable' wipes

By Alex Kuffner

Journal Staff Writer

Posted Mar 24, 2020 at 8:10 PM

Updated Mar 24, 2020 at 11:22 PM

A spike in the use of moist wipes has become one of the unexpected and messier consequences of the coronavirus outbreak.

To our readers: *We are providing coronavirus content for free online as a public service during the outbreak. Please support local journalism by [subscribing to The Providence Journal](#).*

PROVIDENCE — They wrap around equipment in wastewater treatment plants and form dense masses that block up pump stations. They lodge in collection pipes, soaking up grease and mixing with solids to form stubborn “fatbergs” that cause sewage backups and overflows.

A spike in the use of moist wipes has become one of the unexpected and messier consequences of the coronavirus outbreak. Treatment plants were never designed to handle wipes, even those described as flushable, which — despite what their labels may suggest — in most cases do not disintegrate in water like toilet paper.

“These wipes say they’re flushable, but then so is a toy,” said Scott Goodinson, wastewater superintendent in Narragansett. “You can flush a stapler down the toilet if you want to. Anything can be flushed, but that doesn’t mean it’ll break down.”

In Narragansett last week, [an influx of wipes got tangled in a pump station at Congdon Street](#) that sends wastewater to the town’s treatment plant near Scarborough State Beach. The wipes twisted into a rope that was strong enough

to break an impeller shaft inside a pump, causing \$7,300 in damage. The shaft was nearing the end of its design life, but the wipes “definitely contributed to its failure,” said Goodinson.

Burrillville, South Kingstown, East Providence, Warwick, Newport and Cranston have all reported similar clogs in recent days that crews were fortunately able to clear before they caused any damage.

But in Woonsocket on Sunday, a nightmare scenario materialized when a clump of wipes blocked up a 15-inch pipe and sent sewage back into the basements of four homes in the Diamond Hill neighborhood. The dirty water was ankle-deep in one of them.

It took two septic haulers and a five-man crew with Veolia Water, which operates the city’s collection system, 14 hours to clear the blockage using a vacuum truck and clean up the worst of the mess. All told, the cost of the disaster could reach \$20,000, according to Veolia.

If more blockages follow, they could divert untreated sewage into stormwater drains that empty into the Blackstone River, which in turn flows into Narragansett Bay.

“It could be catastrophic,” said Paul Rodman, special projects manager with Veolia.

Questions and answers about COVID-19, the coronavirus disease

Throughout the nation, wastewater treatment plants are experiencing the same problem with wipes as people step up efforts to clean their homes and look to alternatives in the face of shortages of toilet paper. But all those wipes, which may contain plastic or synthetic fibers, should be disposed of only in garbage cans, not toilets. Clogs have occurred from California to Connecticut.

The confusion over wipes has persisted for years with consumer-goods companies that make the products and say that many are safe to be flushed locked in a dispute with treatment operators who argue that they’re a public nuisance. It has resulted in lawsuits, such as the class-action case that Proctor &

Gamble settled over wipes the company had labeled flushable that caused problems to plumbing and septic systems. In another case, Kimberly-Clark, which also makes wipes, was sued for false advertising.

But as these and other suits play out in the courts, blockages are continuing to happen. They include an 820-foot long fatberg found in Liverpool, England last year and one discovered under Baltimore in 2017 that caused an overflow of 1.2 million gallons of sewage. The costs of clearing these obstructions are real. Treatment plants spend tens of millions of dollars a year cleaning out their systems.

The only real solution to the problem is to stop people from flushing wipes down the toilet, said Bill Patenaude, of the Rhode Island Department of Environmental Management. So the DEM sent out two news releases in a matter of days warning people about the damage wipes can do to wastewater systems. If those systems fail, the impact of untreated bacteria-tainted water on homeowners and the environment can be devastating.

“Usually it’s an annoyance,” said Patenaude, a principal engineer with the DEM’s Office of Water Resources. “But at its worst, it’s expensive and dangerous.”

He drew a comparison between the current difficulties faced by treatment plants and the historic floods in 2010, which inundated plants in Warwick and West Warwick and sent sewage flowing into the Pawtuxet River. The 10-year anniversary of the floods is less than a week away.

But this couldn’t possibly be as bad, he was asked.

“It’s getting to be,” he said.

Goodinson also said that the scale of the problem is unprecedented.

“In my 30 years in the business, it’s always been a problem, but this is the worst I’ve ever seen it,” he said.

The Narragansett Bay Commission, which operates the largest treatment system in Rhode Island, hasn’t experienced any serious complications with its pump stations or two treatment plants, in Providence and East Providence, but the agency is doing as much as it can to educate its customers. The company’s

Instagram and Facebook feeds prominently feature instructions on what can be safely flushed — toilet paper — and what can't — disinfecting wipes, hand-sanitizing wipes, baby wipes and so-called flushable wipes.

Jamie Samons, public affairs manager with the commission, urged people to remember the “three Ps” when it comes to what can be flushed: pee, poo and (toilet) paper.

She described an experiment that people can do to show the difference between toilet paper and wipes. Put a wipe in one jar of water and toilet paper in another and then shake them up. The toilet paper will break up and the wipe will stay intact, in some cases for several days.

“If the wipes make it to the sewers, they can combine with grease and create blockages (the dreaded fatbergs), but they are much more likely to wreak havoc with one's in-house plumbing, causing toilet back-ups ... which is the last thing any of us need right now,” she said in an email.

Treatment plants have collection screens that are designed to filter out wipes and debris, but they don't catch everything. And at times like this, when more wipes are getting into the system, it means more hours to clear the screens more frequently. Some plants have machines (known as “muffin monsters”) to collect debris, but in others the work is done with rakes by hand.

Rodman, who works in Woonsocket and responded to the backup there over the weekend, had some simple advice for people:

“Don't use the toilet as a trash can.”

akuffner@providencejournal.com

(401) 277-7457

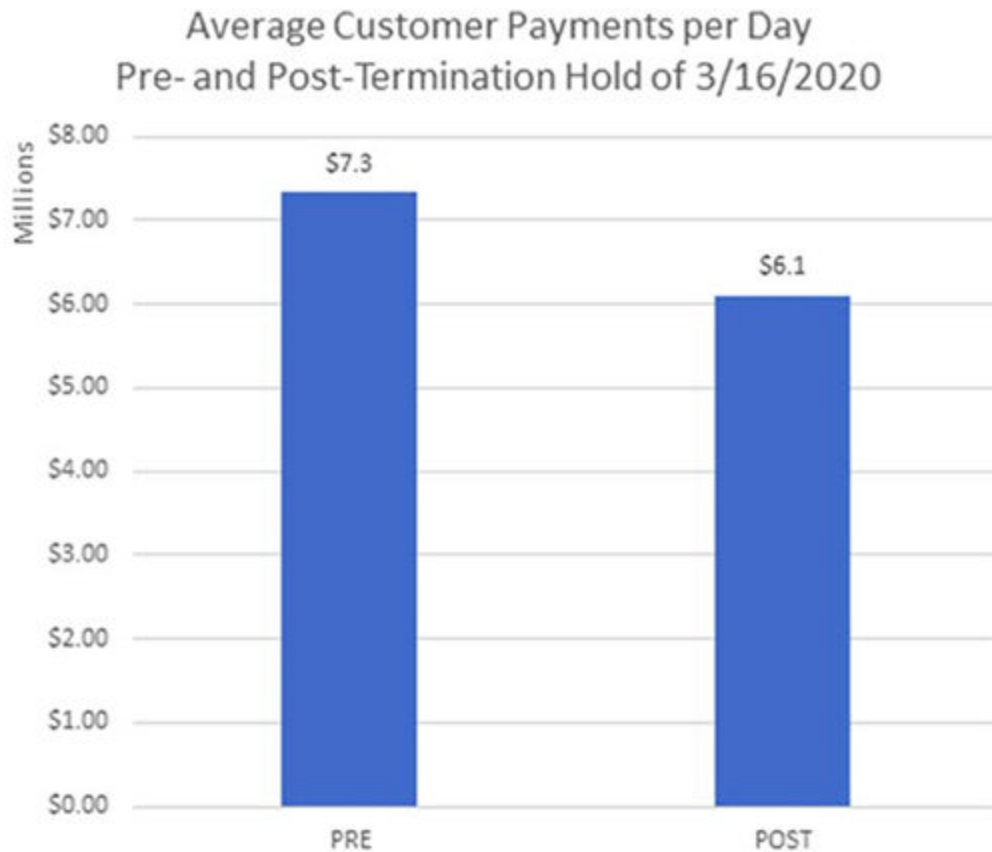
On Twitter: [@KuffnerAlex](https://twitter.com/KuffnerAlex)

Relief from Utility Shutoffs and Collections Extended

ecori.org/renewable-energy/2020/4/13/relief-from-utility-shutoffs-and-collections-extended

Tim Faulkner

April 13, 2020



By TIM FAULKNER/ecoRI News staff

For the third time since the start of the coronavirus pandemic, the Rhode Island Public Utilities Commission (PUC) on April 13 approved another temporary stop on utility shutoffs and collection efforts.

The two previous votes, passed March 16 and March 30, were set to expire April 16. The latest ruling stays in effect until May 8, the date schools and businesses must remain closed per the latest executive order from Gov. Gina Raimondo.

The emergency order prohibits electric, water, sewer, and natural-gas utilities from terminating service for nonpayment and sending past due accounts to collection agencies.

The three-member PUC didn't debate the merits of the moratorium, but none of the written comments from utilities and the public objected to the relief effort.

The Rhode Island Center for Justice noted that students, especially low-income students, need electricity to attend classes via the internet from home.

“Without utility service, Rhode Island’s students literally cannot access their public education as long as their physical school sites remain closed,” said Jennifer Wood, executive director of the Center for Justice. “Distance learning does not exist without utility service in the home.”

Wood also noted that fiscal relief is needed as unemployment claims surge to 100,000, or about 20 percent of Rhode island’s civilian labor force.

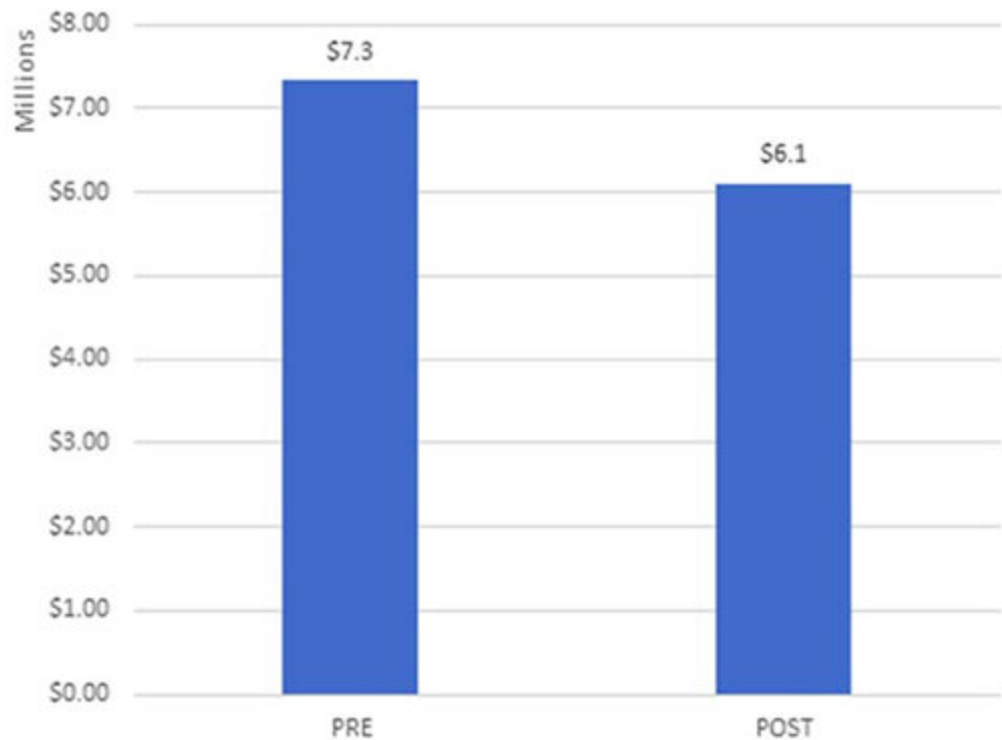
Utilities allow the public to maintain hygiene and basic health and keeping these services running may prevent a second wave of the coronavirus, according to Wood. She said businesses and individuals need the relief to get the economy going and enable them to pay their utility bills when they resume economic activity.

Courts are closed until May 17, thus shutting off a way to settle financial disputes.

“This protection is needed to literally save lives by slowing the spread of the virus,” Wood said.

Rhode Island KIDS COUNT wanted the PUC to extend the rule until the school year ends in June.

Average Customer Payments per Day
Pre- and Post-Termination Hold of 3/16/2020



National Grid says it is averaging about \$1.2 million less daily since collections and shutoffs were paused March 16. (National Grid)

“During this period, they need consistent and reliable access to utilities to meet their basic needs, ensure their health and safety, and support children’s access to distance learning,” according to an unsigned letter from the organization.

Providence Mayor Jorge Elorza and Providence City Council president Sabina Matos asked that the moratorium continue until the end of the state’s declaration of emergency.

The Rhode Island Coalition Against Domestic Violence urged ending all shutoffs to ease the financial burden for those who are unable to leave an abusive relationship due to financial dependency.

Dannie Ritchie, founder of the wellness service Community Health Innovations of Rhode Island, urged a permanent shutdown of shutoffs and support for a percentage of income payment plan, or PIPP.

“It is through no fault of their own that they are in such precarious positions; they are the unseen people that have been essential to our economy but yet expendable,” Ritchie said.

The moratorium extension was also supported by Crossroads Rhode Island, the Economic Progress Institute, the Pawtucket Housing Authority, SISTA FIRE, and the United Way of Rhode Island.

Dozens of letters of support were also sent from individuals who want the moratorium extended or made permanent.

“We cannot forget about those undergoing hardships even before the outbreak,” Providence resident Angel Lopez wrote.

State utilities said the loss of revenue wasn’t threatening to their balance sheets. National Grid said it is averaging about \$1.2 million less per day since collections and shutoffs were paused March 16. Overall, collections are less than they were in 2019, but nearly the same as they were in 2018.

National Grid said it’s also incurring incremental costs such as cleaning costs to ensure the safety of employees. But the utility said it isn’t struggling with cashflow.

“The Company is becoming increasingly concerned about the potential for increased bad debt. Therefore, the Company will continue to monitor the financial impacts that may result from these policies, namely, impacts to cash working capital,” according to a letter submitted by National Grid.

The Block Island Utility District said the loss of collection revenue is “not enough to be concerned about.” Collections are down 20 percent from 2019 but mostly due to less power usage. Cash flow isn’t currently a concern, according to Jeffery Wright, president of the Block Island Utility District.

The Pascoag Utility District is also not suffering financially. Of \$61,443 owed to the utility by commercial customers, \$54,688 is due from the town of Burrillville and is expected to be paid soon. Residential customers owe \$124,637.

The PUC also approved a request by the Narragansett Bay Commission to move a \$2.95 credit-card processing charge from individuals to the ratepayers, thereby socializing the cost. The accounting change for the state's largest wastewater treatment operations is intended to make paying bills more convenient during the crisis. The fee change will be in effect until June 30.



[PUBLIC SERVICES](#)

Governor Raimondo to “look into” allowing the restoration of utilities without down payments



Published

9 months ago on April 14, 2020

By [Steve Ahlquist](#)



“Having access to running water, hot water, heat, electricity, and sewer are necessities of a habitable home, now more than ever...”

The **George Wiley Center** is demanding that **National Grid**, the **Narragansett Bay Commission** and the other regulated utilities in Rhode Island begin utility restorations for anyone who has had their utilities shut off.

Yesterday, the George Wiley Center advocated before the **Rhode Island Public Utilities Commission (PUC)** to mandate utility restorations. The PUC voted to mandate 10 percent down payments for utility restorations, but the George Wiley Center notes that many cannot afford this, especially during this new recession and pandemic.

“When the state of Rhode Island tells residents to shelter at home for their and the entire state’s well-being, homes must be habitable.” said the George Wiley Center in a letter to the PUC. “Having access to running water, hot water, heat, electricity, and sewer are necessities of a habitable home, now more than ever. In addition to access to utility service, there comes an extra anxiety if a household is protected for only a short period of time, yet left with the perpetual fear of imminent shut-off. We are asking the PUC to extend shut-off protections, allow immediate utility restoration with no down payment for low-income households, to find ways in which payments can be alleviated rather than left to accrue, as well as provide a path toward a long term fix by implementing a PIPP (percentage income payment plan).”

See below for the full letter.

Michigan Governor **Gretchen Whitmer**, who many are speculating will be **Joe Biden** the presumptive Democratic presidential nominee’s pick for Vice President, has signed an executive order restoring water services to Michigan residents with no down payment. The George Wiley Center wants to see the same kind of order here in Rhode Island, expanded to include other utilities such as electricity.

The George Wiley Center asked **UpriseRI** to ask Rhode Island Governor **Gina Raimondo**, during her daily COVID-19 press briefing, if she is planing on issuing an executive order similar to the one recently passed by the Governor of **Michigan**, allowing for the restoration of utilities without any down payment.

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“It’s something I might get to,” answered Governor Raimondo, missing the point of the question. “Right now there’s no need for that because, as just announced, utilities cannot, by action of the PUC be turned off. So I feel good about where we are and people should feel confident that their utilities can’t be turned off.”

Here, Governor Raimondo is noting the PUC’s decision, made yesterday, to prevent utility shutoffs though May 8.

In a follow-up question after the public press briefing, UpriseRI explained that the George Wiley Center question had nothing to do with preventing shutoffs, but was about restoring utilities to people who were shut-off prior to the pandemic, and cannot afford to pay to have their utilities restored.

“Thank you for bringing that to my attention. I don’t know if I have the executive authority to do that, or maybe I’ll go through the PUC [Public Utilities Commission], so let me look at it and get back to you.”

We'll see if the Governor actually gets back to UpriseRI about this.

Meanwhile, the George Wiley Center will continue to work for free utility restoration, bill debt relief, and the implementation of a **Percentage Income Payment Plan (PIPP)** for low income Rhode Islanders. Sign the petition for PIPP [here](#).

Here is the full letter from the George Wiley Center to the PUC:

Dear Commissioners,

Please accept these updated comments from the George Wiley Center. Thank you for your directives last month to provide relief for Rhode Island utility customers. We are writing to encourage you to continue and strengthen the utility protections set forth due to the ongoing Covid19 pandemic. This moment in history has shown the gaps in our society's social safety net, even in prior "normal" times. There has been a spotlight on various issues of economic and social inequality, including morbidity disparities in marginalized and communities of color, unsustainable low wages for many frontline workers, unequal access to healthcare, housing, and food, and also on utility service as a basic need. Around the country and world, elected officials and community members are pushing for protections to ensure that utility services of heat, electricity, water, sewage, and communication remain in place for households during this crisis. The silver lining in these times is that we are given an opportunity to solve some of society's inequities, not only in the short term, but also more long term, to create compassionate policies for a more humane and sustainable future.

The George Wiley Center is a grassroots group with a major focus in recent decades on advocating for utility consumer rights. While our office is currently closed to walk-ins and in-person meetings, and most of our staff and volunteers are at home, we are still communicating and offering assistance to people facing shut-off, via phone, email, and social media. I have personally heard from many people who are facing multiple issues, concerned not only about utility termination, but also eviction, deportation, and food access. Our lives and concerns are intertwined, and we see how an inability to afford utility service can exacerbate other challenges and access to basic needs, and vice versa. In this era when everyone is under stress, we hope the PUC will take decisive action to alleviate the extra stress of worrying about utility termination.

When the state of Rhode Island tells residents to shelter at home for their and the entire state's well-being, homes must be habitable. Having access to running water, hot water, heat, electricity, and sewer are necessities of a habitable home, now more than ever. In addition to access to utility service, there comes an extra anxiety if a household is protected for only a short period of time, yet left with the perpetual fear of imminent shut-off. We are asking the PUC to extend shut-off protections, allow immediate utility restoration with no down payment for low-income households, to find ways in which payments can be alleviated rather than left to accrue, as well as provide a path toward a long term fix by implementing a PIPP (percentage income payment plan).

For people who have never been shut off or faced shut-off, utility service is something that plays as a background to daily life. It's one of those things that many don't recognize how important it is until it's gone, whether due to the occasional weather outage or deliberate shut-off for nonpayment of bills. The

George Wiley Center strongly advocates for utility service as a basic need at all times, pre- and post-pandemic as well, and during these times the stakes are even higher.

With many people staying at home nearly 24/7 during the pandemic, our homes' livability is critical. We need heat to keep ourselves warm and healthy. We need electricity to attend school and work meetings, charge our phones to keep in touch with loved ones we can't visit, and stay informed of daily news and updates. Per governmental directive, we use water to wash our hands, do our laundry, and clean our homes. We store extra food in freezers and refrigerators and cook meals at home all day long. We use our computers and phones to access vital services such as unemployment insurance, updating our healthcare plans, and consulting our doctors. From home we rely on our utilities to reach mental health services, peer and recovery support groups. We plug in electric wheelchairs to get charged up, we turn on our sewing machines to make protective cloth masks, we put on the tv to watch movies and unwind from the extra stress of the pandemic. In addition to the ways in which homes are typically used, they have now also become de facto schools for kindergarten through college. Homes are now workplaces, illness recovery centers, restaurants, gyms, doctor's offices, public meeting spaces, and public service arenas. And for those who have no access to utility service, there is no escape to the public library or cafe or church to warm your hands, use the internet, or charge your cell phone.

Even in times prior to the pandemic, many households have to juggle bills, deciding from one month to the next what will get sacrificed: food or a child's new shoes, electricity or health insurance. With the current crisis and unemployment sky rocketing, these bill juggling decisions have become more widespread and more intensified for those who had already faced longer term economic insecurity. Even in pre-pandemic times the charitable organizations that help people pay utility bills are overwhelmed, but now with the extra multiple areas of need we can not expect these organizations to be able to cover everyone's bills. Furthermore, social service agencies, food banks, and hotlines are being inundated, making it even more difficult for people to seek assistance. With utility shut-offs often being a factor that leads to homelessness, it is vital to keep as many people in their homes at this time, when congregate settings are deemed a high risk for contagion and homeless shelters are stretched thin with services. Many people who have applied for Unemployment Insurance are still waiting to receive benefits and have experienced a major loss of income. And with people staying at home all day using additional utility services (that would normally be used at their schools, workplaces, etc.), we can anticipate that incurred utility bills will be even higher than normal. This is a terrible combination: relying on services that are critical to most aspects of life, facing higher payments for such services at the moment when you can least afford it, and living with the ongoing stress of an upcoming termination after the crisis is over because back bills have piled up.

For the above reasons, we hope the PUC agrees that utility services, including water, electricity, gas, and sewer are basic needs, now and always. The George Wiley Center is asking that you implement the following using your powers in the interest of public health and well-being:

- Continue a moratorium on utility shut-offs for the duration of the pandemic and implement a permanent moratorium on shut-offs for low-income households
- Require restoration of utility service with no down payment for low-income households
- No penalties for missed payments, including for the AMP program, for the duration of the pandemic

- Cancel or deeply discount utility payments, so as not to accrue large back debts, for low-income households for the duration of the pandemic
- Emergency implementation of a PIPP (percentage income payment plan) program for the long term, for low-income households

While we thank National Grid for acting in accordance with the PUC's directives, we also think the company can do more. For instance, due to the Covid19 pandemic, Cox Communications has offered to provide internet service to low-income households for free for the first month, with a deeply discounted \$10/month bill in the months after. We saw the data from National Grid in answer to the questions raised by the PUC regarding any changes in the company's income. National Grid reported a dip in income, but did not quantify or correlate the corresponding rise in temperature and length of daylight, which could also contribute to a decrease in demand and therefore income for the company. When further analyzing National Grid's financial status, we recommend the following additional inquiries:

What is the yearly and monthly profit from National Grid's business in RI (electric and gas) for the past 5 years?

What is the difference in profit National Grid has made, comparing month to month averages, in the time period since the company's allowable profit margin was significantly increased as part of the rate case settlement in 2018?

The company cites extra costs incurred for cleaning during the pandemic. It would be useful to know other cost differences that have resulted from the pandemic. For instance, what if any cost differences has the company incurred or saved on, due to staff largely working from home and offices being semi-shut (ie not using company office utility services), if applicable? What if any savings has the company had in terms of staffing expenses, if any employees have been laid off due to the pandemic?

We are aware that National Grid has been in communication with the federal government, inquiring about "critical services infrastructure". What if any funds does the company anticipate receiving from the federal government? This is a moment when large corporations such as National Grid can step up to support the communities that have enriched them. We think there are many ways the company could voluntarily alleviate utility bill burden, for example creating a hardship fund, using some profits from prior years to forgive bills for low-income households, volunteering to forgo profits during the economic crisis, cutting CEO and executive salaries and bonuses, committing to pass on federal Covid19 stimulus funds to ratepayers, deeply discounting rates for low-income households, and/or implementing a PIPP program.

In addition to National Grid's role, we hope the PUC and Division of Public Utilities will also use their power and relationship with various stakeholders to come up with creative solutions to protect our communities while keeping the various local utility companies whole. This could include working with elected officials on the federal and local level to use any CARES Act or other federal funds toward maintaining public utility service and directly paying consumers' bills, or as previously mentioned enacting a PIPP program.

While no one can physically attend today's open meeting, many are waiting in anticipation for the PUC's decision. Over the past few years we have had almost two thousand Rhode Islanders sign our petition

for PIPP, both people who have themselves struggled with affording utilities and people who are concerned for our fellow community members' access to basic needs.

Below are just a few statements from people who have signed in the past few weeks:

"Currently no heat or hot water. Also have three school age children in my home. One of whom has a "medical protection" in place. All three boys started colds yesterday. National Grid refuses to take a down payment of a huge bill to restore service. My boys have started colds due to no heat or hot water to fight the germs. I have called them numerous times at an attempt to pay a down payment and restore service, each time being told the whole bill needs to be paid to restore. \$2,700 of the bill isn't even mine to pay. That amount was transferred to me the day I turned the gas on! National Grid set me up in the hole that I can't get out of." – Amie from Riverside (EP) 3/22/2020

"It was about 2 weeks, and due to being laid off from work. It made living there difficult, especially when it was cold. I relied on going to other buildings or my car to stay warm, and buying gallons of water and refilling them for showers and cooking." – Dominique, Cumberland 3/22/2020

"For about a week. It was awful because I have children so it was really hard for them due to the fact that it was the cold around the time that it happened." –Tatiana, Johnston 3/22/2020

"There have been times when I was threatened to have my power shut off and had it shut off once. I had to take out a loan to have power restored, unable to pay these loans back I had to file bankruptcy, in turn this damaged my credit making it difficult to rent."-Jay, West Warwick 3/20/2020

"I remember it was for a few months. Showering cold was very uncomfortable. Heat was off and made living in the house difficult without always wearing multiple layers. Access to in home utilities such as tap water, heat, electricity, and natural gas, should be, in my opinion, a human right." -Christopher, Johnston 3/19/2020

"Due to another tenant in my dwelling not being able to afford the bill & not being able to access the dwelling, they shut off service to the entire dwelling." -Dwayne, Providence 3/18/2020

In this moment, we hope the PUC will consider this opportunity to fix structural inequities that have existed in our utility service systems for too long. We urge you to enact protections for an extended time so people don't have to carry the extra stress of not knowing when they may be shut off, once the crisis is officially deemed to be over. We also hope you will find a way to eliminate accruing bill payments for low-income Rhode Islanders for the duration of the pandemic, so when the economy opens back up there will not be a spike in shut-offs and an intensification of existing economic inequality. Thank you for your leadership on this issue and for considering the public health and well-being of Rhode Islanders.

Sincerely,

Camilo Viveiros

Executive Director, George Wiley Center

Political Scene: Former R.I. lawmaker mired in battle over 'tunnel muck'

By **Katherine Gregg**

Journal Political Writer

Posted Apr 5, 2020 at 6:17 PM

Updated Apr 5, 2020 at 6:48 PM

A doozy of a fight played out at a Rhode Island State House hearing just before the pandemic shut down this year's legislative session. It involved:

Arsenic-laced "tunnel muck."

An alleged move by a once powerful state lawmaker to acquire property along the East Providence waterfront to build a hotel on land that the quasi public state agency he heads is now seeking to take by eminent domain.

The potential derailment of a multi-million dollar investment by Boston-based developers seeking to build a deep-water port to serve as a staging area for the construction and shipment of turbines for the booming wind farm industry.

It all came together on a Tuesday in March when the House Judiciary Committee held a hearing on a bill to stop the Narragansett Bay Commission — headed by former Rep. **Vincent Mesolella** — from seizing a big chunk of the East Providence waterfront for use as "a dump" for its tunnel muck.

The saga:

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Unbeknownst to anyone with big, starry-eyed plans for the East Providence waterfront, the quasi-public state agency headed by Mesolella sought State Properties Committee's approval to seize 45-plus acres of this property by eminent domain.

For what use? As Mesolella explained it to lawmakers at the March 10 House hearing:

The property is needed as a repository for the “tunnel muck” unearthed during the next phase of a \$1.5-billion underground tunnel-building project for the storage of sewer overflows — and other pollutants — during rainstorms.

“There are, of course, other options,” said Mesolella, the chairman of the agency overseeing this massive “combined sewer overflow” project.

“We could take this tunnel muck to a desert in Nevada and we can bury it there. But of course that adds to the cost,” he said.

Even shipping “the muck” to the state landfill would cost an additional \$30 million to \$35 million, he said.

“That of course will have to be passed on to the ratepayers,” he said.

The NBC’s (now stalled) attempt to condemn the property so enraged city officials in East Providence — who say they had no advance notice of what the NBC was up to — they asked the legislature to intervene.

The bill the House Judiciary was considering on March 10 would prohibit the bay commission from using its condemnation powers to take “any property” in the East Providence Waterfront Special Development District without approval of the mayor and the East Providence Waterfront Commission.

At the very least, the NBC misled the State Properties Committee, **Michael Donegan**, a lawyer for the current property owners, told the House committee.

On its application to the State Properties Committee for approval to take the property, Donegan said, the NBC was, in effect, asked: “Did you speak to the city?”

“On NBC’s application, they represented that they did when they, in fact, had not,” Donegan alleged.

Had city officials not gotten wind, at the last minute, of what was on the State Properties Committee’s Jan. 21 meeting, Donegan said, the committee would have heard only one side.

“They hear from the NBC only and if they grant it, the next step is a couple of conversations with us and if that doesn’t work ... the property is gone.”

Stepping back:

The 45 acres known as the South Quay (pronounced Key) was once owned by the Providence & Worcester Railroad. It was purchased by RI Waterfront Enterprises LLC in June 2019 for \$4.5 million.

Donegan describes RI”We” — as he refers to the company — as an offshoot of Mugar Enterprises, a Boston-based family business with a development history, that includes a port they developed and own in St. Croix. He said the managing members are David Ting and Melissa Martin.

Their plans?

“The development is still in its early stages,” said city spokeswoman **Patricia Resende**. In January, however, Commerce RI gave RI Waterfront Enterprises a grant of up to \$100,000 “to conduct [a] planning study to analyze the potential for South Quay” as a coastal Rhode Island port.

More specifically, the company hopes to develop the property into a deep water port for the offshore wind industry. Donegan said the company has the major players already lined up.

East Providence Mayor **Roberto “Bob” DaSilva** told the lawmakers: “The development we foresee here in East Providence is going to have wide, wide economic implications not only for East Providence but all of Rhode Island and the region.”

“We’re not trying to blow this up more than what it is [but] this is a once in a lifetime investment by private capital, ready to go ... to build a lay down area for the wind farm industry.”

“There’re going to be jobs ... high-paying jobs. It’s going to help spur the further development of the waterfront.”

“Then to have another quasi public agency come in, and try to take this without so much as giving us a courtesy phone call or ... even notifying the property owners to say that, ‘hey, we’re going to take this and we’re going to put material that we’re digging out of the earth that has arsenic on your land...”

Donegan said the Bay Commission move would kill the project.

Even if it didn’t outright kill the project, DaSilva said “the delay that would cause in this development” would be a “black eye to Rhode Island because you are talking about people coming from other states who want to invest in our community.

“They are not asking for any handouts ... [or] any special deals,” he said. “They want to invest their money in our state and now we have this thing rearing its ugly head.”

In his own turn, Mesolessa said it would be “unprecedented to change statutory authority” for any one property owner or to put “a mayor or a town council ... over the greater good.”

Moreover, “we already know what the potential use for that property ... is going to be,” he said, sketching word images of a park “very similar to Providence’s India Point Park.”

“We are [not] in the property ownership business. We are not in the port operation business. So one way or another they get this property back,” he said.

“The only difference being they are going to get it back in a much better condition than they gave it to us.”

Elaborating, he said: “Once this project is complete, we are required by statute to offer it back to the previous owner ... [and] if he refuses the property, then offer it to the city and then, if both the previous owner and the city refuse, then this property goes to public auction.”

The backstory?

When asked by The Journal if, as whispered the night of the hearing, Mesolessa had attempted to purchase any piece of the property before his agency tried to seize it, Donegan said: “Yes.”

He was talking about the same Mesolella who, years back, drained half the water from the two-mile-long Pascoag Reservoir.

As The Journal reported at the time: “Mesolella, one of the most powerful figures in the General Assembly, says he won’t refill the picturesque reservoir (also known as Echo Lake) until the state Department of Environmental Management makes a serious response to his offer to sell it to the state for \$425,000.”

His later push for public subsidies for a hotel he hoped to develop in downtown Providence, that a Journal editorial writer dubbed “Hotel Vinny,” was vetoed by then-Governor Lincoln Almond. The legislature overrode the veto.

Donegan said Mesolella “approached RI Waterfront Enterprises [last year] when it was under contract with P&W with the unusual suggestion, not that he purchase it, but that the purchase agreement be simply assigned to him and his family real estate business, for the purpose of building a hotel on the property.

“We were just scratching our heads, like ‘what are you talking about?’ This is like clearly a port. It’s not like a resort area. I mean the Sprague oil terminal ... is right there. The oil tankers pull up and unload there.”

“The puzzling suggestion was rejected out of hand,” Donegan said.

“But Vinny and then his son, **Derek**, continued to pursue this with us, then following repeated rejections, the next we heard was that the property then inexplicably ended up on an agenda of the State Properties Committee as the subject of a condemnation effort by the Narragansett Bay Commission.”

Mesolella’s version of what happened: “They offered me the property. They approached me to purchase the property. We expressed an interest... We made a direct offer to purchase the property. Someone else bought it. We moved on.”

He also told The Journal last Thursday his conversation with one of the principals at RI Waterfront Enterprises involved another piece of property, “not the property that Narragansett Bay Commission is interested in. It’s the property above it.”

Donegan’s response to Mesolella’s account: “That is factually incorrect.”

“It was Vinny Mesolessa who approached my client and ‘the ask’ was the purchase and sale agreement, which included all of those properties in the South Quay where he [was] going to build a hotel.”

Status?

Check back after the pandemic. The whole shebang is on hold.

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DEM: Seasonal shellfish area closures take effect on May 23

By **What's Up Crew** - May 21, 2020



The Rhode Island Department of Environmental Management (DEM) today announced that seasonal shellfish area closures will take effect at sunrise on Saturday, May 23, and will remain in place until Tuesday, October 13. Consistent with federal requirements, DEM closes some local waters to the harvesting of shellfish every year at this time due to potential water quality impacts associated with marinas and mooring fields. The areas are within:

- o Bristol Harbor
- o Dutch Harbor Area, Jamestown
- o Fishing Cove, Wickford Harbor
- o Great Salt Pond and Trims Pond, Block Island

- o Potter Cove, Prudence Island

- o Sakonnet Harbor, Little Compton

In addition, the smaller marina closures in the southern coastal ponds, Fort Wetherill, and the Kickemuit River in Warren will go into effect on May 23.

In a press release, DEM says that two changes are being made this year related to the classification of shellfishing grounds. The January seasonal closure of the Kickemuit River has been eliminated due to improvements in water quality. To the north and east of Gould Island, additional approved shellfishing waters are now available. Also, the closure area around Gould Island is being increased based on newer shoreline and in-water sediment data and site assessment work.

In 2018 DEM expressed hope about reopening a section of the lower Providence River as a new conditional area within a year. Such an action – which would allow for the harvest of shellfish from the Providence River for the first time in more than 70 years – is the result of water quality improvements from decades of intense efforts to clean up Providence River and Narragansett Bay, most notably improvements by the Narragansett Bay Commission (NBC) to reduce the discharge of combined sewer overflows.

DEM has continued work to finalize the details of a conditional area and drafting a prospective shellfish management plan to make that hope a reality. In 2019 and 2020 DEM met with the Shellfish Advisory Panel of the Marine Fisheries Council to discuss progress to date and to gather input. DEM is also working with shellfishers and NBC to schedule a quahog transplant, in which quahogs from this area would be harvested and relocated to provide breeding stock for other areas of the Bay, as well as providing a source of harvestable clams for later in the season. This relocation effort has been delayed in the interest of ensuring public safety related to COVID-19 concerns, but DEM and their partners are committed to conducting the transplant later this year.

Rhode Island shellfish are much sought-after seafood because of a long history of delivering a high-quality product. This is achieved by diligent monitoring of shellfish harvesting waters, protecting public health with a high level of oversight when conditions indicate a change in water quality either from natural sources such as algae blooms or by the quick response to emergency conditions. DEM, Rhode Island Department of Health, and the RI Coastal Resources Management Council along with industry partners collaborate to ensure that

shellfish grown and harvested from RI waters continues to be a quality safe seafood product to be enjoyed by all consumers.

For more information on the shellfish harvesting reclassification, review the [annual notice](#) available at [RIDEM – Shellfish](#). An [interactive shellfishing map](#) is also available.

For information on emergency and conditional area shellfish closures, call DEM's 24-hour shellfishing hotline at 401-222-2900 or sign up for our listserve here: RishellfishOWR-subscribe@listserve.ri.gov.

What's Up Crew

<https://whatsupnewp.com>

The latest from the What's Up Crew.

Plans for New Wind Port at Controversial South Quay Advance

ecori.org/smart-growth/2020/7/20/port-plans-advance-for-controversial-south-quay

Tim Faulkner

July 20, 2020



Legend

-  Chevron Owned
-  Tockwotton Owned
-  RI Waterfront Enterprises Owned



Legend

- Chevron Owned
- Tockwotton Owned
- RI Waterfront Enterprises Owned

The South Quay, highlighted by the lavender rectangle, was created four decades ago by the infilling of the Providence River. (East Providence Waterfront Commission)

By TIM FAULKNER/ecoRI News staff

Gov. Gina Raimondo is pushing new development to lift Rhode Island’s coronavirus-plagued economy out of recession. Among the proposals being embraced by the governor is a taxpayer-supported project proposed for a controversial waterfront site in East Providence.

Last week, two days after Raimondo outlined her RIse Together plan, the Rhode Island Commerce Corporation swiftly approved a \$15 million tax credit to aid an East Providence port project for a controversial shoreline property.

The rectangular outcrop into upper Narragansett Bay known as the South Quay is considered one the most regrettable approvals by the Coastal Resources Management Council. In 1976, the Providence & Worcester Railroad received authorization from the state

waterfront zoning board to infill 36 acres of Providence Harbor for a rail and shipping port. The tidal area was supplanted with stone and gravel, but the prominent artificial site sat idle for decades as proposals to build the wharf came and went.

In 2003, the parcel was placed under the jurisdiction of the East Providence Waterfront Special Development District — now the East Providence Waterfront Commission — and marketed by the city for commercial development. The Providence & Worcester Railroad sold the property to RI Waterfront Enterprises LLC in June 2019 for \$4.5 million.

The new owner is a subsidiary of Mugar Enterprises Inc., a Boston-based development company with investments in shopping centers and entertainment venues such as the Orpheum Theatre in Boston. A portion of the property is slated for a waterfront entertainment venue, while the South Quay would serve as a staging area for offshore wind-energy development. This new port would partner with similar wind-staging areas at the Port of Providence and the Port of Davisville in North Kingstown.

RI Waterfront Enterprises has pledged to invest \$25 million in cash and in-kind services for the \$103 million project, including buying adjacent land that is part of the former fuel terminal owned by the Chevron Corp. Rhode Island's \$15 million investment is the maximum allowed through the Rhode Island Small Business Development Fund. The project would also receive a special sales-tax exemption. The remainder of the project's costs would be paid through taxpayer money in the form of federal grants.

The \$15 million in new funds are in addition to the \$100,000 award RI Waterfront Enterprises received earlier this year from the Commerce Corporation. The Site Readiness Award paid for a study of a new port and its relationship with existing ports in Narragansett Bay.

The latest state funding was enthusiastically approved by the Commerce Corporation's Investment Committee and its board of directors at their July 17 meetings. The vote by the Investment Committee was held in executive session.

"We've been the leader (in the offshore wind industry) and we need to keep doing this to stay the leader. So full speed ahead," Commerce Corporation board member George Nee said. "Approve with a capital A."

"It's a prime place for development, and we are working hard to lure offshore wind manufactures to Rhode Island," Raimondo said. "And the pitch that we are making is that Rhode Island really is America's leader in offshore wind. So developments like this help us to fortify our leadership position."

A formal plan for the project hasn't been made public, but, according to Commerce Corporation documents, the South Quay Marine Terminal would be used to support the development, operations, and maintenance of new offshore wind projects such as Revolution Wind.



The South Quay property would be turned into a staging area for offshore wind development. (City of East Providence)

RI Waterfront Enterprises plans to install a 1,020-foot-long waterfront wall, a dock for ferry, fire, and harbormaster vessels, two concrete platforms for cargo and cranes, two deepwater berths, a small warehouse and administrative buildings, and an 8-acre heavy-load-bearing lay-down area. Up to 8 feet of fill will be applied to level and cap the site.

Project manager Melissa Martin has pledged to have the port completed by December 2022.

Permits and approvals will be required from East Providence, the Coastal Resources Management Council, Army Corps of Engineers and state agencies. Public hearings will also be held.

Save The Bay closely monitors the South Quay and takes issue with further structural intrusions into the water. The Providence-based environmental group has long preferred that the South Quay be dismantled and the shoreline allowed to renature.

RI Waterfront Enterprises says they don't expect the project to further displace the harbor. And they plan to consult with Save The Bay throughout the approval and building process.

In January, the Narragansett Bay Commission (NBC), the largest wastewater treatment operation in Rhode Island, made overtures to acquire the South Quay by eminent domain and use the site as a permanent home for 600,000 cubic tons of rock and debris from construction of the third phase of NBC's combined sewer overflow project.

East Providence countered by introducing two bills (H7946 and S2346) in the General Assembly to impede the land taking. The bills had hearings in March but they never made it out of committee.

NBC eventually withdrew the site from consideration.

https://www.thewesterlysun.com/news/westerly/winnapaug-pond-quahog-stocking-program-aims-to-improve-water-quality-opportunities-for-recreational-fishermen/article_0e2c858a-f849-11ea-8236-13f00ebad577.html

FEATURED TOP STORY

Winnapaug Pond quahog-stocking program aims to improve water quality, opportunities for recreational fishermen

By Dale P. Faulkner Sun staff writer
Sep 16, 2020



Volunteers prepare to unload quahogs from truck during Wednesday, September 16, 2020, involving the Westerly Island Shellfishermen’s Association, the Salt Pond Coalit contributing will be the Southern Rhode Island Conserva quahogs. Bagged quahaugs were off loaded from a truck shellfish spawner sanctuary in the western end of the po



WESTERLY — A human conveyor belt of about 15 people passed bushel bags of quahogs from the back of a town truck down the line to waiting volunteers in boats in Winnapaug Pond Wednesday morning. The boats then motored to the deeper parts of a spawner sanctuary where the quahogs were dropped into the water as part of a shellfish enhancement project.

Potential benefits of the effort include increasing the population of quahogs in the pond for recreational fishermen and improving water quality, since the clams are filter feeders that remove excess nitrogen from waters.

Protected from harvesting in the sanctuary, the adult quahogs are expected to spawn. The spawning clam larvae become plankton that will disperse from the western edge of the pond, where the sanctuary is located, throughout the pond by tidal and wind energy.

"They sink to the bottom, grow a shell and scatter over the whole pond," said Art Ganz, president of the Salt Ponds Coalition.

The coalition teamed with the Westerly Recreation Department, the Narragansett Bay Commission, the Rhode Island Shellfishermen's Association, the state Department of Environmental Management, and the Southern Rhode Island Conservation District on the project.

Over the years, since he established the sanctuary in the 1970s, Ganz said, the pond has also been seeded with scallops and oysters. The effort on Wednesday was the second time quahogs had been put in the pond since 2009 when Ganz retired from his post as DEM's senior supervisory marine biologist.

The Southern Rhode Island Conservation District contributed \$1,000 for the purchase of the 100 bushels, or about 5,000 pounds, of quahogs that were deposited into the pond, and three of its staff members assisted Wednesday.

"My board fully supported this idea because of our spawning sanctuary so that we have a o said Gina Fuller, manager of the conservatio

The quahogs were dug up Tuesday from the to the pond in the town vehicle.



The quahog transplant was the brainchild of Nick Celico, a Westerly resident who graduated from the University of Rhode Island Graduate School of Oceanography in May, and Julia Beasley, interim director of the Recreation Department.

Beasley, who initiated the Green the Beach campaign shortly after she started working for the department as a coordinator in 2018, looks for a different theme for the campaign each year.

"Every year I pick a project to improve the environmental quality of the town beach area, and that includes Winnapaug Pond, and we decided this year, because of COVID-19, we couldn't do a large public event," Beasley said.

Beasley and Celico had often discussed the beach area, water quality, and challenges posed by littering, she said. During one chat, Beasley said, she spoke with Celico about Green the Beach. At the time she was looking for a theme for the campaign and he was looking for a senior project.

"That's how it came together," Beasley said.

The Green the Beach campaign, Beasley said, illustrates the nexus between the Recreation Department and the town's school system. The beach, she said, draws multi-generational crowds.

"It's really a nice display of collaboration and proves once again that we really are the hub for collaboration and the need for educating the area about the natural resources we have and the need to protect and preserve them or we're going to lose them," Beasley said.

Her commitment to preserving the beach and the pond, Beasley said, grew out of her time as an Olympic rower. "I want to get more people on the water and help them understand that we have such a gem here," she said.

While her time rowing nurtured a connection by pollution.

"A lot of the passion I have for recreation co seen some very beautiful places but I've also boats," Beasley said.



Celico, who served as project manager, said he hoped to accomplish three primary objectives: promote recreation opportunities on the pond, improve the vitality of the pond by purifying the water, and the use of shellfish as a way to educate the community about the pond and its ecosystem.

As a young boy, Celico discovered the fun of hunting for clams, and later in life has made a living, at times, selling quahogs.

"I've been out there digging and raking for clams since I was five years old. I loved it then and then I turned it into an educational pursuit and temporary employment," Celico said.

While the pond is not depleted of quahogs, Celico said, the project will make them more plentiful. He also noted the filtering capability of quahogs and recalled the pond being shut down for recreational fishing in 2019 for a few days due to poor water quality. Scientists believe a single quahog filters about one gallon of water per hour. "Let's say, conservatively, there were 200 quahogs in each bushel. That's an additional 200,000 gallons of water being filtered every hour," Celico said.

The town is getting ready, Celico noted, to embark on a project to dredge part of Winnapaug Pond. He said he hoped the dredge, along with the quahog project, would build a tide of momentum and positive feeling for the pond.

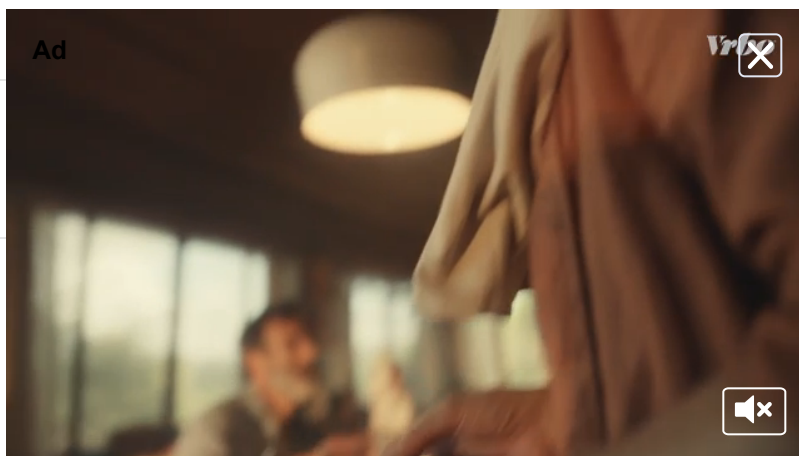
"I look forward to a day when the restaurants in the town serve only clams from Westerly. It could be a point of pride. That's a nice aspiration," Celico said.

State Rep. Brian Patrick Kennedy, Celico's uncle, and state Rep. Sam Azzinaro were both on hand Wednesday observing the project and encouraging the volunteers. Superintendent of Schools Mark Garceau, who lives next door to where the boats picked up the quahogs as they were unloaded off the truck, also observed.

dfaulkner@thewesterlysun.com

Dale Faulkner

Reporter



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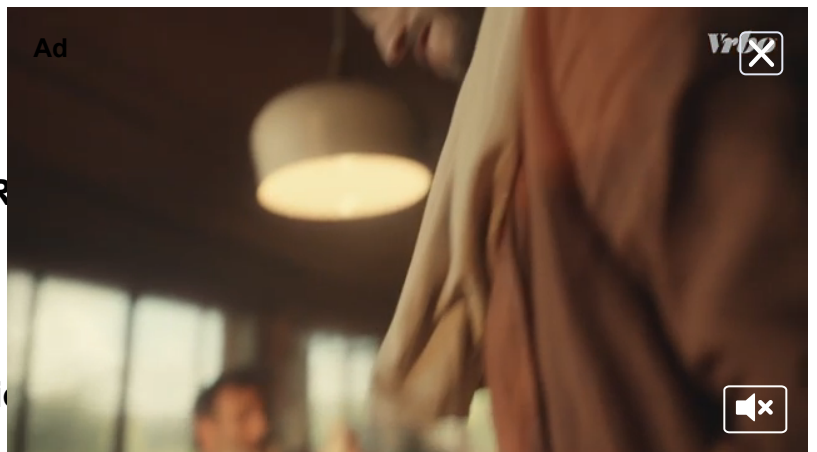
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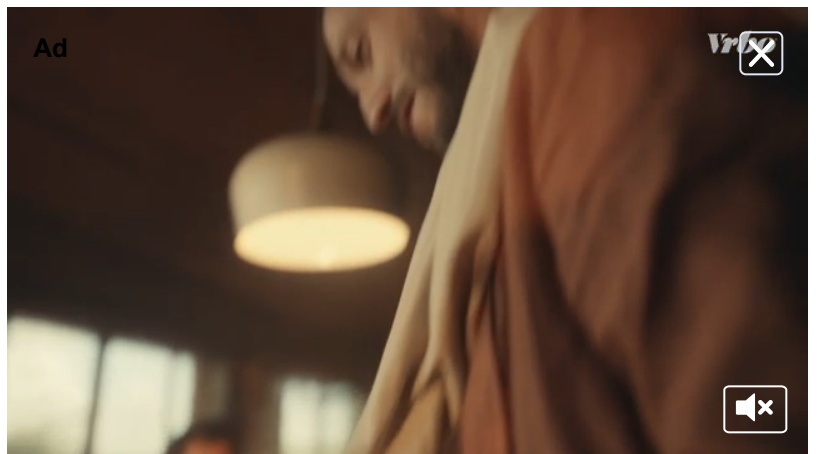
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Narragansett Bay Commission Honored as "Utility of the Future"

Wednesday, September 23, 2020
GoLocalProv News Team

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The Narragansett Bay Commission (NBC), along with sixty-four other clean water utilities worldwide, has been recognized as a Utility of the Future (UOTF) for transformational initiatives in the clean water sector. The UOTF designation recognizes "utilities for recovering resources from wastewater, leading community engagement, forming unique partnerships, and building an internal culture of innovation."

The Utility of the Future Today program was launched in 2016 by the National Association of Clean Water Agencies (NACWA), the Water Environment Federation (WEF), the Water Research Foundation (WRF) and the WaterReuse Association, with input from the U.S. Environmental Protection Agency (EPA).



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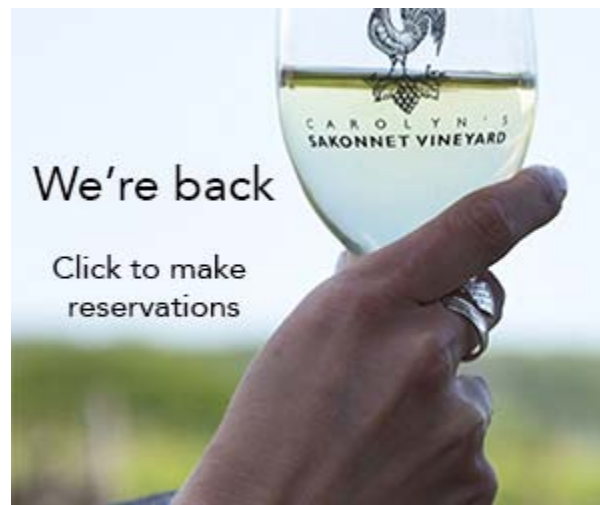
Narragansett Bay Commission PHOTO: GoLocal

“This agency has made great strides for Narragansett Bay and our urban rivers,” said NBC Chairman Vincent Mesoella. “Narragansett Bay is cleaner than it has been in 150 years. Our shellfishermen have access to thousands of additional acres of grounds. NBC generates 80 percent of our own energy through renewable sources and we operate award-winning community and education programs. Thanks to an engaged and committed Board and a staff of environmental professionals, the NBC truly is embracing the future today.”

NBC has received UOTF designation twice since the award’s inception.

“The innovations coming to the water sector present an opportunity for a paradigm shift in the way utilities think about and solve long-standing challenges to clean and reliable water,” said Jackie Jarrell, WEF President. “WEF is excited to recognize the Narragansett Bay Commission for embracing innovative ways to better serve their communities.”

The UOTF lauded NBC’s leadership in renewable energy, robust environmental monitoring program, excellence in water treatment and management, and commitment to community support.



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KBRA Releases Report Assigning Rating to the Narragansett Bay Commission Bucklin Point Resiliency Improvements Project WIFIA Loan

October 05, 2020 12:30 PM Eastern Daylight Time

NEW YORK--(BUSINESS WIRE)--On September 30, 2020, Kroll Bond Rating Agency (KBRA) assigned a long-term rating of AA with a Stable Outlook to the Narragansett Bay Commission Bucklin Point Resiliency Improvements Project WIFIA Loan. At the same time, KBRA affirmed the long-term rating of AA with a Stable Outlook on the Combined Sewer Overflow (CSO) Phase III Facilities WIFIA Loan.

Click [here](#) to view the report. To access ratings and relevant documents, click [here](#).

Disclosures

Further information on key credit considerations, sensitivity analyses that consider what factors can affect these credit ratings and how they could lead to an upgrade or a downgrade, and ESG factors (where they are a key driver behind the change to the credit rating or rating outlook) can be found in the full rating report referenced above.

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A description of all substantially material sources that were used to prepare the credit rating and information on the methodology(ies) (inclusive of any material models and sensitivity analyses of the relevant key rating assumptions, as applicable) used in determining the credit rating is available in the U.S. Information Disclosure Form located [here](#).

Information on the meaning of each rating category can be located [here](#).

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FEATURED

GRASS IS GREENER - Macomber Stadium in C.F. reopens after renovations

By JONATHAN BISSONNETTE jbissonnette@pawtuckettimes.com

Oct 13, 2020



With Central Falls Mayor James A. Dioiosa looking on, Narragansett Bay Commission Chairman Vincent Mesolella makes the ceremonial first kick on the new Macomber Stadium Field during a ribbon-cutting ceremony Friday evening.

Ernest A. Brown

CENTRAL FALLS – When James A. Dioiosa last left the ramshackle, rundown grass field at Macomber Stadium as a member of Central Falls High School’s soccer team in 2005, he began dreaming of this day.

The problem was, at that point, it was just a goal in the mind of a wide-eyed high schooler.

“Rehabbing this stadium was a big dream, too expensive to ever happen, as I was always reminded,” Diossa said. “Having played here myself, and hearing athletes and coaches complain about the horrible playing conditions, gave me the inspiration to work hard, and although many thought I was dreaming too high, we are finally able to deliver a world-class facility for the residents of Central Falls.”

Friday night’s boys’ soccer match between Central Falls High School and visiting Tolman High School marked the night in which Diossa’s dream became a reality, and also marked the first time since the 2016-17 school year that the Warriors of Central Falls could truly call themselves the home team.

That’s because for the better part of the past three years, the football, soccer, and baseball programs at Central Falls High have had to take their show on the road – playing at opposing schools as the “designated home team” – while the once-derelict Macomber Stadium underwent much-needed renovations after it was learned that the grass field contained contaminated soil.

“No one in Central Falls who has ever played here ever thought this day would come,” Diossa said prior to kick-off Friday evening. “This completely rebuilt field is a great metaphor for Central Falls. A lot of work went into it, getting it to this point was not easy, and many thought it would be impossible, yet here we are.”

“Pride has been restored as well as the confidence to excel in all sports that will be played here. No longer will this stadium be known as the worst field in the state. In fact, it is now the newest, most state-of-the-art field in Rhode Island. We have leveled the playing field, literally, so that our kids will no longer feel embarrassed to host teams from anywhere else or be envious of playing on well-kept turf fields in the suburbs,” the mayor added.

Demolition crews tore down the stadium’s old redbrick concrete bleachers last October, making way for new portable bleachers that can be used for any of the numerous sports played at the field, with another option involving the positioning of chairs behind a protective fence near home plate.

The stadium construction project happened in four stages – site demolition and soil removal, installation of underground drainage systems, fill with clean material and site grading, and the installation of turf by AstroTurf – a national leader in synthetic athletic field material.

The project was paid for by a \$37,000 grant from the U.S. Soccer Foundation and \$300,000 from the state, which was part of an overall \$3 million in matching grants awarded to 15 communities across Rhode Island to develop or renovate recreational facilities in cities and towns. The grants were awarded by the Rhode Island Department of Environmental Management.

State officials, including Gov. Gina M. Raimondo, announced in 2018 that the stadium would receive \$300,000 for field remediation; renovations to the irrigation system, bleachers, and dugouts; and installation of a perimeter fence.

But those memories were a thing of the past on Friday evening, as a clear blue twilight sky above gave way to a pristine green turf field below, marked with all the lines for football, soccer, and baseball in white and yellow, with, of course, the Central Falls High logo marking midfield in a brilliant red and blue.

Jeffrey R. Diehl, Executive Director and Chief Executive Officer of the Rhode Island Infrastructure Bank, noted that the stadium was more than just a “beautiful athletic field,” it was also a “huge storm water management project.”

“In a wicked bad storm, it’ll save a million gallons from flowing into the sewers that needs to be managed by Narragansett Bay...” he said. “Think about that, a million gallons of water that isn’t going to have to be treated.”

Narragansett Bay Commission Chairman Vincent Mesoella said he saw an opportunity to combine a “highly-needed environmental program with a recreational program that will be appreciated by all” at the new-and-improved Macomber Stadium.

“After two years, the result is obvious,” Mesoella said. “This field is a world-class field on par with any field in the state of Rhode Island and dare I say any field in this country. You can be proud to play on this field and you can be proud to welcome visitors here.”

“I have been proud of all the accomplishments of Narragansett Bay Commission with regard to the environment, but none, none rise to the level of joy that seeing this field completed gives me and I am so happy and proud to be here today,” he added, before cutting the ribbon to the new field alongside Diossa.

Jonathan Bissonnette on Twitter @J_Bissonnette



BY CRISTINA TUSER

OCT 22, 2020

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RHODE ISLAND STORM WATER TUNNEL UNDERWAY

The Narragansett Bay Commission's CSO Phase III tunnel will divert and treat storm water and sewage from Pawtucket and Central Falls.



The final stage of a massive storm water runoff and sewage collection and treatment project was set in motion by the Coastal Resources Management Council (CRMC) at an Oct. 13 online meeting.

Several issues need to be resolved, however, including where to dispose of 800,000 tons of pulverized rock and sediment, [according to ecoRI](#).

The [Narragansett Bay Commission](#) (NBC), Rhode Island's largest wastewater treatment operation, manages the combined sewer overflow (CSO) system. This CSO system is credited with significant pollution reduction in upper Narragansett Bay.

[CSO Phase III](#) will divert, store, and treat up to 58.5 million gallons of storm water and sewage from Central Falls and Pawtucket before it is discharged into the Blackstone and Seekonk rivers, reported ecoRI.

Final plans have yet to be completed and submitted to CRMC. According to ecoRI, the project will have a tunnel pump station, four drop shafts, a tunnel odor-control facility and two additional treatment clarifiers will be built at Bucklin Point.

Structures on nine properties in East Providence and Pawtucket will be demolished to prepare for construction.

The Pawtucket tunnel is expected to take five years to complete and tunnel boring is scheduled to begin in two years. The project is the first of four segments for Phase III. According to ecoRI, additional connections and segments will be completed through 2041 and the work will include sewer connections, a smaller tunnel link, additional wastewater storage and green storm water infrastructure.

The \$548 million Pawtucket tunnel project received a loan covering half the cost from the U.S. EPA and the Rhode Island Clean Water State Revolving Fund and other programs will also finance a portion of the project costs.



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Major EPA Funding for Rhode Island Water Infrastructure Projects Will Help Protect Health and the Environment

Funding for lead service line replacement in Providence and to upgrade Narragansett Bay Commission water discharge facility

10/27/2020

Contact Information:

David Deegan (deegan.dave@epa.gov)

(617) 918-1017

PROVIDENCE, R.I. – The U.S. Environmental Protection Agency (EPA) is announcing a \$190 million loan to the Narragansett Bay Commission (NBC) under the Water Infrastructure Finance and Innovation Act (WIFIA) for resiliency improvements to its Bucklin Point treatment facility which will aid the reduction of pollutant discharges into Narragansett Bay.

EPA is also awarding a \$6.4 million grant to Providence Water for lead service line replacement projects under the Water Infrastructure Improvements for the Nation Act (WIIN). This is among

the first-ever competitive grant selections under the WIIN Act's Reduction in Lead Exposure via Drinking Water grants, which will be used to assist communities with removing sources of lead in drinking water.

"Especially during Children's Health Month, EPA is very proud to further support these major projects in Rhode Island which will result in tangible and lasting benefits for communities and citizens," **said EPA New England Regional Administrator Dennis Deziel.** "These projects will generate jobs, significantly advance children's health protections, and improve water quality in Narragansett Bay. This is truly good news for Rhode Island."

WIFIA Loan for Narragansett Bay Commission

The WIFIA loan \$190 million WIFIA loan to the Narragansett Bay Commission will be used for the Bucklin Point Resiliency Improvements project. The new loan will augment a \$269 million loan announced in 2019 to help fund the Combined Sewer Overflow (CSO) Phase IIIA Facilities project. This project is the second WIFIA loan awarded in New England to help protect public health and the ecosystems of the largest estuary in this region. Nationwide since March 2020, WIFIA has announced twenty-one loans and updated six existing loans with lower interest rates. These recent announcements will save ratepayers \$1.4 billion.

"Many wastewater treatment facilities are relying on yesterday's infrastructure to deal with tomorrow's problems. At the Narragansett Bay Commission, we are gratified to move forward with this important project to improve our resiliency and protect the water quality of the Seekonk River and Narragansett Bay. We're very grateful for the investment that the EPA is making in our clean water infrastructure. The WIFIA loan also ensures that the cost of this ambitious clean water project will be mitigated for our ratepayers," **said Vincent Mesolella, Chairman, Narragansett Bay Commission.**

WIIN Grant Funding for Lead Service Line Replacement

The \$6.4 million EPA has awarded to Providence Water will fund, at no cost to homeowners, the removal and replacement of an estimated 1,400 private lead lines from households within the distribution system. For such replacements, Providence Water will replace, at their cost, any public lead pipes that may be connected to the private lead lines. Coupled with recent upgrades made by Providence Water to the system's corrosion control treatment, this EPA grant will go a long way towards "Getting the Lead Out" of drinking water at the taps of citizens throughout Providence and surrounding communities.

"Providence Water is committed to reducing elevated levels of lead in drinking water found in some of our customers' homes," **said Ricky Caruolo, General Manager of Providence Water.** "While drinking water that leaves our treatment plant and flows through our distribution system has no detectable levels of lead, some of our customers' service pipes and plumbing fixtures like faucets, valves, brass pipes and pipe solder can contain lead. This \$6.4 million grant award from the EPA will allow us to continue our work helping customers in disadvantaged neighborhoods replace their private side lead service lines. We thank our team at Providence Water for working with the EPA to identify and apply for this drinking water grant opportunity, and we thank the

EPA for their continued partnership and leadership in helping communities reduce lead in drinking water."

"This grant aligns perfectly with the Rhode Island Department of Health's commitment to ensuring access to safe drinking water in every community in Rhode Island," **said Nicole Alexander-Scott, MD, MPH, the Director of the Rhode Island Department of Health.** "Lead service line replacement is one of the most important long-term steps to take to reduce levels of lead in drinking water. This is particularly true for childhood lead exposure. RIDOH commends the Providence Water Supply Board for applying for this grant and thanks EPA for this commitment to the sustained health of all Rhode Islanders."

Background on WIIN Act

The 2016 Water Infrastructure Improvements for the Nation Act (WIIN Act) addresses, supports, and improves America's drinking water infrastructure. Included in the WIIN Act are three drinking water grants that promote public health and the protection of the environment. Since 2018, EPA has made available more than \$69 million to support the Lead Testing in School and Child Care Program Drinking Water and \$42.8 million to assist public water systems in underserved, small and disadvantaged communities meet Safe Drinking Water Act requirements.

For more information visit: <https://www.epa.gov/safewater/grants>

Background on WIFIA

Established by the Water Infrastructure Finance and Innovation Act of 2014, the WIFIA program is a federal loan and guarantee program administered by EPA. WIFIA's aim is to accelerate investment in the nation's water infrastructure by providing long-term and low-cost supplemental credit assistance for regionally and nationally significant projects. EPA's WIFIA program plays an important part in President Trump's infrastructure plan, which calls for expanding project eligibility. The WIFIA program has an active pipeline of pending applications for projects that will result in billions of dollars in water infrastructure investment and thousands of jobs.

For more information about the WIFIA program, visit <https://www.epa.gov/wifia> .

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Trio of wind turbines in Providence get go-ahead

[Alex Kuffner](#)

The Providence Journal



PROVIDENCE -- Three new wind turbines are set to rise over the city's waterfront.

The turbines are set to go up in 2021 at the southern end of Fields Point, on land owned by the Port of Providence and Johnson & Wales University. When they're completed, on a date expected to come around next fall, they will join another trio of turbines that were installed just to the north in 2012 at the wastewater treatment plant operated by the Narragansett Bay Commission.

Green Development, the only company actively developing land-based wind power in Rhode Island, announced Tuesday that it had secured all the necessary approvals for the turbines that will reach 325 feet high when their blades are at their highest points.

Site work is set to begin in the closing weeks of this year for the \$22.5-million project.

"Every time we get a project approved Rhode Island becomes a little less dependent on the fossil fuel industry," Mark DePasquale, founder of Green Development, said in a statement.

Apart from Orsted, the Danish offshore wind company with offices in Providence, Green Development may be the biggest renewable energy developer in Rhode Island. Once the new Providence turbines go up, the Cranston-based company will have installed a total of 43.5 megawatts of onshore wind power in Rhode Island.

In comparison, Orsted's much-celebrated Block Island Wind Farm, the first -- and so far -- only offshore wind farm in the nation, has a nameplate capacity of 30 megawatts. (Orsted [has agreements in place to develop more than 800 megawatts offshore and is planning many hundreds more.](#))

Green started with a single turbine in North Kingstown in 2012 and has followed with 18 more: one in place of a failed turbine at Portsmouth High School that attracted much negative attention; 10 in Coventry; and, most recently, seven in Johnston.

The [turbines in Johnston, which were completed two years ago at a cost of \\$105 million](#), are by far the largest in Rhode Island. Each one has a capacity of three megawatts and reaches as high as 524 feet.

In contrast, the new turbines in Providence, which will be manufactured by German company VENSYS, won't stand as high and will have half the capacity, at 1.5 megawatts each. That will make them equivalent in power-generating ability to the turbines already installed nearby in Providence and those in Coventry, North Kingstown and Portsmouth.

Trying to put larger turbines in Providence would have run up against siting concerns and issues over height with the Federal Aviation Administration, according to Green spokesman Bill Fischer.

The new project received approval last year from the FAA and from the Providence Planning and Zoning Boards this past summer. The final permit came through in November from the state Coastal Resources Management Council.

The turbines will sell power directly into the regional electric grid through the state's [Renewable Energy Growth Program](#), under which long-term power purchase contracts are awarded with National Grid, Rhode Island's dominant utility. Green secured a 20-year agreement to sell the power for 19.34 cents a kilowatt hour.

The company is paying \$54,000 a year to lease the land on which each turbine is sitting. Two are on land owned by Johnson & Wales and one is at ProvPort. Per state law, Green is also making tax payments of \$5,000 per megawatt to Providence, for an annual total of \$22,500.

Green is also active in the solar market, with hundreds of megawatts either developed or proposed, and it has attracted a reputation for aggressive tactics. It has filed lawsuits in Exeter and Coventry and been accused of razing woodlands to make room for ground-mounted solar panels without securing the necessary approvals. There have been complaints, too, by residents in Coventry and Johnston of shadow flicker, noise and negative visual impacts from Green's wind turbines.

Green has also found itself in the midst of more than one Smith Hill controversy. In 2016, a budget provision designed to help the company's Coventry project by shifting some interconnection costs to ratepayers [was shelved after a Journal story](#).

In the 2018 General Assembly session, [the company sought legislation that would have extended a key renewable-energy incentive to biomass](#) — the burning of wood waste for power — to benefit a project

in the works at the time in Johnston, but the measure was dropped in the face of opposition from environmental groups.

The new Providence proposal, however, has charted a smoother course through the approval process and was applauded by Green's partners at Johnson & Wales and ProvPort and by city leaders.

"We are excited to see additional renewable energy projects being developed along our waterfront," Providence Mayor Jorge Elorza said in a statement. "Our Port of Providence is well-positioned to support offshore wind development and I can't think of a better symbol of sustainable investments in our community than projects like these."



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11/25/2020

City properties being leveled to make way for stormwater tunnel



Workers clear the site of the recently demolished Masonic Temple at 50 Pleasant St. on the Pawtucket riverfront last Friday. The Narragansett Bay Commission purchased the property and will use it for its large-scale tunnel project. (Breeze photo by Ethan Shorey)

By **ETHAN SHOREY**, Valley Breeze Editor

PAWTUCKET – The Narragansett Bay Commission has now purchased at least 10 properties on or near the Pawtucket riverfront to help facilitate construction of a massive new tunnel to help capture stormwater runoff and reduce pollution.

Workers late last week were completing demolition of the former Masonic Temple at 50 Pleasant St., one of the 10 properties purchased for nearly \$7 million combined. A number of the properties currently have homes and other buildings that will also be demolished.

Here are the 10 properties purchased by NBC:

- 50 Pleasant St., purchased on July 1 for \$750,000, according to Pawtucket's tax assessor database.
- 5 Central Ave., a mill property previously owned by American Products Realty and purchased by NBC in August 2019 for \$400,000.
- 660 Roosevelt Ave., previously owned by the R.I. Trucking Association and purchased by NBC for \$630,000 last October.
- 672 Roosevelt Ave., a home purchased for \$185,000 in July.



- 17 Nassau St., a vacant property purchased for \$332,000 in July.

- And vacant properties on Nassau Street, 2 Bishop St., 775 School St., 804 School St., and another on School Street, purchased for a combined \$4.55 million last December.

Though the combined \$6.85 million acquisition of the properties might seem an expensive proposition, it pales in comparison to the overall \$548 million cost of the Pawtucket tunnel work, say officials.

The Valley Breeze is committed to keeping quality news stories like this one free to our readers. You can be a huge part of this local journalism success story by making a one-time or monthly contribution to what we do every week. Thank you as always for reading.

Chief of Staff Dylan Zelazo confirmed that the revenue-generating power of these particular properties will be diminished with buildings torn down, but the total tax loss will be diffused over all other properties in the city as part of the overall tax levy and shouldn't create much of an overall impact.

While in an ideal world a city such as Pawtucket would want to see reinvestments in existing buildings to whatever extent possible, or "everything to be tax-productive," this stormwater system modernization work should greatly benefit other major projects, including the soccer stadium project and new train station nearby, said Zelazo. There is a balance needed between having proper infrastructure and commercial reinvestment, he said. In addition to the great environmental benefits through proper treatment of stormwater, he said, this project in the downtown and on the riverfront will help address runoffs from large swaths of paved areas.

Combined sewer overflow system phase 3 upgrades by NBC will help store and treat up to 58.5 million gallons of stormwater and sewage from Central Falls and Pawtucket before it makes it to the river.

The 2.2-mile collection tunnel, measuring 30 feet wide, will run from Pawtucket to the Bucklin Point wastewater treatment facility in East Providence. The tunnel will be dug at a depth of 150-200 feet along the eastern shore of the river.

According to ecoRI News, buildings on nine properties in Pawtucket and East Providence will be demolished to allow construction work to proceed. Completion of the tunnel is expected to take several years. Tunnel boring is scheduled to begin in two years.

This project is the first of four segments planned for phase 3. Additional connections and segments will be completed through 2041.

Combined sewer overflow phase 1, completed back in 2008, treats 1.1 billion gallons of combined water and wastewater that would have gone straight into Narragansett Bay at the Field's Point Wastewater Treatment Facility each year. Phase 2, completed six years later, diverts 17 outflows from discharging into the Seekonk River and Woonasquatucket River, with wastewater now running into the Phase I collection tunnel.

Phase 3 facilities as originally designed included another deep rock tunnel through Pawtucket and Central Falls, ending at the Bucklin Point Wastewater Treatment Facility. In response to the U.S. Environmental Protection Agency's recent guidance documents on affordability and integrated planning, NBC undertook a re-evaluation of phase 3 in 2013, convening a group of stakeholders to provide review and input. The project was approved by the Rhode Island Department of Environmental Management last year.

The Coastal Resources Management Council set the final stage of the stormwater runoff and sewer collection and treatment project in motion at an Oct. 13 meeting, with a number of issues still needing to be resolved.

Upgrades to the combined sewer overflow system have contributed to a significant reduction of pollution in the Narragansett Bay.



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By Cristina Tuser

Nov 30, 2020

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Narragansett Bay Commission Purchases Properties for Storm Water Tunnel Project

Providence, Rhode Island properties are being leveled to make way for a storm water tunnel



The Narragansett Bay Commission purchased at least 10 properties on or near the Pawtucket riverfront to help facilitate construction of a massive new tunnel.

This tunnel will help capture storm water runoff and reduce pollution, [reported the Valley Breeze](#).

The 10 properties purchased by NBC are the following:

- 50 Pleasant St., purchased on July 1 for \$750,000;
- 5 Central Ave., a mill property previously owned by American Products Realty and purchased by NBC for \$400,000;
- 660 Roosevelt Ave., previously owned by the R.I. Trucking Association and purchased by NBC for \$630,000;

- 672 Roosevelt Ave., a home purchased for \$185,000 July 2020;
- 17 Nassau St., a vacant property purchased for \$332,000 July 2020;
- And vacant properties on Nassau Street, 2 Bishop St., 775 School St., 804 School St., and another on School Street, were purchased for a combined \$4.55 million December 2019.

The overall cost of the tunnel work is \$548 million, according to officials

According to Chief of Staff Dylan Zelazo, this storm water system modernization work should greatly benefit other major projects, including the soccer stadium project and new train station nearby. This project aims to address runoffs from large swaths of paved areas.

The combined sewer overflow system phase 3 upgrades by NBC will help store and treat up to 58.5 million gallons of storm water and sewage from Central Falls and Pawtucket before it reaches the river, according to the Valley Breeze.

The project is a 2.2 mile collection tunnel that will run from Pawtucket to the Bucklin Point wastewater treatment facility in East Providence. The tunnel will be dug at a depth of 150-200 feet.

Completion of the tunnel is expected to take several years. Tunnel boring is scheduled to begin in two years.

This project is the first of four segments planned for phase 3 and additional connections and segments will be completed through 2041.



[Environment](#)

No environmental viewpoint represented on Senate's gas and electric transmission infrastructure commission

At least one commission member has a clear history of anti-environmental, pro-fossil fuel bias.

Published 1 month ago on December 14, 2020

By [Steve Ahlquist](#)



In response to the Aquidneck Island gas supply disruption that left thousands of homes without heat during an intense cold spell, Senator **Louis DiPalma** (Democrat, District 12, Middletown, Little Compton, Newport, Tiverton) [introduced legislation](#) to study and evaluate Rhode Island's electrical and fracked gas transmission and distribution infrastructure. Over a year later, in March of 2020, the commission was to hold its first meeting, but then Covid shut down the State House.

Now, nearly two years after the near disaster that precipitated the commission, Senator DiPalma is holding the first meeting on Monday, December 21 at 10:30am. The meeting will be available to stream live on Capitol TV and, of course, UpriseRI will have video and a complete breakdown of the commission hearing soon after.

"The purpose of this commission is to ensure that Rhode Islanders have a reliable and dependable utility infrastructure" said Senator DiPalma in a press release. "The necessity of heat and electricity is too great to allow the possibility of mass service problems, such as we had on Aquidneck Island almost two years ago, and this commission is tasked with preventing any future crises."

The original legislation called for the commission to be made up of three Senators, 13 representatives from various state agencies or private corporations, and four members of the public.

The Senators are:

- Senator Louis DiPalma (Democrat, District 12, Middletown, Little Compton, Newport, Tiverton), chairperson;
- Senator **Dawn Euer** (Democrat, District 13, Jamestown, Newport);
- Senator **Jessica de la Cruz** (Republican, District 23, North Smithfield, Burrillville, Glocester);

Senator Euer was recently made the Chair of the **Senate Committee on Environment and Agriculture**. Senator de la Cruz represents Burrillville, the town that recently defeated the building of **Invenergy's** proposed \$1b fracked gas and diesel oil burning power plant.

The various state agencies and corporations represented are:

- **Linda George, Rhode Island Division of Public Utilities and Carriers (RIDPUC);**
- **Jeffrey Diehl, Rhode Island Infrastructure Bank;**
- **Bijay Kumar, Cybersecurity Officer for the Rhode Island Department of Administration;**
- **Joe Nicholson, Rhode Island League of Cities and Towns;**
- **Terry Sobolewski, National Grid Rhode Island;**
- **Gregg Giasson, Providence Water;**
- **Jim McCaughey, Narragansett Bay Commission;**
- **David Preston, Enbridge Gas;**
- **Jeffrey Wright, Block Island Power Company;**
- **Michael Kirkwood, Pascoag Utility District;**
- **Kathleen Connell, AARP;**
- **Ronald Gagnon, RIDEM;**

One thing the public might notice when looking at the announced members of the commission is the lack of any environmentalists or members of environmental groups that have expertise in energy transmission, like **CLF** or the **Acadia Center**. I asked Senator DiPalma about that.

UpriseRI: There's nobody on this commission to speak to environmental concerns or environmental impacts.

Senator Louis DiPalma: It wasn't an oversight that [environmental advocates] weren't there. The focus, going back to the commission's charge, which I wrote, is on reliability and resilience... Environmental concerns are a piece of that, but they're not the crux. We can still account for renewable and environmental concerns, but reliability and resiliency are the charge of the commission.

Uprise: I know that when the **Senate Commerce Committee** held hearings on the enabling legislation, members on the environmental community testified, in part, about the need for a seat at the table. [Note: Unfortunately, the Senate Commerce Committee does not make recordings of their hearings available to the public. And note also that this bill went through Commerce, not Senate Environmental and Agriculture.]

Senator DiPalma: The environmental piece is something we need to address...

Uprise: Isn't it weird that we've got traditional power suppliers, like National Grid, Enbridge Gas, Pascoag Utility District, Block Island Power Company, and not anybody representing the future of power, like wind and solar suppliers?

Senator DiPalma: Correct... at some point, you can only have so many commissioners. The issue is about transmission and distribution...

Uprise: But to push back on that, can we talk about transmission and distribution without talking about the rapid advancement of behind the meter solar?

Senator DiPalma: We can't. Absolutely not.

UpriseRI: Who on the commission would be able to speak to that or have an expertise in that beyond National Grid, which it could be argued has a financial stake in not factoring in behind the meter solar?

Senator DiPalma: Folks will present at the commission, from wind, from solar, from other energy suppliers. They won't be commissioners. They will be invited to be speakers...

Uprise: But the judges, so to speak, the commission members who will be tasked to judge this testimony and compile it all into a final report or make recommendations on legislation or rule making, will not be environmental advocates...

The four members of the commission from the public are:

- **Antonino Ferrera, ACEA International SA;** The company also, according to Senator DiPalma, does "utility modernization work." Ferrera appears to live in Florida.
- **Cornelia Mueller,** Community Planning Liaison Officer for **Naval Station Newport** and Environmental Scientist;
- **William F Horan,** Middletown resident and retired electrical engineer;
- **Sarah Atkins** is a Community Resilience Specialist in the **Newport Department of Planning & Economic Development**

In a [2018 letter](#) to the **Providence Journal**, William "Bill" Horan claimed, without evidence, that Rhode Island's energy policies "have already resulted in a self-induced energy poverty" and claimed that the "bridge to our energy future that would allow us to keep the lights on is approval and construction of the national gas plant proposed for Burrillville."

A year later Horan [bemoaned the fact](#) that the **Energy Facilities Siting Board (EFSB)** had rejected the proposed power plant in Burrillville. The rejection was based on the clear evidence that the power plant was not needed, but in his second letter, Horan claimed, without evidence, that "[w]ell-funded, agenda-

driven outside detractors came to Rhode Island with their carpetbags in tow to conduct a scorched-earth attack intent on sabotaging the largest privately funded construction project in the history of Rhode Island.”

Horan also claimed in his second letter that “[n]o one was dispatched by the governor to facilitate the [Invenergy] project” even though Governor **Gina Raimondo’s Office of Energy Resources** was on hand at every meeting of the EFSB to strenuously advocate for the power plant, despite the Governor’s false claims of neutrality.

Most troubling is Horan’s [written testimony](#) to the EFSB concerning the proposed power plant. In his testimony, Horan tried to paint the opposition to the power plant as both external to the Town of Burrillville and also as NIMBYism. “The external cult of politically motivated environment terrorist continue to stoke a local NIMBY victim hood assembly with misinformation and fear,” wrote Horan, dismissing the intelligence and wisdom of local activists as gullible victims of a misinformation campaign.

Horan used many charged words and phrases against opponents of the power plant in his EFSB testimony – radicals, magical thinking, socialism, environmental terrorism, cult – while advocating for fracked gas, so-called “clean coal” technologies and nuclear power.

UpriseRI: What kind of vetting was done that allowed an anti-environmental extremist like William Horan to get on this committee?

Senator DiPalma: Bill’s a member of the public as described in the legislation. I wanted someone to be at the table to speak on the nuclear side, because very rarely do people speak about nuclear energy as an option.

Uprise: But here’s a person on the commission with strong, anti-environmental opinions, and counterfactual conspiratorial beliefs, and no space is given for anyone from the environmental or reality based community.

Senator DiPalma: I hear what you’re saying, but it goes back to the commission charge of being reliable and resilient...

Uprise: But reliable and resilient does not mean anti-environmental.

Senator DiPalma: No it doesn’t.

The [first meeting of the commission](#) will include a presentation from **Eric Johnson** and **Kerry Schlichting**, from **ISO New England**. ISO New England is described in the agenda as “an independent, not-for-profit corporation responsible for keeping electricity flowing across the six New England states and ensuring that the region has reliable, competitively priced wholesale electricity today and into the future.”

UpriseRI has questioned ISO New England’s “independence” in the past. See:

- [Grid operator’s faux neutrality and endorsement of natural gas threatens our future](#)
- [Private event for fossil fuel industry insiders held in Cranston](#)

The commission will be clerked by **Katiuska Perez**, out of the Senate Policy office.



Sen. DiPalma's commission to study and evaluate the state's electric and natural gas distribution and transmission infrastructure meets on Monday

By [Ryan M. Belmore](#)

December 16, 2020



Sen. Louis P. DiPalma's (D-Dist. 12, Middletown, Little Compton, Newport, Tiverton) legislative commission to study and evaluate the state's electric and natural gas distribution and transmission infrastructure to ensure its reliance and resiliency will meet virtually on **Monday, December 21 at 10:30 a.m.** and will be available to stream live at <http://www.rilegislature.gov/CapTV/Pages/default.aspx>.

"The purpose of this commission is to ensure that Rhode Islanders have a reliable and dependable utility infrastructure. The necessity of heat and electricity is too great to allow the possibility of mass service problems, such as we had on Aquidneck Island almost two years ago, and this commission is tasked with preventing any future crises," said Senator DiPalma.

The commission will receive an overview and regional update from ISO New England to be delivered by Eric Johnson, Director of External Affairs and Kerry Schlichting, External Affairs Representative. ISO

New England is an independent, not-for-profit corporation responsible for keeping electricity flowing across the six New England states and ensuring that the region has reliable, competitively priced wholesale electricity today and into the future.

Members of the commission are Senator DiPalma, chairperson, Sen. Dawn Euer (D-Dist. 13, Jamestown, Newport); Sen. Jessica de la Cruz (R-Dist. 23, North Smithfield, Burrillville, Gloucester); Linda George, RIDPUC; Jeffrey R. Diehl, RI Infrastructure Bank; Bijay Kumar, RI Cybersecurity Officer for DOA; Joe Nicholson, RI League of Cities and Towns; Terry Sobolewski, National Grid RI; Gregg Giasson, Providence Water; Jim McCaughey, Narragansett Bay Commission; John Sheridan, Enbridge Gas; Jeffrey Wright, Block Island Power Company; Michael Kirkwood, Pascoag Utility District; Kathleen Connell, AARP; Ronald Gagnon, RIDEM; Antonino Ferrera, ACEA International SA; Cornelia Mueller, Naval Station Newport; William F. Horan, Middletown resident and retired electrical engineer; and Sarah Atkins, City of Newport.

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RI Senate Confirms Judicial Appointments, Including First Minority to Majority-Female Supreme Court

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The Rhode Island Senate on Friday approved several judicial appointments, including the first person of color to the Supreme Court and appointments that will result in the first majority-female Supreme Court, the first Asian-American to the Superior Court, and the first Latina to the Family Court.

Governor Gina Raimondo named Superior Court Judge Melissa Long and former Senator Erin Lynch Prata to the Rhode Island Supreme Court. Judge Long will replace retiring Associate Justice Francis X. Flaherty and State Senator Lynch Prata will replace retiring Associate Justice Gilbert V. Indeglia.

In addition, the Senate confirmed the appointments of Richard D. Raspallo and Linda Rekas Sloan as associate justices of



VIEW LARGER +

Rhode Island Superior Court, Kevin B. Reall as associate justice of the Worker's Compensation Court, and Elizabeth Ortiz as associate justice of the Family Court.

Melissa Long is the first minority in Rhode Island's history to be named to the Supreme Court -- which will now have a female majority.

"These appointments represent an important step forward for diversity in the Rhode Island Judiciary," said Senate President Dominick J. Ruggerio (D-Dist. 4, North Providence, Providence). "For the first time ever, we will have a majority of women on the Rhode Island Supreme Court. For the first time ever, we will have a woman of color on the Supreme Court. For the first time ever, we will have a Latina on the Family Court and an Asian-American on the Superior Court. That representation of Rhode Island's diverse and rich tapestry of culture and heritage will have a profound impact on the state's justice system for years to come."

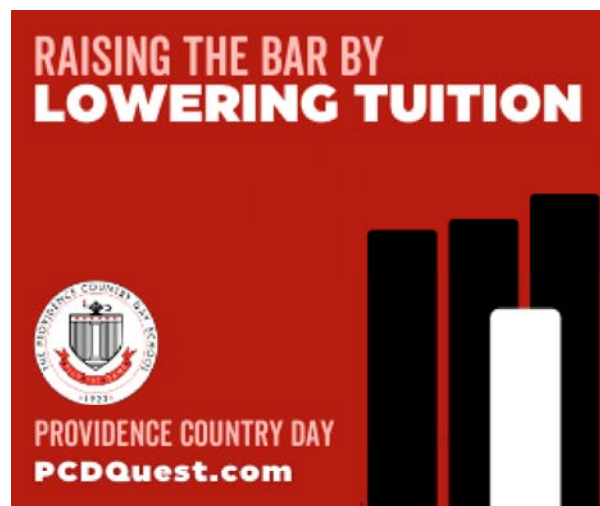
All judicial appointments require the advice and consent of the Senate. Appointments to the Supreme Court also require consent from the House of Representatives, which gave its approval on Wednesday.

Additional Appointments

The Senate also confirmed the appointments of Patrick Tigue as the Health Insurance Commissioner beginning January 10; James Thorsen as Director of the Department of Revenue; and Mark Furcolo as the Director of the Division of State Lottery.

Additionally, the Senate confirmed Patricia M. DiCenso and Michael Almeida to the Board of Education; and Marcus Mitchell and Iraida Williams to the Human Rights Commission.

Among additional appointments, the Senate confirmed Lisa Andoscia, Christine DiBiase, Esq., and Leonard Lopes, to the Narragansett Bay Commission, and the reappointment of James Bennett, Jina Petrarca, and Mario Carlino to the Narragansett Bay Commission.



Related Articles

- [EDITORIAL: It Is Time to Name Melissa Long to the RI Supreme Court](#)
- ["Sad Day in RI History When It Comes To Ethics," Says RI GOP at Lynch Prata Nomination](#)
- [Why Lynch-Prata's Revolving Door Argument is Flawed: Guest MINDSETTER™ Sen. Sheehan](#)

***NBC PRESS RELEASES
AND PUBLIC NOTICES***

NARRAGANSETT BAY COMMISSION

Perfect Compliance

in recognition of Significant Industrial User Perfect Compliance in 2019

The Narragansett Bay Commission recognizes these Significant Industrial User companies for perfect regulatory compliance with Pretreatment Program regulations during 2019:



A. Harrison & Company, Inc.

Denison Acquisition Company, LLC

dba Denison Pharmaceuticals, LLC

Electrolizing, Inc.

Manchester Street, LLC

Pawtucket Power Associates

Tanury Industries PVD, Inc.

Providence Metallizing

Company, Inc.

Teknor Apex Compay

Truex, Inc.

Godfrey & Wing , Inc. dba Impco

Interplex Engineered Products, Inc.

Prov. Journal Co.

- Production Facility

Teknicote, Inc.

Technodic, Inc.

Tiffany and Company

Univar USA, Inc.

Has your company demonstrated extraordinary environmental efforts this year?

If so, apply for an NBC Environmental Merit Award! Download an application form at www.narrabay.com.

Vincent J. Mesolella, *Chairman* • Laurie A. Horridge, *Executive Director*

One Service Road, Providence, RI 02905

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PUBLIC NOTICE

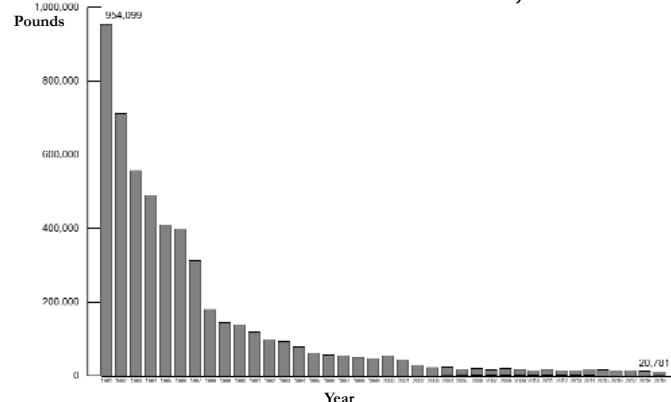
Firms in Significant Non-Compliance

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGULATION 40 C.F.R. 403.8(f) (2) (vii) and Article 10 of the Narragansett Bay Commission, Rules and Regulations require the NBC to publish annually the names of all industrial users in Significant Non-Compliance (SNC) with pretreatment standards and other pretreatment requirements during the preceding year. Companies deemed to be in Significant Non-Compliance are those industrial users who have violated any of the Significant Non-Compliance criteria listed, as defined by Article 2 of the NBC Rules and Regulations during the time period from October 1, 2018 through December 31, 2019. The parameter for which a company was not in compliance and/or the specific administrative deficiency are listed after the company name. The number(s) in parentheses correspond to the type of SNC criteria specified below. Some of the firms listed below may have been issued an Administrative Order in which administrative and/or civil penalties may have been assessed. Many of the companies listed have made significant progress toward correcting the violation and may now be in compliance.

Significant Non-Compliance Criteria:

- (1) Chronic violations of wastewater discharge limits, defined here as those in which 66% or more of all of the measurements taken during a six-month period exceed (by any magnitude) a numerical Pretreatment Standard or Requirement for the same pollutant parameter;
- (2) Technical Review Criteria (TRC) violations, defined here as those in which 33% or more of all the measurements for each pollutant parameter taken during a six-month period equal or exceed the product of a numerical Pretreatment Standard or Requirement multiplied by the applicable TRC value (TRC = 1.4 for BOD, TSS, fats, oil, and grease and 1.2 for all other pollutants except pH);
- (3) Any other violation of a pretreatment effluent limit (daily maximum or long-term average) that the Commission determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of Commission personnel or the general public);
- (4) Any discharges of a pollutant that has caused imminent endangerment to human health, welfare or the environment or has resulted in the Commission's exercise of its emergency authority to halt or prevent such a discharge;
- (5) Failure to meet, within 90 days after the scheduled date, a compliance milestone contained in a Commission notification, permit or enforcement order, for starting construction, completing construction or attaining final compliance;
- (6) Failure to provide, within 30 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, self-monitoring compliance reports and reports on compliance with compliance schedules;
- (7) Failure to accurately report noncompliance;
- (8) Any other violation or group of violations which the Commission determines has adversely effected the operation or implementation of the Industrial Pretreatment Program. •

Total Metals Influent to Field's Point WWTF, 1981-2019



THE NARRAGANSETT BAY COMMISSION IS COMMITTED TO PROTECTING THE STATE'S TWO LARGEST WASTEWATER TREATMENT FACILITIES AND NARRAGANSETT BAY FROM TOXIC DISCHARGES. This is accomplished by the issuance of discharge permits to commercial and industrial sewer users. These discharge permits specify the level of pollutants that can be discharged in a facility's wastestream and may require a firm to conduct wastewater monitoring to verify compliance with discharge limits, to implement a Spill Control Plan and/or Toxic Organic/Solvent Management Plan, and to install pretreatment equipment. Various reporting and record keeping requirements may also be written into discharge permits. The firms listed in this public notice violated one or more of the significant non-compliance criteria specified above. The Commission is required by the RI DEM and the US EPA to annually publish the names of all firms violating any of these criteria. Therefore, firms must be sure to comply with all the terms specified in their discharge permit to ensure that the name of their firm is not listed in this annual public notice. The NBC offers FREE technical assistance to firms located in the NBC service area through its non-regulatory Pollution Prevention assistance program. For information on how the NBC can help your firm achieve and maintain compliance, contact the NBC Technical Analysis and Compliance Section at 461-8848/TDD 461-6549 to schedule a free Pollution Prevention audit.

Most businesses located in the NBC district are to be commended for the fine job they have done treating their process discharges to remove toxic pollutants. In 1981, local industries discharged 954,099 pounds of heavy metals such as copper, nickel and zinc and 80,440 pounds of cyanide to the Field's Point Wastewater Treatment Facility. Since 1981, the total metals and cyanide loadings to the Field's Point facility have been reduced by 97.8% and 98.7% respectively. Similar toxic loading reductions have been observed at the NBC Bucklin Point facility.

The Narragansett Bay Commission will continue to lead in wastewater treatment, environmental protection, and environmental education to ensure a cleaner Narragansett Bay for all to enjoy.

Bucklin Point Service Area

Lincoln		
Company Name	Violations Cited	Present Status
Maroon Group, LLC dba Lincoln Fine Ingredients	O&G (2)	Firm is now in compliance
Pawtucket		
R & D Manufacturing, Inc.	Failure to submit report on time (6)	Report has been received
Cumberland		
Cintas Corporation	Failure to submit report on time (6)	Report has been received

Field's Point Service Area

Providence		
Company Name	Violations Cited	Present Status
Bella's Jewelry	Failure to submit report on time (6)	Report has been received
Mark Precision, Inc.	Failure to submit report on time (6)	Report has been received
Nickel, Brass and Copper Wire, LLC	Failure to submit report on time (6)	Report has been received
Providence Specialty Products, LLC	O&G (1, 2) Failure to submit reports on time (6)	Firm is still out of compliance Reports have been received An Administration Order was issued requiring the firm to comply with NBC discharge limit and submit reports on time.
Tower Manufacturing Corporation	Failure to submit report on time (6)	Report has been received
United Stated Postal Service - Providence VMF	Failure to submit report on time (6)	Report has been received



10 THINGS THAT SHOULD NEVER GO DOWN THE DRAIN

10 Things That Should NEVER Go Down the Drain

The sink drain: so inviting and so useful, but not everything that CAN go down the drain SHOULD go down the drain. Clogged drains can lead to nasty back-ups in your home or in the street; toxic chemicals can cause issues with wastewater treatment. Protect your pipes and the environment by keeping these ten things out of your pipes.

1. Grease, including cooking grease, gasoline, and motor oils

“Grease will coat the inside of the pipe thereby decreasing the size of the pipe,” said NBC Pretreatment Manager Kerry Britt. “Over time the pipe can become clogged causing backups into homes and businesses and can cause manholes to surcharge onto the street.” NBC Interceptor Maintenance Manager Mike Caruolo added, “In the pipes that grease will combine with disposable wipes and other solid materials to create large obstructions known as ‘fatbergs.’” In 2017 in [London](#), a 130-ton fatberg clogged up an entire section of the city’s sewer system. For cooking grease, the NBC’s grease-fighting superhero [Mr. Can](#) encourages us all to “Cool it and can it!”

2. Pasta and Rice

In Rhode Island, we have some of the best pasta in the country, so even though we probably rarely have any leftovers, sometimes a few rigatoni will end up down the drain during dinner clean-up. Pasta and rice are very high in starch and continue to expand (even after they’re cooked) when they come in contact with water. A single strand of angel hair down the sink might not be a big deal, but a heaping plate of risotto can lead to a clogged pipe and as [Mr. Can](#) warns, “a CODE ICKY.”

3. Household Fluids

Concentrated household cleaners, liquid weed and insect killers, car fluids, and paint can be harmful when they go down the drain. “Although they may not clog your pipes, these liquids can disrupt the sensitive biological environment we need to properly treat our wastewater,” said Paul Desrosiers, Operations Manager at the NBC’s Field’s Point Wastewater Treatment Facility. Marc Pariseault, Operations Manager at the NBC’s Bucklin Point facility adds, “Solvents and corrosive substances can erode sewer pipes as well as our treatment facilities.” To properly dispose of household hazardous waste, check out the [Eco-Depot](#) at the Rhode Island Resource Recovery Corporation.

4. Medication

Sending medications through your pipes might not seem like a big deal and it likely won’t clog them, but recent research indicates that our discarded medications are impacting our water supply. Drugs in our rivers, streams, lakes and oceans have definite and disturbing impacts on aquatic species. Oral contraceptives, anti-depressants, hypertension drugs, antibiotics, and antihistamines are among the products that bioaccumulate in aquatic species and interfere with the food chain. Ultimately those chemicals can return to our drinking water supply, as well. The RI Department of Health provides guidelines for safely disposing of prescription drugs on their [website](#).

5. Flour

This kitchen staple is bad news when it comes to your pipes. Think about how flour gets when you mix it with water: it basically becomes glue and dries into cement. Flour will quickly clog your pipes and even cause your garbage disposal to get stuck. Things made with flour---like cookie dough or bread dough---can have the same effect. Just like rice and pasta, a small amount probably isn’t the end of the world, but in large quantities may require a visit from the plumber.

6. Oatmeal and other cooked cereals

A big bowl of oatmeal: so good for your heart, but not for your pipes. Like pasta and rice, oatmeal and other cereals and grains will continue to absorb water even after they are cooked. Expanding grains can join with fats to solidify and cause a blockage.

7. Coffee Grounds

Coffee: can't get the day started without it! Enjoy your cup (or three), but don't toss the grounds down the sink. Coffee grounds can cause a buildup in your pipes, especially when they combine with grease (sensing a pattern here?). So what should you do with your old coffee grounds? They're great for compost and a natural deterrent to a lot of garden pests. Just sprinkle them around your garden to prevent unwanted bugs and critters.

8. Egg Shells

Did you ever hear that egg shells are good for sharpening the blades on the garbage disposal? It's a myth. Garbage disposals don't have blades. They have impellers that are blunt, not sharp. In addition, the membrane inside the egg shell can get wrapped around the impellers and cause damage. Further on in the pipe, the shells can get caught in congealed grease and contribute to fatbergs. They are great for the compost bin, though!

9. Produce Stickers

Those tiny stickers that come on fruits and vegetables might seem insignificant, but they aren't water soluble and can build up in your drain and stick to your pipes. So: keep eating your 5-a-Day, but remove those stickers and put them in the trash before washing your produce

10. Food fat

Much like our #1 culprit grease, food fats like cheese, ice-cream, mayonnaise, milk and butter can clog the pipes and lead to a very unappetizing back-up. Nut butters and coconut oil are no-nos as well.

This article originally was published in GoLocalProv.com.

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NARRAGANSETT BAY COMMISSION ISSUES CALL TO ARTISTS

The Narragansett Bay Commission (NBC) invites local artists to submit proposals for a "fatberg" sculpture.

The sculpture/pipe installation will serve as an educational component to the NBC's wastewater treatment facility (WWTF) tours, explaining the importance of a healthy sewer collection system. Over 3000 people tour an NBC WWTF each year.

Professional, amateur, and student artists are encouraged to submit proposals.

Proposals are due January 14, 2020.

[Download the Call to Artists here.](#)

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SEWER CONSTRUCTION ON DOUGLAS AVENUE IN NORTH PROVIDENCE TO BEGIN JANUARY 2

North Providence construction notice:

Beginning Thursday night (January 2), the Narragansett Bay Commission will be lining sewers in the following streets and rehabilitating manholes:

- **Douglas Ave**
- **Mineral Spring Ave**

The majority of the work will be done overnight and police details will be on-site during the work.

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2020 EARTH DAY CLEAN UP GRANTS AVAILABLE

The Narragansett Bay Commission (NBC) is offering grants ranging from \$250 up to \$1,000 for local Earth Day River and Lake Cleanups, restoration or beautification projects for areas located within the NBC service area or along NBC receiving waters. **The goal of the NBC 2020 Earth Day River Cleanup Grant Program is to clean up our important environmental resources by providing funding assistance to local organizations restoring and improving the green spaces in their communities.**

The grants may be used for Earth Day volunteer cleanup projects of green spaces and river, lake and pond cleanup projects located within the NBC service district or along NBC receiving waters. Projects that include an educational component to educate volunteers about some aspect of the environment, environmental restoration, protection are preferred. All sections of the grant application, including the project description form must be completed. Applications must be accompanied with an invoice on organizational letterhead with the grant award total request listed. The invoice must have the letterhead of your organization. Any incomplete grant application forms received will not be considered. Only one application per project will be considered, and projects must be completed no later than August 31, 2020. The range of funding for any single project shall be between \$250 and \$1,000, depending upon the number of applicants and funding availability.

Application forms are available [here](#) and are due by February 21, 2020.

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NARRAGANSETT BAY COMMISSION EMPLOYEE RECOGNIZED FOR OUTSTANDING SERVICE

Paul Desrosiers of Providence, RI, was honored recently by the US Environmental Protection Agency for his work maintaining the Narragansett Bay Commission's (NBC) Wastewater Treatment Facilities.

Desrosiers, who is an operator of the Narragansett Bay Commission clean water facilities at Field Point and Bucklin Point, was honored by EPA's New England office with a 2019 Regional Wastewater Treatment Plant Operator of the Year Excellence Award for his outstanding work over decades operating and maintaining the Narragansett Bay Commission's facilities.

The EPA Regional Wastewater Awards Program recognizes personnel in the wastewater field who have provided invaluable public service managing and operating wastewater treatment facilities throughout New England. The Rhode Island Department of Environmental Management was instrumental in Desrosiers nomination.

"Paul's professionalism, his knowledge, and his commitment to the environment have been instrumental to the improvement in the water quality of Narragansett Bay," said NBC Chairman Vincent Mesoletta. "Everyone who enjoys the bay has been affected by his work." Daniel Deziel, regional administrator of EPA's New England Office, remarked, "We are proud to acknowledge Mr. Desrosiers outstanding contributions to help protect public health and water quality for so many years and to give her the credit he deserves."

The EPA Regional Wastewater Treatment Plant Excellence Award was established to recognize and honor the employees of publicly owned wastewater treatment plants for their commitment to improving water quality with outstanding plant operations and maintenance.

The Narragansett Bay Commission also received two awards from the National Association of Clean Water Agencies: a National Environmental Achievement Award for Public Service for the NBC's Earth Day River Clean-Up Grant Program and the Utility of the Future Award for pioneering innovative technologies and cutting-edge practices, with a focus on resource recovery, efficiency and sustainability.



R to L: NBC Chairman Vincent Mesoletta, Paul Desrosiers, NBC Executive Director Laurie Horridge

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NARRAGANSETT BAY COMMISSION LIMITS PUBLIC ACCESS IN RESPONSE TO CORONAVIRUS

The Narragansett Bay Commission (NBC) has limited access to its offices to prevent the spread of the coronavirus. Beginning Monday, March 16, 2020, NBC will restrict customer and visitor access to all NBC facilities, including the corporate office at One Service Road, Providence, until further notice.

While the corporate office is closed, customers are encouraged to call Customer Service at (401) 461-8828 or email cs@narrabay.com. Customers may also visit the agency's website at www.narrabay.com for on-line bill payment and account management. All transactions except the acceptance of cash payments and site visits can be completed through NBC's automated phone service or on-line.

During this time, NBC will suspend water service terminations and collection calls arising from non-payment.

NBC is committed to its environmental and public health mission to deliver safe and reliable wastewater collections and treatment service, while protecting the health of its employees and customers.

More information is available from the [Centers for Disease Control](https://www.cdc.gov) and the [Rhode Island Department of Health](https://www.health.ri.gov).

For additional information about coronavirus and water safety, visit www.epa.gov/coronavirus/coronavirus-and-drinking-water-and-wastewater

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DON'T FLUSH! NO TIRAR EN EL INODORO!

The Narragansett Bay Commission encourages everyone to refrain from flushing disposable wipes. The wipes do not dissolve in water and can lead to unpleasant toilet back-ups as well as larger sewer system issues.

Only the 3 Ps should go in the toilet: pee, poo, and (toilet) paper.

Please see these [Spanish](#) and [English](#) language flyers explaining why #WipesClogPipes.

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NBC NAMED ONE OF RI'S BEST PLACES TO WORK



For the tenth consecutive year, the Narragansett Bay Commission has been named one of Rhode Island's Best Places to Work by the Providence Business News.

According to the PBN, "Each of the companies recognized for this year's program were judged based on human resources policies and confidential surveys of employees put together by Best Companies Group."

Companies will be recognized in a virtual ceremony held Wednesday, Sept. 30 at 4 p.m. and profiled in a special section to be included in the Oct. 2-8 print edition of PBN.

The NBC is one of 66 companies recognized for 2020.

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NBC HONORED AS UTILITY OF THE FUTURE

The Narragansett Bay Commission (NBC), along with sixty-four other clean water utilities worldwide, has been recognized as a Utility of the Future (UOTF) for transformational initiatives in the clean water sector. The UOTF designation lauds utilities for recovering resources from wastewater, leading community engagement, forming unique partnerships, and building an internal culture of innovation.



The Utility of the Future Today program was launched in 2016 by the National Association of Clean Water Agencies (NACWA), the Water Environment Federation (WEF), the Water Research Foundation (WRF) and the WaterReuse Association, with input from the U.S. Environmental Protection Agency (EPA). The recognition celebrates the achievements of water utilities that transform from the traditional wastewater treatment system to a resource recovery center and leader in the overall sustainability and resilience of the communities they serve. The NBC has received UOTF designation twice since the award's inception.

“The innovations coming to the water sector present an opportunity for a paradigm shift in the way utilities think about and solve long-standing challenges to clean and reliable water,” said Jackie Jarrell, WEF President. “WEF is excited to recognize the Narragansett Bay Commission for embracing innovative ways to better serve their communities.”

The UOTF lauded the NBC's leadership in renewable energy, robust environmental monitoring program, excellence in water treatment and management, and commitment to community support.

"This agency has made great strides for Narragansett Bay and our urban rivers," said NBC Chairman Vincent Mesolella. "Narragansett Bay is cleaner than it has been in 150 years. Our shellfishermen have access to thousands of additional acres of grounds. The NBC generates 80 percent of our own energy through renewable sources and we operate award-winning community and education programs. Thanks to an engaged and committed Board and a staff of environmental professionals, the NBC truly is embracing the future today."

A virtual celebration will publicly honor all UOTF recipients on October 9.

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NARRAGANSETT BAY COMMISSION RECOGNIZED BY NATIONAL ASSOCIATION OF CLEAN WATER AGENCIES AS CLEAN WATER SUCCESS STORY AND FOR CONTINUED OPERATIONAL EXCELLENCE

The National Association of Clean Water Agencies (NACWA) has named the Narragansett Bay Commission (NBC) as one of fifty American Clean Water Success Stories over the past fifty years. The honor reflects the NBC's commitment to improving the water quality in Narragansett Bay and the urban rivers, protecting public health, and robustly pursuing renewable energy and other community-focused programs.

The focus of the Clean Water Success Stories designation is to acknowledge that although wastewater agencies may have been created solely to deal with pollution, now many agencies are leading the charge on resource recovery, are true innovators and frontline environmentalists, and are anchoring and transforming communities and their economies through a sustainable one-water approach.

“Narragansett Bay is cleaner than it has been in 150 years,” noted NBC Chairman Vincent Mesoella. “We’re proud of the role we have played in that recovery and very gratified by this recognition. Much of the work we do at the NBC is never seen, but everyone can see the benefits of a cleaner and healthier bay.”

In addition, NACWA presented the NBC with two of this year's NACWA *Peak Performance Awards*. This annual award is presented to honorees who have achieved excellence in operational performance and permit compliance. The NBC's Bucklin Point Wastewater Treatment Facility received a Gold Award, which indicates no permit violations over the last calendar year; the Field's Point Wastewater Treatment Facility received a Silver Award, which indicates fewer than five permit violations over the last calendar year.

Adam Krantz, Chief Executive Officer of NACWA, congratulated this year's honorees, noting: "Our public utility members are the backbone of the communities they serve, providing safe, reliable access to clean water services day-in and day-out. The *Peak Performance Award* ceremony is our chance to shine a national spotlight on those outstanding clean water utilities that have demonstrated operational excellence. These utilities represent the top performers in the whole country and go above and beyond in their mission to protect public health and the environment."

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NBC NEWSLETTERS



NBC Pipeline

January 2020

NBC Pipeline is a monthly publication designed to keep Narragansett Bay Commission staff up to date on internal current affairs. Staff is welcome to forward to the Public Affairs Office any items they would like to share or see in a future publication. Your suggestions and participation are encouraged and appreciated.

Calendar of Events *for January*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1 Happy New Year New Year's Day HOLIDAY	2	3	4
5	6	7	8	9	10 Full Moon Payday	11
12	13	14 11 AM Board of Commissioners Meeting	15 7 AM - 12 PM Know Your Numbers Event COB	16	17	18
19	20 Martin Luther King, Jr. Day HOLIDAY	21	22	23	24 Payday	25
26	27	28	29	30	31	

All meetings are held at the Commission's One Service Road Offices unless otherwise noted.



News Briefs...

Rockin' Around the NBC...

This year's Holiday Employee Appreciation Events (HEAE) were a huge success and lots of fun! The COB employees wore their ugliest Christmas sweaters, enjoyed some delicious food and treats, and participated in some competitive games and fun activities.

- **Brendon McClean, Mike Golenia and Bruce Stoeckel** were voted "most exuberant" for their holiday sweaters.
- **Elizabeth Kohr** won the holiday quiz.
- **Mike Golenia** was right on the money with the guess-the-ornaments game, 96 ornaments were in the vase.
- **Dan Mitchell** won the charitable giving raffle and NBC will make a donation to a charity of his choosing, the Providence Animal Rescue League from the NBC's Casual Day Chairtable Giving Fund.
- **Amanda Calore** won the most intense game of Jenga that most of us have ever seen against **Dan Mazza**.



IM's HEAE luncheon was followed by a very competitive corn hole tournament with the winner receiving the employee of the month parking space for three months! The finals came down to **Pete Jarest** and **Meg Goulet**. Pete won and is now NBC's "Corn Hole King" with a prime parking space!



Welcome



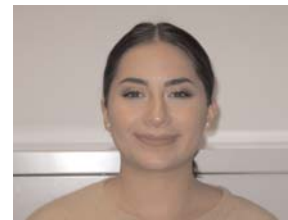
Steve Duque,
Customer
Service
Representative



Harrison
Songolo,
Assistant E & I
Technician



John Motta III,
Winter intern



Sophia Andrade,
Administrative
Assistant



Alex Coppola,
BP Operator I



Bethany Lewis,
Environmental
Compliance
Technical
Assistant



- To **Sophia Andrade, Andrew Ashkar, Karen Musumeci** and **Talia Cheshier** for coordinating the Holiday Employee Appreciation Events
- To **John Motta** and **EMDA staff** for helping with the set-up and break down of the Holiday Employee Appreciation
- To **Jason Galego** and **Brendan McClean** for providing music and visuals for entertainment
- To Bucklin Point's Operations staff. On December 30th Bucklin Point had 3 separate rain events that started at 3:19 AM and ended at 11:16 PM. Prior to these three events BP had higher flows which made this long duration event challenging to say the very least.

Cliff Kohler, Mike Taylor, Joe Garganese, Roberto Navarro, Josh Hoak, Jose Galvan, Gene Medeiros, Nicole LaBoy and Andre Dixon all worked extremely hard to keep BP in compliance under the worst possible conditions. It was heavy on everyone's mind to finish the year without any violations and have a perfect ending to 2019.

NBC appreciates the Communication and the effort put forth that would have resulted in violations. We will be awarding gold stars to all mentioned above!



--Submitted by Marc Pariseault

Renewable Energy Update



During the month of November, NBC renewable energy projects provided 94.82% of NBC energy needs.

Congratulations...

- To Sustainability Coordinator, **Kerri Houghton** for completing all course requirements and earning her Public Sector Safety & Health Fundamentals Certificate from the OSHA Training Institute.
- To **Cole Paola** on passing Grade 1, **Andre Dixon** passing Grade 2 and **Gene Medeiros** passing Grade 3 of their wastewater certification exams.
- To **Daryll Sirleaf** for passing his Operator I exam.



December Board Meeting Acknowledgements

At the December 3rd Board of Commissioners meeting Executive Director Laurie Horridge presented two awards to employees for their outstanding work.

NBC Biologist **Nora Lough** was inducted into the Golden Shovel 5S Society, New England Chapter. The Society selects members who contribute notable amounts of their efforts, time and



energies in applying themselves to the greater good of water associations in the industry. Selection and membership is in recognition of outstanding, meritorious service above and beyond the call of duty.



Environmental Chemist **Kim Sandbach** received the James Marvelle award from the Narragansett Water Pollution Control Association. The award is

for leadership excellence as an active and contributing member of the NWPCA in the wastewater industry. Congratulations Nora and Kim!

Maintaining NBC's Bullock's Reach Buoy

NBC is a member of the Rhode Island Fixed Site Network, a consortium of agencies in Rhode Island that maintain a set of water quality instruments throughout Narragansett Bay. The Network deploys ten water quality stations in the Bay, of which the NBC maintains two: a fixed site station at Phillipsdale Landing in the Seekonk River downstream from the Bucklin Point WWTF, and at Bullock's Reach, downstream of the Field's Point WWTF.

The Phillipsdale Landing site provides a data collection platform for two sondes: one sonde near the water's surface and a second near the bottom of the water column. The Bullock's Reach buoy provides a data collection platform for three water sondes: one near surface, the second mid-depth, and the third near bottom of the water column. Each sonde contains multiple sensors, called probes, which record temperature, salinity, dissolved oxygen, pH, chlorophyll a, and water clarity at each site and at each depth. The data is transmitted hourly to an NBC base station and then uploaded to the NBC's nationally recognized "Snapshot of the Bay" webpage, providing near real-time conditions of water quality in the Providence and Seekonk Rivers.

At the end of each monitoring season, the buoys are removed from the water and the daunting task of preparing them for the next season. This work includes an intense and comprehensive maintenance schedule which involves at least four NBC departments.



Buoy Removal aboard the R/V Chafee.

November/December

The NBC coordinates the buoy removal with DEM. A week or so prior to the buoy removal, EM staff aboard the NBC's R/V Monitor head out to the buoy to remove all sondes, the solar array tower, meteorological equipment, and the water tight canister containing the datalogger, communications modem and other electronics. Arrangements are made with Interceptor Maintenance to borrow a truck and trailer and they are driven to Ft. Wetherill the day of the buoy removal.

Aboard the DEM R/V Chafee URI, DEM and

NBC staff all work together removing the NBC buoy, along with additional URI and DEM maintained buoys throughout the Bay.

The buoy travels back to Ft. Wetherill and is off-loaded by crane from the R/V

Chafee and placed onto the NBC trailer. Once back at the NBC, EM and Operations staff safely unload the main body and anchors with fork lifts to the Water Quality Science Building loading dock for cleaning. EM staff will then scrape and remove the tenacious barnacles and other biological growth from all parts of the buoy body, mooring balls and ground tackle. It usually takes a day or two to properly remove all the biological growth. EM staff professionally inspect the two massive 80' 5/16" mooring chains, and then we



Mooring buoys being painted.

work with the Mechanics from our Maintenance department to remove any weak links caused by corrosion.

All electrical wiring from the solar tower is inspected and cleaned, and the buoy electronics canister, which houses the datalogger and communication components, is sent back to the equipment vendor for end-of-season "tune-up".

Logos and other Coast Guard identification placards are removed from the buoy body; they are either replaced with new ones or cleaned for reuse. All ground tackle (anchors, mooring balls, shackles, chain, rope) is inspected by the EM professional and requisitions are created for items requiring replacement.



Buoy anchors and mooring chains undergoing annual inspection.

Next Month: How do those buoys keep their bright yellow color? Stay tuned for more!

-- Submitted by EMDA Staff



Buoy underside after removal from the water.

PFAS Analysis

Our PFAS series continues this month with the topic of laboratory analysis. There are thousands of PFAS compounds in existence, but laboratory science has only just begun to successfully test for their presence. In 2009, the United States EPA finalized Method 537, approved to test for 14 PFAS compounds in drinking water; this method was updated in 2018 to capture 18 compounds. More recently, EPA Method 533 was validated and published in December 2019, analyzing for an additional 11 PFAS. Another test, the Total Oxidizable Precursor (TOP) Assay, further expands the number of compounds that can be measured, though thousands remain unknown and unmeasurable. Notably, the EPA has not formally approved testing methods for samples other than drinking water; EPA SW-846 Method 8327 has been validated for surface water, groundwater, and wastewater samples, though concerns about this method are still being addressed by the EPA.

Despite a lack of approved methodology, industries are being pressured to “just go sample” and laboratories have developed modified versions of the EPA drinking water method as they struggle to adapt. Further, there are no EPA laboratory certification requirements for PFAS, as PFAS is not regulated under the Safe Drinking Water Act. Unfortunately, this lack of oversight and consistency in laboratory methods creates a major problem, as substantial differences in methods utilized among laboratories leads to data that are hard to understand and are not comparable across studies. Sampling and analysis for PFAS compounds is further complicated by their ubiquitous presence, including being found in some traditional sampling equipment; special care must be taken to avoid sample contamination. It is critical that the laboratory, sampling teams, and researchers communicate clearly, so samples are collected and analyzed in a way that maximizes the power of the researcher to understand true PFAS concentrations in the field.

The NBC is helping to lead the charge to develop novel methods to detect and measure PFAS concentrations in wastewater, biosolids, and our receiving waters. Since 2017, the NBC’s Environmental Science



Example of the complex laboratory instrumentation required for PFAS sample analysis, including Ultra High Performance Liquid Chromatography-tandem Mass Spectrometry (courtesy of ADPEN Laboratories)

and Compliance (ES&C) Division has worked with Dr. Rainer Lohmann and students at the University of Rhode Island to deploy passive PFAS sampling devices and collect grab samples around the Field’s Point Treatment Plant and in the Providence River. Preliminary findings indicate that NBC effluent does contain PFAS, but PFOA and PFOS concentrations (two of the most prevalent and concerning compounds) appear to be below the EPA’s drinking water advisory level of 70 parts per trillion.

Given the complexities in analyzing for PFAS, contract labs charge \$250-\$350 per sample, and have long turn-around times (e.g., 2 weeks to over a month) for completing the analyses. Members of the ES&C Division recently met with EPA researchers at the EPA Office of Research and Development-Atlantic Ecology Division Laboratory in Narragansett to discuss PFAS monitoring and their efforts to develop a method to analyze wastewater. The picture above shows a similar instrument set-up as was seen at the EPA laboratory. The NBC Laboratory staff have the expertise to perform PFAS analyses; however, it would cost approximately \$300,000 to procure the equipment needed to perform these analyses in-house. At this time, we cannot justify the cost to procure this equipment, but as regulations change, we may have to move forward with this option.

-- Submitted by Eliza Moore



NBC Pipeline

February 2020

NBC Pipeline is a monthly publication designed to keep Narragansett Bay Commission staff up to date on internal current affairs. Staff is welcome to forward to the Public Affairs Office any items they would like to share or see in a future publication. Your suggestions and participation are encouraged and appreciated.

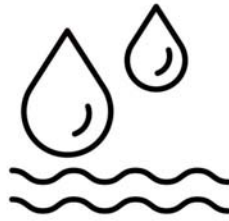
Calendar of Events *for February*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1
2	3	4	5	6	7	8
					Payday	
9	10	11	12	13	14	15
					 Valentine's Day	
16	17	18	19	20	21	22
	 President's Day HOLIDAY			Full Moon	Payday	
23	24	25	26	27	28	29
		11 AM Board of Commissioners Meeting	<i>All meetings are held at the Commission's One Service Road Offices unless otherwise noted.</i>			

News Briefs...

NBC Receives NEAA Awards

NBC was selected to receive two 2020 National Environmental Achievement Awards (NEAAs) from the National Association of Clean Water Agencies (NACWA). These awards include the Public Service Award for NBC's efforts in The Chairman's River Restoration Program, and the Water Resources Utility of the Future Award, which is given to member agencies that "demonstrate bold, transformational leadership in managing resources, partner effectively in local economic development, and engage stakeholders, resulting in environmental, economic, and social benefits." The NBC will be recognized at NACWA's Winter Conference, Chasing Zero: How Today's Policies are Shaping the Future of Clean Water, held this month in Atlanta, GA. Special thanks to ES&C staff for compiling the awards.



Board Meeting Acknowledgements

At the January 14th Board of Commissioners meeting Executive Director Laurie Horridge recognized two NBC employees who participated and received an award in the Operations Challenge.

NBC's **Kim Sandbach** and **Nicole LaBoy** are members of the Ocean State Alliance Team who won first place overall during the regional competition at the spring meeting on June 4th in NH and then placed top three in the laboratory event during the national competition at WEFTEC 2019 in September.

The Operations Challenge, also known as the "Wastewater Olympics," is a competition that allows wastewater professionals to showcase their skills and improve upon them in a fun and challenging environment. Teams are judged in five categories to reflect different skills and aspects of the wastewater field: maintenance, lab, safety, collections and process.

NBC's **Walter Palm** and **Nora Lough** participated as judges in the laboratory events.



Left to right: Vin Mesoletta, Nicole LaBoy, Kim Sandbach & Laurie Horridge.



- To **Kathryn Kelly** and **Kerry Britt** for dedicating their time to assist the young ladies from the St. Mary Academy Bay View Middle School Robotics Team. The team qualified for statewide competition held on January 11th. They designed a system to clean runoff to rivers using reverse osmosis and netting.



Overnight Work in North Providence

While some of us were sleeping in the early hours of January 8th,



others were working at the Intersection of Mineral Spring Avenue and Douglas Avenue in North Providence re-lining pipe. This has been one of the toughest installs for this project due to the fact that 3 pipe segments dump heavy flows into the 24" pipe section that Insituform lined. Overall it went well.

--Submitted by Joe Moniz

Congratulations...

- To **Molly Welsh** on winning the NBC gym bag filled with goodies and **Roberto Castellanos** on winning the FitBit at the Know your Numbers Event.

- To **Joe Caranci** on his retirement. Joe worked his last shift on Saturday January 18th, working for NBC for 11 years. The first 6 years in Customer Service and then transitioned over to Environmental Monitoring in 2015 working the last 5 years. Joe will be sorely missed, he was a very dedicated and hard worker, paying attention to detail in everything he did. EMDA celebrated his retirement on Friday, January 17th at Twins Pizza. Best wishes, Joe!



- To **Paul Desroisers** on receiving EPA's Operator of the Year Award. Thank you for all your hard work and dedication, Paul!



American Ninja Warrior Junior Season 2

The Dean family has some exciting news to share. Pretreatment's **Nathan Dean's** son Carson will be on the second season of American Ninja Warrior Junior on the Universal Kids Network!

Carson had his 9th birthday party at a local ninja gym, Laidback Fitness in Warwick and has been hooked ever since. Carson is now 12 years old and competing locally and nationally. Over the last three years he has competed monthly for the New England Ninja Association



(NENA) and a few times a month for the National Ninja League (NNL). Both of these organizations are not related to the upcoming show. They've traveled all over for him to do what he absolutely loves to do. He keeps the Dean family busy! Carson has qualified for NNL World Finals in Greensboro, NC at the end of February.

American Ninja Warrior Junior was filmed over the summer in Los Angeles, California. The show celebrates real kid athletes as more than 140 boys and girls from across the United States compete in head-to-head courses. Competitions are broken down by three age brackets, 9 & 10 year olds, 11 & 12 year olds and 13 & 14 year olds. There will be one winner per age bracket at the end of the competition. Carson and his parents had to submit an application in order for him to qualify and be chosen for the show.

Season 2 airs on **Saturday, February 22nd at 7 PM on the Universal Kids Network**. Carson's qualifying episode is episode #9 which will air towards the end of April (we will keep you updated once we get closer). Make sure you tune in and cheer on Carson Dean!

--Submitted by Nathan Dean

Maintaining NBC's Bullock's Reach Buoy Continued...

January/February:

EM staff repaint the yellow topside portion of the buoy in accordance with criteria established by the Coast Guard for "special purpose buoys" and the bottom portion is coated with an environmentally friendly Hydrocoat antifouling paint. The mooring balls marking the anchors also get bottom coated with antifouling paint. Logos and registration placards are re-

installed with special threaded 4" stainless steel screws designed for attaching to foam. Two new premium 35', 1/2" double braided nylon lines are purchased, and spliced with stainless steel thimbles on each end to provide connection to the two 24" mooring buoys. These buoys mark the location of each of the two 150 lb. mushroom anchors once deployed. The 5/16" mooring chains are re-attached to the anchors and the above-mentioned braided line



Painting the Underside of the Buoy after Cleaning

is attached ready to accept the mooring buoys later when the buoy is deployed. Heavy-duty 5/8" stainless steel shackles and swivels are used to complete all connections to the elaborate ground tackle system.



Buoy after Painting

Swivels at each connection help prevent twisting and entanglements. All shackles are wired with stainless steel seizing wire to prevent them from unscrewing when deployed.

March/April:

Several 2" sacrificial anodes are attached to the metal underwater components of the buoy in an effort to reduce galvanic corrosion. Reflector tape is attached to the topsides of the mooring buoys so they can easily be seen at night. The solar light tower array is brought outside here at the FPWWTF for testing once the communication canister is brought back from YSI. All six water quality sondes are tested as a final check to ensure everything is working prior to deployment.

The required solar 4 second flash amber light

mounted to the top of the tower is allowed to charge in the sunlight and tested. The 24" Plastimo PVC Tubular radar reflector is also inspected and re-installed on the tower so that the buoy is visible on other vessels' radar.

May:

The DEM notifies NBC when the R/V Chafee is available to deploy the buoys for the season. The deployments usually occur

around the 3rd week in May. Once the date is finalized, a trailer is borrowed from Interceptor Maintenance one day prior to the launch. OPS will load the main buoy body along with the anchors, on to



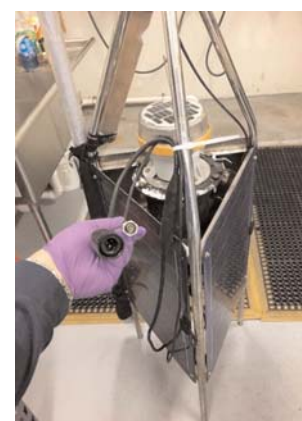
The R/V Chafee is used to remove and deploy the RI Fixed Site Monitoring Buoys

the trailer using the forklift. The mooring buoys are also loaded and the whole load is secured with ratchet straps for the ride to Fort Wetherill. Once the buoy is deployed, EM staff aboard the NBC's R/V Monitor will install the com-

munication canister and solar light tower. The 3" rotating electric powered davit is used to safely lift the canister and drop it down into the buoy body. The three water quality sondes are then suspended from the buoy at the surface, mid and bottom depths to collect data and transmit it using state of the art technology to the "Snapshot" website.



Painted Buoy with Sacrificial Anodes Installed

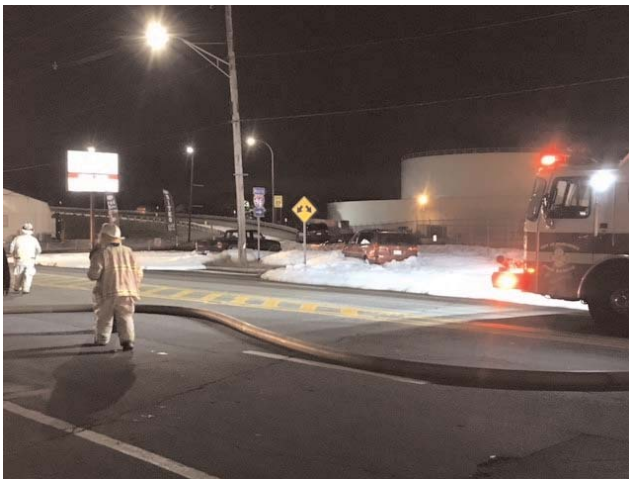


Solar Array Connectors Being Inspected

-- Submitted by EM Staff

The NBC Responds to EPA PFAS Report

Our PFAS series continues this month with details of a recent meeting between the NBC and scientists at the United States Environmental Protection Agency (EPA) Atlantic Ecology Division Office of Research and Development. This meeting was in response to an EPA report on PFAS contamination following the 2018 gasoline spill on the I-95N ramp from Allens Avenue. On the evening of October 3rd, 2018, a tanker truck overturned on the ramp, spilling 10,000 gallons of gasoline onto the roadway. The spilled gasoline flowed down the ramp to the east side of Allens Avenue. The Providence Fire Department applied copious amounts of firefighting foam to the gasoline (see photo, courtesy Kerry Britt); this firefighting foam is known to contain PFAS compounds. The gasoline/foam mixture discharged to the Providence River via a City of Providence-owned storm line. As the response progressed, emergency response contractors pumped out catch basins along the east side of Allens Avenue that contained the gasoline/foam mixture; this material was disposed of offsite. NBC Pretreatment staff were present at the site to assist in the response as well as to ensure that the Field's Point plant was protected.



NBC Environmental Monitoring staff went out the following morning to collect samples in the Providence River to test for gasoline and PFAS contamination near storm drain discharges. The PFAS samples were sent to our collaborator, Dr. Rainer Lohmann at the University of Rhode Island (URI), for future analysis by his team of researchers. The EPA

was also on the water that morning to monitor for PFAS contamination. The NBC received a report by the EPA in July 2019, summarizing their findings. The EPA's report found that elevated PFAS concentrations were measured in the Providence River following the spill, but that concentrations were rapidly diluted to near-background levels. The NBC was surprised to read assumptions in the report that substantial amounts of firefighting foam passed through the Field's Point plant. This assumption was in conflict with the NBC's own staff observations on the night of the spill and was not well supported by the EPA data. Environmental Science and Compliance Director **Tom Uva** reached out to the EPA to discuss this issue and to learn more about their monitoring program.

On September 26, 2019, members of the NBC's Laboratory, Technical Analysis and Compliance, Pretreatment, and Environmental Monitoring Departments traveled to the EPA Atlantic Ecology Division labs in Narragansett, RI for a discussion and tour. The EPA scientists, David Katz and Dr. Mark Cantwell, gave a presentation about their PFAS monitoring and analysis method development efforts and provided a tour of their laboratory facilities. NBC staff saw the analytical equipment required for PFAS sample analysis (for estuarine waters in particular) and also discussed the issues with the EPA report. Mr. Katz and Dr. Cantwell were highly receptive to our concerns that their report language could lead to unfounded regulatory scrutiny of the NBC's operations. **The NBC provided the EPA with documentation in support of our position including maps of stormwater and sewer infrastructure at the spill site, Pretreatment site observations and data, tidal dynamics data, and sampling results showing the distribution of gasoline compounds in the Providence River following the spill. The NBC also offered to give the EPA our PFAS samples collected following the spill, which remain frozen at the URI Lohmann lab, and are expected to further support our position.** The meeting was a great example of the NBC taking an active role in ensuring potential future regulations for PFAS are based on the most accurate and sound science.

--Submitted by Eliza Moore

Monitoring the Impact of NBC's Biological Nutrient Removal Enhancements on Water Quality in Upper Narragansett Bay

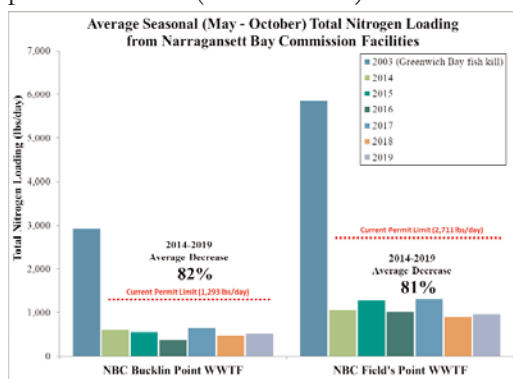
True to the NBC's mission, the Environmental Science and Compliance Division conducts water sampling and data analysis to understand the impacts of the Field's Point and Bucklin Point wastewater treatment facilities (WWTFs) on water quality in Narragansett Bay and its tributaries. The NBC is particularly interested in measuring nutrient concentrations, as it must meet seasonal total nitrogen (TN) permit limits set by the Rhode Island Department of Environmental Management (RIDEM). These TN limits dictate the amount of nitrogen NBC facilities can discharge from May through October. RIDEM regulates TN due to the role this nutrient has in fueling algal bloom formation in the summer months, when high water temperatures and prolonged sunlight are conducive to algal growth. When algae decay, the bacteria responsible for decomposition use up dissolved oxygen in the water column, leading to low oxygen (hypoxic) conditions. These conditions are stressful or even deadly for aquatic life. Following a major fish kill in Greenwich Bay in 2003, and the subsequent directive to achieve a 50% reduction in effluent nitrogen loading compared to 1995-1996 levels, eleven Rhode Island WWTFs that discharge to Upper Narragansett Bay and associated tributaries have been implementing facility upgrades to increase nitrogen removal. The NBC has installed enhanced biological nutrient removal systems at each WWTF, completed in 2013 (Field's Point) and 2014 (Bucklin Point).

The results of the 2019 permit season are in, and NBC performed very well in relation to

the seasonal TN permit limits of 5.0 mg/L. From May through October 2019, TN averaged 2.7 mg/L at Field's Point and 3.3 mg/L at Bucklin Point. In terms of TN loading, average post-upgrade nitrogen loads have decreased by 81% at Field's Point and by 82% at Bucklin Point since the year of the Greenwich Bay fish kill (2003), and average seasonal TN loading typi-

cally remains under 1,500 lbs/day at each plant (see figure, "Average Seasonal Total Nitrogen Loading from NBC Facilities"). This equates to a 69% average decrease from 1995-1996 RIDEM baseline TN levels. Though there have been individual months with exceedances since the permit limits went into effect in 2014, the NBC facilities have performed well over the past few years. When evaluating additional major TN sources to Upper Narragansett Bay (including large rivers and WWTFs), there has been a 43% reduction in average seasonal TN loadings, when comparing pre-NBC nutrient removal upgrade years (2006-2013) to post-upgrade years (2014-2019).

In terms of Narragansett Bay water quality, there has generally been a decreasing trend in dissolved inorganic nitrogen (DIN, the forms of nitrogen with the most impact on aquatic life) concentrations and in the persistence of hypoxia in bottom waters since the mid-2000s (see figure, "Seasonal DIN, Precipitation, and Hypoxia Frequency").



Precipitation, and Hypoxia Frequency"). In 2019, three out of the NBC's regular seven Bay monitoring locations had "good" DIN levels, according to the EPA National Coastal Condition Report categories, an improvement over the previous year. Hypoxic conditions at Bullock Reach were also rare this past season. Please note, however, that 2019 had a relatively dry summer, which likely contributed to the improved conditions. The NBC is currently partnering with Dr. Chris Kincaid's Hydrodynamics Laboratory at the University of Rhode Island to refine a computational model of Narragansett Bay to understand how nutrient concentrations interact with other environmental variables to influence algal bloom dynamics and oxygen levels. Results of this model will help inform future regulatory decisions to ensure NBC permit limits for nutrients are based on sound science.

RI COMIC-CON Weekend with the P-Bruins

The P-Bruins are offering NBC a great special during RI COMIC-CON weekend. Games will be on...



- **Friday, February 14th @ 7 PM**
- **Sunday, February 16th @ 3 PM**

They offer us great lower level seats and tickets are just \$22 each. Tickets include a popcorn and 12 oz. fountain drink or draft beer for those 21+. Everyone will also receive a \$3 Dunkin Donuts gift card!

For this special weekend, games are being transformed into a Comic-Con theme with special "Back to the Future" themed jerseys, superhero graphics and music, and other activities on the concourse! Different characters will be out for pictures, including the car from Ghostbusters!

Deadline to purchase will be on Wednesday, February 5th. Please contact **Talia Cheshier** at ext. **394** to purchase.

Watershed Explorers Recycle their Plastic Gloves

The NBC Watershed Explorers just completed all their winter water testing for the month of January and with water testing comes the use of plastic gloves. The program includes almost 800 students this year, times that by two and that's 1600 gloves. Environmental Education Coordinator **Cynthia Morissette** discovered a way to recycle them through Terracycle rather than disposing of them in the trash. Once recycled, Terracycle will turn the gloves into playground equipment, Trex Decking and plastic patio furniture.








Keeping Plastic Away From Narrabay

North Kingstown's Brownie Girl Scout Troop is on a mission to keep plastic out of Narragansett Bay. **Kim Kirwans** daughter Kennedy is a part of the Girl Scout Troop and NBC was happy to give all the girls a poster contest calendar in honor of their mission considering our theme for the 2020 year, "Keep Plastics Away for Narrabay".



The Girl Scouts are in need of NBC's help. They are learning to care for their earth and they are collecting plastic container caps to be recycled into a buddy bench for their school. They have a goal of collecting 250 lbs of plastic caps for the bench which will also help to save a lot of small plastic from polluting our beautiful waterways.

They will be collecting, sorting and tallying the weight of all caps until their goal is reached. Please consider being a part of this worthwhile project by collecting all of your household plastic caps and give them to Kim Kirwan.

ACCEPTABLE CAPS	
medicine bottle caps/info packet removed	drink bottle caps soda, water, juice caps, sports drink
 milk jug, creamer caps	flip-top caps (ketchup)
detergent caps	spout caps (mustard)
 hair spray caps	spray paint caps
toothpaste caps	ointment tube caps
 deodorant caps	baby food caps
apple sauce pouch caps	shampoo/conditioner caps
ACCEPTABLE LIDS	
 Cottage cheese	cool whip container lids
yogurt lids	Pringle can lids
 mayonnaise jar lids	coffee can lids
 peanut butter lids	Butter lids
Ice cream bucket lids	cream cheese container lids
"under 8" in diameter"	Spice lids

--Submitted by Kim Kirwan



NBC Pipeline

March 2020

NBC Pipeline is a monthly publication designed to keep Narragansett Bay Commission staff up to date on internal current affairs. Staff is welcome to forward to the Public Affairs Office any items they would like to share or see in a future publication. Your suggestions and participation are encouraged and appreciated.

Calendar of Events *for March*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1	2	3	4	5	6	7
8	9	10	11	12	13	14
 Daylight Savings Time Begins	Full Moon				Payday	RI State Science & Engineering Fair
15	16	17	18	19	20	21
		 St. Patrick's Day	Employee Appreciation 3 PM - 4 PM FP Admin Bldg.	Employee Appreciation 3 PM - 4 PM BP Lunch Rm.	First Day of Spring Payday	
22	23	24	25	26	27	28
29	30	31				

News Briefs...

Congratulations...

- To Technical Advisor of Operations, **Paul Desrosiers** on his reappointment to the Board of Certification of Operations of Wastewater Treatment Facilities.
- To **Sean Grace**, LIMS Data Coordinator. Sean took and passed the Safe Boating exam offered by the RIDEM and received his Safe Boating Certificate.
- NBC was recognized at the NACWA Winter Conference in Atlanta, Georgia the beginning of February and received two 2020 National Environmental Achievement Awards (NEAAs) from the National Association of Clean Water Agencies (NACWA). These awards include the Public Service Award for NBC's efforts in The Chairman's River Restoration Program, and the Water Resources Utility of the Future Award, which is given to member agencies that "demonstrate bold, transformational leadership in managing resources, partner effectively in local economic development, and engage stakeholders, resulting in environmental, economic, and social benefits." Director of Administration, Jim McCaughey accepted the awards at the Winter Conference. Congratulations to all staff that helped make these awards possible!



Jim McCaughey and wife, Michelle at the NACWA Winter Conference.



To Environmental Education Coordinator, **Cynthia Morissette** for representing NBC at the Providence Children's Film Festival last month. Cynthia presented after both screenings of the Mr. Toilet Film on February 16th and 23rd, connecting the work we do at NBC to the film. The movie Mr. Toilet: The World's #2 Man is about Jack Sim, the global sanitation crusader who created World Toilet Day, bringing awareness to the fact that half of the people who live on the planet do not have access to adequate sanitation. Cynthia, thank you for being a great ambassador to the NBC. For those interested in seeing the film visit <https://mrtoiletfilm.com>.



Jack Sim aka Mr. Toilet.

Welcome...



Christopher Dracoules,
Environmental Engineer

A Call for Volunteers...

NBC is looking for volunteers to act as "special" judges for the RI State Science and Engineering Fair on Saturday, March 14, from 11-2. Please contact **Jamie Samons** at ext. 377 if interested.



March Employee Appreciation

Celebrate the Saints of March with us!

FP Admin Building: March 18th 3-4 PM
BP Lunchroom: March 19th 3-4 PM

Take a break and celebrate St. Patrick's Day and St. Joseph's Day at each facility in appreciation of all the hard work NBC employees put in each and every day.

As in the past NBC is trying to be as inclusive as possible with respect to times and locations, but we understand that not everyone will be able to make it.

Please be sure to get approval to attend from your supervisors or managers.



NBC Launches the Leadership Development Program

When she assumed the role of Executive Director, Laurie Horridge set as a priority to establish a Leadership Development Program for the NBC that will provide on-going training to our current and future managers to build the knowledge and skills needed to become effective leaders.

The first course released under the Leadership Development Program is **Leadership Essentials**. The target audience for this training includes NBC Directors, Managers, and Supervisors as well as select individual contributors whose role requires team leadership.

The focus of this instructor-led training is to provide participants with the foundational knowledge and skills required by leaders at all levels. The course consists of two-and-a-half days of total training spread out over a three-month period and addresses topics such as engaging employees, building trust, communicating effectively, delegating responsibility, providing feedback, influencing others, leading teams, and employee coaching.

The first two groups of participants attended day one of their training in January, which included a self-assessment and anonymous feedback from members of their staff.



Laurie Horridge emphasizes her point to Sara Nadeau and Ryan Patnode during a break-out discussion.



Eliza Moore participates in a role-playing exercise with course instructor Bob Gabor.

The overall response from the participants on day one was overwhelming positive with the class giving high marks to the Trainer for his high level of energy, engaging style, and subject matter knowledge. Many participants commented on how the use of various types of group activities helped the learning process and kept things interesting. Day two is scheduled for March with the final half day scheduled for April.

Two additional groups will attend Leadership Essentials later this year, bringing the total number of participants to approximately 80.

In the future, the Leadership Development Program will expand our curriculum by adding courses on a variety of management related topics. This training will be delivered through a combination of classroom-based and online courses. If you have any questions regarding Leadership Essentials or the Leadership Development Program, please feel free to contact Peter Yidiaris at ext.482 or at pyidiaris@narrabay.com.



Kayomie Polanco presents the results of a team exercise.



Tony Diiorio, Eric Bogosian, Dean Martelly and Amanda Calore practice a skill in a pairs exercise.

--Submitted by Peter Yidiaris

Dean, Nathan

From: Cheshier, Talia
Sent: Friday, March 27, 2020 1:03 PM
To: All Users
Subject: this weeks e-Pipeline!



A message from the Executive Director:

Dear NBC Family:

At the risk of sounding like a broken record: THANK YOU for your resilience and ongoing cooperation in this uncertain time. When I think about how you all have responded—creatively, sometimes—to keep the NBC operating smoothly, I'm a bit overwhelmed and very, very proud.

In this e-Pipeline you'll read about what your colleagues have been up to, both at work and at home. It's been a busy week that included a significant wet weather event AND the start of distance learning for many of our children. We're also asking you to enlist your social networks in the fight against flushing disposable wipes (#ick).

And, let's hear more from you! If you're on-site at one of the WWTFs or COB, how has your commute changed? If you are working remotely and have kids, how did the first week of school-at-home go? And we still want to hear about your culinary skills and entertainment recommendations – personally I can't wait till Friday night when the 3rd season of Ozark comes out on Netflix! You can send your photos/recommendations to tcheshier@narrabay.com

A final thought: since many extra-curricular activities have been cancelled for the foreseeable future, I encourage you to consider volunteering for one of the countless organizations that need help in your off work hours. You'll see below some ideas for in-person (with safe social distancing) and virtual volunteering opportunities

Stay safe and healthy.

—Laurie

Updates from the NBC:

Operations: During Monday's wet weather event the tunnel almost reached capacity, filling up 60 million gallons. (Capacity is 65mgd)

Construction: Project 304.67, Work continues with the installation of cured in place pipe (CIPP) liners in East Providence and Johnston with crews working through the night to mitigate impacts on traffic.

Project 308.09, Work is ongoing at Macomber Stadium in Central Falls to enhance the field with green stormwater infrastructure (GSI). This project is a part of CSO Phase III.



IM:
IM has setup Temporary Hours for Septage Station (Monday, Wednesday, Friday 8am - 4pm) and also Operating Conditions for Septage haulers. Septage Station has suspended all pH samples being taken from loads and also all entry to the office area. The haulers are instructed to fill all hauler logs out and leave them at the front door and then discharge their load into the garage sumps. All IM trucks, including our vac trucks and diggers, have been supplied with PPE gear including gloves, Tyvek Suits and hand sanitizers. All IM trucks have been started to maintain the batteries in case of any emergency calls. IM will continue to have an IM Operator and Supervisor on call for all OT calls and emergencies.



Finance:

Customer Service Supervisors have been in the office to answer phones, prepare the billing, process closing requests and process the payments received in the mail. Hours for customer calls were temporarily reduced to 8:30 - 12:00. NBC's on-line payment functionality has been a great advantage since in-person payments have also been temporarily suspended. We have shifted payroll, capital, banking, bill payment and accounting to remote work. Finance and Accounting are also coordinating the tracking of COVID related expenses and new pay codes were added so that we will be in a position to request federal assistance if appropriate. Purchasing is also making sure that purchasing is running smoothly so that folks can get the supplies and services that they need. The P-card implementation was also timely since it has allowed for streamlined, digital purchasing.



Environmental Science & Compliance:

The Environmental Science & Compliance Division continues to operate with minimal staffing. The Technical Analysis & Compliance section staff are all working from home and continue to work on energy, safety and water quality issues. On Friday the TAC energy team submitted an award application to the EBC for recognition of the NBC energy programs. Pretreatment staff continue to keep the office running. A skeleton crew is in office each weekday processing mail, writing permits and answering any calls that come in. The Environmental Monitoring and Laboratory sections continue to collect and analyze all samples required by our RIPDES permits, including all plant and process samples, wet weather samples and urban river samples needed to comply with the NBC 9 Minimum CSO Controls Plan. Staff have been using Microsoft Teams to have virtual meetings and TAC and EM staff are preparing data on a daily basis to ensure that DMR submittals will be made on time. A special THANK YOU to all the ES&C staff that are coming into the facilities to help keep our plants running and our agency in compliance!



Administration:

IT continues in their amazing work to convert as many NBC functions as possible to remote access. Employees experiencing difficulties or issues with connection should use the Service Desk function on BayNet to request help, rather than emailing IT staff directly. (Need updates from HR, etc.)

Volunteer Opportunities

Virtual volunteering ideas from [Good Morning America](#)

Locally, these organizations all have calls out for volunteers:

- COVID – 19 Call Center Volunteers Needed Please contact Margarita for more information: Margarita Jamamillo (401) 222-8018 margarita.jaramillo@health.ri.gov
- [Tapin](#) (affiliated with the RI Community Food bank, serving the East Bay)
- [Meals on Wheels](#)
- [Care](#) (to help frontline workers in need of childcare)
- [Family Services of RI](#) is asking for help to provide “Be Safe” kits to their low income children, families and seniors they serve. The kits will include, as available, antibacterial soap, disinfecting wipes, alcohol-based hand sanitizers and other items in a reusable bag that they can pick up from their school or any other Family Service of RI location. If you would like to help, they are accepting donations [here](#).

#WipesClogPipes

On Wednesday, the Providence Journal published a [story](#) about so-called flushable wipes and how these items can wreak havoc on wastewater treatment facilities and collection systems. AS NBC employees, we all know that wipes should NEVER be flushed. If you are on social media (Facebook, Twitter, Instagram, etc.), please pass the message along to your network. Let your friends know that #WipesClogPipes

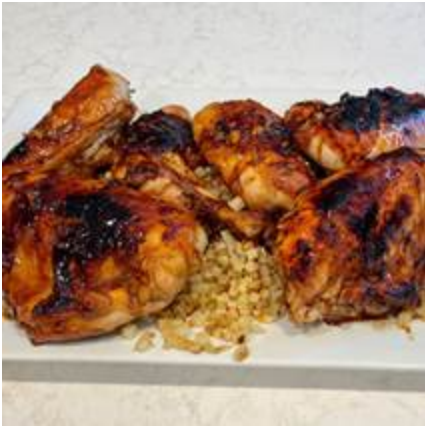


PROJO photographer in action at FP.

Fun Stuff:

Daily Dose of Beauty

Every day at 1:30 PM, I watch the Paris-based pianist Steve Nieve live on Facebook for a half-hour of improvisational piano with his wife Muriel and the vocalist A.J.U.Q. Steve Nieve is a Grammy-winner and graduate of the Royal Academy of Music in London, but more importantly he has played keyboards for Elvis Costello for 40+ years. It’s a total bright spot for my lunchtime! (facebook.com/stevenieveofficial/ or @a.j.u.q on Instagram) —Jamie



NEW Recipe to try - Honey Garlic Chicken with Cauliflower Rice: [Click here](#). Thanks to Melissa DeFusco!



Cynthia Morissette and her family are getting creative outdoors with nature critters.



Ron Goodinson is thinking about opening his pool early and turning the heater on.



Kim Kirwan's kids practicing social distancing while crab and sea glass hunting



Sophia Andrade is turning into a 5 star chef #wheninquarantine

Dean, Nathan

From: Cheshier, Talia
Sent: Friday, April 3, 2020 1:29 PM
To: All Users
Subject: April 3rd E-PIPELINE



A Message from the Executive Director:

Dear NBC Family:

I can't adequately express my appreciation for your continued hard work, resiliency, and words of support as we move into the third week of our COVID-19 response efforts.

At the NBC, our critical work of protecting Narragansett Bay continues, even if looks different from normal. This crisis has challenged our creativity, but I'm very impressed at the way we have all responded, from adequate social distancing on-site to remote working and virtual meetings to learning new skills on the fly. We are an agile group!

On a national level, we are virtually convening with wastewater agencies around the country through the National Association of Clean Water Agencies (NACWA) to share information and develop resources for utilities to help respond to the crisis. In addition, we will work with NACWA on advocacy efforts with Congress and EPA.

Please take a moment to read the updates from your co-workers below and then let us hear from you! I just finished binge-watching Ozark over the weekend – it was amazing! I need some new binge-worthy recommendations. What have you been doing? Have you perfected your homemade pizza recipe? Played Jenga with your kids? Got out your old exercise equipment? Picked up your forgotten guitar? Personally, I'm a little too nervous these days to really start a new hobby or do much else than work, watch a little TV, perform neurotic Corona cleaning, make hundreds of unnecessary trips to the kitchen for snacks I don't need and yell at my kids and the dog when I'm on conference calls. These are certainly trying times and I know many of us miss our work families as well so let's keep track of each other, even if it's just virtually.

Please stay safe and be well,

Laurie

Recognition of Appreciation from NEWEA: NEWEA expressed how grateful the organization is for their group of volunteers, in particular, **Walter Palm**. Walter serves on their Laboratory Practices Committee and has been a judge for the Operator's Challenge. Thank you for your volunteerism to improve the water sector.

NBC Updates:

Environmental Science & Compliance:

- Environmental Monitoring: Environmental Monitoring staff work every day to ensure that all RIPDES and process samples are collected and delivered to the Lab for analysis. This week Stephen DePasquale sampled Field's Point and Fern Johnson sampled Bucklin Point.



Sara Nadeau calibrated the Phillipsdale sondes on Monday, readying them for deployment. Bekki Songolo deployed the sondes on Tuesday with assistance from Amanda Kezirian, and removed the sondes currently deployed. On Wednesday Jeff Tortorella post checked the sondes that were removed on Tuesday. Jeff Tortorella also made a trip to the R/V Monitor to check on it and run the engine for a while, as the boat has been docked for quite some time.

Michael Golenia sampled the tributary rivers on Monday and Amanda Kezirian sampled on Tuesday, satisfying NBC CSO Nine Minimum Controls Plan requirements to sample the rivers. Karen Cortes continues to work with Sean Grace, processing data and readying data tables for the annual NBC Data Report and the monthly DMR. Ashley continues to work from home, printing out sample labels, ordering supplies, tracking COVID-19 expenditures for the division and preparing the month end PCard report. Sean, Ashley, Karen, Bekki and John are working to complete the monthly departmental report.

- Lab: Lab staff have demonstrated the true spirit of teamwork in daily operations. Bob Noonan, Elizabeth Medeiros, and Brenna McCarthy have anchored the wet chemistry lab, assuring their work was done quickly and accurately so that both WWTFs could make appropriate operational adjustments. Bob, Elizabeth, and Brenna have worked extra days in the lab to cover the shifts of their co-workers.

In addition to her own work analyzing nutrient compounds, Janet Luu has learned the rigorous and complex sample receipting process, and has covered this station for her co-workers. Without a functional sample receipt station, none of the lab's samples could be process and analyzed.

Nora Lough has provided critical microscopic examinations that confirm the absence or presence of "resident" microorganisms that both WWTFs rely upon to help in the treatment process. Nora has also continued to process fecal coliform and enterococci samples for both plants and urban river monitoring.

Lauren Lessuck has stepped in to help with wet chemistry tests and has continued to process influent and effluent metals samples for both WWTFs a couple of days during the week.

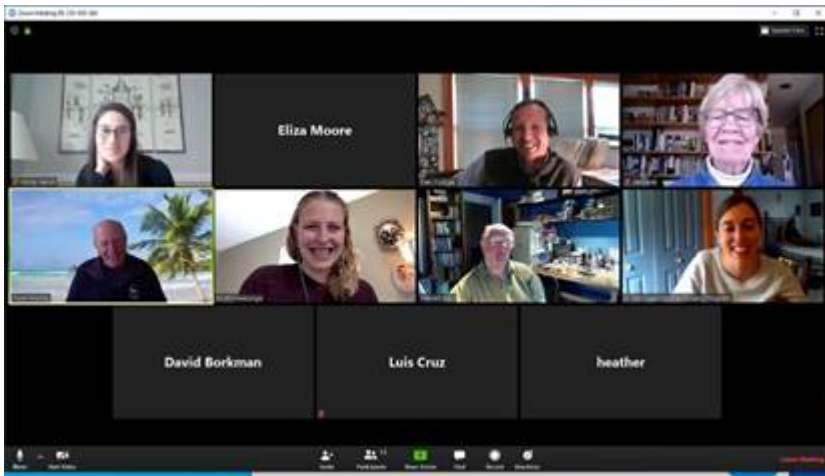
Kara Taglianetti and Betty Teixeira have come in to analyze nitrite and cyanide samples and have cross-trained on other analytical tests to help during emergencies. Kim Sandbach has analyzed TSS, SV30, SV60, and TS/VS samples, which help the WWTFs make operational decisions each day and are a part of permit requirements. Walter Palm, Angelina Glater, and Anna Stevenson alternated their schedules to work from home and to come into the Lab to provide LIMS support and technical resources to lab staff.



- **Technical Analysis & Compliance:** In addition to performing research, analyzing data, updating reports, and attending webinars, on-line trainings and virtual meetings, this week TAC completed and submitted an application for the EBC Award for a Non-Profit Organization for the NBC Sustainable Energy Program.

Work on Renewable Energy projects continued this week. NBC received access to the Green Hill Turbine SCADA data and got a glimpse of Coventry data on a new dashboard from the company that is now managing that RTU for the three Coventry assets. Barry Wenskowicz researched NBC's eligibility for applying for a solar carport grant in the future. Barry also is researching energy recovery options for sludge treatment.

The TAC environmental scientists and members of Environmental Monitoring have been busy finishing a draft of the Annual Environmental Monitoring Data Report to send up for review before it is published online. We are also optimistically preparing for the upcoming monitoring season, including reviewing protocols for the fixed-site program, preparing a site comparison study on the Blackstone River, and gearing up for a RI Sea Grant-funded benthic video collaboration with the Nature Conservancy. The scientists also participated in a Zoom meeting with researchers from URI, Brown, and others to discuss chlorophyll monitoring and the best way to track changes following nitrogen reductions at wastewater plants.



All classroom based health and safety trainings have been postponed until further notice. However, NBC employees working from home are reminded and highly encouraged to take advantage of a variety of FREE online safety trainings available through [NBC's Online University](#). If you have forgotten your username and/or password, please ask your supervisor.

Of particular interest and value are the following classes:

- 8 Tips for Working from Home (BV90) - 5 minutes

- Practicing Hand Hygiene (HW03) - 15 minutes
- COVID-19: A Pandemic Response (SG54) - 10 minutes

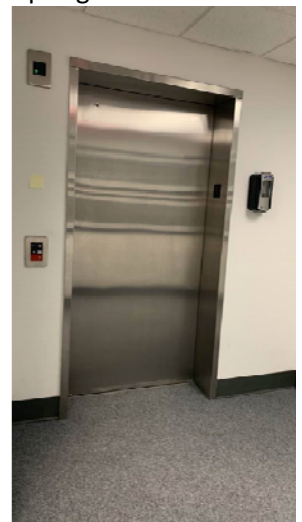
Applicable NBC employees that have opted to wear a N95 respirator under NBC’s Voluntary Use Program, are reminded that they must watch the OSHA video on how to properly wear these masks. The required paperwork must also be signed and returned to NBC’s Safety Compliance Coordinator as soon as possible. N95 respirators are designed to be disposable, but may be re-used under certain circumstances. Contact NBC’s Safety Compliance Coordinator for more information.

Emergency Preparedness & Coordination: A reminder to all employees that local, state, regional and national emergency preparedness information is available to all NBC employees:

- If NBC’s O&M Division should need assistance during this pandemic (staffing, chemicals, equipment, etc.), please contact NBC’s Safety Compliance Coordinator. NBC is a member of the statewide mutual aid network for water and wastewater utilities (aka “[RIWARN](#)”). If such a request cannot be fulfilled among member utilities, then NBC has immediate access to potential resources at both the Providence Emergency Management Agency, as well as the RI Emergency Management Agency. If a nationwide search for assets is needed, NBC can facilitate this through the National WARN Network. NBC’s Safety Compliance Coordinator has been participating in weekly conference calls with the EPA and the rest of the 49 WARNs in the country.

TAC staff would like to thank Field’s Point Maintenance for installing much-needed hand sanitizer stations throughout several locations in the COB, including the Customer Service area. This will benefit all NBC customers and employees for now and in the future

- Pretreatment: staff continue to keep the office running with a skeleton crew. Four staff members are in office each weekday processing mail, writing permits and answering any calls that come in. Companies are required to continue to comply with their permits. In order to ensure the health and safety of staff, we have encouraged companies to submit their reports by email.
- Osprey Web Cam: NBC’s Osprey camera is back on-line, brought you by your Friendly IT Department and Bucklin Point Maintenance Staff, who worked hard over the past winter to build this new portable system. The photovoltaic system was built from scratch under the direction of Dave Brouillard. John Contrino and Alfredo Diez have been working on fabrication since the fall of 2019, ensuring completion for the spring 2020 avian arrival. Under the direction of Brendon Mclean, IT staff Wade Pooler, Jason Galego and Christine Cooper have been closely collaborating with BP staff to integrate the camera and wireless access point into the Bucklin Point wireless network. For now, recorded video will be curated for public viewing by Kerry Houghton and clips will be shared via NBC’s YouTube page. Collaborators hope to be able to share live feed to the NBC Intranet sometime in the near future.





Osprey preparing the nest while awaiting the arrival of its mate.

Here are a few film clips on share point to check out:

<http://intranet/s/ppr/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2Fs%2Fppr%2FShared%20Documents%2FAdmin%20TV%20Content%2FOsprey&FolderCTID=0x012000627A8E79E524CC4AB15751869FF0E272&View=%7B728684C5%2D7639%2D4A58%2DB060%2DA9B212013991%7D&InitialTabId=Ribbon%2ERead&VisibilityContext=WSSTabPersistence>

Volunteer Opportunities:

- RI Blood Center (RIBC) is calling on healthy blood and platelet donors to help strengthen the region's blood supply. Fifty percent of the center's blood donations come from blood drives that are hosted by schools, organizations, and businesses. Due to the coronavirus, many of the up-coming drives scheduled have been canceled. Cancellations pose a significant threat to the RIBC blood supply. Right now they are looking to double their reserves if cancellations continue even further to prevent shortages.

If you would like to donate please visit their website to make an appointment. www.RIBC.org

Fun Stuff:

Homeschooling the kiddos is a major challenge for parents at home these days. You may have a strict curriculum you need to follow, but if you have the ability to steer your own program remember that science is all about making observations, collecting information, making predictions, and then using our observations and data to investigate! Here are a couple activities **Eliza Moore** sent over that you can do at home that are educational and fun!

- Observe – Start a nature journal! Record observations every day about the weather, new plants sprouting from the ground, new things in bloom, birds observed, etc. Plan to revisit your journal next year to compare. Learning to make observations about our surroundings, no matter how simple, is the foundation of the scientific method!
 - Eliza has observed many different birds in the maple tree outside her home office window since working from home such as the Northern Cardinal, Black-capped Chickadee, Downy Woodpecker, Dark-eyed Junco, European Starling, American Crow, Blue Jay and House Sparrow.
 -
- Collect some data – Count the number of daffodil or tulip or other blossoms in bloom in your yard daily. Graph them over time to see when the peak blooming period was. Was it different for different types of flowers? If you have a scale in the house, weigh yourself every two hours. Does it change throughout the day? Graph your

weight by the time of day so you have a line for each day you measured. Does a pattern appear? When are you heaviest? When are you lightest?



Eliza also baked up these delicious looking pretzel buns!



Who's up for this challenge? Patty Pinilla's daughter and her soccer team had the #10toucheschallenge with toilet paper.



Laurie's dog buddy is keeping close watch on her files while working from home.

Dean, Nathan

From: Cheshier, Talia
Sent: Friday, April 10, 2020 2:46 PM
To: All Users
Subject: Weekly e-Pipeline



A message from the Executive Director:

Dear NBC Family:

As we prepare to enter week 4 of our new normal, I appreciate your patience, your professionalism, and your ability to pivot to new ways of working. I know none of us could have imagined we would welcome Spring in this fashion, but I'm repeatedly impressed by the way everyone is adapting to the disruptions and curve balls this pandemic has required while we strive to flatten the curve for all Rhode Islanders.

We're focusing this week's e-Pipeline on Operations. At Bucklin Point and Field's Point, staff is implementing the highest level of hygiene, adopting new work patterns, and maintaining social distancing to fulfill NBC's 24/7 obligation to protect public health and keep the bay and rivers clean. We've got some great stories from the staff at the plants on what is different and what has stayed the same over the past several weeks.

In the news below, you'll also find some great resources for working from home, staying fit while the gym and parks are closed, and maintaining resiliency in these trying times. We're also asking staff working remotely to put your crafting and cooking skills to work to help the NBC staff who are working on-site.

As Cynthia Morissette reminded us in her daily [blog](#), April is National Poetry Month. If you've written a good one lately, please send it along! Otherwise, we still want to hear about what is bringing you joy or at least sanity in these unusual times.

If you observe Easter or Passover, please accept my deepest wishes for a happy celebration.

Stay safe and sane,
Laurie

SEW: What?

We know the NBC community has big hearts and lots of talent, and now we're looking for sewers (I.e., people who can sew, not the underground pipes we all love so much) and cooks working remotely willing to use those talents for our on-site staff.

We need cloth face coverings, as recommended by the CDC and the Governor for on-site staff, so if you know your way around bobbin and are willing to sew a few, we appreciate your skills! In addition, if you've been cooking up a storm

(who has named their sourdough starter?) and would like to provide snacks or meals for the staff on-site, your efforts will be greatly appreciated.

To get more information or to volunteer, contact Jamie Samons (jsamons@narrabay.com)

Here's a pattern for a sewn cloth face covering from the CDC: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>

NBC Updates

Field's Point: A lot has changed with the day to day operations at FP, mostly when it comes to assisting other departments. The normal rounds, permits, and SOPs have for the most part stayed the same except for a few adjustments here and there.

The Operations staff have really stepped it up. The Supervisors have been delivering packages to the other departments and doing a heck of a job dealing with the plant while Operations Manager, Nathan Boiros and Assistant Operations Manager, Eric Bogosian have been working remotely most of the week. A lot of phone calls for billing and pretreatment, and also dealing with a lot of outside vendors they normally wouldn't. The off shift crews so far have been doing tons of cleaning and disinfecting. Maintenance Staff have been coming in as needed and getting the job done when called upon. Maintenance Manager and Supervisors have all stepped up in helping with preparation and scheduling.

Staff are taking all precautions needed and continue to follow all the guidelines. FP Operations & Maintenance have done such a great job at going with the flow and trying to stay positive, we are very proud of all of them!

Screenings have become a little easier to deal with over time. Kerry Britt has been emailing in the screened people instead of doing it at the gate. Which has really helped during the current situation.

Operations was able to do some research and came up with their own disinfectant solution. They coordinated with the lab to get two and half gallons of Deionized Water and mixed about 30ML of Sodium Hypochlorite. Staff has been using this solution to clean and this has been extremely beneficial during these tough times. All in all they are doing their best to be the frontline for the plant and will continue to do so!



FP's homemade disinfectant.



Operator II, John Colson getting the job done in his PPE.



Social distancing at lunch time.

■ Submitted by Eric Bogosian

Bucklin Point: The transition has been challenging but BP is making it work with similar scheduling to FP. Managers Marc Pariseault and TJ Harrington are working remotely. Maintenance has been coming in a few days a week to work on scheduled projects, assignments and necessary preventative maintenance both on site and at our remote pump stations. Although world changing for most of them, staff seem to be making the transition work as best as possible while taking the right precautions. Additionally, maintenance remains on call during off hours. PPE and N-95 masks are worn daily by most of the staff and social distancing is practiced on daily basis.

BP recently implemented a schedule change that went into effect this week. This was a quick turnaround but, knowing it was in the best interest for everyone's health and safety operations made it work. The schedules are now teams of 4 lead by a supervisor and consisting of a process monitor and 2 operators for each shift. There is also a utility crew during the day that are working on daily grounds, cleaning locker rooms and buildings, operations preventative maintenance and filling in if need be.

Supplies seem to be in good standing so far. BP have yet to make our own disinfectant like FP, however, they have plenty should they need to. Each shift has been using a PineSol solution with disinfectant and wiping down door handles/knobs, railings, desks, equipment, etc.

O & M and purchasing staff have also been heavily involved at BP. Although working mostly remotely, inventory and purchasing have not skipped a beat. Operations have been the frontline during this pandemic and management couldn't be happier with their efforts, their courage and their team work.



BP staff following the guidelines wearing their PPE equipment.

- Submitted by TJ Harrington & Marc Pariseault

HR:

Workers Compensation Claims

Due to the current conditions of COVID-19 and with non-essential staff working remotely from home, please follow the guidance below.

Under law, all workplace injuries must be reported within 10 days. All First Report of Injuries must be completed in full and scanned to bsmith@narrabay.com or cmarandola@narrabay.com. Or, faxed to 461-2242.

Brenda or Crystine will report the claim to Beacon Mutual Insurance and follow up with Beacon Mutual/employee/supervisor as needed. Please note, it is important to complete the form as much as possible since we have limited access to personnel file information at this time.

If an employee needs medical attention, the normal procedures should be followed. Medical notes can also be scanned to bsmith@narrabay.com or cmarandola@narrabay.com. The usual WC charts will be sent to Manager/Supervisor with pertinent information.

FMLA

If an employee needs an FMLA package, it can either be emailed directly to the employee or mailed to their home. Please advise HR how you would like to receive the package.

NOTE: Under FMLA, an employee has 15 days to return FMLA certification. If you need an extension, we will be flexible, but you will need to communicate the pertinent information.

Please note, HR staff is working remotely from home; however, a staggered schedule has been created to check mail and faxes periodically.

If you have any questions, please email Brenda or Crystine.

BlueCross Blue Shield of RI offers a fun interactive wellness site called Virgin Pulse. If you're looking for something different, try some of the following programs: Cardio & Relaxation classes for COVID-19. On Apple/Google Podcasts, How to manage stress during COVID-19, Enrich your financial health during COVID-19 and Virgin Pulse Nutrition Guide. Also you can compete with your co-workers on fitness challenges.

Sign up for Virgin Plus <https://app.member.virginpulse.com/enrollmentSearch.html#!?language=en-US>

At sign up page start by entering the first 2-3 letters of your sponsor organization's name (Blue) and choose BlueCross & BlueShield of RI then follow the prompts to sign up.

Coastline EAP is the Narragansett Bay Commission Employee Assistance Program. They have programs such as The Power of You, Emotional Wellbeing and Meditations and Mindfulness, plus much more.

To login click on <https://coastlineeap.personaladvantage.com/>

Company Sign in is Narragansett Bay Commission

■ *Submitted by Brenda Smith & Crystine Marandola*

TAC:

Explore NBC's Online Learning Platform

Although NBC's classroom-based health and safety trainings remain postponed, that doesn't mean the learning has to end!

All NBC employees are reminded and highly encouraged to take advantage of a variety of FREE online safety trainings available through [NBC's Online University](#). If you have forgotten your username and/or password, please ask your supervisor.

For those employees working from home, these classes may be of particular interest and value:

- 8 Tips for Working from Home (BV90) - 5 minutes
- Practicing Hand Hygiene (HW03) - 15 minutes
- COVID-19: A Pandemic Response (SG54) - 10 minutes
- Back Safety (BS61) – 30 minutes
- Preventing Slips, Trips & Falls (ST61) – 45 minutes

For NBC essential employees working in the field or on NBC property every day, the following are a few of the many valuable classes available that can help to serve as a reminder about health & safety guidelines:

- Practicing Hand Hygiene (HW03) - 15 minutes
- COVID-19: A Pandemic Response (SG54) - 10 minutes
- Back Safety (BS61) – 30 minutes
- Preventing Slips, Trips & Falls (ST61) – 45 minutes
- Personal Protective Equipment (PE61) – 60 minutes
- Workplace Violence (WV15) – 30 minutes

- Confined Space Entry (CS61) – 60 minutes
- Laboratory Safety (LS09) – 60 minutes

■ Submitted by Dave Aucoin

Fun Stuff:

Engineering Activities for Kids, Young & Old

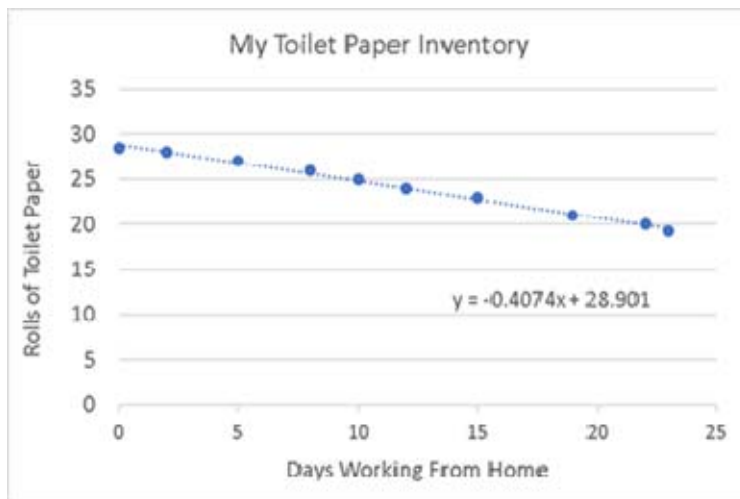
Still looking for fun learning activities to do with the kids (or maybe for yourself)? Courtesy of the James Dyson Foundation and Dyson engineers, you can [download a free set of 44 engineering and science experiments](#), all of which demonstrate basic principles of science and physics, and are buildable with common household items including balloons, plastic bottles, dish soap, and eggs.

Go [here](#) to download the full packet of experiments, some of which are simple enough for a kindergartener to complete with proper supervision. Who knows? We may discover the next generation of NBC engineers!

Send us photos of your experiments—we really want to see the lava lamp!

Track Your Toilet Paper Usage

Get creative with how you can collect data and play with numbers while stuck at home. This activity is part science, part math, and part home economics. First thing you will need to do is take an inventory of the amount of toilet paper currently in your home. Environmental Scientist, Eliza Moore started with 28.5 rolls on Day 0 (March 17th). Each blue circle on the graph shows her roll count on subsequent days. The dotted line is the best-fit linear trend line, drawn in Excel. I have turned on the “show equation” option for more detail. This equation shows that my household uses toilet paper at a rate of 0.4074 rolls per day (this is the slope of the line). To determine when you will run out, set “y” equal to zero and solve the equation for “x”. With 19.25 rolls left on Day 23, at this rate of usage Eliza will run out on Day 71 (May 27th). No need to fight the crowds at the grocery store yet!



■ Submitted by Eliza Moore

Test a Hypothesis

If you have a packet of seeds, plant them in a few separate containers and put them into different “treatments” (at least 2 in each) – put some in a sunny spot and some in the dark. Put some in a warmer room and some in the cold. Write down a hypothesis or prediction of how the growth might differ in the two treatments. Compare how fast they sprout, and then measure the growth each day to compare the differences. Was your hypothesis correct?

■ Submitted by Eliza Moore



Brenda Smith walks down to Riverview Beach to “de-stress” after unplugging from her daily work. Brenda noticed how clean the water looked and wanted to give a big thanks to NBC essential workers who contribute to the clean water.



Melissa DeFusco was busy in the kitchen, making Brazilian style pound cake <https://www.eaglebrand.com/recipe-detail/brazilianstylepoundcake-8240> and bacon and egg with gluten free bread in her air fryer. Yum!

Dean, Nathan

From: Cheshier, Talia
Sent: Friday, April 24, 2020 3:04 PM
To: All Users
Subject: This weeks e-Pipeline



A message from the Executive Director:

Dear NBC Family:

Thanks to all of you who reached out with a virtual high-five (high paw?) for last week's message from my dog Buddy. I've been trying to give him the space he asked for but most times he's the best conversationalist in the house. He's a tough act to follow. He loved the fan mail, so tune in for future cameo appearances!

This week, we held our first remote Board of Commissioners meeting. It went very well (thanks to IT) but it felt really weird! The Board was able to push forward several very important initiatives, including approving NBC's 2022-2026 Capital Improvement Plan and authorizing the NBC to borrow money from the USEPA's Water Infrastructure Finance and Innovation Act (WIFIA) for climate resiliency projects at Bucklin Point. The Finance division deserves great credit for keeping the NBC on track to participate in this excellent funding program as well as many COVID related programs for potential reimbursement of necessary expenditures.

Also, this week the Governor extended distance learning through the remainder of the school year. I know this affects many of you and realize this will present challenges for many of us, but I want you all to know that we are already planning to address the complications that may arise from this. More news on this next week.

It's a shorter e-Pipeline this week, but that doesn't mean that business isn't going on! On the contrary, Operations, Interceptor Maintenance, Construction, Customer Service: it's all still happening due to your resilience and diligence, for which we are all very grateful.

And: since wearing a face covering is now the law, send us your #maskie (it's a selfie with a mask—I made it up, but I think it could become a thing).

As always, reach out with questions and suggestions.

Stay safe and sane,

Laurie

NBC Updates:

IM:

On Tuesday April 21st the IM Crew repaired the roadway leading to NBC's Wind Turbines located in Coventry RI.



IM crew also completed inspections this week required by the RIPDES Permit while wearing their PPE.





Offspring spotted at Bucklin Point this week.

- Mark Healy

Happy 50th Anniversary Earth Day!



Earth Day was first established on April 22, 1970 to create an environmental movement for planet Earth and is now observed all around the world. Approximately 1 billion people in 192 countries celebrate this day every year and come together to fight for the environment, raising awareness about pollution, climate change and most importantly focusing on the importance of caring for our beautiful planet.



Kim Kirwans family got outside for the day, built a terrarium and planted some lettuce to celebrate.



Cynthia Morissette's family built a teepee, created a nature critter with items found in the yard and played some nature bingo to celebrate.

Reese's Peanut Butter Pie:

https://www.hersheys.com/kitchens/en_us/recipes/reeses-peanut-butter-hersheys-kisses-pie.html



- Kristen Petit

Pet(s) of the week



Meet Sammie-Sue, Alice Marchessault's dog. Sammie-Sue follows her around better than her own shadow. Sammie-Sue and Alice are getting lots of walks in during these unusual times.



Meet Stella, Kristen Petit's dog at a local spot where they enjoy some daily meditation.



Meet Cosmo, Steve Duque's new addition to the family. They've been wanting to get one for over 20 years now and finally made the decision! Cosmo is a Hungarian Puli.



Meet Luke, Dionne Bigotti's new addition to her family. He arrived on March 21st on one of the last rescue transports from Mississippi prior to everything being shut down for Covid-19.



And lastly, my two trouble makers Wendy (left) and Jett (right). They think its playtime all the time now since we've been home so much and sit by the back door waiting.

Dean, Nathan

From: Cheshier, Talia
Sent: Friday, May 1, 2020 1:43 PM
To: All Users
Subject: This weeks e-Pipeline
Attachments: Lemon Poppy Scones Recipe.docx



e-Pipeline

A message from the Executive Director:

Dear NBC Family:

I hope you are all well and enjoying the small bursts of spring we are seeing. The first flowers and the budding trees give me great hope for better days in our future! As many of you know, the Governor is beginning to discuss reopening the economy and what they will look like. While the Governor has indicated she may lift the stay-at-home order on May 8, the first phase she has identified will not look much different from what we are currently doing. To quote the Governor, "Everybody who is working from home now will continue to work from home on May 9". Depending on how things go from there, I expect she will relax restrictions further and we can start to figure out how to bring people back into the offices.

In this week's e-Pipeline, we focus on the money people! Accounting, Finance, Purchasing, and Customer Service have exerted incredible effort to ensure that NBC's balance sheet stays healthy, that we continue billing and mostly remote servicing of customer calls, that we are able to purchase necessary equipment, and that we all receive our paycheck! And, as you'll see, they're not above getting some four-legged help along the way!

This week is Water Week and in any other year I would be in Washington DC with other Executive Directors trying to get greater federal commitment to our life-saving infrastructure (i.e. money for our capital projects!). This year, at a virtual convening of over 2000 water professionals, Andrew Sawyers, Director of EPA's Office of Wastewater Management, expressed his gratitude for the essential work being done by the wastewater community for going above and beyond in this time of national crisis to protect our public health and environment. I couldn't agree more. I continue to be impressed and gratified by the resilience and commitment of our NBC community.

If any of you know of a budding young artist within the NBC service district, we are accepting digital submissions to our annual poster contest this year. The theme is "Happy Toilet, Healthy Bay" and we're asking the artists to artistically decorate a picture of a toilet with clean water images or messages (template provided here: <https://www.narrabay.com/media/1831/toilet-template.jpg>). It's our first attempt at a digital poster contest and we're excited to see some creative submissions!

One final shout-out to our featured Accounting folks: they have won a Certificate of Achievement for Excellence in Financial Reporting for the FY2019 audit from the Government Finance Officers Association (GFOA). This is the seventeenth consecutive year Accounting has received this honor — AMAZING! Congratulations!

Stay safe and sane,

Laurie

NBC Needs Your Help:



Over the next week we'd really appreciate it if you could help us thank our amazing staff that has to show up and continue operation at NBC while many of us are working from home.

Make a sign and send us a photo, or send us video of you thanking staff, or BOTH! Get creative!

Please email your message to Jamie (jsamons@narrabay.com) and I (tcheshier@narrabay.com) by Thursday, May 7th.

NBC Updates:

Finance Division

The employees in the Finance Division located on the second floor of the COB are getting ready for the much-anticipated renovations by packing up their offices and files.

Finance

Finance staff has been working remotely now for the past seven weeks and has seamlessly transitioned to remote processes. Staff is busy drafting narrative, charts, graphs and supporting schedules for the upcoming FY 2021 budget. Staff is monitoring FY 2020 expense and has added the new COVID-19 code to financial reporting.

Finance has been analyzing daily cash receipts to identify effects that COVID-19 may have on collections. Staff responded to the Public Utilities Commission (PUC) requests for information relating to the impact of the COVID-19 on collections and the ability of the utility to meet its financial obligations. The Finance staff is actively reviewing all COVID-19 available expense reimbursement programs and grants on a weekly basis and reporting any opportunities NBC plans to pursue to the RI Department of Administration (DOA).

Finance has prepared its first payment request to the USEPA's Water Infrastructure Finance and Innovation Act (WIFIA) loan administrators for the CSO Phase III project and expects loan proceeds to be received by May 15th.

On a lighter side.....

In our spare time, we are doing lots of yardwork, gardening, cooking and baking!!



Sherri Arnold Family's Quarantine project – eight, 4-week old baby chicks!!



Gail's yummy Lemon Poppy Scones – see attachment in this email for recipe!

Accounting

The Accounting staff is pleased to announce that NBC has received the Government Finance Officers Association (GFOA) Certificate of Achievement for Excellence in Financial Reporting for the fiscal year 2019 audit report. This is the seventeenth consecutive year NBC has received this award.



Accounting staff is gearing up for NBC's fiscal year end. NBC's Board approved engaging Hague, Sahady & Co., P.C. Certified Public Accountants for the FY 2020 and 2021 financial and pension audits. This year's close will be a change from prior years but we are up for the challenge. Accounting staff wants to remind managers to plan your year-end purchases accordingly to ensure the expenses are charge to your FY 2020 budget.

On a lighter side.....

Accounting's own Missie Defusco has been cooking up a storm. Anyone that knows Missie will not be surprised. Here is a picture of her latest creation a scrumptious chicken parm dinner.



Purchasing

Purchasing has been working hard to ensure that all departments can continue to make purchases and that all requisitions are raised to PO status as fast as possible.

NBC's Purchase Card program has proven to be a valuable tool during this time, allowing departments to order necessary supplies within a matter of minutes. We are on track to have more than \$175k in expenditures in the month of April - our highest total spent since the inception of this program!

Customer Service

Safety is a top priority in Customer Service! The Customer Service staff is working hard assisting our customers virtually. NBC will be installing a kiosk at the COB to offer our customers a way to make self-service payments.

NBC also received approval from the Public Utility Commission to waive all payment fees associated with check and credit card payment through the phone and website in an effort to help our customers. Another new feature is pay by text. Our customers can register to receive a text from NBC to make their payment. Lastly, Customer Service has updated NBC's website and phone menus to offer Spanish translations for our customers.

Welcome NBC's newest employees:



Meet Cassie Balzano's dog, Lilo, who alternates between begging for treats and walking all over piles of paperwork.



Meet Rascal, Trish Fabrizio's dog and newest coworker. If you happen to get an email that doesn't make any sense, it probably came from him.



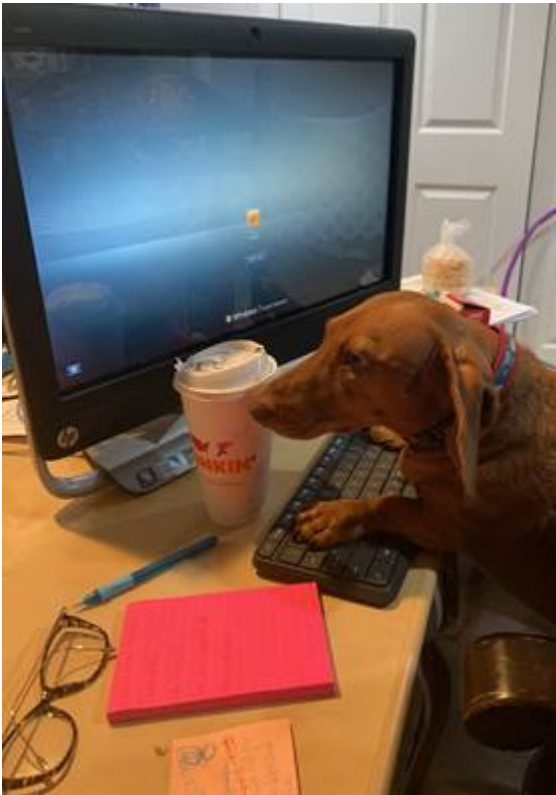
Meet Mike Cook's cat, Abby, who is always there to lend a helping paw.



Patty Pinilla's dog, Ruby, is busy reconciling the bank statement.



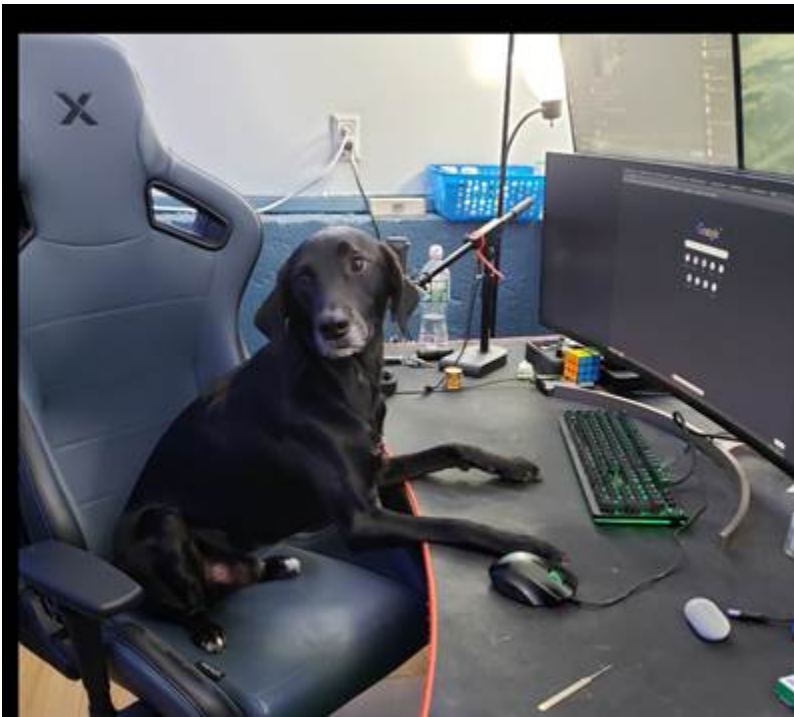
Molly, Michelle Grossi's dog, was caught sleeping on the job.



Amy Chabot's dog, Charlie, is having a short coffee break before reconciling the PCards.



Chris Walaska's dog, Charlie, decided to take an afternoon break from answering the phones all morning.



Leah Foster's dog, Dexter, getting a lot of work done with his large computer screens.



Bandit and Apollo, Leah Foster's dogs waiting patiently for their paychecks!

Fun Stuff:



Belinda McLaughlin has been keeping busy with something she really enjoys, crocheting. She was able to finish a baby blanket and an afghan.

Dean, Nathan

From: Cheshier, Talia
Sent: Friday, May 8, 2020 2:10 PM
To: All Users
Subject: e-Pipeline



Dear NBC Family:

Please click the image below for a message from Executive Director's Dog...



NBC Needs Your Help:



We are still accepting messages! Over the next week we'd really appreciate it if you could help us thank our amazing staff that has to show up and continue operation at NBC while many of us are working from home.

Make a sign and send us a photo, or send us video of you thanking staff, or BOTH! Get creative!

Please email your message to Jamie (jsamons@narrabay.com) and I (tcheshier@narrabay.com) by Thursday, May 14th.

NBC Updates:

Field's Point:



These guys desperately needed a pizza break, with so many wet weather events lately! Team Starnino on Friday, May 1st enjoyed their pizza while social distancing on their third shift.

Wildlife at Bucklin Point:



Turkeys roosting in the trees and a mama duck and her ducklings hanging out by one of the aeration tanks. Keep reading to see BP's Osprey update!

Photo Credit: Guy Beaudette

Environmental Science & Compliance Update:

Throughout the month of April, the Environmental Science & Compliance Division operated with minimal staffing in the office, as most office staff worked from home. The Technical Analysis & Compliance section staff all continued working from home on energy, safety and water quality issues. The DMR was prepared and submitted remotely on April 15th.

Pretreatment staff continue to keep the office running with a skeleton crew each weekday processing mail, writing permits and answering any calls that come in. Through these efforts they were able to issue all permits requiring reissue during April. Pretreatment staff working at home have been taking this time to do online training, taking on-line training classes, learning beginner Spanish and many wastewater treatment operations that are performed at our two treatment plants. We continue to meet RIPDES monitoring requirements but are falling behind on performing user annual Pretreatment inspections and user sampling.

The Environmental Monitoring and Laboratory sections continue to collect and analyze all samples required by our RIPDES permits, including all plant and process samples, wet weather samples and urban river samples needed to comply with the NBC 9 Minimum CSO Controls Plan. Their efforts have been incredible and are greatly appreciated. Staff have been using Microsoft Teams and Zoom to have virtual meetings and staff are preparing data daily to ensure that DMR submittals and process sample notifications are made on time. All the Environmental Science & Compliance staff working within our facilities have been doing an extraordinary job meeting all the critical RIPDES requirements, while maintaining social distancing.



The Lab, Environmental Monitoring and Pretreatment staff would like to thank our Executive Director and the executive staff for providing donuts and pizza for our team. It means a lot to us to know that you have been thinking about us and are so considerate to our staff working throughout this the COVID-19 pandemic.

ES&C continue to seek out and procure PPE to ensure an agency wide supply for present operations and for when NBC staff start to return to the offices. ES&C have also been researching technologies that can be used to protect the health and safety of employees and visitors to our buildings when the offices are reopened. These include thermal imaging cameras that can automatically scan people for elevated temperatures, office spray disinfection products and ozone HVAC treatment systems. A special THANK YOU to all the ES&C staff, and especially the staff that are coming into the facilities to help keep our plants running and our agency in compliance!

Cyanide Violations at Field's Point

The ES&C Division has been studying effluent cyanide concentrations in the wastewater at Field's Point in order to identify the cause of four recent RIPDES permit violations. Since the first violation, in August 2019, the Technical Analysis and Compliance (TAC), Environmental Monitoring (EM), Laboratory, and Pretreatment Departments have worked together to investigate potential sources of cyanide both outside and inside the treatment plant. Pretreatment has conducted additional company inspections, TAC and EM have designed and conducted special sampling projects, and the Laboratory has analyzed numerous non-routine samples for this effort. At this time, there has been no evidence that the cyanide is coming from an industrial or commercial user, or any other source outside the plant; several process chemicals (e.g., polymer, hypo) and potential contaminants within the plant (e.g., Synagro's deodorizing spray, road salt blown from shipping piles) have also been investigated, though seem to be highly unlikely sources. The ES&C team has identified a strong correlation between sampler maintenance activities with the dates of the elevated cyanide levels. The team has designed a special study to focus on the potential for sample contamination or interference during collection at the final effluent related to sampler maintenance activities. This three-week study will begin next week and will require close cooperation and coordination among departments. If we can replicate the elevated cyanide levels and can conclusively determine the sampler maintenance skewed the results, we will request that DEM update the DRM results to remove the exceedances from our records.

Electric Vehicle Update

Sustainable energy consultant VEIC recently delivered a free custom report recommending that NBC start greening its fleet by purchasing electric vehicles where applicable to save money and reduce greenhouse gas emissions. The report coincides with the recent installation of an electric vehicle (EV) charging station behind the gate at each NBC treatment facility. NBC is in the process of activating these stations which were entirely grant funded.



The EV Fleet Study Report is based on information specific to NBC that TAC gathered from various NBC Managers after last year's EV Ride & Drive event. It recommends replacing eight SUVs that are almost 10 years old with fully electric cars over the next few years. The report states a simple grant funded charging station port should be installed for each EV and that electric trucks are not viable for NBC to consider this year. It concludes the Nissan Leaf meets driver needs and its purchase is economically justifiable compared to making a conventional in-kind replacement presumed to have a \$35,000 cost of ownership. The report estimates the cost of ownership of a Mitsubishi Outlander (an AWD plug in hybrid) and the Chrysler Pacifica Van (plug in hybrid) is more than a conventional replacement. However, savings would increase if the new EV gets more use than expected. Electrifying the fleet is good practice to help reduce the fleet carbon footprint and local vehicle emissions.

Stocking Up on PPE for NBC

This month, the words “Personal Protective Equipment” or “PPE” now resonate with all NBC employees and their families. Always a crucial component of NBC’s Health & Safety program, PPEs are now being purchased and used more than ever in recent history, not only by NBC employees, but by other critical infrastructure employees battling the COVID-19 pandemic throughout the country and the world. Considered a “last resort” in the hierarchy of controls for workplace hazards, the availability and proper usage of PPE remains important for NBC’s essential employees to continue working safely in the field.

In late March, NBC’s Technical Analysis & Compliance (TAC) section quickly realized the need to begin placing orders of crucial PPE used daily by NBC essential and non-essential employees. Orders were immediately placed with local vendors for such items as gloves, surgical masks and N95 face masks. As the pandemic has spread, the availability to obtain in-stock items of PPE has become a difficult task. However, NBC sections seek out alternate sources of PPE, even on international scale. TAC staff are very busy various necessary PPE for the NBC to ensure working in the field now have all the proper and to ensure staff returning to the office possible.



KN95 Mask



Disposable 3-Ply Medical Mask

much more continue to an procuring that staff PPE necessary are as safe as

Employees should also be aware that the Emergency Management Agency (FEMA) has reusable cloth face masks for all water and employees in RI. So, NBC will be receiving masks in the coming weeks. Managers will when the masks are available for each NBC All managers should contact Dave Aucoin once a PPE order is placed and received so continue to assess and update agency wide totals. An example of PPE recently ordered by TAC staff is highlighted below. Other NBC sections should consider using this table as a template to keep track of their own PPE orders:



Federal secured wastewater these cloth face be notified section. and Kim Kirwan TAC can

Status of Supplies Ordered and On-Hand			
Item	# On-Hand	# On Order	Expected Delivery Date
N95 Masks	234	2180	4/17-5/15/2020
KN95 Masks	250	0	RECEIVED
Dust Masks	594	236	4/24-4/29/2020
Surgical Masks	1000	0	RECEIVED
Reusable Cloth Masks	0	520 (FEMA)	
Gloves	389	3	
Face Shields	14	52	4/27-4/29/2020
Disinfecting Wipes	50	480	4/29/2020
Disinfecting Spray	0	27	
Hand Sanitizer - Personal	15	300/300	6/5/20 & 5/12/20
Hand Sanitizer - 1 Gallon Size	5	0	RECEIVED

Osprey Camera Update

The camera system above the Osprey nest in the Bucklin Point landfill has been problematic so far this year. Over the past year TAC staff has worked with BP and IT to design and build a new system. So far, the system has had some bugs that have prevented continuous communication and maintaining continuous video feed has been challenging. Some footage is available that appears to show that mama Osprey is incubating her eggs!



As you can see, the Osprey are collectors, and have incorporate shop rags and nitrile gloves into their nest. All three osprey platforms at Bucklin Point are occupied and a couple of ospreys are trying to make a new nest on top of the soda ash silo. This round metal dome does not seem like an ideal location for a nest, but the birds are persistent. Staff have removed the branches and the osprey rebuild.



Photo Credits: Mark Healy



Close encounters with an osprey: Mike D'Arezzo

Birds seem to be making their nests in unusual places at BP this year. A small nest has been constructed on a bookcase inside the E&I workshop. Nestled between a couple of books there lie two brown speckled eggs. Can anyone identify these?



Fun Stuff:



Renee Rinaldi-Patterson picked up these beautiful tulips from Wicked Tulips in Johnston. Wicked Tulips is a popular place this time of year to pick your own tulips. This year under these current circumstances they are only doing curbside pick-up. You can place your order online and then pick up.

www.wickedtulips.com

and last but certainly not least...

Happy Mother's Day to all our NBC moms out there!



Dean, Nathan

From: Cheshier, Talia
Sent: Friday, May 22, 2020 3:32 PM
To: All Users
Subject: Weekly Pipeline



e-Pipeline

A message from the Executive Director:

Dear NBC Family:

Happy Friday and Happy Memorial Day weekend! In any other year, we would all be talking about big family cookouts and school vacation plans. And although the pandemic has put us all in a strange new reality, I want you to know that your efforts on behalf of the NBC's mission are greatly appreciated.

You may be wondering about our plans to resume in-office work on a large scale. We have been hard at work to develop protocols to ensure employee safety, but we are also waiting to hear more from the Governor about Phases 2 and 3 of her re-opening plans. Each Director has developed a reopening plan for their department. To view the reopening plans as well as all COVID related plans and protocols, go to our intranet and click the big COVID 19 link. For now, just know that Phase II (which looks like it will begin in July) will look a lot like Phase I, with most office personnel continuing to work remotely if they can but allowing people to come in to pick up files or work as needed.

As you know, at the NBC we always try to find the positive in any situation, and the large-scale work-at-home order is no different. In the time that so many employees are working remotely, we have been able to fast-track the renovations of the second floor of the COB without disrupting work. You can read more about that and our very robust construction program below.

I know many of you are facing unforeseen family obligations as we approach the summer. I want you know we understand and will accommodate these situations with all the flexibility that we are able. Resiliency and the ability to pivot will serve us all well in the coming weeks.

If you are a veteran or a family member of someone who has served in the military, please accept my deepest thanks for your service on this Memorial Day. I hope you are all able to enjoy time with loved ones this weekend---even if it's virtually!

Stay safe and sane,
Laurie



Laurie & Buddy taking a #Maskie !

NBC Needs Your Help:



We are still accepting messages! We hope to be able to create a slide show to display with all that we receive, we've received some awesome messages so far and we can't wait to share! Over the next week we'd really appreciate it if you could help us thank our amazing staff that has to show up and continue operation at NBC while many of us are working from home.

Make a sign and send us a photo, or send us video of you thanking staff, or BOTH! Get creative!
Please email your message to Jamie (jsamons@narrabay.com) and I (tcheshier@narrabay.com) by Thursday, May 28th.

NBC Updates:

Bucklin Point: Work has been steady for operations and Maintenance at BP. Last week BP had Tom from After Hours come in and jet the sludge and scum lines from PSPS and up to the digesters. A clean out of about ¾ of the way up that was utilized, which was about 700 feet of line, was cleaned out. Staff did excellent job getting this project done!



-- TJ Harrington

Field's Point: FP is eager to get back to "normal" whatever that might be. Operations staff are continuing to hold down the day to day work to keep the plant operating efficiently and Maintenance staff have been coming in as needed to make select repairs based on how critical it is to the plant. FP is fully stocked with cleaning supplies and face coverings and the staff has been doing a great job practicing social distancing and cleaning their work areas. When the time is right, FP is ready for more staff to return to work!

-- Nathan Boiros

Construction & Engineering:

Contract 304.44, Rocchio: Higginson Field project is complete with filter fabric, under drains and crushed stone installed. Higginson Ave - 2 courses of binder was installed and bituminous curb, laying down topcoat on Higginson and parking lot took place on May 21st.





-- Eric Tift

Contract 909.00C, COB Office Renovations: Work resumed on this Project on May 11th. All staff from the 2nd floor has been moved out and into their temporary homes on the 1st floor. The contractor has begun disassembling the office furniture and wall partitions. Window replacement has also begun on the first floor. Most of the windows on the old side of the building and Customer Service have been replaced.



-- Tony Dalmazzi

CSO - Staff continues to meet remotely to review Phase 3 preliminary design plans. We are on schedule to submit preliminary plans for Phase 3A and Phase 3B facilities to RIDEM by June 30th in accordance with the Consent Agreement.

Staff visited Alden Research Labs with Stantec and Kleinfelder to observe the hydrodynamic modelling results of the OF-218 structure. Improvements to the structure is currently under design by the consultant team

-- Kathryn Kelly & Robert Baglini

Contract 304.67C, Lining - Continue manhole rehab and replacing frame & covers on Mineral Spring Ave. and Douglas Ave. in North Providence and in Johnston on Putnam Pike. Manhole rehab work is complete on Atwood Ave. and Hartford Ave. in Johnston.



Crew replacing Frame & cover on Mineral Spring Ave.

Contract 308.13C - Building Demolition & Site Preparation of 250 Front Street & Nassau Street. On Nassau Street three out of four houses have been demolished.



The building on 250 Front Street was built in the early 1900's and the west side of the building sits on top of the river wall along the Blackstone river. Crews started to work on the support wall in the basement and started to demolish south side portion of the building.





-- Joe Moniz

202.00C - Field's Point WWTF Improvements: Continuous pressure and hydrogen sulfide monitoring of the CSO tunnel and Shaft at Calvely Street was performed during April for the modeling report, which is wrapping up, to allow for improvements to the odor control system to reduce complaints. The design for the items listed below has been completed, and the project has been advertised for bids.

- Repairs to the knife gate valves at the Ernest Street Pump Station,
- Rehabilitation of The Grit Bins in the Grit facility,
- Rehabilitation of the BNR electrical switchgear enclosure
- Miscellaneous structural repairs at the Aeration Tank Dewatering Pump Station
- Repairs to the sluice gate actuator for Junction Box A
- Rehabilitation of the primary sluice gates at Junction Box B
-



810.00D - BPWWTF Standby Power Reliability Improvements Project: The design has been completed, and the project has been advertised for bids. The operations and maintenance group has been doing such a great job managing the power reliability challenges at Bucklin, so this work can't be completed soon enough!



810.00D - BPWWTF UV Project: Preselection of UV system vendors is currently underway. In March 2020 staff from engineering, construction, maintenance and operations visited the Hartford, CT MDC to review a large installation of a prospective vendor's equipment.

BPWWTF Administration & Maintenance Building Design-Build: Subsurface geological explorations were completed in February. The architect provided options for staff review. Dave can fill you in on the rest.

RIPDES Climate resiliency plan: Engineering submitted the plan to RIDEM in November, and RIDEM issued their approval May of 2020.

-- Robert Baglini

NBC Osprey Cam:

The Osprey population at Bucklin Point is on the rise! The happy couple filmed at the northern platform boast a clutch of three eggs. A three-egg clutch takes about 6-7 days to complete and typically hatch in about 40 days. These eggs are the size of a jumbo chicken egg and this particular clutch has mahogany spots with flecks of cinnamon. The incubation period has begun. The video shows that this is a two-bird job. Dad is keeping the eggs warm while mom takes a stroll along the river. Upon her return, they carefully switch positions ensuring the that the eggs are kept warm.

Osprey Video: <https://www.youtube.com/watch?v=27sYmNVenIA>



-- Kerri Houghton

THANK YOU to Kerri for keeping an eye on the chicks!

Fun Stuff:

Kristen Petit and her daughter Isabella had a dessert competition over last weekend. Kristen made an apple pie and Isabella made a key lime pie. Judge ruled it a tie!



Dean, Nathan

From: Cheshier, Talia
Sent: Friday, May 29, 2020 5:23 PM
To: All Users
Subject: this weeks e-Pipeline



e-Pipeline

A message from the Executive Director:

Dear NBC Family:

We are on the cusp of entering Phase II of the state's re-opening (set for June 1), which is exciting but also perhaps a little scary. I encourage you to revisit the COVID-19 section of NBC's intranet for specific plans relating to your section. If you can't access the Baynet from home, you can use this link <http://www.narrabay.com/reopening>. If you have questions regarding the appropriate time for you to return to the office, I recommend that you discuss it with your supervisor or division director. We want you all to be safe and healthy and are encouraging flexibility with respect to returning to our physical workspaces. Trust me when I tell you that I hate wearing masks just as much as the next person, but we all have an obligation to our co-workers not to be irresponsible with each other's health.

We had our second virtual Board of Commissioners meeting this week, and although it didn't have the same energy as an in-person, live meeting, the Board approved many important initiatives. First, the FY 2021 budget was approved unanimously. For this, we owe great appreciation to the entire Finance staff. The Board also re-elected Chairman Mesolella, Vice-Chairman Rotella, and Treasurer Andrade for another year of service, so we can all be confident that the NBC will continue with the strong leadership that has been so successful for us over the years.

In other news, if you haven't checked out the sweet osprey chicks that hatched this week at Bucklin Point, please do! They are featured on NBC's Facebook page and YouTube channels. Special thanks to staff from Environmental Science & Compliance who collaborated with BP Operations and Maintenance staff and IT to make this exciting video feed available to us.

I'm so proud and grateful of the way our entire NBC team has responded over the past 11 (REALLY??) weeks. I look forward to the day when we can all see one another again in person!

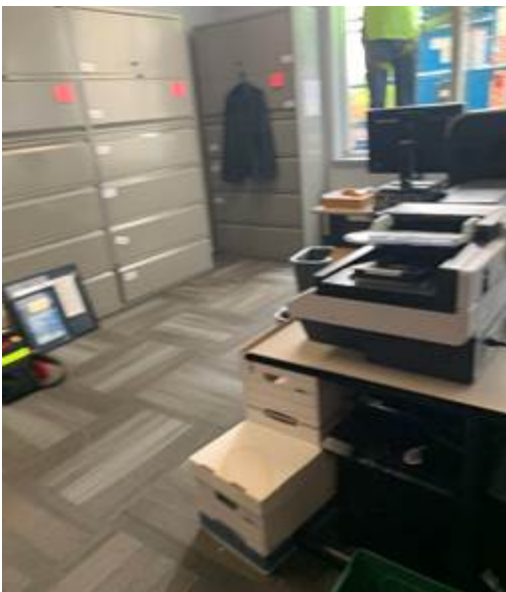
Stay safe and sane,

Laurie

NBC Updates:

Finance

Accounting, Finance, and Purchasing have been very busy packing our offices. We are all now getting settled in our new temporary work areas but still working remotely for the most part. We are all very excited about our office renovations and hope to be back on the 2nd floor soon.



Purchasing



Finance



Accounting



Accounting

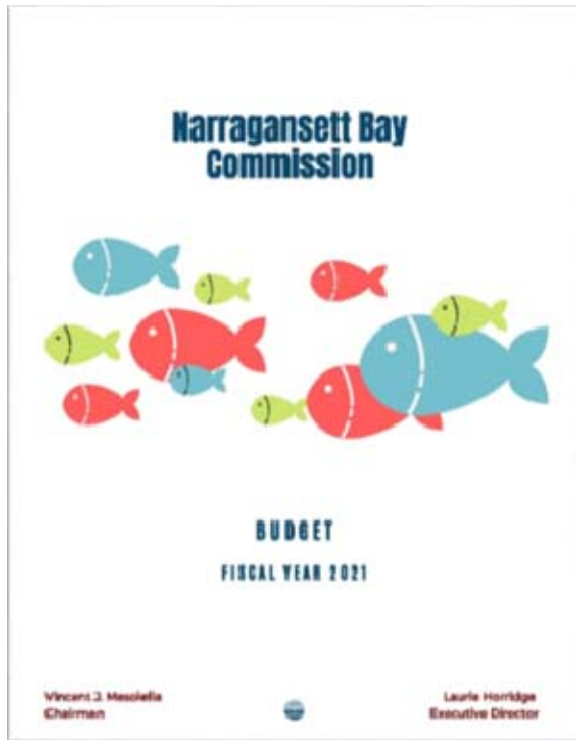


Payroll



Accounting

Finance is pleased to announce that the FY 2021 Budget was approved by the Board of Commissioners on Wednesday, May 28th. Thank you to the Managers & Staff for their efforts throughout the budget process. A big thanks to the Finance staff for their efforts in putting together a balanced budget given the many 2020 constraints - COVID 19, working remotely, undergoing office reconfigurations and ensuring final printing before the printer was disconnected and moved. Finance will provide each cost center with their FY 2021 approved budgets by line item in the next few weeks.



On May 13th, the Finance staff submitted NBC's loan application and wired the application fee to the USEPA for the 2nd WIFIA loan to finance the Bucklin Point Resiliency Improvements project . We are working on the Division filing for approval to enter into the loan.

Accounting

Good news! All employees receiving ACH employee reimbursements, travel advances and travel settlements will now also receive an email automatically generated from Oracle to inform your ACH payment has been processed.

The Accounting staff is gearing up for the fiscal year end. The Auditors will be in next week to start their preliminary testing and risk assessment. It will be a very interesting audit with some of it being done remotely and portion being done from our temporary work location. It will be challenging trying to locate all our records in the packed-up boxes in several location. But who does not like a challenge?

Our resident chef, Missie DeFusco has been busy cooking up a masterpiece grilled pork chop with a watermelon martini.



Purchasing

Purchasing will have two virtual bid openings next week. This is the first time that a public bid opening will take place using the zoom technology. By dialing into a link, the public can access the bid opening, and both hear and see the process. For these two bids, the public will be allowed to ask questions by using the virtual hand raising.

Customer Service

Customer Service has started using Power BI. Power BI is a business analytics service by Microsoft. It provides interactive visualizations and business intelligence capabilities with an interface for employees to create their own reports and dashboards. Reports have already been created for customer payments, billing by month and cycle and aging accounts receivable.

Chris Walaska's son William Walaska III will be graduating from Bishop Hendricken High School. He will be Attending URI College of Nursing in the fall.



NBC Osprey Cam Update:

The first osprey chick of the season hatched this week on May 26th!



Osprey Video: <https://youtu.be/d0PxginCE1Q>

At 8:14:43 you can see mom pull out the first piece of broken shell from the nest bowl and throw it to the outer perimeter. At 8:16:10 the chick breaks free from the shell and fully emerges. The female adult continues to keep the hatchling warm while it tries to find its bearings. At 8:18:13 the baby osprey raises its head for the first time. Fun fact: The neck is the strongest part of a newly hatched chick's body. A couple days prior to hatching, the developing chick uses its neck to tap the eggshell with its beak. The neck drives its beak to break through the shell.

Stay tuned: The other two eggs should hatch within 2-4 days.



NBC Pipeline

July 2020

NBC Pipeline is a monthly publication designed to keep Narragansett Bay Commission staff up to date on internal current affairs. Staff is welcome to forward to the Public Affairs Office any items they would like to share or see in a future publication. Your suggestions and participation are encouraged and appreciated.

Calendar of Events *for July*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
					Independence Day Observed HOLIDAY	 Independence Day
5	6	7	8	9	10	11
Full Moon					Payday	
12	13	14	15	16	17	18
19	20	21	22	23	24	25
					Payday	
26	27	28	29	30	31	

News Briefs...

NBC Use or Lose Vacation Time

Due to the COVID19 situation many of us have had to cancel or forgo our spring/summer vacation plans. Vacation hours however continue to accrue, and while it seems early in the year, we have only until December 19 to utilize our use or lose time. Information on your current vacation balance and the hours of use or lose time that will need to be utilized before December 19th are now displayed on your SharePoint login screen. Please take a few minutes to review this information and speak with you supervisor to schedule appropriate vacation time.

COVID19 Update

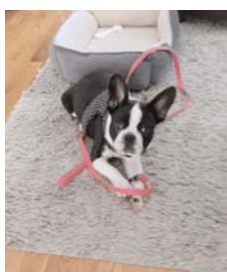
On Tuesday June 30th the State of Rhode Island entered into Phase III of Reopening RI. During this phase larger social gatherings and public events will be allowed and more businesses will be opening. During this time NBC will also, slowly and cautiously, be bringing more people back into the workplace. Social distancing, wearing of face masks and screening for COVID19 symptoms will be key factors in assuring that we can work safely and minimize the spread of the COVID19 virus.

If you have been working remotely you will find when returning to the workplace that Screening Stations have been set up at various locations throughout NBC where you will need to answer some COVID19 self-screening questions before starting your workday. Office and work areas have been equipped with facemasks and disinfectant products and each evening all occupied areas will be thoroughly cleaned by our cleaning contractor. Individual sections/offices may be returning to work at varying times and schedules based on site-specific work conditions so please stay in contact with your supervisor/manager as to when and how you will be returning to work.

If you have any issues regarding your return to work please call or e-mail the Human Resources Office.

New Addition to the Musumeci Family

Meet Yara “Trouble” Musumeci, Karen Musumeci’s Frenchton. Yara arrived in March to join the Musumeci family just in time before the pandemic started and has provided lots of entertainment for



Welcome...



Peter Gnocchi,
Laboratory
Supervisor



Matthew
Fitzpatrick, BP
Operator I



Sonia Sanchez,
BP Operator I



Diego
Matamoros, FP
Operator I



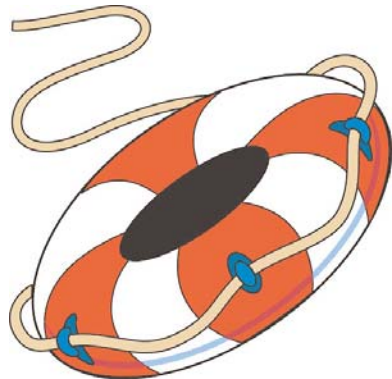
Michael Smith,
IM Operator II

Remembering Dan Pereira

June 21st marked one year since the loss of our dear friend and co-worker, Dan Pereira. NBC would like to take a moment to remember Dan who was a husband, father, skilled process monitor, committed environmentalist and Marine Corps veteran gone too soon.

Boat Capsized, Bucklin Point Third Shift Crew Assists in the Rescue

On Sunday, June 14th around 2 AM BP's third shift crew were alerted to the fire alarm going off at the Hypo Building. They found no issues but due to NBC protocol the East Providence



Fire Department arrived at the scene. After the alarm was silenced they could hear yells for help and they found a young woman at the top of the hill on the back road where the BP final clarifiers are located. She had swum to shore and pulled the fire alarm. Once they were able to get to her she explained there were still two others missing and that their boat had capsized in the river.

Immediately BP Operator, **Guy Beaudette** took the firefighter over to the river bank and they were able to rescue the second victim in the water. The temperatures had dropped significantly in the middle of the night and water temperatures were freezing. **Robert Morrissey**, another Operator assisting in the rescue gave the man a sweatshirt he had on him and Guy was able drive the rescued man in the Bobcat up to the rescue with the heat blaring to try to keep him warm.

A rescue boat was then launched to search for the third victim. She was found unconscious in the water; EMT's were able to revive her and take her to the hospital.

Guy Beaudette and Rob Morrissey both jumped right into action assisting the fire fighters with direction and transportation. Their quick thinking and quick action helped EP Firefighters save three lives.

--Submitted by Sara Nadeau & Jose Galvan

Congratulations...

To Sierra Musumeci, **Livia Musumeci's** daughter on graduating Cum Laude with a BSBA in Finance from the Catholic University of America in Washington D.C. Sierra will be working for S&P Global in July.

Congratulations & best of luck!



Thank you, #H2OHeroes

Operations staff with their disrupted schedules still continue to go above and beyond to make sure Bucklin Point & Field's Point operate smoothly. NBC overnight shifts have been quite busy. At FP, staff tended to some clogs at the plant this month. Operator Brian McGinn (bottom left) removed a wad of rags from the grit washer and Operator Joseph Malouin (bottom right) is using the hose to unclog the remaining debris from the grit washer.



We can't thank Operations enough for holding it down here at NBC. Great teamwork!

-- Submitted by Nicole Laboy

Environmental Scientists Attend Virtual NEERS Spring Meeting; Water Quality Improvements in Narragansett Bay Highlighted

NBC Environmental Scientists attended the virtual spring meeting of the New England Estuarine Research Society (NEERS) in the month of June. The spring meeting highlighted long-term changes in New England estuaries. At this meeting, Dr. Courtney Schmidt of the Narragansett Bay Estuary Program (NBEP) gave a presentation describing forty years of water quality improvements associated with implementation of the Clean Water Act in Rhode Island and Massachusetts. Her talk, and corresponding technical report (available for download at: <http://nbep.org/resource-library/>), focused on reduction of nitrogen, metals, organic contaminants, and pathogens in Narragansett Bay. The NBC has been instrumental in reduction of these pollutants through installation of advanced biological nutrient removal systems at both treatment facilities, development of a robust Pretreatment program, and implementation of combined sewer overflow (CSO) abatement initiatives.

Thanks to the Clean Water Act and NBC's partnerships with regulatory agencies and other environmental organizations in efforts to keep the Bay clean, we have seen an increase in open days for shellfishing in the Upper Bay and a decrease in beach closures in the state. In 2017, 3,711 acres of shellfishing grounds were upgraded from "conditionally open" to "open." These "open" shellfishing grounds no longer have to be closed when it rains.

Areas that are "conditionally open" must be closed temporarily following certain rain events. Regulations have been relaxed at remaining areas that are classified as "conditionally open," allowing greater rainfall before closures are initiated and thus more days open to shellfishing. For example, Conditional Area "A" in Upper Narragansett Bay (extending from Conimicut Point to Rocky Point), has experienced a 41% reduction in closure days since the first relaxation of rain criteria in 2011. This equates to an average of 89 more open days per year in this area.

NBC would like to recognize Assistant Environmental Monitoring Manager Karen Cortes for her work on the NBEP technical report presented at the meeting. Great job, Karen!

-- Submitted by Molly Welsh

NBC Blood Drive July 15th, Donations by Appointment Only



Help Someone Else
Give Blood

It is Safe to Donate!
www.ribc.org/safety

Narragansett Bay Commission

Wednesday, July 15, 2020
9:00 am - 1:00 pm
Main Conference Room
One Service Road, Providence



DONATIONS BY APPOINTMENT!
(walk-ins **only** accepted if safe spacing permits at time of arrival)
www.ribc.org/drives to book
Sponsor Code 0665

Eat, hydrate, bring identification with you.

2020

A synthesis of case studies from Narragansett Bay (RI/MA, USA) emphasizing implementation of the US Clean Water Act using adaptive management

Courtney E. Schmidt, Emy Monroy, Mark Cantwell, John King, Charles Stoman



NARRAGANSETT BAY
ESTUARY PROGRAM

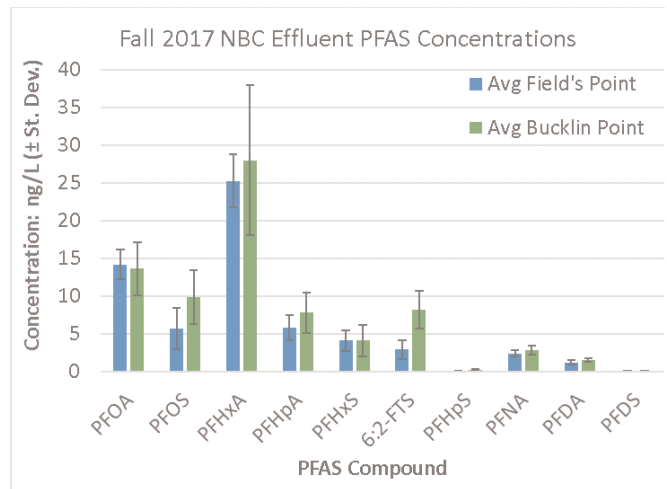
PFAS Monitoring at the NBC

Our series on per- and polyfluoroalkyl substances (PFAS) resumes with what we know about them in our wastewater stream. These contaminants of emerging concern enter wastewater from many domestic and industrial sources. You may recall that PFAS are a class of man-made chemicals with uses including water-proofing and stain-proofing of fabrics, food packaging, and firefighting foam. Preliminary research indicates that most PFAS in wastewater are transported out in the effluent, while some will settle into the biosolids or be evaporated/volatilized into the atmosphere. Some studies at wastewater plants show PFAS concentrations that increase from the influent to the effluent; it is expected that this increase is due to transformations of PFAS compounds during treatment, resulting in forms that are more readily detected by sample analysis at the effluent, though the mechanism for this is not well understood. The NBC is eager to understand the sources and fates of these compounds in our treatment process.

World-renowned PFAS researcher Dr. Rainer Lohmann (University of Rhode Island) has conducted preliminary sampling at the NBC, with the help of EM staff, to study PFAS in the wastewater. Dr. Lohmann also concurrently sampled the waters of Narragansett Bay for PFAS - these results will be discussed in a future article. In the fall of 2017 and summer of 2018, Dr. Lohmann's team sampled for 24 PFAS compounds in Field's Point and Bucklin Point effluent and found that effluent PFAS concentrations were similar between the two plants. Carboxylic acids like PFHxA and PFOA were the dominant forms, followed by the sulfonic acids. According to Dr. Lohmann, the carboxylic and sulfonic acids are the most persistent PFAS compounds typically found in wastewater. Results from 2017, displayed below, indicate the most dominant compound was PFHxA averaging 25.3 ng/L (Field's Point) and 28.0 ng/L (Bucklin Point). The maximum PFHxA result observed was 37.6 ng/L (Bucklin Point). The effluent PFOA+PFOS results for each plant averaged 19.9 ng/L (Field's Point) and 23.5 ng/L (Bucklin Point).

You may recall from a previous Pipeline article that the EPA drinking water health advisory level is 70 ng/L for the combined total PFOA and PFOS concentration; Rhode Island is currently basing drinking water quality evaluations on this same advisory level, though other states are considering and/or adopting much more stringent limits.

These preliminary numbers are just the beginning of the story - the Environmental Science and Compliance Division will be sampling for PFAS compounds at multiple locations in the plants, at industries, and in the collection system beginning this summer to better understand PFAS sources, fate, and transport in our district. For now, the samples will be sent to contract labs for analysis, but in the future may be analyzed in-house. The NBC believes investing in this study is important to stay ahead of this pressing regulatory issue.



--Submitted by Eliza Moore

Follow NBC






NBC Pipeline

August 2020

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Calendar of Events *for August*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1
2	3	4	5	6	7	8
	Full Moon				Payday	
9	10	11	12	13	14	15
	 Victory Day					
16	17	18	19	20	21	22
					Payday	
23	24	25	26	27	28	29
30	31					

News Briefs...

Welcome to NBC!



Meet Robin Valenti!

Robin started as an NBC Customer Service Representative in July. She lives in Johnston with her husband, 3 children and their dog Maddie. Robin graduated from Katherine Gibbs and recently worked as a Loan Servicing Specialist with Citizens Bank. Some of her favorite movies consist of *The Blind Side* and *My Cousin Vinny*.



Meet Erin Child!

Erin has started as a Billing Analyst with NBC. She is from East Providence and has 2 children and 2 dogs. Erin loves photography, traveling to NH and watching *The Voice*. She has a bachelors degree in Interior Design and previously worked as a New Customer Rep. for Igus before starting at NBC in July.

Welcome to the team Robin & Erin!

NBC Employee Promotions

Wishing success and support to NBC's new Customer Service team and announce the following promotions:

Christine Walaska - Customer Service Manager
Kayomie Polanco- Assistant Customer Service Manager
Jorge Pemberty - Billing Supervisor
Amanda Calore - Collections Supervisor
Alex Coppola - Asst. Billing Supervisor

They will join other recently promoted Customer Service Team Members:

Dan Mazza - Research Supervisor
Andrew Mendillo - Billing Supervisor
Steve Duque - Asst. Billing Supervisor

Congratulations to all!

--Submitted by Karen Giebink

Surprise!

On Sunday June 28th with horns honking, a few ladies in the Finance section surprised Financial Analyst Shaylyn Forloney and her husband Gary. Shay and Gary were expecting their first child, a baby girl in July (see their new arrival below). This has been a true quarantine pregnancy! Shay was truly surprised and absolutely glowing!



From left to right: Gail Degnan, Sherri Arnold, Shay Forloney, Patricia Pinilla & Alice Marchessault

--Submitted by Sherri Arnold

Congratulations!

Shay and her husband Gary added a little more love to their family and welcomed their beautiful baby girl, Francesca Lena on July 7th weighing 7 lbs 8 oz. Everyone is happy and healthy!



NBC Celebrates Three Long-time Employees on their Retirement

In July two long-time NBC employees **Tony Tamburrino** and **Ed Taylor** retired from Bucklin Point. Both Tony and Ed worked for the Blackstone Valley Water District before NBC took over. Tony started there in March of 1984 and retired on July 30th and Ed started in February of 1987 and retired on June 30th. Tony and Ed worked in Operations as foremen scheduling day-to-day operations projects, training new hires and working closely with the management team running the facility on a day-to-day basis.



There is an endless list of contributions these two committed individuals have made over the years. Through hurricanes, power outages, blizzards, construction, floods, Covid 19 and even some personal tragedies, they have always been there to rally the team and keep spirits up.



BP Staff celebrated the upcoming retirements at the Riviera restaurant in East Providence.

BP staff and all of NBC appreciates and will always value their service to Bucklin Point. They have both earned a happy and healthy retirement and NBC is forever grateful for their loyalty, service and getting all the operators through their certification exams.

-- Submitted by Marc Pariseault

On July 16th NBC celebrated the retirement of Customer Service Manager, **Clara Casimiro**. Clara has been with NBC for more than 32 years starting in June of 1986, and has skillfully guided Customer Service through a lot of changes and challenges during that time. Most recently, she managed the conversion to a new state-of-the-art customer service application. Clara has been a mentor to many and we appreciate her hard work and dedication to NBC over the years. We are going to miss her (ok, especially her French toast!). NBC wishes her health and happiness in her retirement.



-- Submitted by Karen Giebink

From all of us throughout NBC
we wish you a very happy
and healthy retirement!

Surface Mapping of Water Quality in Upper Narragansett Bay

Back in the September 2019 Pipeline, the Technical Analysis and Compliance (TAC) team started a series of articles to showcase the environmental monitoring programs at the NBC. By monitoring how certain parameters change seasonally and spatially, we gain insight into the overall health of the Bay. This month we focus on a monitoring initiative that utilizes state-of-the-art technology to document water quality in the Bay through surface mapping of key parameters.

Every week throughout the year, if the weather holds up, Environmental Monitoring (EM) staff conduct sampling of upper Narragansett Bay, specifically the Providence and Seekonk River estuaries, via the research vessel the R/V Monitor. As the boat is underway and staff are collecting samples at various sites, the vessel continuously records its location while pumping Bay surface water to a water quality sonde (Figure 1). The sonde measures various parameters including temperature, salinity, dissolved oxygen (DO), and chlorophyll. The water quality data are then combined with the boat position data in a geographic information system (GIS) program, like ArcGIS; this allows EM and TAC staff to produce surface maps, much like the one shown here. Surface mapping is an efficient tool for evaluating water quality throughout the upper Bay without the need to collect additional samples that would be costly and time consuming to analyze.



Figure 1: Water quality sonde aboard the NBC's research vessel R/V Monitor.

Understanding the relationship between chlorophyll and DO is of particular importance in monitoring water quality and is a main focus of the surface mapping efforts. Chlorophyll measurements estimate algal biomass (particularly phytoplankton); the higher the chlorophyll, the more abundant the algae. As algal blooms die-off, oxygen is used up by the bacteria breaking down the organic material. This process can lead to hypoxia, or low oxygen conditions that are harmful to estuarine organisms. Therefore, it is important to understand when and where chlorophyll

is concentrated in the Bay to get a sense of areas at risk of hypoxia. The map shown (Figure 2) illustrates how chlorophyll concentrations may vary throughout the upper Bay during the summer, when waters are warm and ample sunlight stimulates algal growth. Here, dark red illustrates the highest chlorophyll concentrations, while green illustrates the lowest. Data are collected along the black line, which shows the boat path; the colors have been interpolated all the way to the shoreline for visual clarity, though any projection of data outside what was measured (the boat path only) is an estimation. In the areas with high chlorophyll, like the Seekonk River, intermittent seasonal hypoxia is also typically observed. Chlorophyll and algae are natural parts of an estuarine system, though historically, nuisance levels of algal growth have been observed in the Bay, fueled by excessive nutrient loading (e.g., nitrogen). It is these nuisance algal blooms that lead to persistent hypoxia and may contribute to fish kills. As wastewater facilities like the NBC reduce nitrogen discharges through facility upgrades, we monitor the Bay waters for measurable responses in chlorophyll concentrations and hypoxic events.

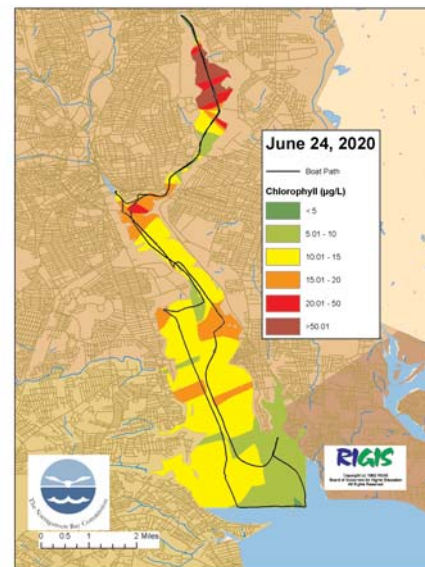


Figure 2: Chlorophyll concentration surface map of Upper Narragansett Bay on June 24th, 2020.

chlorophyll concentrations, while green illustrates the lowest. Data are collected along the black line, which shows the boat path; the colors have been interpolated all the way to the shoreline for visual clarity, though any projection of data outside what was measured (the boat path only) is an estimation. In the areas with high chlorophyll, like the Seekonk River, intermittent seasonal hypoxia is also typically observed. Chlorophyll and algae are natural parts of an estuarine system, though historically, nuisance levels of algal growth have been observed in the Bay, fueled by excessive nutrient loading (e.g., nitrogen). It is these nuisance algal blooms that lead to persistent hypoxia and may contribute to fish kills. As wastewater facilities like the NBC reduce nitrogen discharges through facility upgrades, we monitor the Bay waters for measurable responses in chlorophyll concentrations and hypoxic events.

By continuing the monitoring and mapping of water quality parameters like chlorophyll, we are routinely capturing the bay's response to expensive nitrogen reductions funded by wastewater facilities, as well as developing sound science for future nitrogen management decisions by DEM. Monitoring initiatives like surface mapping, allows the NBC to remain a leader in the efforts to understand and keep Narragansett Bay healthy for years to come.

NBC Receives Best Places to Work Award from PBN

NBC has been selected as one of the Best Places to Work in RI for 2020 by Providence Business News for the tenth consecutive year. A virtual event will take place on September 30th and winners will be published in the October 2nd issue of Providence Business News.



Thank you to the entire staff for completing the surveys and feeling that this truly is a great place to work!

NBC Environmental Scientist's Abstracts to be Presented at 2020 RAE Virtual Summit

NBC Environmental Scientists Eliza Moore and Molly Welsh received notice that their abstracts were accepted for the Restore America's Estuaries 2020 Virtual Summit being held September 29th through October 1st. Congratulations to you both!

Eliza will be presenting *"Restoring Upper Narragansett Bay Through CSO Abatement - Progress Report Following Phase II"* and Molly will be presenting *"Long-term Monitoring of Water Quality Improvement Following Wastewater Treatment Nutrient Reductions"*. Both Eliza and Molly have chosen to do their presentations on-demand which requires them to submit a pre-recorded 10-12 minute presentation on the subject. Best of luck to you both on the RAE Virtual Summit!



Working Safely in the Heat



Launched in 2011, OSHA's Heat Illness Prevention campaign educates employers and employees on the dangers of working in the heat. This is accomplished through training sessions, outreach events, publications, social media, etc. The overall message comes down to three key words: Water. Rest. Shade. NBC employees working outdoors are encouraged to consume adequate fluids (water and sport drinks), take frequent breaks, quickly identify any heat illness symptoms among themselves and co-workers, and implement engineering controls, such as air conditioning, when possible.

For real-time heat index information, and as a valuable tool for planning work activity, employees are encouraged to download the free NIOSH Heat Safety Tool Smartphone App.

Featured Online Safety Training Course for August: "COVID-19 - A Pandemic Response"

NBC employees can access this brief, informational course by logging onto NBC's catalog of Online Safety Training Classes [here](#).



If you have forgotten your username or password, please ask your supervisor.



--Submitted by Dave Aucoin



NBC Pipeline

September 2020

NBC Pipeline is a monthly publication designed to keep Narragansett Bay Commission staff up to date on internal current affairs. Staff is welcome to forward to the Public Affairs Office any items they would like to share or see in a future publication. Your suggestions and participation are encouraged and appreciated.

Calendar of Events *for September*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		1	2	3	4	5
			Full Moon		Payday	
6	7	8	9	10	11	12
	 Labor Day				 Patriot Day	
13	14	15	16	17	18	19
		Shellfish Transplant 8 AM - noon			Rosh Hashanah Begins Payday	
20	21	22	23	24	25	26
		 First Day of Autumn				
27	28	29	30			
Yom Kippur Begins		Board of Commissioners Meeting 11 AM				

Use or Lose



Just a reminder due to the on-going COVID situation, many NBC employees have had to cancel or reschedule vacation and/or time-off plans. As such, NBC's "Use of Lose" vacation accruals have been building-up and we have only until December 19th to use this time.

If you have time to use please coordinate with your manager or supervisor and make plans to take some much-deserved time off. You can view your most up-to-date vacation and personal time balances on Share-Point at <http://intranet/default.aspx>.

News Briefs...

Welcome to NBC!



Meet Benjamin Reiss!

Benjamin likes to go by Ben and is originally from South Florida. Ben will begin as legal counsel this month. Ben previously worked as an attorney at a private practice before joining the NBC team. He has 3 kids and enjoys running, reading and playing guitar.



Meet Caitlyn Valle!

Caitlyn likes to go by Cait and will begin her NBC journey as a Pretreatment Engineer this month. Cait was born and raised in RI, coming from North Providence and graduated from the University of Rhode Island. She enjoys spending her free time with her dog Rusty.

Welcome to the team Ben & Cait!

Tuition Reimbursement

Applications for fall tuition reimbursement for Local 1033, Council 94 and Non-Union Employees must be submitted to **Karen Musumeci** by Friday, September 18th.

Each application must be accompanied by a short course description taken from the college catalog. Blank application forms may be obtained from Human Resources or by going on Baynet to General Information, Benefits, Tuition Reimbursement Programs.

If you have any questions about the program, you may contact **Diane Buerger** at x340.



Upcoming Flu Shot Clinics

NBC will be hosting free Flu Shot Clinics on these following dates...



- **October 1st at Bucklin Point**
- **October 8th at Field's Point & COB**

Sign up details and times will be forthcoming. All employees are invited to participate, even those who waive NBC health coverage.

NBC Recognized as "Utility of the Future"

The NBC is one of an elite group of utilities worldwide to receive the recog-



nition of "Utility of the Future" for the second time. The NBC was first recognized in 2016 and has been recognized again in 2020. The "Utility of the Future" concept is defined by clean water utility leaders pioneering innovative technologies and cutting-edge practices, with a focus on resource recovery, efficiency and sustainability. A utility can only be recognized once every three years. Big thanks to the staff of Environmental Science & Compliance, who assembled NBC's application documents and congratulations to the entire NBC family for pursuing excellence in all activities!

Safety Boot & Glasses Reimbursement

There are a couple changes to this year's annual boot reimbursement. The July-October time window for seeking reimbursement of safety boots has been removed and the reimbursement of prescription safety glasses to those that need it has been added. Eligible employees are allowed one pair of approved PPE boots and safety glasses per fiscal year. Contact **Meg Goulet at x302** with questions or for more information.



NBC's TN Levels Under 3 PPM for the Month of July

For the month of July both Bucklin Point and Field's Point's nitrogen levels were under 3 PPM. Effluent total nitrogen concentrations and loadings have been decreasing since the beginning of permit season in May. Great Job to all those involved, ensuring NBC discharges clean water!

NBC Environmental Scientist's Abstracts to be Presented at 2020 RAE Virtual Summit

Environmental Scientists Molly and Eliza will give their virtual presentations on their abstracts that were chosen for the Restore America's Estuaries 2020 Virtual Summit September 29th-October 1st. Eliza will be presenting "Restoring Upper Narragansett Bay Through CSO Abatement - Progress Report Following Phase II" and Molly will be presenting "Long-term Monitoring of Water Quality Improvement Following Wastewater Treatment Nutrient Reductions". The video from the virtual event will be made available on sharepoint after the event for NBC staff to view, stay tuned...



Best of luck Molly & Eliza on the RAE Virtual Summit!

NBC Employee Promotions

Wishing the following NBC employee success in her new position:

Jacklyn Pickering - Assistant Permits Coordinator

Construction Update: Central Falls GSI Project is Almost Complete

Stormwater runoff has become one of the leading causes of water pollution in urban environments. Last year NBC demolished an old abandoned industrial building at 1304 High Street in Central Falls to make way for our first Green Stormwater Infrastructure (GSI) Project that is being constructed as part of the CSO Phase III Pawtucket Tunnel project. GSI projects reduce and treat stormwater at its source while also reducing localized flooding. The site, which was contaminated, was ultimately capped with clean fill before a new natural grass soccer field was installed. The work was performed by Cardi Corporation under a \$1.7 million contract with NBC. Pictured below is the final stage of the project showing the installation of the sod for the new recreational field.



Pare Corporation of Lincoln, RI is the design engineer and the project was overseen by NBC's **Joe Medina** and **Joe Moniz** from the Construction Department. Completion of the project is expected at the end of September.

-- Submitted by Greg Waugh



NBC Pipeline

October 2020

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Calendar of Events *for October*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1 Flu Shot Clinic @ BP Full Moon	2 Payday	3
4	5	6	7	8 Flu Shot Clinic @ FP & COB	9 Macomber Field Ribbon Cutting Ceremony	10
11	12  Columbus Day HOLIDAY	13	14 Higginson Field Ribbon Cutting Ceremony	15	16 Payday	17
18	19	20	21	22	23	24
25	26 Sport's Day	27 Board of Commissioners Meeting 11 AM NBC Day	28 Annual Pumpkin Decorating Contest Costume Day	29 80's Day	30 Tacky Tourist Day Payday	31 Full Moon Halloween

News Briefs...

Welcome to NBC...



Meet Justin McDowell!

Justin started his position as an Operator for Bucklin Point on September 27th. Justin previously worked for Stalwart films. He currently lives in Providence with his wife and two kids. They hope to visit their

favorite travel destination, Disney World, once traveling is safer!



Meet Anne Marie Higgins!

Goes by Annie and started as the Creative Administrative Assistant at NBC in the IT department on September 27th. Annie is originally from Maine and received a

Bachelors degree from Providence College . She previously worked as a Legal Assistant before joining NBC. Annie enjoys theatre, biking, watching Schitts Creek and spending time with her cat Sparkle!

Welcome to the team Justin & Anne Marie!

Walter Palm's Mojo Sauce Featured in Edible Rhody

Walter Palm and Palm's Locally Made were recently featured in Edible Rhody. If you haven't gotten your hands on a jar yet you are missing out! Check your local farmers markets or order online at palmslocallymade.com.

Palm's Locally Made is still continuing to collect 20% off all sales of the She's the Boss, Knock it Off BBQ Sauce to donate to the Rhode Island Foundation's COVID-19 Response Fund.

Check out the article on Edible Rhody: [Get Your BBQ Mojo Working](#)



Photo Credit: Edible Rhody

Flu Shot Clinic

NBC will be hosting a free Flu Shot Clinic on October 8th, which is also available to those who did not attend the October 1st clinic.



• **FP & COB: October 8th 6:30 AM - 8:30 AM & 9:30 AM - 11:30 AM in the Main Conference Room**

Flu shots will be by appointment only, no walk-ins allowed. Employees and families ages 3+ are eligible to make an appointment and participate. Follow these steps to sign up...

1. <http://twc.thewellcomp.com/flu>
2. Choose worksite
3. For FP & COB use login ID: nbayserv

Any questions please contact **Crystine Marandola** at x376.

Employee Promotions

Wishing the following NBC employees success in their new positions...

Karina Taveras - Capital Accounting Assistant

Brenna McCarthy - Biologist I

Patricia Chiellini - Asset Management Specialist

Justin Vigorito - Environmental Monitor

NBC Blood Drive

The Rhode Island Blood Center has seen a decline in donations since the pandemic and is in need of donations now more than ever. They ensure it is safe to donate, so please consider donating at the next NBC Blood Drive on...



Thursday, November 19th
9:00 AM - 1:00 PM
Main Conference Room

Donations by **appointment only**.
Go to www.ribc.org/drives and use Sponsor Code 0665

In Memory of...

We lost two long-time employees, **Wade Pooler** and **Jo-Ann Ragosta** within the last two months to battles with cancer.



The Casual Day Fund will be making donations to American Cancer Society in memory of Jo-Ann and Army Emergency Relief Fund in memory of Wade.

Wade started at NBC in May of 1991 as a Software Support Specialist and was currently Senior Network & Communications Administrator as well as serving on the Affirmative Action Committee.

Jo-Ann began working for NBC in January of 2001 as a Customer Service Representative, promoted to Office Administrator in 2002 and then transitioned to Facilities Management Administrator in 2019, as well as serving on the Safety Committee.

Wade and Jo-Ann were valuable and dedicated members of our NBC family and will truly be missed.

Other Casual Day Fund Donations in September: RI Community Food Bank, Pawtucket Soup Kitchen, and the Gloria Gemma Breast Cancer Research Foundation.

Once in a Blue Moon...

October welcomes two full moons, the Harvest Moon on October 1st and the Hunter's Moon, aka this month's Blue Moon on October 31st,



All Hallows' Eve. A Blue Moon describes the second full moon of a calendar month. The only time this happens is when the first full moon falls on one of the first few days of the month. This happens every two to three years. The next time we will witness this will be August 2023.

Both moons will rise at sunset and for several days around the time of the Harvest Moon rising, it will rise about 30 minutes later each night giving us extra light early in the evening. This was and still is important to farmers giving them extra days for harvesting, hence the name, "Harvest Moon".

The Hunters Moons always follows the Harvest Moon; this moon always signaled it was time to go hunting in preparation for the coming winter. A full moon, especially a Blue Moon, is a rare occurrence on Halloween and only happens every 18 to 19 years. This year its appearance will make Halloween night extra spooky!

2020 Shellfishing Transplant

NBC hosted another successful shellfishing transplant on September 15th. 58 Shellfishermen participated in the Providence River, 1,053 bags were collected and 52,650 lbs were transplanted into the Winnapaug Pond Spawner Sanctuary. Clean water is essential to this multi-million dollar industry. Thanks to the success of NBC's CSO Phase I tunnel, shellfishermen see an extra 65 days on average per year for shellfishing in Area A and about 45 days in Area B. Great job to all those who helped make this another successful Shellfishing Transplant event!



NBC Facilities Receive Peak Performance Awards

The National Association of Clean Water Agencies (NACWA) has presented NBC's wastewater treatment facilities with two prestigious awards for excellence in permit compliance.



Photo: Bucklin Point

Bucklin Point received the NACWA Gold Peak Performance Award for having no permit violations for the calendar year.

Field's Point received the Silver Peak Performance award for having less than five violations per calendar year.

Thank you to all NBC Operations & Maintenance staff for ensuring NBC's facilities achieve perfect compliance!

NBC Environmental Scientists featured in National Coastal and Estuarine Summit

Environmental Scientists **Eliza Moore** and **Molly Welsh** recently gave pre-recorded talks at the 2020 National Coastal and Estuarine Summit, held virtually September 29th - October 1st and hosted by Restore America's Estuaries. These recorded talks are saved to YouTube at the links below. The work featured in each talk would not have been possible without the entire NBC team, so please enjoy the videos and take pride in your accomplishments!

[Long-Term Monitoring of Water Quality Improvement Following Wastewater Treatment Nutrient Reductions \(13:15 duration\)](#)

[Restoring Upper Narragansett Bay Through CSO Abatement - A Progress Report Following Phase II \(14:02 duration\)](#)

NBC Receives Credit Ratings from S&P and KBRA

The Narragansett Bay Commission (NBC) has received an AA Stable rating from the Kroll Bond Rating Agency (KBRA) for the Bucklin Point Resiliency Improvements Project WIFIA Loan. At the same time, KBRA affirmed the long-term rating of AA with a Stable Outlook on the Combined Sewer Overflow (CSO) Phase III Facilities WIFIA Loan. In rating the NBC, KBRA commended the NBC's experienced management team that has a good background completing capital projects, favorable history of rate setting and financial management, and comprehensive capital planning process.

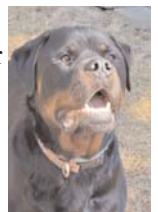
The Standard and Poor's (S&P) Rating Agency has also assigned its AA- underlying rating to the NBC's 2019 WIFIA Loan and affirmed its AA- underlying rating on NBC's wastewater bonds outstanding, based on its view of the agency's strong enterprise and financial risk profiles. S&P also affirmed its AAA/A-1+ rating on the NBC's series 2008A wastewater system revenue refunding bonds.

The ratings take into account the NBC's entire \$908 Million Capital Improvement Program, focusing on Phase IIIA of the agency's Combined Sewer Overflow (CSO) project.

Congratulations to the entire Finance team for their excellent work!

Calling all Pets..

Show us your pets in costume! Send photos to either tcheshier@narrabay.com or jsamons@narrabay.com to share in next months pipeline!

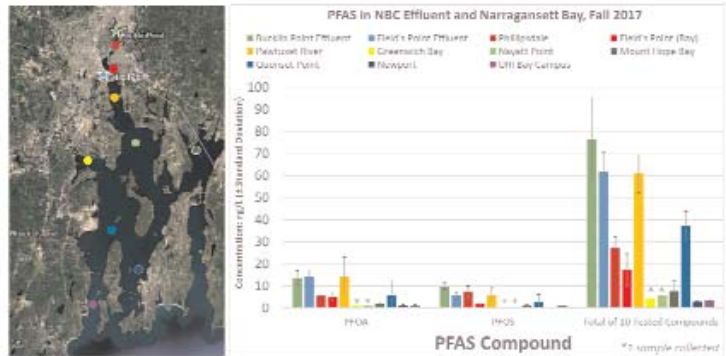


*Marc
Pariseault's
dog Jake*

PFAS Monitoring in Narragansett Bay

You may recall that PFAS are a class of thousands of man-made chemicals that have uses such as water-proofing and stain-proofing of fabrics and food packaging and are found in firefighting foam. PFAS don't easily break down, and they are now found to be widely present in the environment. As regulatory agencies ramp-up plans to control the discharge of PFAS, it is critical that the NBC understand current levels of PFAS in our wastewater and our receiving waters. In our last article, we shared the results of monitoring efforts for 10 PFAS compounds at the NBC facilities by respected PFAS researcher Dr. Rainer Lohmann (University of Rhode Island), and today we focus on the Lohmann team's monitoring efforts in Narragansett Bay. These efforts were led by URI graduate student Christine Gardiner with in-kind support by NBC's Environmental Monitoring staff, collecting samples while performing routine NBC monitoring activities in the upper Bay. In the fall of 2017, the team collected water samples from nine sites in Narragansett Bay and the samples were analyzed by URI for 24 PFAS compounds. The graph below displays the sum of 10 target PFAS compounds in Bay stations compared to NBC effluent concentrations. Results for PFOA and PFOS are also shown, as the EPA drinking water health advisory is 70 ng/L for the combined total of these two compounds. Similar to the findings for NBC effluent, carboxylic acids like PFOA were the dominant forms of PFAS, followed by the sulfonic acids, such as PFOS.

Generally, results in Bay waters were lower than concentrations in our effluent. With only two samples collected at each Bay station, results were variable. Overall, sites nearest to the urban northern portion of the Bay generally contained the highest PFAS concentrations. The Pawtuxet River in particular had relatively high PFAS concentrations, potentially related to industrial activities in the watershed (e.g., electrical or metal-finishing, textiles, legacy contamination from historical activities).



Elevated PFAS results were also observed at Quonset Point; these results may be due in part to AFFF firefighting foam which may be used for training purposes at a nearby military facility.

Ms. Gardiner has prepared a study manuscript for publication in a scientific journal (from which this Pipeline story benefited) and the NBC plans to continue to collaborate with the Lohmann lab in the future to proactively be prepared for future PFAS regulations. The NBC has recently commenced our own PFAS monitoring at companies regulated by our Pretreatment Program as well as within our collection system and treatment plants. Environmental Monitoring and Laboratory staff are becoming well-versed in the intricacies of performing this sensitive sampling effort. All of this special sampling is critical to the NBC's ability to stay ahead of the PFAS story, so we'll be ready for any future regulatory requirements related to these contaminants of emerging concern.

-- Submitted by TAC

NBC Recognized as "Utility of the Future"

The NBC is one of an elite group of utilities worldwide to receive the recognition of "Utility of the Future" for the second time. The NBC was first recognized in 2016 and has been recognized again in 2020. The "Utility of the Future" concept is defined by clean water utility leaders pioneering innovative technologies and cutting-edge practices, with a focus on resource recovery, efficiency and sustainability.

Check out NBC's latest video highlighting what makes NBC a Utility of the Future: [UotF Video](#)

NBC is a Better Plants Program Goal Achiever for 2020



The NBC is a 2020 Better Plants Goal Achiever, designated by the US Department of Energy. Through Better Plants, we surpassed our goal of 25% energy savings in 10 years and achieved 33% energy savings in 7 years! Many thanks to **Barry Wenskowicz** and our NBC energy team that worked so hard to implement energy efficiency projects, track our usage and ultimately achieve this recognition!

NBC Spirit Week

NBC would like to introduce its first Spirit Week as a way to celebrate employee appreciation this fall since any large gatherings have been put on hold due to COVID guidelines and restrictions. Employees are welcome to dress up and show their spirit. Don't forget to send pictures to share in November's Pipeline. We look forward to seeing all your creativity!



Monday - Sports Day

Tuesday - NBC Day

Wednesday - Costume Day

Thursday - 80's Day

Friday - Tacky Tourist Day

Annual Pumpkin Decorating Contest

Join us **Wednesday, October 28th** for our annual pumpkin decorating contest. Due to COVID restrictions things will look a little different from years past. Decorating and voting will stay the same, each section is welcome to decorate or carve a pumpkin for the contest. Seeing as though some departments are much larger than others, to be fair you will not be allowed to vote for your own pumpkin.

We are **NOT** allowing any homemade treats this year, please do not bring anything. NBC will provide a pre-packaged treat for everyone to ensure everyone's safety, so please make sure to stop by!

Pumpkins can be set up starting at 8 AM on the 28th, we will start voting at 10 AM and we ask that you please adhere to the following guidelines. Voting will take place by last name as follows...

- A-F can vote from 10 AM - 11AM
- G-L can vote from 11 AM - 12PM
- M-R can vote from 12 PM - 1 PM
- S-Z can vote from 1 PM - 2 PM

We ask that you follow the marked areas for social distancing when entering the Main Conference room. No congregating will be allowed this year. We appreciate your understanding and hope this will still be a fun event for everyone during these tough times. Please be sure to grab your treat on the way out!

Pumpkins need to be picked up by 4 PM.

Any questions or concerns please contact, **Talia Cheshier** at x394.





NBC Pipeline

November 2020

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Calendar of Events *for November*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1	2	3  Election Day	4	5	6	7
8	9	10	11  Veteran's Day HOLIDAY	12	13 Open Enrollment Deadline Payday	14
15	16	17	18	19	20	21
22	23	24	25	26  Thanksgiving HOLIDAY Payday	27	28
29	30 Full Moon					

Open Enrollment Reminder

NBC would like to remind everyone that on-line enrollment benefits need to be completed by November 13th for 2021 and all forms need to be submitted to HR by November 20th.

On-line enrollment instructions can be found on Baynet. Click Forms -> Open Enrollment.

Any questions please contact HR's Brenda Smith at ext. 370 or Crystine Marandola at ext. 376.

News Briefs...

Welcome to NBC...



Meet Doris Salazar!

Doris started on October 11th as a Customer Service Fiscal Clerk. She is originally from Columbia in South America. She loves running, swimming, dancing, hiking and visiting Florida where many of her relatives reside.



Meet Raffi Tashdjian!

Raffi will be the new Facilities System Administrator in IT. Raffi is from Montreal in Quebec, Canada and enjoys traveling there to visit his parents. He is married and has two sons that are both in college pursuing an accounting degree and a masters in music performing. Fun Fact: Raffi met his wife on a cruise ship!



Meet Richard Hoppman!

Richard started on October 25th as a Field's Point Operator I.

Welcome to the team Dorris, Raffi & Richard!

NBC Promotions & Retirements

Wishing the following NBC employees success in their new positions and happy and healthy retirement to those retiring..

Promotions:

Anthony Calenda - IM Supervisor

Transfers:

Joe DeVitt - FP Inventory Control Clerk

Gabe Vieira - FP E&I Technician

Retirements:

Jackie Giroux - Prinicipal Accountant

Karen Lonardo - Customer Service Rep./Fiscal Clerk

NBC Blood Drive

The Rhode Island Blood Center has seen a decline in donations since the pandemic and is in need for donations now more than ever. They ensure it is safe to donate, please consider donating at the next NBC Blood Drive on...



Thursday, November 19th

9:00 AM - 1:00 PM

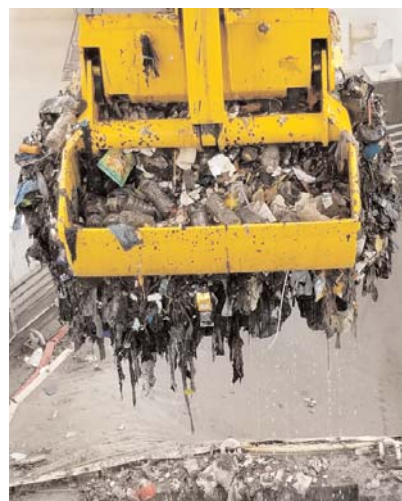
Main Conference Room

Donations by **appointment only**.

Go to www.ribc.org/drives and use Sponsor Code 0665

Routine Tunnel Mucking

On Wednesday, October 21st Field's Point Operations completed routine tunnel mucking. The weather was perfect for this event and with the tunnel filling to 60 million gallons from the previous weekends rain events, tunnel mucking was a must!



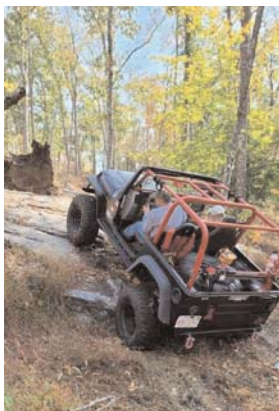
Project Comeback

Project Comeback with the help of NBC's **Anthony Ciacciarelli**, hosted a charity trail ride on October 10th in honor of the late NBC employee **Dan Pereira**.

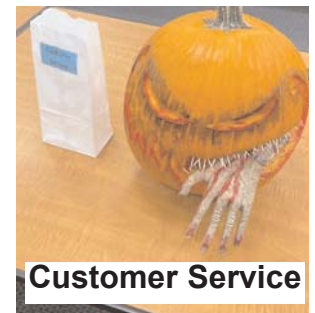
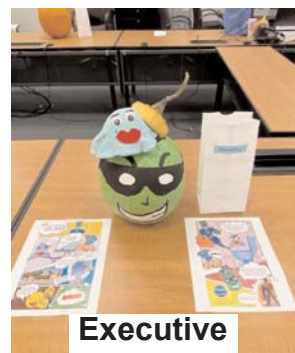
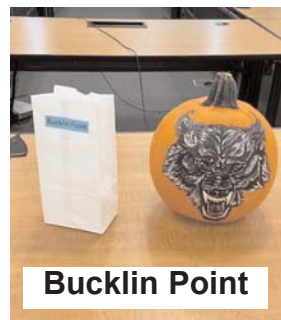
The trail ride was put on by Ocean State Jeepsters, of which Anthony is a member. The event had over 40 Jeep rigs participate on private trails in Burrville and the weather was absolutely perfect for the ride. The charity event netted \$2,000 between registrations to participate to ride and raffle tickets.

Project Comeback's mission is to rescue horses, patiently reeducate these horses, and connect them with people who have endured trauma, primarily veterans.

For more information about Project Comeback, visit www.projectcomeback.org.



NBC's Annual Pumpkin Decorating Contest



Spirit Week Highlights

NBC's first spirit week was a success! Thank you to those who participated and helped celebrate employee appreciation this year in a different way with laughs, costumes and masks of course!

Sports Day:



Costume Day:



Tacky Tourist Day:



NBC Day:



80's Day:



NBC's Pet Costumes

Thank you Marc, Meg and John for sharing your adorable "pets in costume" photos. Meg Goulet's cat (top right), Rhody celebrated his 17th birthday on Halloween and was less than thrilled to be dressed as a unicorn. Bottom left is Marc Pariseault's dog Jake and bottom right is E & I Tech John Contrino's pup!



Successful Rain Event Prior to Halloween Weekend

NBC would like to give a BIG shoutout and congratulations to Field's Point Operations & Maintenance and Interceptor Maintenance on a fine job with handling the most recent rain event October 29th-30th. Field's Point staff performed like a well-oiled machine; **Meg Goulet** stated, Director of Operations and Maintenance. There were a lot of hands involved making this a team effort. Here is the run down...



Wednesday 10/28: Supervisor, **Mike Starnino** began getting wet weather prepared on third shift. The weather was calling for about an inch to an inch-and-a-half-of rain.

Thursday 10/29: Process Monitor, **Gary Cook** on the 7 AM - 3 PM shift stayed on top of the Upstream/Wet Well all day making numerous pumping adjustments and pumped the tunnel down right before the heavy rain hit leaving FP in great shape.

Manager **Nathan Boiros** and Assistant Manager **Eric Bogosian** of Operations added over time to assist both the 3-11 PM and 11-7 AM shifts.

IM Supervisor **Tony Calenda** checked in before end of day to see what was needed of IM to tackle the storm.

Art Sheridan, Jack Fascitelli and **Marco Quinones** in Control Systems resolved G5 communication issues.

Process Monitor **Ricky Mello** worked overtime to help supervise before Supervisor, **Nicole Laboy** arrived. Ricky helped relay information to Process Monitor **Andrew Iasimone** who stayed on top of the Upstream/Wet Well during the 3-11 shift.

New Hire **Richard Hoppman** worked 16 hours which helped him learn and gain experience.

Gary Cook came back in for 11PM to assist and train

Process Monitor **Nikolas Carroccio** through a rain event. Mechanic **Norman Rodolowicz** also came in for 11 PM and worked as a Front Group Operator and Process Monitor **Sean O'Keefe** worked 16 hours to assist.

E & I Technician **Gary Ruggerio**, and Electricians **Steve Morelli** and **Wesley Andrew** played a big part as well, getting the G5 PLC resolved prior to communication issues.

With the amount of rain coming in NBC assumed the tunnel would reach capacity and Field's Point would possibly be in a Wet Weather Event, luckily that was not the case. The Upstream/Wet Well level was down 97-98' and the tunnel reached 27MG. FP had no issues in other parts of the plant such as grit, primaries and final clarifiers, equipment operated smoothly. This was truly a team effort, communication and performance by everyone involved was outstanding. Great job everyone!

NBC Featured in Latest NEWEA Journal

The NEWEA Fall 2020 Journal features an article by **Barry Wenskowicz**, NBC Environmental Sustainability Engineer. The article gives the latest news on NBC energy programs.



NBC is right on track to achieve its net-zero goal, tripling usage in the last three years, increasing from 28% in 2016 to 76% in 2019. The state of RI is currently requiring a minimum of 25% of fleet purchases to be zero emissions by 2025. We are making it a goal to bring Electric Vehicles (EV) into NBC's fleet.

This past spring NBC installed EV charging stations with the help of National Grid and RI Office of Energy Resources through grants. EV stations were installed in Field's Point and Bucklin Point and are able to be expanded if needed. NBC plans to purchase its first EV in fiscal year 2021.

To read the full article visit: [NEWEA FALL 2020](#)

NBC, One of Fifty Clean Water Success Stories

Last month, the National Association of Clean Water Agencies (NACWA) celebrated its 50th anniversary. As a part of their anniversary celebration they



Field's Point reconstruction in 1984.

announced 50 agencies across the United States and showcased each entity's "Clean Water Success Story" during a virtual ceremony on October 28th.

NBC is excited to announce and honored to be chosen as one of the fifty Clean Water Success Stories. Originally, NBC would have received this honor at NACWA's Anniversary Conference in Seattle this past July but due to COVID-19 the ceremony was held virtually.

Field's Point is one of the nation's first WWTF's, originally built by the City of Providence in 1901. The facility was in deplorable condition for many years until the Clean Water Act was established. Since the City of Providence could not comply with the new law, NBC was created to take over the WWTF. After millions of dollars invested in upgrades over 40 years, a CSO abatement program, and renewable energy infrastructure, NBC is now one of the leading clean water agencies in the nation with a thriving commercial fishery and tourism economy.

To read the full story on NBC visit: [NBC Success Story](#)

To see all 50 Clean Water Success Stories: [Click here](#)

NBC Celebrates New Recreational Facilities for Central Falls and Clean Water

Macomber Field:

The Green Stormwater Infrastructure (GSI) project at Macomber Field is complete and the City of Central Falls along with NBC held a ribbon cutting ceremony on October 9th kicking off the holiday weekend and hosting the first soccer game at their new field.

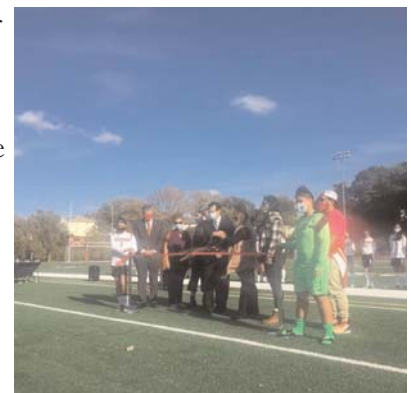
This project was part of CSO Phase III and consisted of construction of a synthetic turf athletic field and GSI facilities. The work included demolition and preparation of the site, grading, construction of an underground infiltration system and other GSI best management practices (BMPs), construction of a new infilled synthetic turf system, stormwater systems, fencing, retaining walls, sidewalks and paving.



Photo credit: Peter Goldberg

Higginson Field:

NBC and the city of Central Falls held another ribbon cutting ceremony to celebrate the completion of Higginson Field on October 15th before kicking off the first soccer game for the CF Warriors on the new field. The construction was also part of CSO Phase III and consisted of making improvements to the sewer and drainage systems under the field to redirect stormwater runoff to ensure better water quality in the Blackstone River.





NBC Pipeline

December 2020

NBC Pipeline is a monthly publication designed to keep Narragansett Bay Commission staff up to date on internal current affairs. Staff is welcome to forward to the Public Affairs Office any items they would like to share or see in a future publication. Your suggestions and participation are encouraged and appreciated.

Calendar of Events *for December*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		1	2	3	4	5
6	7	8 Board of Commissioners Meeting 11 AM	9	10 Hanukkah Begins	11 Payday	12
13	14	15	16	17	18	19
20	21  First Day of Winter	22	23	24  Christmas Eve	25 Christmas Day Payday	26 Kwanzaa Begins
27	28	29 Full Moon	30	31  New Year's Eve		

Use or Lose Update

Due to COVID-19 impacts NBC will extend the deadline for utilizing vacation “Use or Lose” time from December 19, 2020 to January 16, 2021. Please note all current personal time will still need to be utilized by December 19th and if you are at your maximum allowable carry over time, any vacation time accrued during the extended “Use or Lose” time period will also need to be discharged by January 16th. Upfront personal time will be available for you on December 20, 2020; upfront vacation time will not be available until January 17, 2021. Please plan accordingly and remember to coordinate all time off with your supervisor and obtain all necessary approvals.

News Briefs...

Welcome to NBC...



Meet Vikram Shah!

Vik is NBC's new Principal Accountant. He is originally from India, currently residing in Massachusetts. He has 2 children and recently a granddaughter. Vik is a big movie buff and enjoys traveling to Europe and collecting watches to match his clothing.



Meet Domingo Fontes!

Domingo will start as an Operator I at Bucklin Point. He is from Cape Verde and went to RIC where he received a bachelors degree in Industrial Technologies. He enjoys the gym, traveling and watching Person of Interest!



Meet Veronica Gonzalez!

Veronica will Start as a Customer Service Representative on December 6th. She loves to visit Columbia where she is originally from. She has a daughter, 2 dogs and previously worked as an insurance agent.



Meet Kallie Longval!

Kallie will start as Legal Counsel on December 6th. Kallie is from South Kingtown and has a background in Marine Biology and Law. She enjoys surfing and hanging with her adopted American Foxhound named Cooper!



Meet Robert Arrai!

Goes by Rob, Rob will start as a Process Monitor at Bucklin Point on December 6th. Rob is from Warwick and previously worked as an Operator for the town of West Warwick.

NBC Promotions & Retirements

Wishing the following NBC employees success in their new positions and happy and healthy retirement to those retiring...

Promotions:

Miriam Larios to Senior Payments Coordinator

Andrea DiCicco to Facilities Manager Administrator

Tiziano Roncone to O&M Technician

Retirements: FP Clerk Rosaleen Grof

Thank you!

for Helping Someone Else

RI Blood Center

Narragansett Bay Commission

Your blood drive had **17** presenting donors.

Resulting in **14** donations.

Helping to save **42** lives!

See you in 2021!



NBC Receives “Lead By Example” Clean Energy Award

NBC received the RI Office of Energy Resources “Lead by Example” Clean Energy award for 2020.

NBC has received this award three

times, previous-

ly in 2017 and 2018. This award was established in 2015 by Governor Raimondo, directing state agencies to “Lead by Example” and transition energy supply consumption practices to reduce energy costs and mitigate greenhouse gas emissions, which is part of RI’s economic, energy and environmental goals.

NBC continues to be a leader in renewable energy practices for the state, currently receiving 76% of its energy through renewable sources, with 27 individual energy efficiency measures totaling 7.5 million kW hours per year in energy savings.

Congratulations NBC!

Congratulations...

To **Crystine Marandola’s** daughter Kiley on the La Salle Division I Soccer State Championship and for her commitment to Millersville University next fall!

Kiley is a senior this year at La Salle Academy and it has been a tough year for any senior athlete headed to college. Fall sports had a short season at La Salle but the team completed the season, participating in playoffs and winning the Division I State Championship. This was the third championship win for La Salle in three years. Kiley scored the winning goal in the semi-finals against Barrington and scored the final goal in the Championship game against Pilgrim.

On top of winning the season Kiley committed to play soccer at Millersville University in Pennsylvania; she was being recruited just as COVID hit last spring. Kiley signed her National Letter on National Signing day, November 11th. Congratulations and good luck, Kiley!



NBC Solar Array.

Annual Port of Providence Toy Drive



Any questions please contact **Talia Cheshier** or **Jamie Samons**.



BP Projects are Moving Along

Bucklin Point's aeration project is almost complete. BP Maintenance is currently combing through each and every aeration diffuser in cell 2B and replacing the ceramic stones with membrane material. Over 700 individual diffusers will be replaced when complete. The diffusers are used to transfer air into these tanks which is needed for the tiny microorganisms/bacteria to naturally breakdown in the wastewater treatment process. The upgraded membrane diffusers will be more efficient and ultimately save NBC money.



Above: Old ceramic diffusers.



Above: Cleaned and replaced with new membrane diffusers.

-- Submitted by TJ Harrington

CSO Phase I Tunnel turns 12!

The CSO Phase I Tunnel turned 12 on November 1st. Over 12 Billion gallons of CSO flow has been captured since 2008.



Safety Corner

COVID Update:

Sections throughout NBC purchased Victory Electrostatic Handheld Disinfectant Sprayers for sanitizing purposes. These will be used throughout the



buildings and will coat hard surfaces with a fine mist that will dry in just a few minutes and can sanitize surfaces for up to a week. This will provide better coverage and create less waste by not having to use disinfecting wipes.

For those participating in training sessions on how to properly use and disinfect with the sprayer, sessions will be held after the Governor's two week pause.

Casual Day Fund

NBC will continue to host the Casual Day Charitable Giving Raffle like we have in years past at employee appreciation events.

Those who partipate in Casual Day will automatically have their name entered in the raffle. If your name is picked, the NBC Casual Day Fund will make a donation to the 501(c)(3) charitable organization of your choice. A winner will be chosen towards the end of the month, stay tuned!



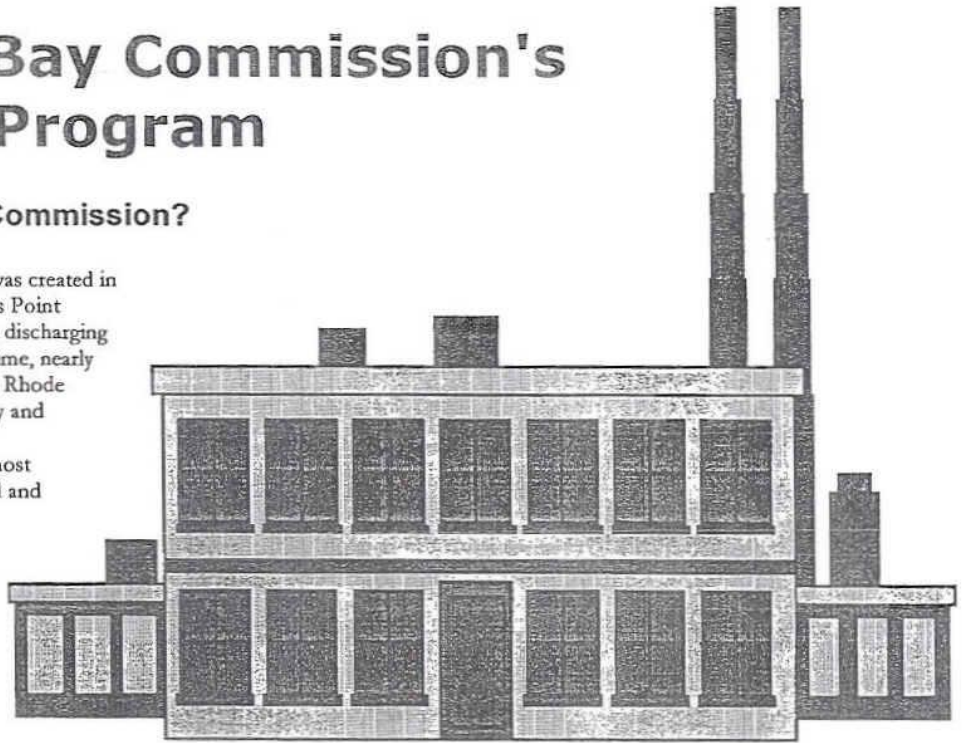
EDUCATIONAL DOCUMENTS

Narragansett Bay Commission's Pretreatment Program

What is the Narragansett Bay Commission?

The Narragansett Bay Commission, or the NBC, was created in 1980 to reduce the amount of pollutants the Field's Point Wastewater Treatment Facility, in Providence, was discharging into Narragansett Bay and its tributaries. At that time, nearly 65 million gallons of untreated sewage flowed into Rhode Island's waterways everyday, resulting in temporary and permanent closures of shellfishing beds in Upper Narragansett Bay, violations of federal laws, and most importantly, threatened the region's environmental and economic well-being. The NBC acquired the facility from the City of Providence in 1982, and has spent the last decade transforming the once failing, antiquated facility into the highly sophisticated, award winning facility it is today.

In 1992, the NBC assumed ownership of the Bucklin Point Wastewater Treatment Facility in East Providence. The NBC now owns and operates the state's two largest wastewater treatment facilities and provides quality wastewater collection and treatment services to about 300,000 persons and 8,000 commercial and industrial customers in Providence, North Providence, Johnston, Pawtucket, Central Falls, Cumberland, Lincoln, the northern portion of East Providence and small sections of Cranston and Smithfield.



What is the purpose of a Pretreatment Program?

Since wastewater treatment facilities are not designed to remove heavy metals, cyanide and other toxic chemicals, the federal Environmental Protection Agency (EPA) requires that wastewater agencies implement Pretreatment Programs to control toxic discharges. The NBC's Pretreatment Program staff is responsible for protecting its treatment facilities and Narragansett Bay from the discharge of such contaminants. To satisfy EPA requirements, a program was put in place by the NBC to monitor and regulate the many electroplaters, metal finishers, chemical manufacturers, machine shops, laboratories, hospitals, laundromats, restaurants, and other firms that are tied into the NBC's sewer system.

Depending upon what kind of business or industry is discharging into the system, certain substances can do a lot of damage to the sewer system, the wastewater treatment facility, the environment and, ultimately, to people. The discharge of metals and other toxics into the sewer system jeopardizes the health and safety of NBC personnel, clogs sewer lines, can be extremely toxic, if dumped in high concentrations, and can mix with other chemicals to form toxic gases in the sewer system.

Heavy metals and other toxics interfere with the operation of the wastewater treatment process by upsetting the biological process at the facilities and killing the microorganisms needed for proper treatment. This prevents the NBC from meeting its effluent limits that are established by EPA and RI DEM. Approximately 40 to 60 percent of the heavy metals and toxics in wastewater can settle out in the sludge, contaminating the sludge, and preventing its reuse, while the remainder of the toxics empty into Narragansett Bay and its tributaries. Once this happens, marine life is exposed to toxic substances, which may enter the food chain and eventually expose people to these toxic substances. While our mission at the NBC is to protect the environment, our top priority is to protect human health. Our pretreatment program helps us accomplish this goal.

How effective is the Pretreatment Program?

To date, this program has had a major positive impact on the quality of treatment and discharges from the Field's Point and Bucklin Point facilities. By taking steps to permit, monitor and regulate the thousands of sewer users in the NBC District, the NBC has dramatically reduced the amount of metals and toxics being dumped into the sewer system and ultimately into Narragansett Bay. For example, in 1981, local industries discharged 954,099 pounds of heavy metals and 80,440 pounds of cyanide to the Field's Point Wastewater Treatment Facility. Data for 2006 indicates that significant reductions in metals (96.6%) and cyanide (96.7%) were achieved. Additionally, nearly 95.6% of all our regulated users are adhering to these environmental regulations.

Why do I have to pay sewer user fees and permit fees?

Sewer user fees are necessary for the NBC to recover the cost to transport and treat wastewater discharged from commercial, industrial, and residential users. The user fees are based, in part, on the amount of water discharged to the sewer system and are regulated by the Public Utilities Commission (PUC). Part of the fee charged to users is a fixed amount, the other part is based on how much water is used. By conserving water, a sewer user can reduce the portion of the fee associated with the amount of water used.

In May, 1990, the PUC issued an order requiring that the expense of the NBC's Pretreatment Program must be paid for entirely by the permitted user. These permit fees are necessary to recover costs associated with satisfying all EPA and State mandates and to ensure the protection of the treatment facilities and Narragansett Bay. The rates charged are PUC approved and cover the cost of program administration, facility inspection and facility sampling conducted by the NBC.

How were permit fees determined?

Discharge permit fees range from \$217 - \$14,492 per year. Individual rates are based on the effort necessary for the NBC to regulate a user. The level of effort is dependent on the size of a facility, the volume of discharge, the toxicity of the chemicals used, etc. Budget plans are available for any business demonstrating financial hardship. Simply contact the NBC Customer Service Section at 461-8828 to discuss a budget payment plan.

What if I don't get a permit?

Failure to apply for a wastewater discharge permit may subject you to administrative, civil and/or criminal penalties of up to \$25,000 per violation per day and you may lose your privilege to discharge into the NBC sewer system. The NBC is strict about the enforcement of this requirement because we need to know what is going into the sewers so we can protect our treatment facilities and the bay. Further, inconsistent permitting would be unfair to other permitted users and ultimately increase the cost to all other users.

What if I need technical assistance?

The NBC has available free, non-regulatory technical assistance through its Environmental, Safety & Technical Assistance (ESTA) Section, formerly known as Pollution Prevention. Pollution prevention is any practice that reduces or eliminates the amount of hazardous materials entering a waste system. Elimination of pollution at the source will not only help you remain in compliance with discharge standards, but will save you money by taking full advantage of all your resources. Pollution Prevention engineers and chemists are available to assist you incorporate the latest source reduction technologies into your manufacturing operations. We will evaluate your operating procedures and general practices and recommend alternatives, such as chemical substitution, that will generate less waste without sacrificing quality production. This program is confidential; no regulatory repercussions will occur by taking advantage of this program. If you wish to have NBC's ESTA staff visit your facility, or if you wish to find out more about this program, please contact James McCaughey, P.E., Environmental, Safety & Technical Assistance Manager, at 461-8848 ext. 352. This program is meant to be one alternative or a step a business can take to meet pretreatment requirements. It may be necessary for a business to seek additional professional guidance from an outside consultant.

What if I have more questions?

Ask us. The NBC has well-trained and capable chemical engineers, technicians and others who would be happy to answer any questions or concerns you may have regarding your permit, or any other program relating to the NBC. For questions regarding the Pretreatment Program, please contact Kerry M. Britt, Pretreatment Manager at 461-8848 ext. 490. For other questions, contact our Public Affairs Office at 461-8848/TDD 461-6540 or email at jsamons@narrabay.com.

Narragansett Bay Commission's Restaurant & Food Preparation Facility Grease Removal Program

What is the Narragansett Bay Commission?

The NBC owns and operates the State's two largest wastewater treatment facilities and provides quality wastewater collection and treatment services to about 300,000 persons and 8,000 commercial and industrial customers in Providence, North Providence, Johnston, Pawtucket, Central Falls, Cumberland, Lincoln, the northern portion of East Providence and small sections of Cranston and Smithfield.

What is the purpose of a Pretreatment Program?

Since wastewater treatment facilities are not designed to remove heavy metals, toxic chemicals, grease, etc., the federal Environmental Protection Agency (EPA) requires that wastewater agencies implement Pretreatment Programs to control toxic discharges. The NBC's Pretreatment Program staff is responsible for protecting its treatment facilities and Narragansett Bay from the discharge of such contaminants. To satisfy EPA requirements, the Pretreatment Program was put in place by the NBC to monitor and regulate the many electroplaters, metal finishers, chemical manufacturers, laboratories, hospitals, laundromats, restaurants and other firms that are tied into the NBC's sewer system.

What is a Grease Removal Program?

The Grease Removal Program was initiated by the NBC's Pretreatment Section to control the discharge of grease and animal fats from restaurants and food preparation facilities into the sewer system.

Why is the discharge of grease and animal fats a problem?

The presence of grease, fats, and oils in wastewater results in major operational problems both in the NBC sewers and at the wastewater treatment facilities. Grease from food preparation operations solidifies on the inside of sewers restricting the flow of sewage, similar to the way that cholesterol restricts the flow of blood through arteries and veins. Sewer blockages have resulted from this grease build up, causing raw sewage to back up into the basements of homes and businesses. Further, grease has fouled equipment and controls at treatment facilities, and high concentrations of grease and oils in wastewater inhibits the biological processes used to treat domestic sewage.

What kitchen operations are responsible for grease entering the sewer system?

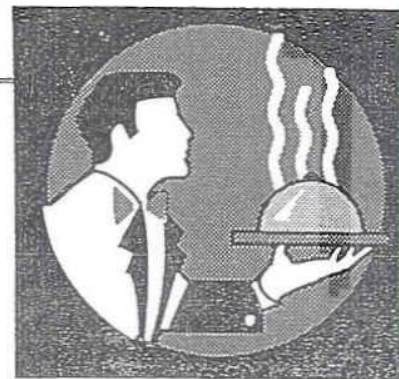
Grease discharges are predominantly generated from washing and cleaning operations and not from fryolators or deep frying units as most people might think. The pot washing sink, dishwasher pre-rinse station, and garbage grinder are the major sources of grease discharges to the sewer system.

How can grease discharges be controlled and minimized?

There is only one way -- by installing and maintaining a grease removal or recovery unit (GRU).

What is a GRU?

A GRU is a device designed to collect



and remove grease from wastewater discharged from restaurants and food preparation facilities. Most GRU's separate grease from water by gravity. Since grease weighs less than water, the grease floats and can be skimmed from the surface of the wastewater.

What types of Grease Removal Units are acceptable to the NBC?

There are two (2) types of GRU's that are acceptable for installation in the NBC districts. One type of GRU is the automatic electrical/mechanical grease removal unit. This type of GRU is small, which allows installation in the kitchen under a sink or elsewhere. This type of GRU removes grease daily, collecting it neatly in a bucket from which it can be disposed in a dumpster or recycled through a rendering firm. Maintenance must be performed daily consisting of checking the grease collection bucket and cleaning a solids removal strainer.

Another acceptable GRU is the large in-ground passive type grease interceptor. This type of GRU must have a capacity of at least 15 gallons per seat in the restaurant with a minimum capacity of 500 gallons. This type of GRU is so large that it must be installed underground outside the facility. Maintenance requirements include weekly inspections to determine grease layer thickness and regular pumping of the grease by a certified

waste hauler. Pumped-out grease must be hauled to special facilities for processing or incineration.

Is the small, under the sink passive type grease interceptor acceptable to the NBC?

No, the NBC has found that these small, passive grease traps are not effective at removing grease because these units are considerably undersized, resulting in insufficient time for oil/ water separation. In addition, the small size of these passive units allows hot water from the pot wash sink to dissolve trapped grease in the unit and flush it into the sewer system. This type of grease trap is also maintenance intensive, requiring time consuming effort to perform system inspections or remove collected grease. Due to these intensive maintenance requirements this type of GRU is often neglected and does not perform properly. Therefore, the NBC does not allow installation of this type of GRU.

Can a garbage grinder or garbage disposal unit be used in the restaurant or food preparation facility?

Only if the garbage disposal unit discharges to a large in-ground passive type grease interceptor that has been properly sized for removal of settleable solids. Garbage disposal units may not be used in facilities with automatic under the sink type grease interceptors.

Should a restaurant just go ahead and install a grease interceptor?

Definitely not. Anyone proposing to install a grease interceptor must contact the NBC pretreatment staff at 461-8848 prior to purchasing or installing a grease interceptor. NBC staff will provide the guidance necessary to ensure that the GRU chosen meets all NBC criteria. Contacting the NBC in advance may prevent your company from purchasing expensive GRU retrofits should the initial installation not satisfy NBC criteria.

Is there anything else that is required of restaurants or food preparation facilities?

Yes. All restaurants and food preparation establishments must obtain a wastewater discharge permit from the NBC. A permit application can be obtained by contacting the pretreatment staff at 461-8848 or by visiting the Pretreatment Office at 2 Ernest Street in Providence.

What is required by the Wastewater Discharge Permit?

The restaurant discharge permit requires the restaurant or food preparation facility to maintain the GRU in a proper operating condition. A log book must also be maintained at the facility documenting the date of each GRU inspection and each GRU maintenance activity.

What if I have more questions?

Just ask us. The NBC has well trained and capable engineers, technicians, and others who would be happy to answer any question or concerns you may have regarding the Grease Removal Program, the permitting process, or the NBC in general. Feel free to call us! ■

NARRAGANSETT BAY COMMISSION



ENVIRONMENTAL

BEST

MANAGEMENT
PRACTICES

for

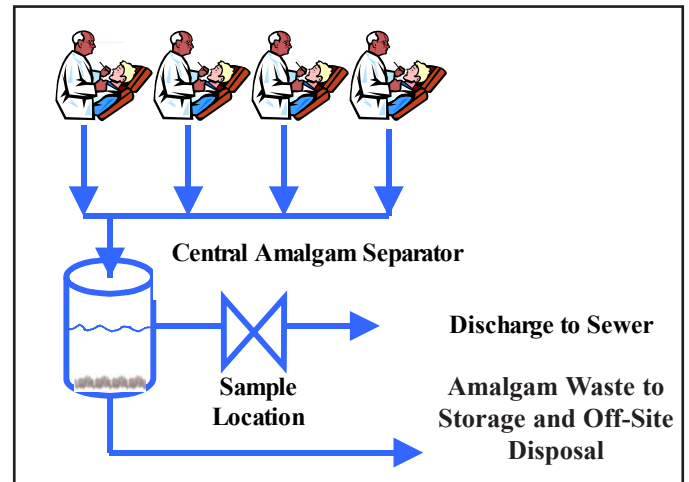
the Management of Waste Dental Amalgam

The Narragansett Bay Commission (NBC) has developed the following set of Environmental Best Management Practices (BMPs) for the Management of Waste Dental Amalgam to help the dental community safely and economically reduce the amount of mercury released into the environment. Dental facilities serviced by the NBC must install, use, and maintain an amalgam separator with a separation efficiency of 99% when tested according to ISO 11143 standards and must demonstrate compliance with the BMPs. These separators help to remove most mercury from dental wastewater without being overly burdensome to operate or maintain. Based on NBC's current discharge limit for mercury, as little as 1/10,000 of a gram of amalgam in one gallon of wastewater would place your office in non-compliance resulting in additional sampling and monitoring costs. Continued non-compliance with NBC discharge limits can result in having your name published in the newspaper as being in significant non-compliance and/or the issuance of fines and penalties.



NBC BMP Implementation with the Installation of an Amalgam Separator

The installation and operation of an amalgam separator and implementation of the attached NBC BMPs is required. All amalgam-contaminated wastewater, including wastewaters from cuspidors and vacuum systems, must flow through an amalgam separator and through a sample location prior to sewer discharge.



Typical wastewater plumbing diagram for dental office with an amalgam separator

Specific Requirements for NBC Dental BMP Option

Amalgam Separators must be ISO 11143 certified and capable of handling flow from vacuum pumps and chair side cuspidors. Separators vary in complexity, capabilities and cost. Here are some criteria that should be considered when selecting an amalgam separator:

1. The vendor of the equipment must be able to provide ISO 11143 documentation certifying that the equipment has been proven capable of removing at least 99% of amalgam during certification tests.
2. There should be minimal loss of suction power within the vacuum system.
3. A system that is low maintenance is preferred over one that requires manual operation and frequent cleaning and/or servicing.
4. The unit should operate quietly.
5. The unit should be centrally installed so as to service a whole office or a series of chairs in order to minimize the cost and maintenance associated with individual units that service only one chair.
6. The unit or units must be capable of handling flow from:
 - a. Vacuum Systems,
 - b. Cuspidors and
 - c. Sinks if applicable.
7. Plans of the dental office and amalgam separator must be approved by NBC prior to installation.

Maintenance of Amalgam Separator

1. Amalgam separators must be installed and maintained such that all flow from vacuum systems; cuspidors and applicable sinks receive proper treatment.
2. Amalgam separators must be operational at all times.
3. Follow the manufacturer's specification for maintenance of the separator.
4. Inspect the separator weekly to ensure proper operation.

Certification and Record Keeping

1. The dental office must document all separator and trap inspections, cleaning and maintenance activities in a bound logbook.
2. Information in the logbooks must include:
 - Date (mm/dd/yy) of each trap/separator inspection/service activity;
 - A clear indication of which trap/separator is being serviced;
 - All routine and non-routine activities conducted (i.e., cleaning, maintenance, repairs, etc.);
 - Signature of person conducting activity.

Best Management Practices

Dental offices must adhere to all of the required BMPs detailed in this brochure.

1. While regular sampling of wastewater effluent, on the part of the dental facility, is not required as part of Option 1 of the NBC BMP Program, installation of a sampling location is required.

Best Management Practices

Chair Side Traps

1. Equip all dental chairs with chair side traps to capture large amalgam particles from cuspidors and vacuum systems.
2. Use traps with the smallest screen size that your vendor says will work.
3. While not required as a condition for participation in this program, disposable chair side traps are preferred to reusable traps due to the difficulty of cleaning traps for reuse without releasing captured amalgam particles to the sewer system during the cleaning process.

Maintenance of Chair Side Traps

1. Check to make sure all chair-side traps are in place when chair is in use.
2. Inspect chair-side traps on a daily basis and clean or replace as necessary.
3. If using disposable chair side traps, place spent traps directly into a labeled amalgam waste storage container. Never rinse a used trap over a sink that is directly connected to the sewer or place in trash.
4. If using a reusable trap remove all visible amalgam particles from the trap by emptying the contents into a labeled storage container.
5. Never dispose of the collected amalgam down the drain, in the trash or with sharps and/or biohazard waste.
6. Rinse reusable traps only if necessary and only in sinks plumbed into an amalgam separator using a minimum amount of water.

Maintenance of Vacuum Pump Filters

1. Check to make sure your vacuum pumps are equipped with filters. Talk to your equipment vendor to upgrade all such equipment not equipped with filters.
2. Talk to your equipment vendor to make sure you are using the smallest available vacuum filter screen that will not compromise the efficiency of the vacuum system.
3. Dry-turbine vacuums - Check to make sure the air/water separator is free of built-up sludge. Manage collected sludge as you would a mercury containing waste - do not wash down drain.
4. Change vacuum pump filters at least once per month or more frequently in accordance with the manufacturer's recommendations.
5. After removing the filter hold it over a spill tray or other type of container that can catch any water that has collected in the trap. Carefully decant the water without losing any visible amalgam. The decanted water, if it contains no visible amalgam, may be discharged to the sewer through an amalgam separator.
6. Place spent filters in their original container or in another sealed container and properly store prior to disposal/recycling as a mercury-containing waste.

Storage, Management and Disposal of Scrap Amalgam

1. Collect and store all contact and non-contact amalgam in separate appropriate labeled and closed containers.
2. Label all containers used to store waste amalgam with the words "Hazardous Waste" and "Waste Mercury/Amalgam."
3. Wastes containing mercury are regulated as hazardous waste by the RIDEM and EPA - comply with all state and federal hazardous waste management regulations (see section on Hazardous Waste Management).
4. Do not mix waste streams, including contact and non-contact amalgam waste, without checking with your waste hauler and disposal/recycling facility first. Mixing of waste streams may limit disposal and/or recycling options and increase waste management costs.
5. Do not put mercury-containing waste in medical waste containers. Disposal methods used for medical waste, such as incineration, will release mercury into the environment.

Please note: "empty" prepackaged amalgam capsules may contain enough residual amalgam to be classified as a hazardous waste. While not a BMP, it is recommended that empty capsules be collected and stored separate from other amalgam waste. This will allow for testing of the spent capsules in order to determine an ultimate disposal method.

Line Cleaners

Dental clinics may regularly use a liquid cleaner to disinfect the pipes in their vacuum system. Certain brands of line cleaners that are corrosive or oxidizers must be avoided because they dissolve solid mercury. Never use bleach (sodium hypochlorite) or a bleach-containing product to clean vacuum lines, instruments or equipment that may be contaminated with mercury or amalgam. Mercury that is mobilized in this way is very difficult to trap and can easily travel to the sewer plant or into the receiving waters. The following brands of cleaners and disinfectants are acceptable:

- Green and Clean (Metasys)
- GC Spray-Cide (GC America)
- Sani-Treet Plus (Enzyme Industries, Inc.)
- VacuCleanse Evacuation (Infection Control Tech)

The above list is not all-inclusive and NBC may give written approval to use other cleaners. The NBC will review requests to use other cleaners upon receipt of a Material Safety Data Sheet (MSDS) for the proposed cleaner.

Best Management Practices

Clean Plumbing and Sink Traps

Due to the potential past use of sinks as disposal outlets for contact and non-contact scrap amalgam, all sink traps in the vicinity of mercury use (past or present) must be removed, inspected and cleaned.

1. Remove sink traps/elbows and inspect for sludge build-up.
2. Collect any sludge in a container separate from scrap amalgam waste.
3. Install new traps/elbows or replace the existing traps/elbows after cleaning with an appropriate line cleaner .
4. Dispose of the sludge as a mercury containing waste or have samples of each waste stream tested by a licensed analytical laboratory prior to ultimate disposal. Guidance on testing waste samples can be obtained through NBC's Pollution Prevention Program.



Sinks Located in Operatories

Sinks located in operatories have the potential to discharge amalgam waste to the sewer from the cleaning and rinsing of dental instruments, chair side traps and other equipment or devices that may come into contact with amalgam. Two Sink Use Alternatives are available to dental offices participating in these Best Management Practices.

Sink Use Alternative A: Designate all sinks for "Sanitary Use Only" by eliminating the cleaning of amalgam contaminated instruments, traps and other equipment in all sinks.

For sinks designated for "Sanitary Use Only" the following conditions and procedures will apply:

1. Washing of instruments, filters from chair-side traps and used amalgam capsules will be strictly prohibited.
2. Sign stating: "Sinks to Be Used for Sanitary Purposes Only - No Chemical or Amalgam Disposal" must be clearly posted at each sink.
3. All employees must be trained on this policy and certification of training maintained on site.

Sink Use Alternative B: Designate certain sinks for "Sanitary Use Only" and other sinks for "Equipment Cleaning Only ." This alternative requires sinks in which equipment cleaning will take place be plumbed into an amalgam separator - if you choose to not install an amalgam separator you will have to comply with Alternative A. If you choose to install an amalgam separator, please note that some separators may not allow for the connection of sinks. Discuss this with your separator equipment vendor before purchasing a separator.

For sinks designated for "Sanitary Use Only" all conditions and procedures noted above will apply.

For sinks used for "Equipment Cleaning Only" the following conditions and procedures will apply:

1. Plumb each of these sinks into to the amalgam separator.
2. Install flow restricting orifices in each sink discharge line in order to limit and control the flow rate to the separator and prevent washout of the amalgam separator
3. Submit plans of each of these sinks and the amalgam separator to NBC for approval prior to installation.
4. Manage all debris removed from these sinks and drain lines as mercury contaminated waste.
5. Post signs stating: "Washing of Instruments and Filters Contaminated with Amalgam only - Sanitary Use Prohibited" at each sink.
6. Train all employees on these policies and procedures and maintain certification of training on site.

Please note: if flow can not be adequately controlled using flow constrictors a surge tank capable of handling peak flow from these sinks may need to be installed up stream of the amalgam separator .

Wastewater Discharge Permit Requirements

Annual Certification and Record Keeping

1. Document all separator (if applicable) and trap inspections, cleaning and maintenance activities in a bound logbook.
2. Include the following information in the logbooks:
 - a. Date (mm/dd/yy) of each trap/separator inspection/service activity,
 - b. A clear indication of which trap/separator is being serviced,
 - c. All routine and non-routine activities conducted (i.e., cleaning, maintenance, etc.)
 - d. Signature of person conducting activity.
3. Maintain all Hazardous Waste Manifest documents and/or shipping papers of mercury waste sent off-site for disposal or recycling on-site and have them immediately available for inspection by NBC.
4. Submit an annual certification statement to NBC attesting to compliance with all BMPs.

Personnel Training Requirements

All personnel associated with the handling and management of amalgam and/or mercury containing materials/ wastes must be trained with respect to:

- the hazards associated with mercury
- hazardous waste management regulations
- procedures to follow in the event of a spill or an accident including spill-reporting requirements.

Waste Management and Spill Response

If any elemental mercury is used or is present in the dental office, including mercury from historical use and mercury in any medical instruments such as thermometers, a mercury spill kit must be maintained on site and all appropriate staff trained in its use.

Please note: even very small amounts of metallic mercury (for example, a few drops) can raise air concentrations of mercury to levels that may be harmful to human health. The longer people breathe the contaminated air, the greater the risk to their health. Metallic mercury and its vapors are extremely difficult to remove from clothes, furniture, carpets, floors, walls, and other such items. If these items are not properly cleaned, the mercury can remain for months or years, and continue to be a source of exposure.

Steps to take in case of a spill:

- Contact your local poison control center, fire department, the RIDEM or the RIDOH for advice on cleanup the spill.
- Ask everyone to leave the area.
- Close-off the area while unoccupied.
- Shut off conditioning and air circulation to the room
- Open windows and doors in the area of the spill to ventilate the area while clean-up activities are taking place.
- Wear rubber or latex gloves to prevent skin contact with metallic mercury.
- Use a dry sponge, paper towel or paper to clean up the spill.
- Place all collected mercury in a sealed glass jar.
- In the event of a large mercury spill (more than a broken thermometer's worth), immediately evacuate everyone from the area, seal off the area as well as possible, and call local and state authorities for assistance.

What Not to do when there is a spill:

Do NOT use a vacuum cleaner to clean up a mercury spill. A vacuum cleaner will spread the mercury vapors throughout the area, thereby increasing the chance of exposure. Do NOT attempt to sweep the spill with a broom. Never dispose of mercury down the drain. Never throw materials used to clean up a spill in the trash - contact the RIDEM for guidance.

Emergency Contacts

Rhode Island Department of Environmental Management: (401) 222-6822

Narragansett Bay Commission: (401) 461-8848

Rhode Island Poison Control Center: (401) 444-5727

National Response Center: (800) 424-8802

Rhode Island Emergency Management Agency: (401) 946-9996

Local Hospital: _____

Fire Department: _____

Useful Web Sites

www.narrabay.com
www.epa.gov/mercury/index.html
www.state.ri.us/dem
www.newmoa.org

Pollution Prevention

The goal of pollution prevention is to reduce or eliminate the use of toxic substances at the source. This minimizes the release of toxic compounds and serves to protect human health by ultimately reducing exposure to solid, dissolved or gaseous toxic compounds. Although source reduction is most efficient, it is often combined with control-based approaches such as end-of-pipe treatment to achieve desired results. Pollution Prevention activities and recycling in dental offices are essential in order to minimize releases of polluting substances into the sewer system, medical waste, ordinary trash or environment. Recommended activities include the use of the following materials, processes or practices:

1. Use non-amalgam substitutes where appropriate as determined by general dental practice procedures.
2. Utilize prepackaged, single-use amalgam capsules to eliminate larger bulk quantities of elemental mercury (also referred to as free, bulk, or raw mercury).
3. Stock amalgam materials in a range of capsule sizes. Use the smallest capsule required for the job at hand to minimize the amount of scrap non-contact amalgam produced.
4. Properly seal all amalgam capsules before amalgamation. Reassemble capsules immediately after dispensing amalgam. Disassemble and clean the amalgamator on a regular basis.
5. If a small amount of elemental mercury is to be disposed of, initiate a reaction with amalgam alloy to form scrap amalgam, which can then be recycled through your amalgam recycler.
6. When removing an existing amalgam, attempt to remove it in chunks so that it is more likely to be caught in the chair - side trap.
7. Consider using techniques that eliminate the need for cuspidors in the operatory when possible.
8. Do not mix different types of wastes, such as contact and non-contact amalgam, when it impacts wastewater treatment or waste disposal. Whenever possible, collect waste amalgam solids for proper storage before they mix with wastewater.
9. Do not discharge solutions that mobilize mercury such as certain vacuum line cleaners that are corrosive or contain bleach or other oxidizing compounds. Neutral, enzymatic cleaners are preferred.
10. During office renovations, alert renovators to the possibility of historical mercury spills that may have resulted in the presence of mercury in carpets, floor cracks, behind moldings and other areas where amalgam capsules may have been spilled. A waste is considered hazardous if TCLP tests indicate a mercury concentration over 0.2 mg/l. Seamless and impermeable floors are easiest to keep clean.

Hazardous Waste Management

Mercury is one of eight "heavy metals" regulated by EPA and the Rhode Island Department of Environmental Management (RIDEM) as a "Characteristically Toxic" Hazardous Waste.

This means wastes containing mercury, over established Regulatory Levels (0.2 mg/l for mercury using the Toxicity Characteristic Leaching Procedure), must be handled in strict compliance with federal and state hazardous waste regulatory requirements. A detailed overview of these regulations is outside the scope of this BMP document and the reader is referred to the document "Hazardous Waste Compliance Workbook for Rhode Island Generators" at <http://www.state.ri.us> for a comprehensive description of Rhode Island's hazardous waste management regulations. The following general guidelines, however, should be followed as part of generating and managing wastes containing amalgam:

Waste Generation

1. Apply for an EPA Identification Number through the RIDEM,
2. Inform all employees of the hazards associated with handling waste amalgam, and
3. Write a brief procedure to be followed in case of a spill of waste amalgam and familiarize all applicable employees with these procedures.

Waste Storage

1. Keep all containers closed except when adding or removing waste amalgam,
2. Label containers with the words "Waste Mercury Amalgam",
3. Inspect containers on a weekly basis, and
4. Store containers in a safe and secure location away from office traffic.

Waste Shipment

1. Become familiar with hazardous waste manifesting requirements,
2. Utilize only properly licensed/permitted waste haulers, and
3. Utilize only properly licensed/permitted waste recycling/disposal firms.
4. Contact the state environmental regulatory agency from which a waste hauler, recycler and/or disposal company resides in order to assure they are in compliance with all applicable regulations. A list of contacts for all state environmental agencies can be found at www.epa.gov.

Record-keeping

1. Maintain a readily accessible file on employee training with respect to hazardous waste management, and
2. Maintain a readily assessable file with all copies of Hazardous Waste Manifests.

Note: EPA regulations allow for certain exemptions from strict hazardous waste management regulations when a waste is being sent off-site for recycling. These exemptions, however, are not always adopted by individual state environmental agencies and are often open to interpretation. It is a good idea to comply with all hazardous waste management regulatory requirements even if the waste is being recycled.

THE GREASE BUSTING ADVENTURES OF MR. CAN!

Quick guide to proper grease disposal



Meanwhile in Providence, RI...

There seems to be a problem downtown. I'm afraid it's the Grease Beasts!

This is a CODE ICKY.
I repeat: a CODE ICKY!

Pouring grease down the drain can cause costly, icky, and even dangerous effects on our neighborhoods and environment. Grease hardens and clogs our pipes causing messy backups into homes and city streets. When pipes are clogged, dirty water can't make it to the Narragansett Bay Commission facilities to be cleaned.

How about that, Icky Ike? They poured us down the drain! Let's clog this baby up and wreak havoc on the streets! Nothing like a nice backup to throw Mother Nature into a tizzy!

This is great Boss!
And the best part is it tastes like french fries!
We'll be oozing out in no time!
No WWTF for us!

WHAT WAS THAT?!

WHAM!

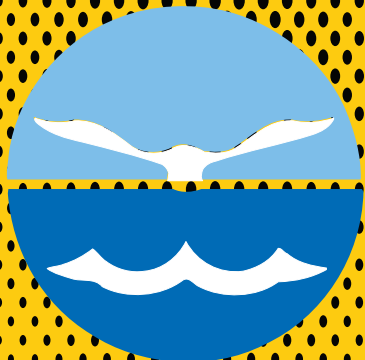
Not today
Grease Beasts!
It's me: Mr. Can!

Get a load of
my cooling
wand!

ZAP!

FOR PROPER GREASE
DISPOSAL,
COOL IT & CAN IT!

Together we can keep
the grease beasts off the
streets!



Narragansett Bay Commission

One Service Road, Providence, RI 02905

www.narrabay.com



**THE GREASE BUSTING
ADVENTURES OF
MR. CAN!**

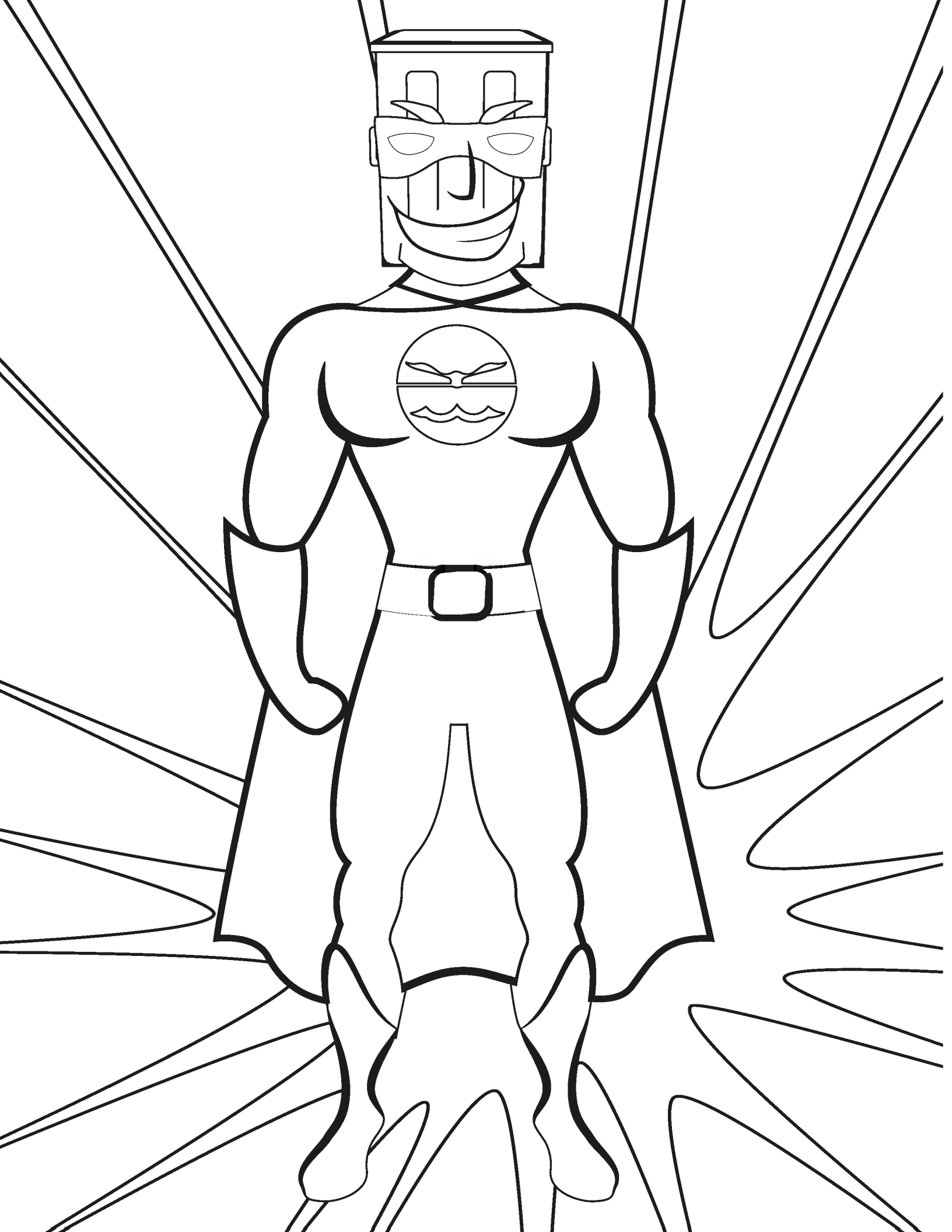


**COLORING &
ACTIVITY BOOK!**

**COOL IT
& CAN IT!**

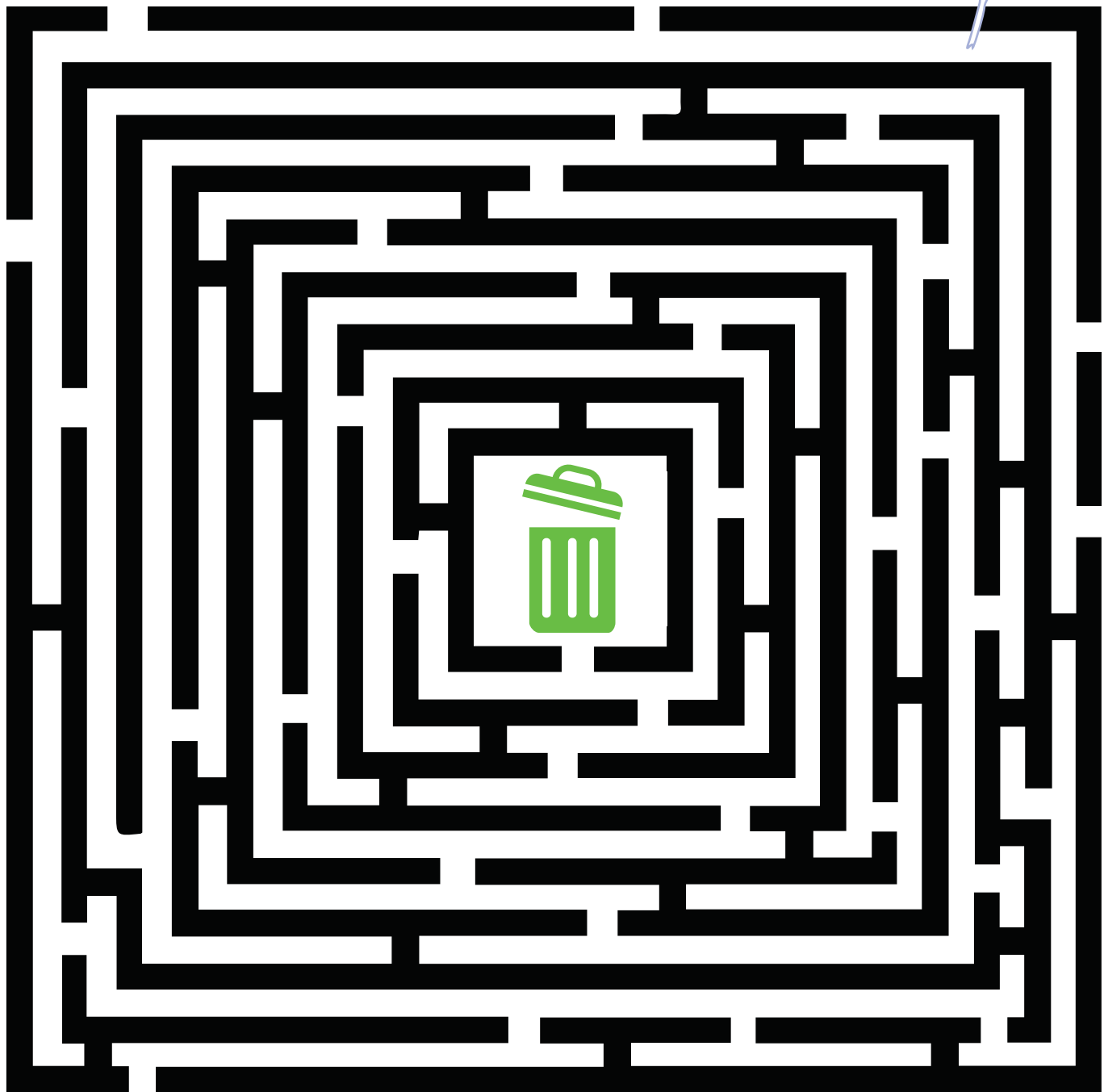


**Pledge to COOL IT & CAN IT and
help Mr. Can share the message
of proper grease disposal!**

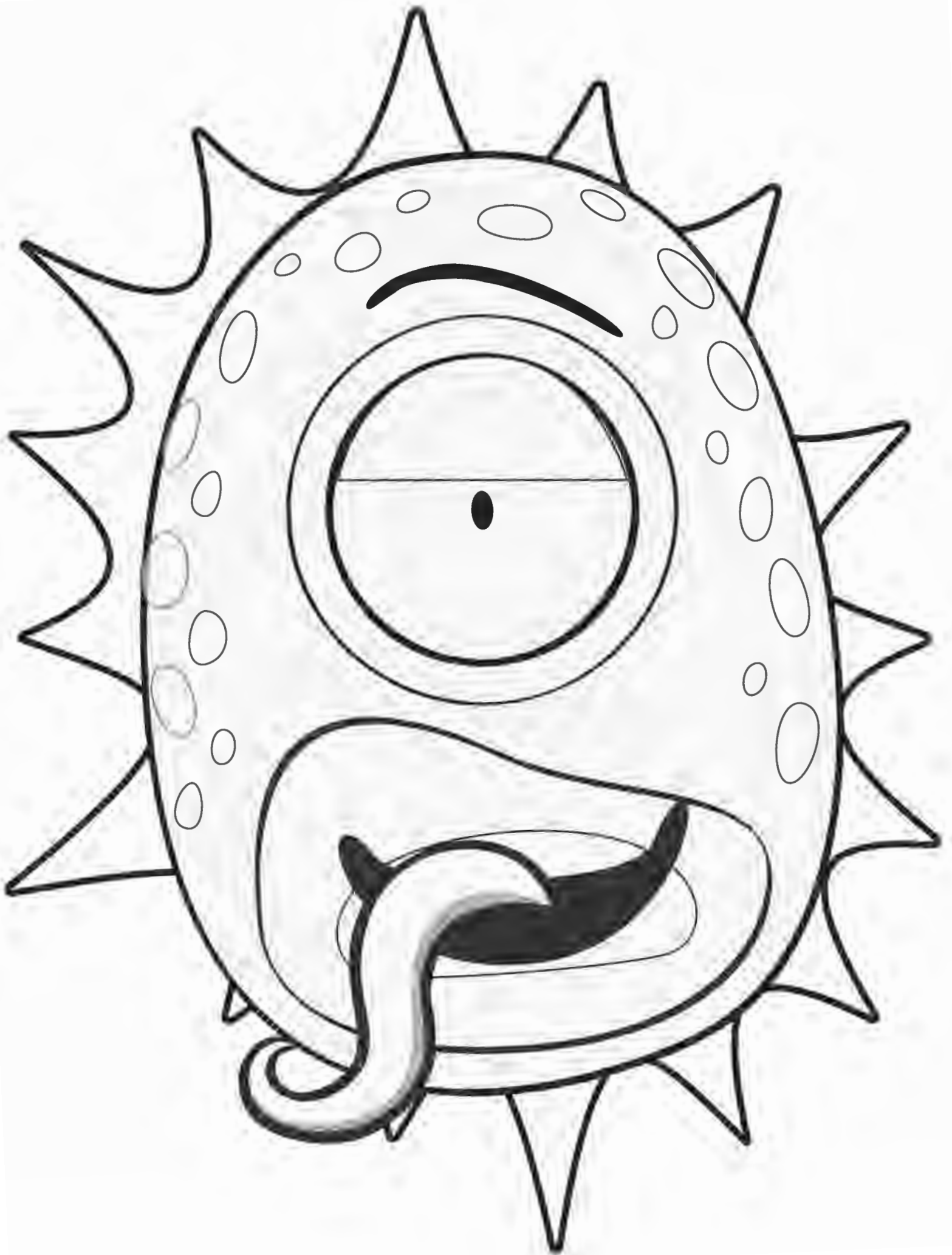


GUIDE THE GREASE!

Get this cooled off grease beast to the trash can in the center!



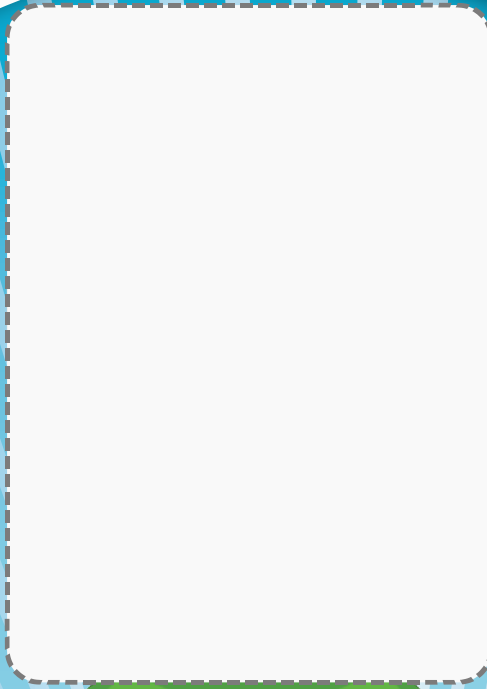






SUPER HERO FACE SWAP!

Want to be a Mr. Can double?!
Carefully cut and paste a photo
of your face in the area provided.
Using a marker draw a mask
over your eyes!





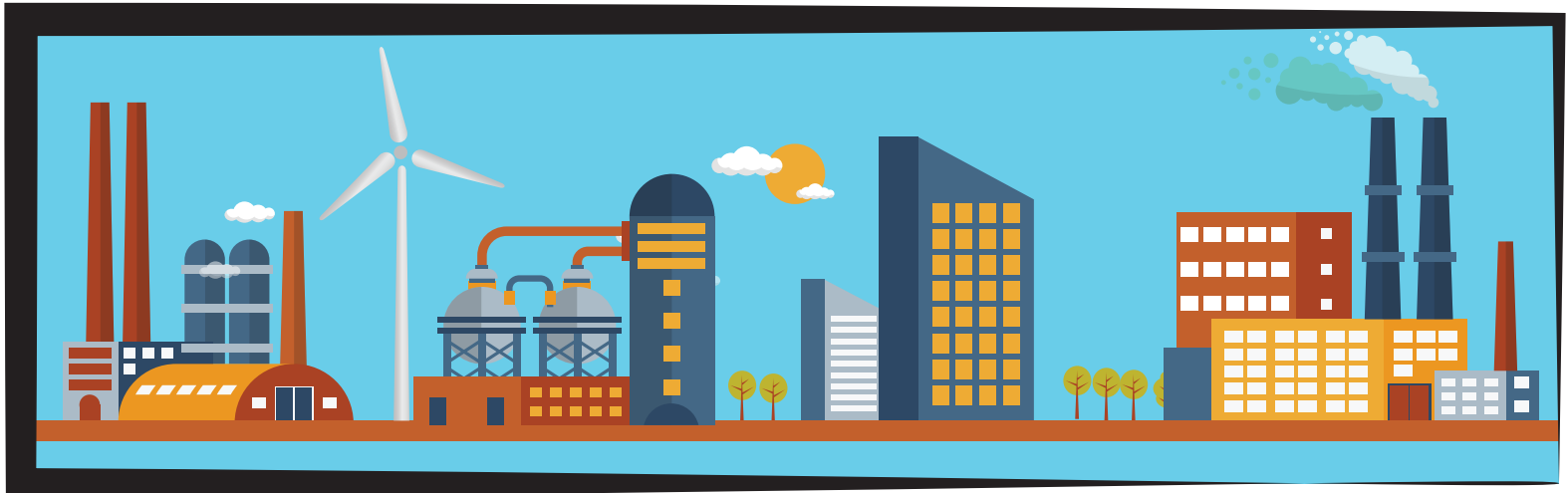
WHAT'S MISSING?

Compare wastewater treatment facility images 1 and 2.

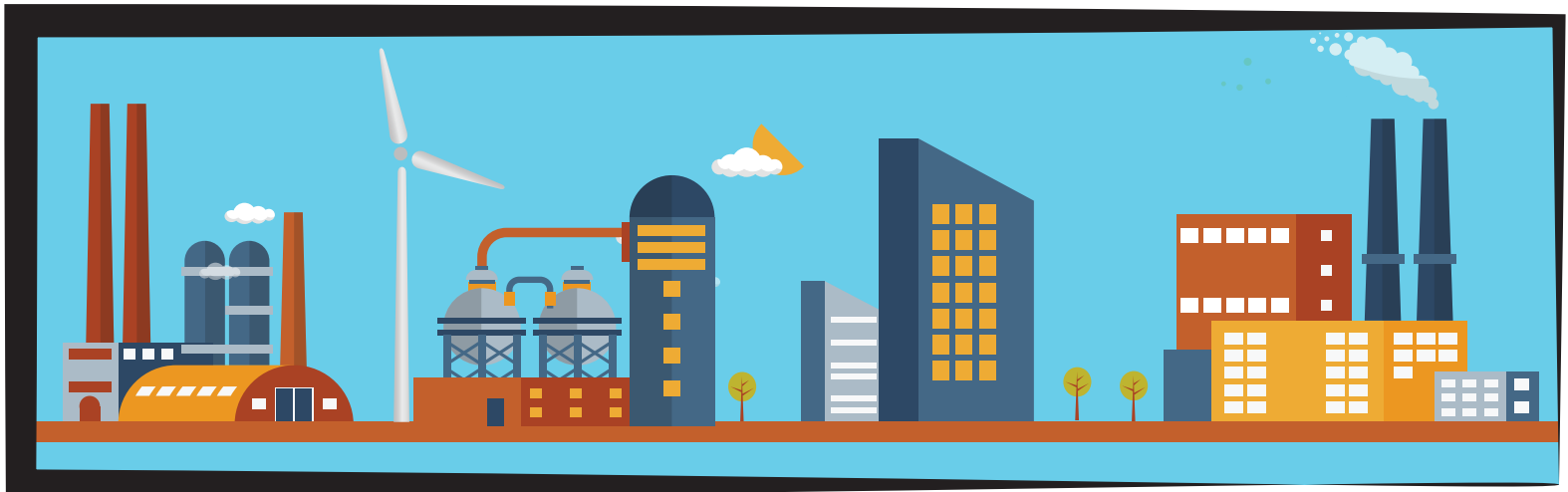
Can you spot what's missing in image 2?

Draw a circle around those items!

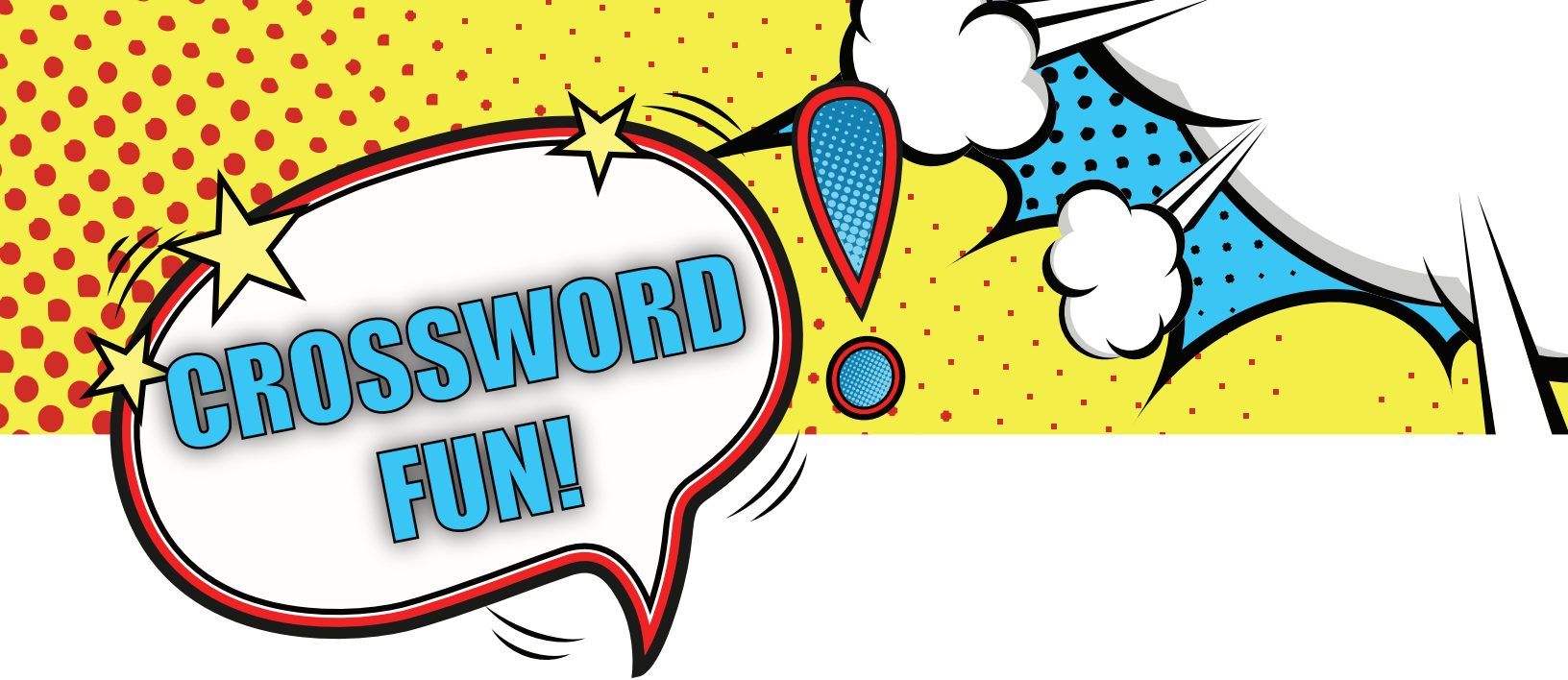
WASTEWATER TREATMENT FACILITY IMAGE 1



WASTEWATER TREATMENT FACILITY IMAGE 2







LARD
VEGETABLE OIL

DRIPPINGS
GREASE

MR. CAN
NBC

WATER
COOL IT

CAN IT
NARRAGANSETT BAY

**LGNMXIARCANITTSNAAT
LRKBGNVEGETABLEOILA
LEDECBLLIWATEROETS I
AACOOLITVDRIPPIN GSM
RSTIVNADSNXMRCA NP H
DET NARRAGANSETT BA Y**

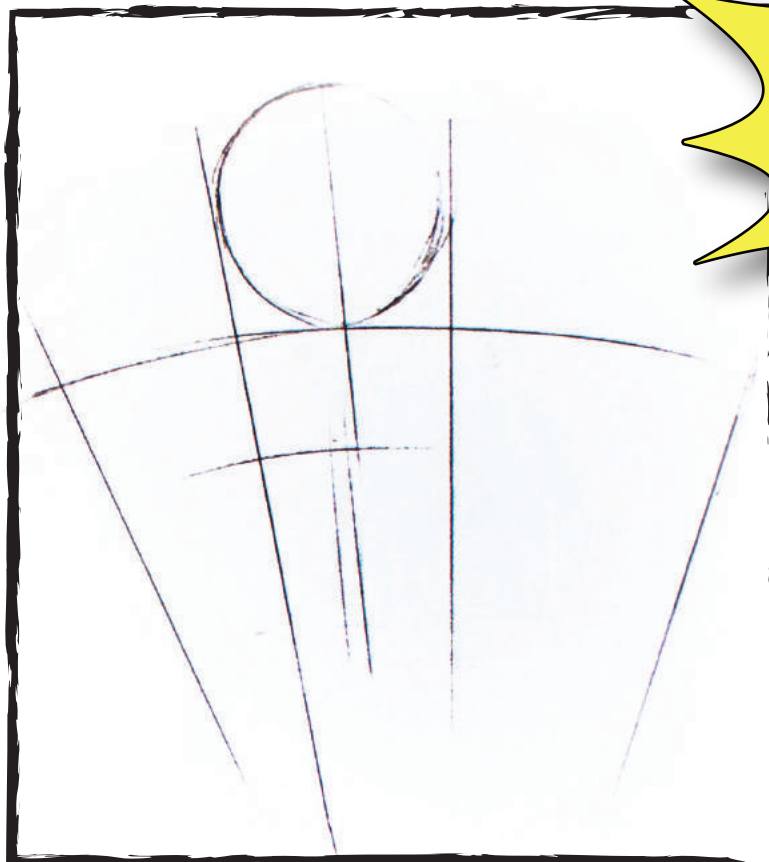




DRAW COMIC STYLE!

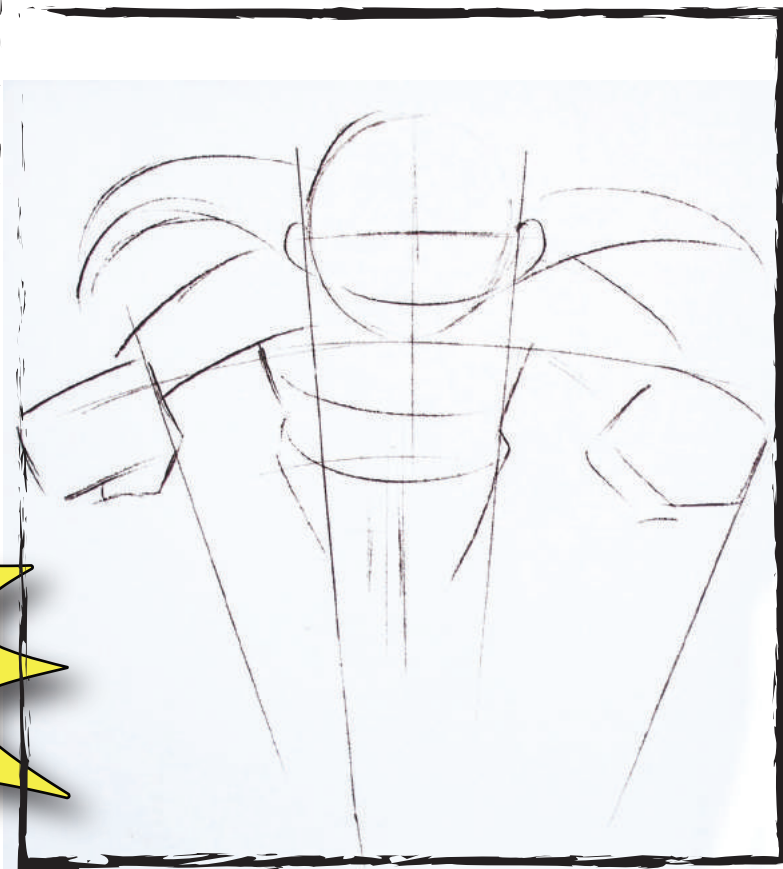
STEP 1

Sketch perspective lines to help you draw a super hero flying in the sky!
Keep things simple at this stage.
Just use a few lines and shapes to help you think about the pose.



STEP 2

Draw the rough shape of your super hero within your guides, paying attention to your perspective lines. The fists are near to us, so they need to look very big. The legs and feet are farther away so should appear smaller.



DRAW COMIC STYLE!

STEP 3

Add more detail. Sketch in the shapes of the hair and fingers, and give your super hero a simple, silly comic expression. To add movement, draw a flowing cape using curved lines.



STEP 3

Use a heavier pencil to add more detail and shadow. Go over the drawing in black ink pen or marker, then color your super hero in bright, comic-book colors!

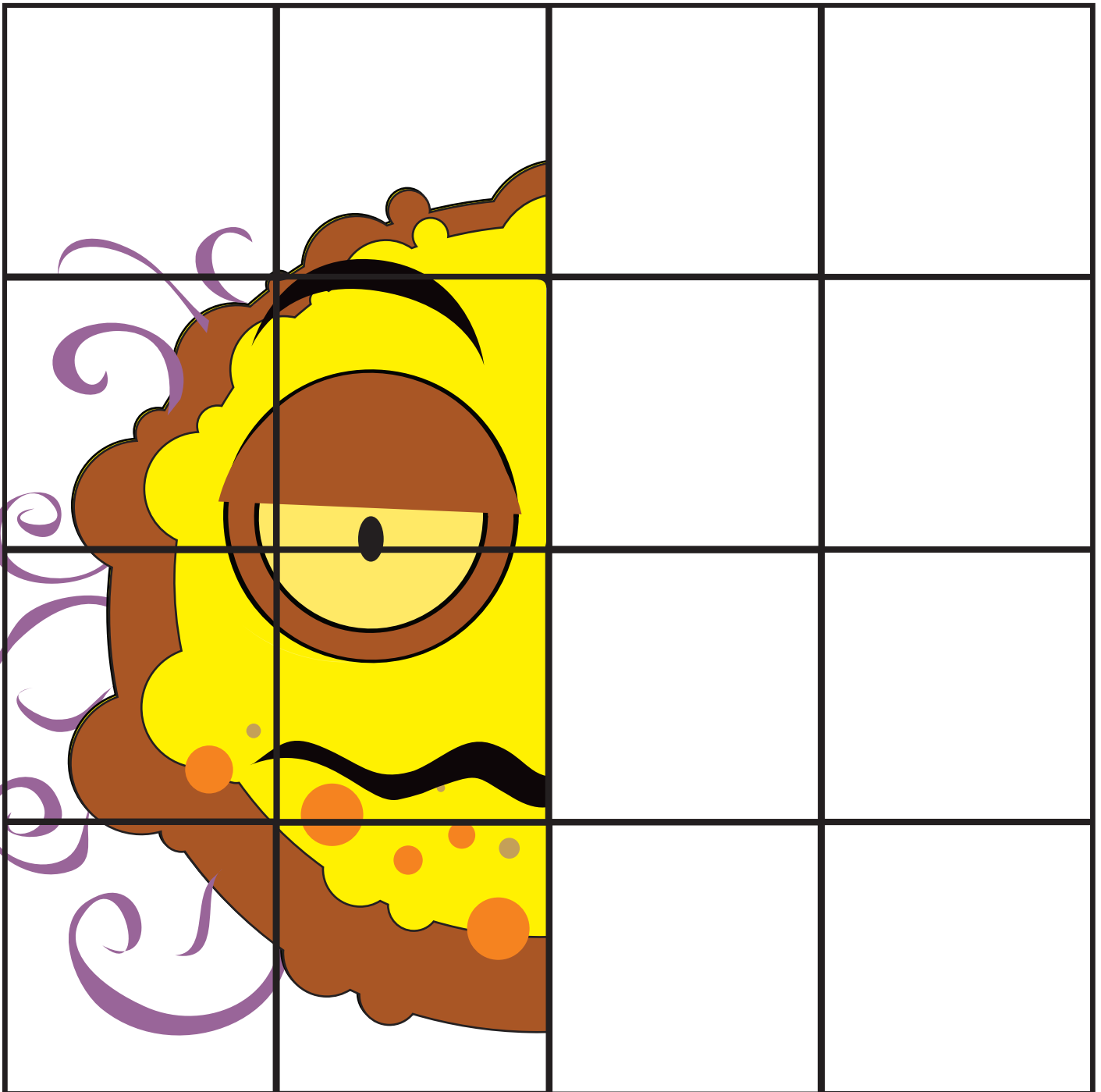


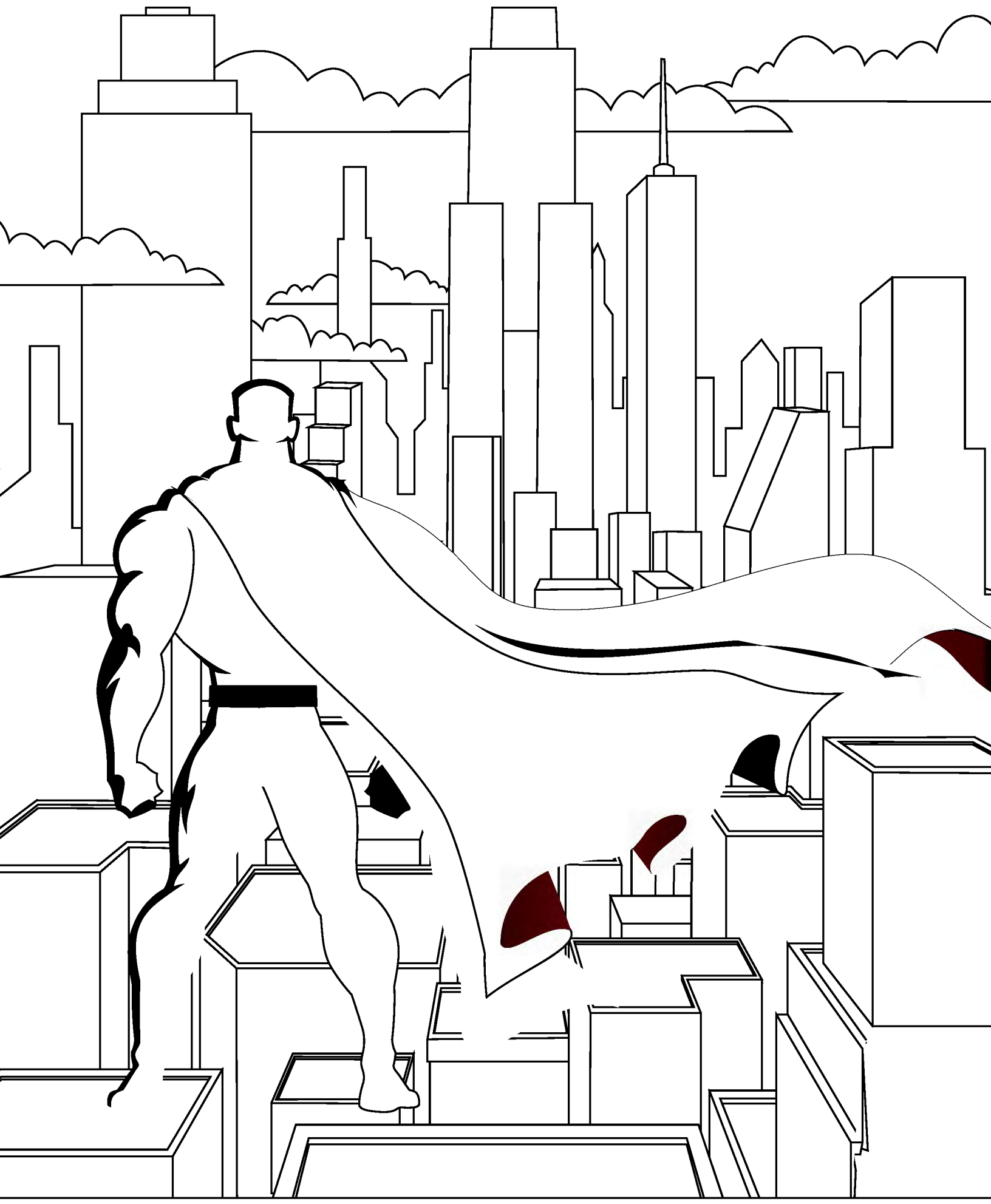
Comic style is about exaggerated elements and simple features. Once you've mastered your super hero, try drawing a whole comic strip!



**OTHER
HALF!**

Using the grid as a guide, complete the drawing of the grease beast.

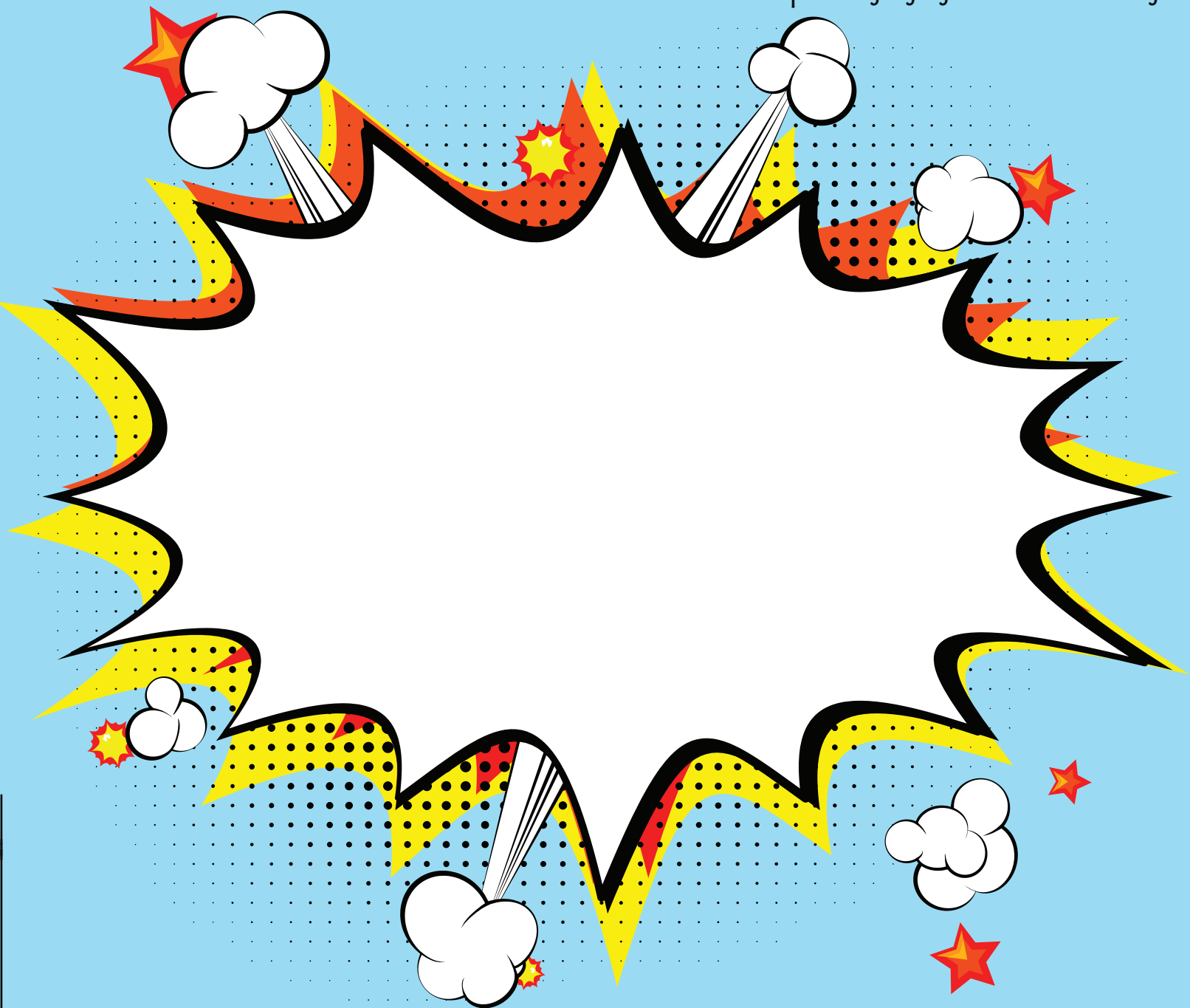


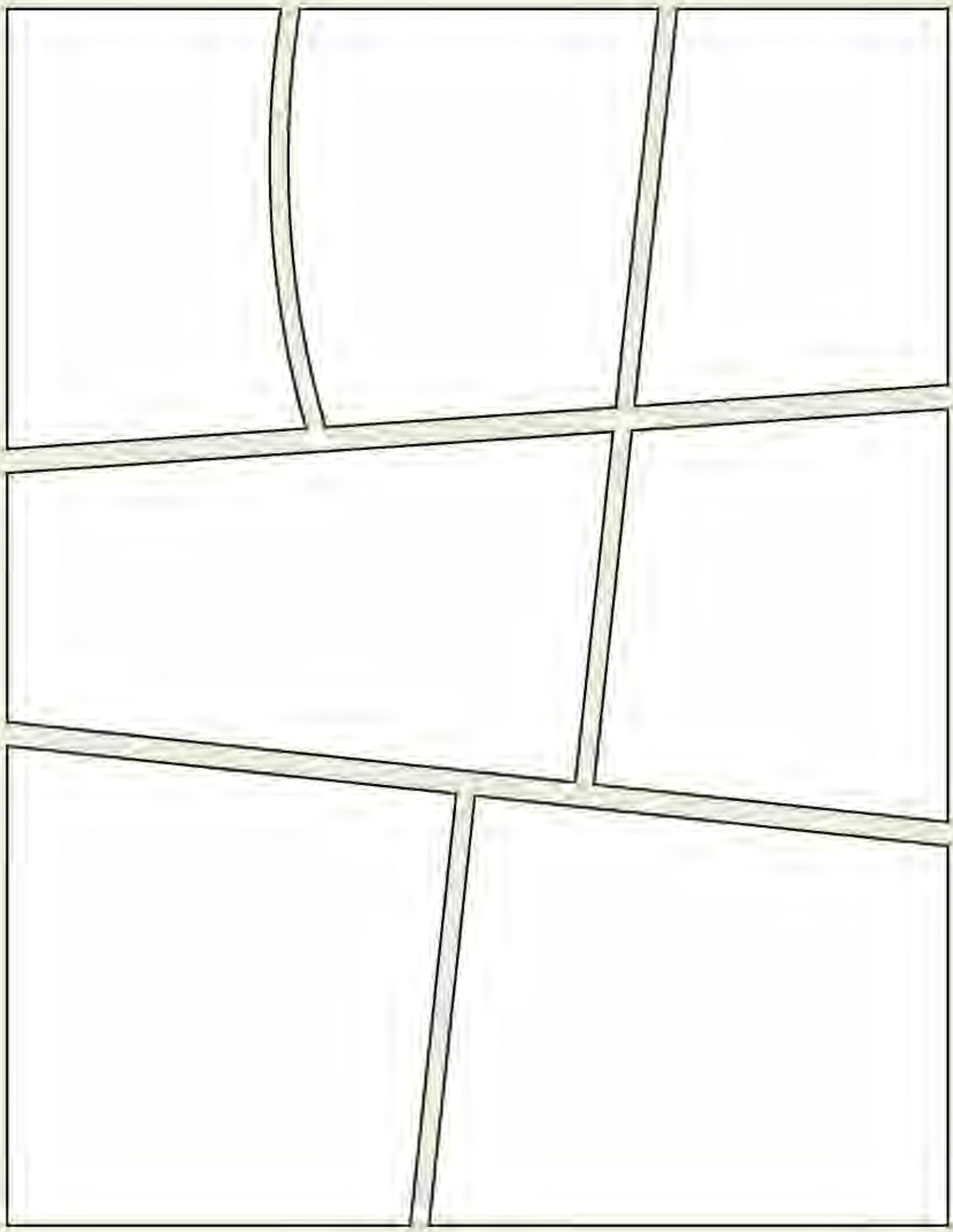


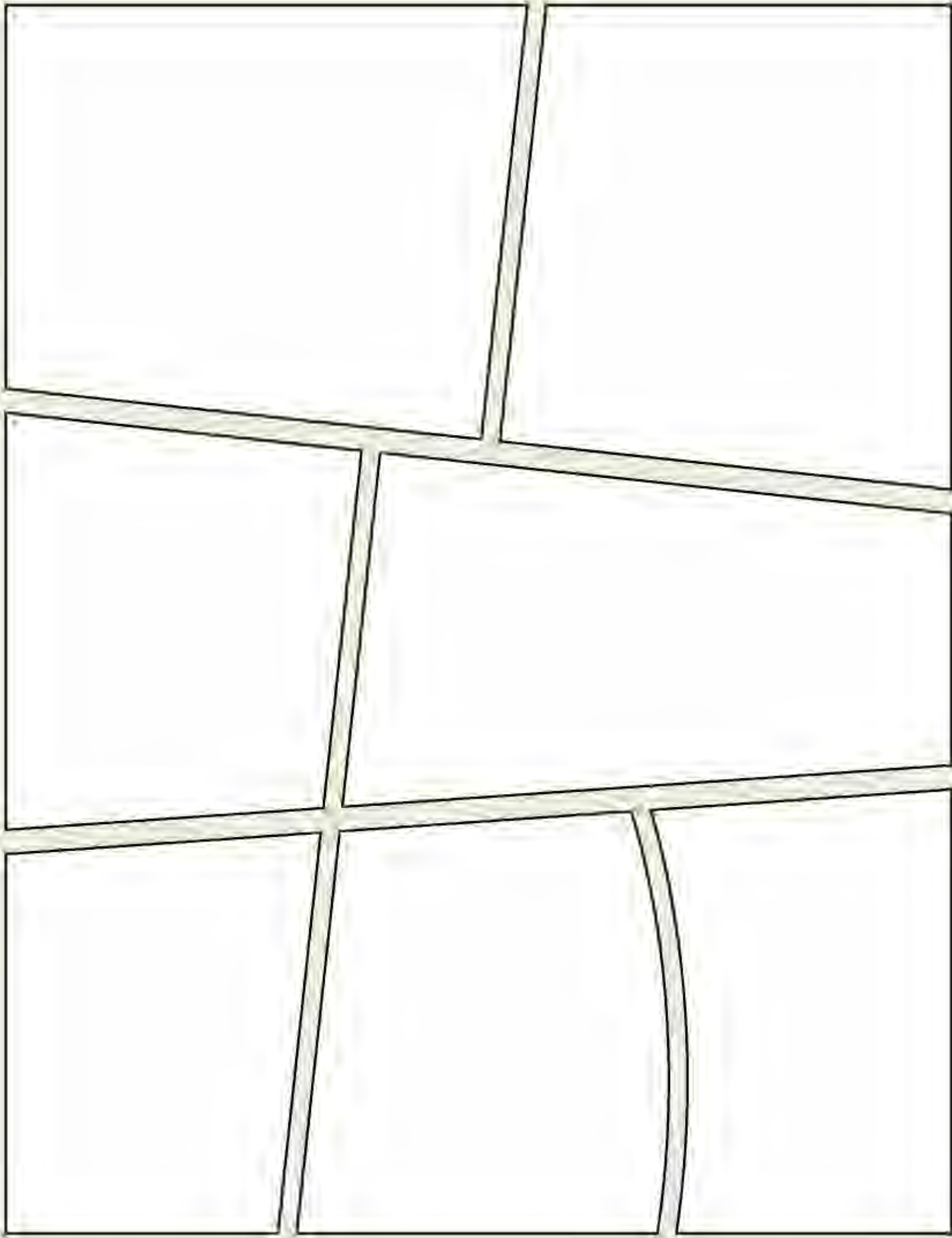


COMIC STRIP ADVENTURE!

In the next few pages draw your very own comic strip!
Every good comic strip has a super hero and one or two villains!
Start with a cool title below and let your imagination go wild!
Remember draw exaggerated elements and simple features.
Draw extra comic shapes using zigzag lines and fat lettering!









**COOL IT
& CAN IT!**

www.narrabay.com

Narragansett Bay Commission

One Service Road, Providence, RI 02905

**FATS, OILS, & GREASE
COMPLIANCE AND BEST MANAGEMENT
PRACTICES WORKBOOK**



**for RESTAURANTS
FOOD PREPARATION FACILITIES**

In an effort to address fats, oils and grease (FOG) management problems the Narragansett Bay Commission (NBC), in cooperation with the University of Rhode Island, the RI Department of Environmental Management and EPA Region I have established the NBC FOG-Environmental Results Program (ERP) to help the local food service industry keep FOG out of the sewer.

The goal of the NBC FOG-ERP is to improve the management of FOG at the source of generation through:

- On-site Technical Assistance
- Workshops
- Development and use of FOG Best Management Practices (BMPs)
- FOG management "Self-Evaluations"
- Compliance Inspections
- FOG data collection and analysis

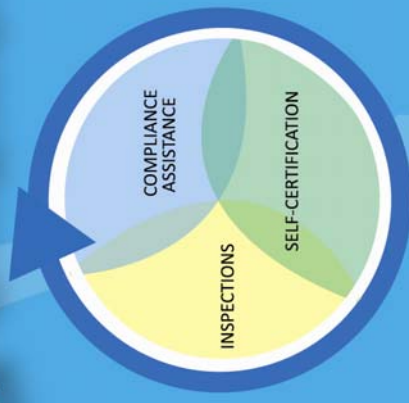


1 Service Road
Providence, RI 02905

Phone: 401.461.8848
Fax: 401.461.6540
www.narrabay.com

NARRAGANSETT BAY COMMISSION

FATS, OILS, & GREASE



ENVIRONMENTAL RESULTS PROGRAM

One Service Road
Providence, RI 02905

Tel: 401.461.8848
Fax: 401.461.6540
www.narrabay.com

Fats, Oils and Grease

Fats, Oils and Grease (FOG) are by-products of the Food Service Industry (restaurants, cafeterias and other commercial food service establishments) as well as household kitchens. FOG is generated from the use of vegetable oils and animal fats in the preparation of food products.



Typical operations that produce FOG include washing of dishes, pots, and utensils; floor cleaning, equipment sanitation (collectively referred to as “Brown Grease”) and the disposal of used fryolator cooking oils (“Yellow Grease”).

When released into the environment, particularly into sewer systems, septic systems or water surface bodies, FOG causes serious environmental harm. FOG that is discharged into the sewer system or septic tanks will accumulate and cause blockages that often result in backups and overflows. FOG that enters municipal wastewater treatment facilities and/or

natural surface water bodies will form unsightly globular balls of grease that can foul equipment, impact beaches and deplete water oxygen levels.

Restaurants that release excess FOG to the sewer system can be closed down if grease blockages and backups occur and can be held financially responsible for any resulting damages.

Biodiesel Production

Yellow grease from fryolators can be converted into biodiesel which can be used in diesel engines and as a renewable home heating fuel. As part of the NBC FOG-ERP, participating restaurants are encouraged to send their waste yellow grease to a biodiesel production facility.



The NBC FOG Environmental Results Program

The NBC FOG Environmental Results Program (ERP) has been designed to help improve the management of FOG by local restaurants through a combination of: 1) Compliance Assistance, 2) Voluntary Self Evaluation, 3) Regulatory Inspections, and 4) Certification.

1. Compliance Assistance

Pollution Prevention Engineers from the University of Rhode Island and the NBC are available to meet with participating restaurants owners and managers both one-on-one and in educational workshop settings to help implement sound and sustainable FOG Best Management Practices.

2. Self Evaluation

Participating restaurants will be trained to self evaluate their facility and will certify their FOG management practices utilizing the NBC Oil & Grease Compliance and Best Management Practices Workbook.

3. Regulatory Inspections

As required by NBC Pretreatment Program regulations, all restaurants will continue to be inspected on a regular basis. Participation in the FOG ERP will help firms prepare for regulatory FOG Inspections and help firm comply with FOG regulations.

4. Certification

Restaurants that demonstrate a superior FOG management performance level will be issued a Certification of Best Management Practices which may be displayed in their place of business.

To participate in the NBC FOG-ERP, complete the self-evaluation checklist in the

NBC Fats Oils & Grease Compliance and Best Management Practices Workbook and mail a copy to:

Narragansett Bay Commission
Pollution Prevention Program
One Service Road

valves on the truck, and hosing down the discharge area where spillage occurred.

- After cleaning up, the hauler is to proceed in a forward direction, since backing up is not allowed, and must be sure to exit the facility at a slow speed.

WHAT ELSE SHOULD I KNOW?

- The NBC runs the Septage facility as a service to Rhode Island's non-sewered residents. As such, only septage from within the state of Rhode Island may be brought to the facility. Any loads, or partial loads, from outside the state will not be accepted.

- The hauler must establish and maintain an account with a positive cash balance with the NBC Customer Service Section. The hauler will not be allowed to discharge without sufficient funds.

- Trucks with capacities less than 4,500 gallons are permitted to discharge between the hours of 8:00AM and 2:00PM, Monday through Friday and 8:00AM and 12:00 noon on Saturdays. Larger capacity trucks may discharge between the hours of 2:00PM and 4:00PM weekdays and 12:00 noon to 2:00PM on Saturdays.

- Once the NBC septage station receives 100,000 gallons of septage for any given day, only those trucks with full loads, all originating in the NBC primary service district, will be allowed to discharge. The NBC may only accept 116,000 gallons of septage daily, at which point the facility will close.

- Firms found to be falsifying paperwork submitted to the NBC and/or bringing non-residential quality septage to the facility may be subject to civil, criminal and/or administrative penalties. These penalties could include fines of up to \$25,000 per violation per day, revocation of permit and 30 days imprisonment for criminal violations.

- Haulers who discharge grease or other waste that causes the processing equipment to foul and/or breakdown will be immediately suspended from using the station for a minimum of a two-week period while NBC investigates the cause of the incident.

- Inquiries regarding permitting may be made to the NBC Pretreatment Section by calling (401) 461-8848 Ext. 483.



NARRAGANSETT BAY COMMISSION

LINCOLN SEPTAGE RECEIVING FACILITY

Septage Acceptance Policy Summary



Narragansett Bay Commission
Corporate Headquarters:
1 Service Road, Providence, RI 02905
Phone (401) 461-8848
Fax (401) 461-8540

Pretreatment Office
2 Ernest Street
Providence, RI 02905
Phone (401) 461-8848
Fax (401) 461-0170

Lincoln Septage Receiving Facility:
692 Washington Highway
Lincoln, RI 02865
Phone (401) 333-5610
Fax (401) 333-5610



OVERVIEW

The Narragansett Bay Commission (NBC) has upgraded the Lincoln Septage receiving station, installing new wastewater treatment equipment to reduce odors and remove solids contained in the septage. A six (6) inch hose connection has been installed to speed-up the discharge process and a computer tracking system has been installed for identification and billing streamlining purposes. This informational brochure provides an outline of procedures and practices which must be strictly followed to ensure the acceptance of your septage loads and the proper operation of the NBC facility.

PERMITTING REQUIREMENTS

- All trucks and/or trailers must be permitted with the NBC prior to bringing septage wastewater for disposal. Any changes, such as new or deleted vehicles, must be made known to the NBC Pretreatment office by submitting a new permit application with the correct information. It is the haulers' responsibility to ensure all registrations, insurance and DEM permits for vehicles are obtained and maintained in a valid state.
- Each permitted truck and/or trailer must be weighed empty and full to determine the capacity of the vehicle. This process must be overseen by NBC Pretreatment personnel. Appointments must be

scheduled in advance at 461-8848 Ext. 483 for this purpose.

- All trucks and/or trailers must have a NBC computer tracking chip programmed with identification and capacity information affixed to it.

- All trucks and/or trailers must have Permit Fee Paid and Permitted Volume stickers affixed.

MANIFEST REQUIREMENTS

- The manifest form must be completed in its entirety prior to arriving at the facility. The manifest requires the hauler to certify that only residential quality septage is contained in the truck that shall discharge.

- The manifest must clearly identify the origin of the load. The customer name, address and telephone number for that customer must be indicated for every load which is contained in the truck.

- A signature by the customer that your firm pumped must be on the manifest. If the customer was not home to sign the manifest, additional confirmation information regarding the customer is required in order to discharge the load. This could include a copy of the customer's signed check for the pump out or a photocopy of your company invoice to the customer. These documents must be attached to the manifest in lieu of a customer signature.

- Information provided on manifests is routinely checked by Pretreatment staff to verify the origin of the load. Pretreatment staff will routinely contact your customers.

PROCEDURES TO BE FOLLOWED AT THE STATION

- Upon arriving at the station, the driver is to wait in line to use the facility.
- When it is your turn, the facility operator will inspect the stickers on your vehicle, scan your computer chip and take your manifest and other associated information. If anything is not in order, the load will be refused.
- Prior to discharging you must take a sample under the perview of the station operator. This sample will be checked for pH and visual indications for grease or other suspected pollutants. The pH must be in the range of 5.5 to 12.0 standard units or the load will be refused. Detection of other suspected pollutants will also result in the load being refused.
- When given the OK to discharge, the hauler is to hook up to the six (6) inch discharge connection and proceed to empty the truck. Grease and/or gravel will foul the solids handling equipment and will be readily detected. **If your load contains grease and/or other dense solid material, such as gravel or rocks, do not bring it to the Lincoln facility.** It must be brought elsewhere for proper disposal.
- Upon completing the discharge, the hauler must properly clean up and make the station neat and safe for the next hauler. This includes putting away all hoses, shutting all



Narragansett Bay Commission

Electroplaters, Metal Finishers, Chemical Processing Firms and Other Industries:

Vacation Shutdown Prohibited Sewer Discharges

Typically many industries shut down their operation for a period of time during the holiday months. Past operating experiences in the Narragansett Bay Commission (NBC) District have shown that large quantities of toxic and hazardous wastes have been indiscriminately dumped in significant quantities into the sewer as part of an industry's "clean-up" procedure prior to their shutdown. This usually occurs in the last two weeks of June and throughout the month of July, as well as in December. Pursuant to Title 46 Chapter 25 of the Rhode Island General Laws, the NBC has adopted regulations which prohibit the discharge of wastes which could:

- create a fire or explosion (example: solvents such as trichloroethylene, xylene or gasoline);
- cause corrosive damage to our facilities (example: acids or bases);
- hinder the flow or causes obstructions to our facilities (example: fats, waxes, greases, oils, solids);
- result in an excessive hydraulic/pollutant flow rate (example: slug discharge from the dumping of plating or other baths);
- interfere with treatment facility operations (example: dumping cyanide or heavy metal containing solutions) and;
- cause pass through of the wastewater treatment facility (example: dumping of dyes or pigments).

Other wastes are also regulated specifically by type of waste and concentration by the NBC's Rules and Regulations. Copies of these regulations may be obtained at the NBC's Pretreatment office. In addition, it is illegal to discharge any non-sanitary wastewaters into the NBC sewer system prior to being issued a discharge permit. Please dispose of spent solutions properly. It is less costly than being caught illegally disposing of these wastes. Industries found to be in violation of the NBC's Rules and Regulations may be subject to a fine of up to \$25,000 per violation per day and/or up to thirty (30) days of imprisonment. In general, industries located in the NBC service area are to be commended for the fine job to date at reducing toxic discharges to the sewer. In 1981, local industries discharged 954,099 pounds of heavy metals such as copper, nickel, and zinc, and 80,440 pounds of cyanide to the Field's Point Treatment Facility. A portion of these toxics would eventually pass through the treatment plant and enter Narragansett Bay. There has been a 97.0% reduction in heavy metal discharges to the Field's Point Facility since 1981. The cyanide loadings to this treatment facility were also reduced by 97.6% over this same period. This impressive reduction in toxic discharges by industry has also been noted at the Bucklin Point Wastewater Treatment Facility. The level of toxics entering Narragansett Bay from the NBC facilities has been similarly reduced.

The NBC will continue to be a leader in the field of wastewater treatment and environmental protection to ensure a cleaner Narragansett Bay for all to enjoy. For more information on the proper disposal of wastes from your facility, contact the pretreatment program staff at 461-8848 ext. 490 / TDD 461-6549.

Vincent J. Mesolella, *Chairman*

Raymond J. Marshall, P.E., *Executive Director*

ATTACHMENT VOLUME I

SECTION 2

***TYPICAL NBC WASTEWATER
DISCHARGE PERMITS***

***TYPICAL METALFINISHER
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B1112-094-0925

Company Name: **MATERION TECHNICAL MATERIALS, INC.**

Facility Address: 5 Wellington Road, Lincoln, RI 02865

Mailing Address: 5 Wellington Road, Lincoln, RI 02865

Facility President: Mr. Jugal K. Vijayvargiya

Facility Authorized Agents: Mr. Roy Piatelli, Mr. Matthew Jodoin

User Classification: Metal Finisher

Categorical Standards Applicable: 40 CFR §433.17, Pretreatment Standards for New Sources

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Jugal K. Vijayvargiya and Materion Technical Materials, Inc.**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 19 pages with conditions A - W.

**This permit becomes effective upon receipt
and expires on September 30, 2025.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

October 27, 2020
Date

NOTE: The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Effluent Discharge Limitations:

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 18, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee agrees that the average discharge per calendar day of metal finishing process wastewater is greater than or equal to 50,000 gallons but less than 100,000 gallons per day. Decreasing or increasing the average daily water usage may affect the annual permit fee and/or the monitoring frequency. The permittee must notify the NBC of any deviations from the aforementioned average flow range so that required permit modifications may be made.
5. The permittee is classified as a Metal Finisher and, therefore, must at all times comply with EPA Categorical Regulations 40 CFR §433.17, Pretreatment Standards for New Sources. EPA regulations require that Metal Finishers maintain full compliance with the EPA Total Cyanide Metal Finishing maximum limit of 1.20 ppm and the monthly average limitation of 0.65 ppm at the combined point of cyanide process discharge, prior to combining with non-cyanide bearing wastewater streams, and at the discharge from the cyanide treatment system. Upon conducting an engineering review of the facility, it has been determined that the discharges from the Pump Station PS-2 area are the only waste streams contaminated with cyanide. A sampling location has been installed downstream of T-4, the second stage of the continuous cyanide destruct system. The EPA Total Cyanide Metal Finishing limitations will be enforced at this sampling location. The NBC Total Cyanide limitations will be enforced at the final discharge location.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
 - a. Treated Metal Finishing Rinsewaters;
 - b. Treated Acid Cleaner Solutions;
 - c. Treated Acid Activator Solutions;
 - d. Treated Acid Pickle Solutions;
 - e. Treated Anodic Cleaner Solutions;
 - f. Treated Alkaline Soak Cleaner Solutions;
 - g. Treated Electrocleaner Solutions;
 - h. Treated Ultrasonic Cleaner Solutions;
 - i. Treated Acid Laboratory Sink Wastewaters;
 - j. Treated Brush/Anode Cleaning Wastewaters;
 - k. Treated Backwash Waters;
 - l. Treated Ion Exchange Regenerate and Rinsewaters;
 - m. Treated Cyanide and Alkaline Laboratory Sink Wastewater;
 - n. Treated Cyanide Air Scrubber Blowdown;
 - o. Treated Acid Scrubber Blowdown;
 - p. Treated Boiler Blowdown and Steam Condensate;
 - q. Treated Oscillating Brushline Rinsewaters;
 - r. Treated Rinsewater from Solder-Clad Operations;
 - s. Treated Rinsewater from Clair Line Operations;
 - t. Contract Cooling Water from Pressure Bonding Mills;
 - u. Clutch Cooling Water from Cerdip Machines;
 - v. Secondary Rinse from Solder-Clad Operations;
 - w. Hydrogen Generator Wastewater;
 - x. Treated Kitchen Wastewater;
 - y. Chiller Purge;
 - z. Chiller Discharges on a Batch Basis with prior NBC approval.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

C. Prohibitions:

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
 - a. Concentrated Electroplating Solutions;
 - b. Concentrated Cyanide Solutions;
 - c. Acidic Solutions with a pH less than 5.0 standard units;
 - d. Caustic Solutions with a pH greater than 11.0 standard units;

- e. Degreasing Solutions;
 - f. Solvents;
 - g. Sludges;
 - h. Fuel or Lubricating Oils.
2. The permittee is strictly prohibited from batch discharging the entire contents of the chiller without first receiving approval prior to discharge. In order to receive approval, the contents of the chiller must be sampled in accordance with Section F(3) of this permit.
 3. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 18, attached hereto and incorporated herein.
 4. The permittee may only treat and/or discharge those solutions that were indicated as such on plans submitted to the NBC by the permittee on June 25, 1997, September 8, 2000, July 15, 2004, October 13, 2004, February 9, 2006, May 30, 2007, July 27, 2007, September 2, 2008, August 20, 2010, September 22, 2010, March 27, 2015, May 11, 2015, and August 18, 2020. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
 5. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

D. Pretreatment Requirements:

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of four (4) sample locations must be provided and must collect wastewater from the process operations indicated as follows:
 - Sample Location #1 - Sample port on the discharge line from T-9, collecting all process discharges specified in Section B(1)(a through v) of this permit.
 - Sample Location #2 - Upflow baffle on the second stage cyanide destruct tank T-4, collecting all process discharges specified in Section B(1) (a, m, and n) of this permit.
 - Sample Location #3 - Sample port on the discharge line of the grease removal unit, collecting all process discharges specified in Section B(1)(x) of this permit.

Sample Location #4 - Sample port on the discharge line of the chiller, collecting all process discharges specified in Section B(1)(y and z) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1, #3, and #4 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit. The discharge through Sample Location #2 must be in compliance with the EPA Metal Finishing Standards referenced in Section A(5) of the permit.

2. The permittee shall operate and maintain a pretreatment system in conformance with plans submitted to the NBC on June 25, 1997, July 9, 1999, January 14, 2000, March 26, 2003, November 19, 2003, and October 13, 2004. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

E. Zero Discharge/Recycle Operation Requirements:

1. The permittee shall operate and maintain a Zero Process Discharge Wastewater Recycle Pretreatment System as proposed in the plans that have been submitted to the NBC on October 18, 1993, June 25, 1997, January 14, 2000, and October 13, 2004. This pretreatment system shall be used specifically for the use of recycling wastewater or eliminating discharges from the following operations:
 - a. Alkaline Cleaning Line;
 - b. Copper Plating Rinsewaters;
 - c. Gold Plating Rinsewaters;
 - d. Nickel Plating Rinsewaters;
 - e. Palladium Plating Rinsewaters;
 - f. Tin/Lead Plating Rinsewaters.
2. The permittee shall make no changes to the process tanks or pretreatment system without first submitting plans to the NBC for approval. Only those solutions indicated as being discharged to the treatment system on the plans submitted to the NBC on October 18, 1993, June 25, 1997, January 14, 2000, and October 13, 2004 may be treated on-site in the pretreatment equipment.

3. If any problems with the recycle system arise or if the permittee would like to connect to the sewer for the purpose of discharging any alkaline cleaning line wastewater, copper, gold, nickel, palladium, and/or tin/lead plating rinsewaters, the permittee must notify the NBC, in writing, and obtain written approval from the NBC before resuming discharge or making any physical changes to process tanks, the pretreatment recycle system, or associated piping.
4. The permittee shall cap off and seal all sewer drain lines in the facility and no process wastewater may be discharged to the sewer through sanitary or any other sewer connection.
5. The permittee shall post signs at all sanitary sewer connections stating the following: "Discharge of Chemicals Prohibited by Rhode Island Law".
6. Failure to notify NBC personnel prior to resuming alkaline cleaning, copper, gold, nickel, palladium and/or tin/lead plating process wastewater discharges to the sewer may be considered an intentional violation of the NBC's Rules and Regulations and may subject the permittee to civil and/or criminal penalties as defined in R.I.G.L. §46-25-25.2 and §46-25-25.3.

F. Monitoring Requirements:

1. The permittee shall monitor the pH of the effluent discharge and record it continuously. The permittee shall report the results monthly in a summary report giving the maximum, minimum and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The pH Monitoring Report must be received by the NBC within thirty (30) days from the end of the month in which the data is recorded. The original recording chart must be maintained on site for a period of at least three (3) years.
2. The permittee shall conduct sampling over one (1) full normal operating day during the months of January, February, March, April, May, June, July, August, September, October, November, and December until the expiration date of this permit.
 - a. A composite sample is to be collected which must consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the sample port on the discharge line from T-9, Sample Location #1. The composite samples collected in April and October are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Silver (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)
	Nickel (Total)	

The composite samples collected during all other sampling months are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Copper (Total)	Nickel (Total)	Zinc (Total)
Lead (Total)	Silver (Total)	

- b. On the same day that the composite samples listed in Section F(2)(a) above are being collected, the permittee shall collect a minimum of four (4) grab samples at equidistant time intervals over the entire operating day from the sample port on the discharge line from T-9, Sample Location #1 (i.e., one (1) grab sample collected every two (2) hours over an eight (8) hour operating day). Each grab sample must be preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.6 grams of ascorbic acid must be added. The sample should then be retested for chlorine residual, and if it is present, the addition of ascorbic acid should be repeated. Once residual chlorine has been eliminated from the sample, the pH of the sample must be checked and elevated to greater than 12.0 standard units by the addition of sodium hydroxide, if necessary. Once the grab sample has been preserved to a pH greater than 12.0 standard units and no chlorine residual is detected, it may be composited with the other grab samples collected on that operating day. The composite of preserved grab samples must be refrigerated until analysis and must be analyzed within fourteen (14) days of collection for **Total Cyanide**.

- c. On the same day that the composite samples listed in Section F(2)(a) above are being collected, the permittee shall collect a minimum of four (4) grab samples over the entire operating day from the combined point of discharge of the cyanide bearing rinsewaters, the upflow baffle on the second stage cyanide destruct tank, T-4, Sample Location #2, prior to combining with any other non-cyanide bearing wastestream. Each grab sample must be preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.6 grams of ascorbic acid must be added. The sample should then be retested for chlorine residual, and if it is present, the addition of ascorbic acid should be repeated. Once residual chlorine has been eliminated from the sample, the pH of the sample must be checked and elevated to greater than 12.0 standard units by the addition of sodium hydroxide, if necessary. Once the grab sample has been preserved to greater than 12.0 standard units and no chlorine residual is detected, it may be composited with the other grab samples collected on that operating day. The composite of preserved grab samples must be refrigerated until analysis and must be analyzed within fourteen (14) days of collection for **Total Cyanide**. This sample must be in compliance with the EPA Metal Finishing Total Cyanide Standards referenced in Section A(5) of this permit.

Table 2 attached hereto summarizes the sampling requirements for this facility.

3. Prior to obtaining approval to discharge the contents of the chiller, a grab sample of the chiller wastewater must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Silver (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)
	Nickel (Total)	

4. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of sampling and at the end of sampling. These readings and the resultant total flow are to be submitted with the sampling results.
5. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
6. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding BOD, TSS and pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
7. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
 - a. Failure to meet effluent limitations;
 - b. Change in production processes;
 - c. Expansion or reduction of production;
 - d. Change in water usage;
 - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

G. Record Keeping Requirements:

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
 - a. Amount of chemicals used on a monthly basis;
 - b. Amount of sludge generated on a monthly basis;
 - c. Completed manifest forms for hazardous materials;
 - d. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred;
 - e. The amount of chemicals added to provide pretreatment of batch discharges;
 - f. pH and chlorine residual readings taken during the course of providing batch treatment of any process wastewater and the amount of sludge generated, where applicable;
 - g. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration and other maintenance requests specified by inspectors of the NBC;
 - h. pH, type of solution, and discharge destination of solutions collected in the plating process area spill containment trays;
 - i. A listing of all chiller purges including the time, date, and volume of the discharges.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

H. Spill and Slug Prevention Control Plan:

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

I. Toxic Organic/Solvent Management Plan:

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

J. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR §403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350. Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

K. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

L. Permit Fee:

The permittee agrees to pay an annual permit fee and all sewer user fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G. L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

M. Authorization To Do Business:

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Materion Technical Materials, Inc. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Materion Technical Materials, Inc. has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Materion Technical Materials, Inc. is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Materion Technical Materials, Inc. shall be subject to the terms and conditions of the permit as if named herein.

N. Closing, Selling, Moving the Business:

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

O. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

P. Permit Violations:

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

Q. Revocation/Suspension of Permit:

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
 - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
 - b. Failure to report changes in operations or wastewater constituents;
 - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
 - d. Failure to adhere to an approved compliance schedule;
 - e. Failure to comply with administrative orders or settlement agreements;
 - f. Failure to pay authorized fees and user charges;
 - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The NBC shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

R. Civil and Criminal Liability:

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

S. Duty to Comply:

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

T. Removed Substances:

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

U. Permit Modification/Renewal:

1. This permit may be modified for various reasons, including but not limited to the following:
 - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;

- b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
- c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
- d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
- e. Violation of any terms or conditions of the permit;
- f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
- g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
- h. To correct typographical or other errors in the permit;
- i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
- j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

V. Integration:

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

W. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

NPD:NJD:smb

Attachments:

- Self-Monitoring Compliance Report Form
- Continuous pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- List of Toxic Organic Compounds

Table 1

NBC Effluent Discharge Limitations
Bucklin Point District

<u>Parameter</u>	<u>Limitation (Max)</u>
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300.00*
Total Suspended Solids (TSS)	300.00*
Total Oil and Grease (Fats, Oils, and Grease)	125.0
Oil and Grease (mineral origin)	25.0
Oil and Grease (animal/vegetable origin)	100.0
pH range (at all times)	5.0 - 11.0 s.u.

<u>Parameter</u>	Daily Maximum Concentration Limit (<u>mg/l</u>)	Monthly Average Concentration (<u>mg/l</u>)
Arsenic (Total)	0.20	0.10
Cadmium (Total)	0.11	0.07
Chromium (Total)	2.77	1.63
Copper (Total)	1.20	1.20
Cyanide (Total)	0.50	0.50
Lead (Total)	0.69	0.29
Mercury (Total)	0.06	0.03
Nickel (Total)	1.62	1.62
Selenium (Total)	0.40	0.20
Silver (Total)	0.40	0.20
Tin (Total)	4.00	2.00
Zinc (Total)	1.67	1.39

All limitations are in units of mg/l unless otherwise specified.

* Exceeding this discharge limitation may be permitted but would be subject to a surcharge in accordance with rates approved by the Public Utilities Commission and in accordance with R.I.G.L. §39-1-1 et seq.

Table 2

Materion Technical Materials, Inc.
Sampling Requirements

	Sample Location #1 Sample Port on the Discharge Line from T-9		Sample Location #2 Upflow Baffle on the Second Stage Cyanide Destruct Tank T-4	
Month	Composite Sample	Parameters	Composite Sample	Parameters
January	X	Cu, Pb, Ni, Ag, Zn, CN	X	EPA-CN
February	X	Cu, Pb, Ni, Ag, Zn, CN	X	EPA-CN
March	X	Cu, Pb, Ni, Ag, Zn, CN	X	EPA-CN
April	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN	X	EPA-CN
May	X	Cu, Pb, Ni, Ag, Zn, CN	X	EPA-CN
June	X	Cu, Pb, Ni, Ag, Zn, CN	X	EPA-CN
July	X	Cu, Pb, Ni, Ag, Zn, CN	X	EPA-CN
August	X	Cu, Pb, Ni, Ag, Zn, CN	X	EPA-CN
September	X	Cu, Pb, Ni, Ag, Zn, CN	X	EPA-CN
October	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN	X	EPA-CN
November	X	Cu, Pb, Ni, Ag, Zn, CN	X	EPA-CN
December	X	Cu, Pb, Ni, Ag, Zn, CN	X	EPA-CN

Legend

Cd - Cadmium Pb - Lead
Cr - Chromium Ni - Nickel
Cu - Copper Ag - Silver
CN - Cyanide Zn - Zinc

CERTIFICATE TO DISCHARGE

the following types of process water:

TREATED METAL FINISHING WASTEWATERS

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Materion Technical Materials, Inc.

5 Wellington Road

Lincoln, RI 02865

PERMIT NUMBER: B1112-094-0925

PERMIT EXPIRATION DATE: 09/30/2025

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

October 27, 2020
Initial Date of Issuance

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager

***TYPICAL PHARMACEUTICAL
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B1404-018-0322

Company Name: **DENISON ACQUISITION COMPANY, LLC D/B/A
DENISON PHARMACEUTICALS, LLC**

Facility Address: 1 Powder Hill Road, Lincoln, RI 02865

Mailing Address: 1 Powder Hill Road, Lincoln, RI 02865

Facility President: Mr. Bradley S. Stone

Facility Authorized Agents: Mr. Alfred Silva, Mr. Victor Maia

User Classification: Pharmaceutical Manufacturing Operations

Categorical Standards Applicable: 40 CFR §439.47, Pretreatment Standards for New Sources

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with the Rules And Regulations For The Use Of Wastewater Facilities Within The Narragansett Bay Water Quality Management District (Rules and Regulations), **Mr. Bradley S. Stone and Denison Acquisition Company, LLC d/b/a Denison Pharmaceuticals, LLC**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 19 pages with conditions A - V.

**This permit becomes effective on April 1, 2017
and expires on March 31, 2022.**

Noncompliance with any term or condition of this permit shall constitute a violation of the NBC's Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

March 31, 2017
Date

NOTE: The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Effluent Discharge Limitations:

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 17, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Article 5 of the NBC's Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC's facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC's facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee is classified as a pharmaceutical manufacturing firm and therefore must at all times comply with EPA Categorical Regulations 40 CFR §439.47, Subpart D, Pretreatment Standards for New Sources. EPA regulations require pharmaceutical manufacturers to maintain full compliance with the maximum daily discharge limit of 20.7 ppm and the monthly average of 8.2 ppm for n-amyl acetate, ethyl acetate, and isopropyl acetate. Subpart D of the pharmaceutical regulations also requires categorical pharmaceutical manufacturers to maintain full compliance with the maximum daily discharge limit of 3.0 ppm and the monthly average limit of 0.7 ppm for methylene chloride. NBC discharge limits for the Bucklin Point Treatment Facility do not exist for n-amyl acetate, ethyl acetate, and isopropyl acetate. The categorical limits are therefore in effect for these parameters. Methylene chloride and acetone are included in the NBC list of Total Toxic Organics and must meet the more stringent local limit of 2.13 mg/L. NBC discharge limits for all other parameters in this permit are more stringent than the EPA categorical limitations. Therefore, NBC local limits will be applied and enforced for all other parameters.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions or process wastewater streams to the NBC facilities:
 - a. Treated Process Tank Washwater;
 - b. Treated Laboratory Glassware Washwater;
 - c. Reverse Osmosis Reject Wastewater;

- d. Carbon Filter Backwash;
 - e. Softener Regenerant Wastewater;
 - f. Treated Air Compressor Condensate;
 - g. Non-Contact Cooling Water.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

C. Prohibitions:

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations of the Narragansett Bay Commission. Prohibited discharges include, but are not limited to, the following:
- a. Off-specification Product Batches;
 - b. Concentrated Raw Materials and Solutions;
 - c. Acidic Solutions with a pH less than 5.0 standard units;
 - d. Caustic Solutions with a pH greater than 11.0 standard units;
 - e. Degreasing Solutions;
 - f. Solvents;
 - g. Sludges;
 - h. Fuel or Lubricating Oils;
 - i. Laboratory Chemicals.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 17, attached hereto and incorporated herein.
3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans submitted to the NBC by the permittee on February 13, 2012. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations of the Narragansett Bay Commission, without written approval from the NBC.
4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

D. Pretreatment Requirements:

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Effluent monitoring station, collecting all process discharges specified in Section B(1)(a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit and with the EPA Pharmaceutical Manufacturing Standards referenced in Section A(4) of this permit.

2. The permittee shall provide additional pretreatment of the process wastewater discharges listed in Section B(1) above if determined necessary by the NBC to ensure that effluent limitations are met at all times. Plans of additional pretreatment systems must be submitted to the NBC for approval before beginning construction.
3. The permittee shall operate and maintain a pretreatment system in conformance with plans submitted to the NBC on February 13, 2012. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
4. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

E. Monitoring Requirements:

1. The permittee shall monitor the final pH, and volume of each treated batch discharge and shall record the data in the pretreatment system logbook referenced in Section F(1) of this permit. The final pH, and volume of each batch discharge is to be reported to the NBC monthly on a summary report within thirty (30) days from the end of the month in which the data was recorded. (See sample copy enclosed).

2. During the months of January, April, July, and October, until the expiration date of this permit, the permittee must conduct sampling from the effluent monitoring station, Sample Location #1, while a batch discharge is occurring.
- a. During the months of January, April, July, and October, one grab sample is to be collected in a glass container having a total volume greater than 20 ml. The grab sample must be preserved immediately upon sample collection in accordance with EPA Regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If the sample is known to contain residual chlorine, add sodium thiosulfate preservative (10 mg/40ml) to the empty sample bottles just prior to shipment to the sample site. If the sample is tested and residual chlorine is present then 0.008% by volume of sodium thiosulfate must be added (i.e., 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0-4° C until analysis. No air bubbles may be present in any grab sample or that sample must be discarded. The grab sample is to be analyzed within fourteen (14) days of collection by EPA Method 1666 for the following **Volatile Organic Compounds** specific to the Pharmaceutical Manufacturing Industry:

n-Amyl acetate
Ethyl acetate
Isopropyl acetate
Methylene Chloride

- b. During the months of January, April, July, and October, during the same batch discharge that samples in Section E(2)(a) are collected, one grab sample is to be collected, preserved, and analyzed in accordance with analytical method number D3695, D4763, 524.2, or 1624 and with EPA protocols for the following parameter:

Acetone

- c. During the months of April and October, during the same batch discharge that samples in Section E(2)(a) are collected, one grab sample is to be collected in a glass bottle with a Teflon lined cap with a volume of either 25 or 40 ml. The grab sample must be preserved immediately upon sample collection in accordance with EPA Regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine

residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0-4° C until analysis. No air bubbles may be present in the grab sample or that sample must be discarded. The grab sample is to be analyzed within three (3) days of collection for the **Volatile Organic Compounds (purgeables)** fraction of the Total Toxic Organics (TTO) list enclosed.

- d. During the months of April and October, during the same batch discharge that samples in Section E(2)(a) are collected, one grab sample is to be collected in a 1000 ml (minimum) glass amber bottle with a Teflon lined cap. The grab sample must be preserved immediately upon sample collection according to EPA Regulations. The sample must be tested for residual chlorine with potassium iodide paper. If chlorine residual is present in the sample, 0.008% by volume of sodium thiosulfate must be added (i.e., 80 mg per liter of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate shall be repeated. Once chlorine residual has been eliminated from the sample, the pH of the sample must be adjusted to between 6.0 and 9.0 standard units and the sample must be stored in the dark until analysis. The sample must be extracted within seven (7) days of collection and must be analyzed within forty (40) days of extraction for the **Acid, Base and Neutral fraction** of the Total Toxic Organics (TTO) list enclosed.
- e. During the months of January, April, July, and October, until the expiration date of this permit, one grab sample must be collected in a glass bottle. The samples collected during April and October must be collected from the same batch discharge that is being sampled in Section E(2)(a). The sample must be collected and preserved according to EPA protocols and must be analyzed for the following parameter:

Total Oil and Grease (fats, oils, and grease)

- f. During the months of January, April, July, and October, until the expiration date of this permit, the permittee must collect one grab sample. The samples collected during April and October must be collected from the same batch discharge that is being sampled in Section E(2)(a). The grab sample is to be collected, preserved, and analyzed according to EPA protocols for the following parameters:

Copper (Total)

Zinc (Total)

- g. During the months of January, April, July, and October, until the expiration date of this permit, the permittee must collect one grab sample. The samples collected during April and October must be collected from the same batch discharge that is being sampled in Section E(2)(a). The grab sample is to be collected, preserved, and analyzed according to EPA protocols for the following parameter:

Biochemical Oxygen Demand (BOD)
Total Suspended Solids (TSS)

Table 3 attached hereto summarizes the sampling requirements for this facility.

3. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of sampling and at the end of sampling. These readings and the resultant total flow are to be submitted with the sampling results.
4. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
5. The permittee must compare the analytical report results with the NBC's effluent discharge limitations listed in Table 1. If there are any violations of the NBC's standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC's standards, excluding BOD, TSS and pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
6. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
 - a. Failure to meet effluent limitations;
 - b. Change in production processes;
 - c. Expansion or reduction of production;
 - d. Change in water usage;
 - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

F. Record Keeping Requirements:

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
 - a. Amount of chemicals used on a monthly basis to provide pretreatment;
 - b. Amount of sludge generated on a monthly basis;
 - c. Completed manifest forms for hazardous materials;
 - d. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred;
 - e. The amount of chemicals added to provide pretreatment of batch discharges;
 - f. pH and chlorine residual readings taken during the course of providing batch treatment of any process wastewater and the amount of sludge generated, where applicable;
 - g. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration and other maintenance requests specified by inspectors of the NBC.

2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

G. Spill and Slug Prevention Control Plan:

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

H. Toxic Organic/Solvent Management Plan:

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

I. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350. Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC's Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

J. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

K. Permit Fee:

The permittee agrees to pay an annual permit fee and all sewer user fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

L. Authorization To Do Business:

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Denison Acquisition Company, LLC d/b/a Denison Pharmaceuticals, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Denison Acquisition Company, LLC d/b/a Denison Pharmaceuticals, LLC has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Denison Acquisition Company, LLC d/b/a Denison Pharmaceuticals, LLC is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Denison Acquisition Company, LLC d/b/a Denison Pharmaceuticals, LLC shall be subject to the terms and conditions of the permit as if named herein.

M. Closing, Selling, Moving the Business:

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

N. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

O. Permit Violations:

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC's Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC's NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Article 10 of the NBC's Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

P. Revocation/Suspension of Permit:

1. Violations of the conditions of this permit, the NBC's Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the NBC's Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:

- a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
- b. Failure to report changes in operations or wastewater constituents;
- c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

Q. Civil And Criminal Liability:

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the NBC's Rules and Regulations or State or Federal laws or regulations.

R. Duty To Comply:

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

S. Removed Substances:

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

T. Permit Modification/Renewal:

1. This permit may be modified for various reasons, including but not limited to the following:
 - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
 - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
 - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
 - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
 - e. Violation of any terms or conditions of the permit;
 - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
 - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
 - h. To correct typographical or other errors in the permit;
 - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
 - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Article 8 of the NBC's Rules and Regulations a minimum of ninety (90) days prior to the expiration date.

U. Integration:

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Article 8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Article 2 of the Rules and Regulations.

V. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

NPD:NJD:smb

Attachments:

- Self-Monitoring Compliance Report Form
- Batch pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- List of Toxic Organic Compounds

Table 1

NBC Effluent Discharge Limitations
Bucklin Point District

<u>Parameter</u>	<u>Limitation (Max)</u>
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300.00*
Total Suspended Solids (TSS)	300.00*
Total Oil and Grease (fats, oils and grease)	125.0
Oil and Grease (mineral origin)	25.0
Oil and Grease (animal/vegetable origin)	100.0
pH range (at all times)	5.0 - 11.0 s.u.

<u>Parameter</u>	Daily Maximum Concentration Limit (<u>mg/l</u>)	Monthly Average Concentration (<u>mg/l</u>)
Arsenic (Total)	0.20	0.10
Cadmium (Total)	0.11	0.07
Chromium (Total)	2.77	1.63
Copper (Total)	1.20	1.20
Cyanide (Total)	0.50	0.50
Lead (Total)	0.69	0.29
Mercury (Total)	0.06	0.03
Nickel (Total)	1.62	1.62
Selenium (Total)	0.40	0.20
Silver (Total)	0.40	0.20
Tin	4.00	2.00
Zinc (Total)	1.67	1.39

All limitations are in units of mg/l unless otherwise specified.

* Exceeding this discharge limitation may be permitted but would be subject to a surcharge in accordance with rates approved by the Public Utilities Commission and in accordance with R.I.G.L. §39-1-1 et seq.

Table 2

Denison Acquisition Company, LLC d/b/a
Denison Pharmaceuticals, LLC

Pharmaceutical Manufacturing
Pretreatment Standards for New Sources (PSNS)
40 CFR §439.47

Subpart D		
PSNS for Mixing, Compounding, and Formulating Subcategory D		
Pollutant or Pollutant Property	Maximum for Any One Day (mg/L)	Maximum for Monthly Average (mg/L)
n-Amyl acetate	20.7	8.2
Ethyl acetate	20.7	8.2
Isopropyl acetate	20.7	8.2
Acetone*	20.7	8.2
Methylene Chloride*	3.0	0.7

*Must meet the combined total TTO discharge limit of 2.13 mg/L.

Table 3

Denison Acquisition Company, LLC d/b/a
Denison Pharmaceuticals, LLC
Sampling Requirements

Sample Location #1		
Effluent Monitoring Station		
Month	Grab Sample	Parameters
January	X	Cu, Zn, O&G, Acetone, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Methylene Chloride, BOD, TSS
February		
March		
April	X	Cu, Zn, O&G, VOC, EXT, Acetone, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Methylene Chloride, BOD, TSS
May		
June		
July	X	Cu, Zn, O&G, Acetone, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Methylene Chloride, BOD, TSS
August		
September		
October	X	Cu, Zn, O&G, VOC, EXT, Acetone, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Methylene Chloride, BOD, TSS
November		
December		

Legend

Cd - Cadmium Pb - Lead BOD - Biochemical Oxygen Demand
Cr - Chromium Ni - Nickel TSS - Total Suspended Solids
Cu - Copper Ag - Silver O&G - Total Oil and Grease (fats, oils, and grease)
CN - Cyanide Zn - Zinc VOC - Volatile Organic compounds Portion of TTO List
EXT - Extractable Portion of TTO List

CERTIFICATE TO DISCHARGE

the following types of process water:

TREATED PROCESS TANK WASHWATER, LABORATORY GLASSWARE WASHWATER, REVERSE OSMOSIS WASTEWATER, AIR COMPRESSOR CONDENSATE, NON-CONTACT COOLING WATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Denison Acquisition Company, LLC d/b/a Denison Pharmaceuticals, LLC

1 Powder Hill Road

Lincoln, RI 02865

PERMIT NUMBER: B1404-018-0322

PERMIT EXPIRATION DATE: 03/31/2022

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

March 31, 2017
Initial Date of Issuance

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager

***TYPICAL METAL FORMER
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B1506-017-0423

Company Name: **TIFFANY AND COMPANY**

Facility Address: 300 Maple Ridge Drive, Cumberland, RI 02864

Mailing Address: 300 Maple Ridge Drive, Cumberland, RI 02864

Facility President: Mr. Alessandro Bogliolo

Facility Authorized Agents: Mr. Christopher Lepore, Mr. Timothy LaLonde, Mr. Daniel Brouillard,
Mr. Luc DeSmet

User Classification: Non-Ferrous Precious Metal Forming Operations

Categorical Standards Applicable: 40 CFR §471.45, Pretreatment Standards for New Sources

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with the Rules And Regulations For The Use Of Wastewater Facilities Within The Narragansett Bay Water Quality Management District (Rules and Regulations), **Mr. Alessandro Bogliolo and Tiffany and Company**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 19 pages with conditions A - W and Attachment A.

**This permit is effective on May 1, 2018
and expires on April 30, 2023.**

Noncompliance with any term or condition of this permit shall constitute a violation of the NBC's Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

April 27, 2018
Date

NOTE: The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Effluent Discharge Limitations:

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 17, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Article 5 of the NBC's Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC's facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC's facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee is classified as a non-ferrous precious metal former and, therefore, must at all times comply with EPA Categorical Regulations 40 CFR §471.45, Pretreatment Standards for New Sources. EPA regulations require that non-ferrous precious metal formers maintain production and flow data to ensure full compliance with categorical limitations for cadmium, copper, cyanide, and silver. Table 2 attached to the permit provides concentration based limits calculated from EPA production based limitations and facility production and flow data. The calculations are outlined in Attachment A. Since the EPA limitations in Table 2 are more stringent than the NBC limitations in Table 1, the EPA limitations will be enforced at the final discharge location. Local limitations will be enforced for all other parameters as categorical limitations do not apply.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC's facilities:
 - a. Treated Pickling Rinsewaters;
 - b. Treated Backwash from Filters;
 - c. Treated Investing Wastewaters;
 - d. Treated Divesting Wastewaters;
 - e. Treated Sanding and Grinding Area Floor Spills;
 - f. Treated Wastewater Treatment Room Floor Spills;
 - g. Treated Hand Wash Sink Wastewaters;
 - h. Treated Annealing Quench Contact Cooling Water;
 - i. Treated Shot Casting Contact Cooling Water;

- j. Non-Contact Cooling Water;
 - k. Air Compressor Condensate;
 - l. Eye Wash Station Discharge.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

C. Prohibitions:

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations of the Narragansett Bay Commission. Prohibited discharges include, but are not limited to, the following:
- a. Concentrated Pickling Solutions;
 - b. Mass Finishing Wastewaters;
 - c. Soak Cleaner Solutions;
 - d. Soak Cleaner Rinsewaters;
 - e. Ultrasonic Cleaner Solutions;
 - f. Ultrasonic Cleaner Rinsewaters;
 - g. Wet Air Scrubber Wastewater;
 - h. Casting Department Chiller Unit Solutions;
 - i. Stamp & Strike Annealing Oven Non-Contact Cooling Water;
 - j. Wet Grinding/Sanding Wastewaters;
 - k. Filtered Polishing Wastewaters;
 - l. Cooling Tower Discharges;
 - m. Electroplating Solutions;
 - n. Acetone Dip Tank Solutions;
 - o. Isopropyl Alcohol;
 - p. Isopropyl Alcohol-Castor Oil Solutions;
 - q. Cyanide Solutions;
 - r. Acidic Solutions with a pH less than 5.0 standard units;
 - s. Caustic Solutions with a pH greater than 11.0 standard units;
 - t. Degreasing Solutions;
 - u. Solvents;
 - v. Sludges;
 - w. Fuel or Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 17, attached hereto and incorporated herein.

3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans received by the NBC from the permittee on August 15, 2000, April 24, 2002, June 2, 2003, January 29, 2004, October 20, 2009, March 25, 2010, August 16, 2010, December 15, 2010, March 5, 2012, May 31, 2012, July 16, 2012, December 12, 2012, April 12, 2013, May 1, 2013, September 5, 2013, June 16, 2014, January 13, 2015, August 14, 2015, November 30, 2015, December 3, 2015, April 11, 2016, August 4, 2016 and February 27, 2017. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals, or materials, including all prohibited substances as defined in the Rules and Regulations of the Narragansett Bay Commission, without written approval from the NBC.
4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

D. Pretreatment Requirements:

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of two (2) sample locations must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the final pH adjustment tank, collecting all process discharges specified in Section B(1) (a through j) of this permit.

Sample Location #2 - Sample port on the discharge line of the oil/water separator in the Mechanical Room, collecting all process discharges specified in Section B(1)(i) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Locations #1 and #2 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit. The discharge through Sample Location #1 must be in compliance with the EPA Non-Ferrous Precious Metal Former Standards referenced in Section A(4) and Table 2 of this permit.

2. The permittee shall operate and maintain a pretreatment system in conformance with plans received by the NBC on April 24, 2002, January 29, 2004, October 19, 2006, July 16, 2012 and February 27, 2017. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.

3. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

E. Zero Discharge/Recycle Operation Requirements:

1. The permittee shall operate and maintain a zero process wastewater recycle system as illustrated in the plans that have been received by the NBC on January 29, 2004, October 12, 2004, October 19, 2006, March 18, 2008, July 10, 2009, August 31, 2009, March 23, 2010, December 15, 2010, July 11, 2011, December 2, 2011, July 2, 2012, May 1 2013, September 5, 2013, June 16, 2014, January 13, 2015, December 3, 2015, April 11, 2016 and February 27, 2017. This system shall be used specifically for the purpose of recycling wastewater or eliminating discharges from the following operations:
 - a. Ultrasonic Cleaner Rinsing Operations;
 - b. Soak Cleaner Rinsewaters;
 - c. Mass Finishing Wastewaters;
 - d. Casting Department Chiller Units;
 - e. Wet Grinding/Sanding Operations;
 - f. Filtered Polishing Operations;
 - g. Polishing Department Cleaning Lines;
 - h. Solvent Cleaning Unit Operations;
 - i. Annealing Oven Non-Contact Cooling Water;
 - j. Castor Oil-Isopropyl Alcohol Operations;
 - k. Acetone Dip Tank Operations;
 - l. CNC Cooling Oils.
2. The permittee shall make no changes to the process tanks or zero discharge system without first submitting plans to the NBC for approval. Only those solutions indicated as being discharged to the zero discharge system on the plans received by the NBC on dates referenced in section E(1) above may be treated on-site in the pretreatment equipment.
3. If any problems with the zero discharge systems arise, or if the permittee would like to connect to the sewer for the purpose of discharging wastestreams referenced in Section E(1) above, the permittee must notify the NBC, in writing, and obtain written approval from the NBC before resuming discharge or making any physical changes to the process tanks, recycle systems, evaporation systems, or associated piping.
4. The permittee has capped off and sealed all sewer drain lines associated with the process operations identified in Section E(1) above. They must remain capped off and sealed so that no process wastewater may be discharged to the sewer through sanitary or any other sewer connections from the zero discharge operations.

5. The permittee shall post signs at all sanitary sewer connections stating the following: "Discharge of Chemicals Prohibited by Rhode Island Law".
6. Failure to notify NBC personnel prior to resuming process wastewater discharges to the sewer from the process operations listed in Section E(1) above may be considered an intentional violation of the NBC's Rules and Regulations and may subject the permittee to civil and/or criminal penalties as defined in R.I.G.L. §46-25-25.2 and §46-25-25.3.

F. Monitoring Requirements:

1. The permittee shall monitor the pH of the effluent discharge and record it continuously. The permittee shall report the results monthly in a summary report giving the maximum, minimum and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The permittee must submit the pH Monitoring Report within thirty (30) days from the end of the month in which the data is recorded. The original recording chart must be maintained on site for a period of at least three (3) years.
2. The permittee shall conduct sampling over one (1) full normal operating day during the months of February, April, June, August, October, and December until the expiration date of this permit.
 - a. A composite sample is to be collected which must consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the sample port on the discharge line of the final pH adjustment tank, Sample Location #1. The composite samples collected in April and October are to be preserved and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Lead (Total)	Silver (Total)
Chromium (Total)	Nickel (Total)	Zinc (Total)
Copper (Total)		

The composite samples collected during all other sampling months are to be preserved and analyzed in accordance with EPA protocols for the following parameters:

Copper (Total)	Silver (Total)
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- b. During the months of April and October, on the same day that the composite samples listed in Section F(2)(a) above are being collected, the permittee shall collect a minimum of four (4) grab samples at equidistant time intervals over the entire operating day from the sample port on the discharge line of the final pH adjustment tank, Sample Location #1 (i.e., one (1) grab sample collected every two (2) hours over an eight (8) hour operating day). Each grab sample must be

preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.6 grams of ascorbic acid must be added. The sample should then be retested for chlorine residual, and if it is present, the addition of ascorbic acid should be repeated. Once residual chlorine has been eliminated from the sample, the pH of the sample must be checked and elevated to greater than 12.0 standard units by the addition of sodium hydroxide, if necessary. Once the grab sample has been preserved to a pH greater than 12.0 standard units and no chlorine residual is detected, it may be composited with the other grab samples collected on that operating day. The composite of preserved grab samples must be refrigerated until analysis and must be analyzed within fourteen (14) days of collection for **Total Cyanide**.

3. During the month of October, until the expiration date of this permit, the permittee shall collect one (1) grab sample from the sample port on the discharge line of the oil/water separator in the Mechanical Room, Sample Location #2. The grab sample for each month is to be collected in a glass bottle and must be preserved and analyzed in accordance with EPA protocols for the following parameter:

Total Oil and Grease (fats, oils, and grease)

Table 3 attached hereto summarizes the sampling requirements for this facility.

4. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of sampling and at the end of sampling. These readings and the resultant total flow are to be submitted with the sampling results.
5. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
6. The permittee must compare the analytical report results with the NBC's effluent discharge limitations listed in Table 1. If there are any violations of the NBC's standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC's standards, excluding BOD, TSS and pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.

7. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
 - a. Failure to meet effluent limitations;
 - b. Change in production processes;
 - c. Expansion or reduction of production;
 - d. Change in water usage;
 - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

G. Record Keeping Requirements:

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
 - a. Amount of chemicals used on a monthly basis to provide pretreatment;
 - b. Amount of sludge generated on a monthly basis;
 - c. Completed manifest forms for hazardous materials;
 - d. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration and other maintenance requests specified by inspectors of the NBC.
2. The permittee shall be responsible for maintaining production and flow data for all categorical processes, as defined in 40 CFR §471.45 which discharge to the sewer. These records must be maintained at the facility and be available at all times for NBC review. The permittee shall report the production and flow data monthly to the NBC within thirty (30) days from the end of the month in which the data is recorded.
3. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

H. Spill and Slug Prevention Control Plan:

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

I. Toxic Organic/Solvent Management Plan:

The permittee must maintain an approved Toxic Organic/Solvent Management Plan to ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

J. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR §403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350. Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility.

The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC's Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

K. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

L. Permit Fee:

The permittee agrees to pay an annual permit fee and all sewer user fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G. L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

M. Authorization To Do Business:

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Tiffany and Company shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Tiffany and Company has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Tiffany and Company is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Tiffany and Company shall be subject to the terms and conditions of the permit as if named herein.

N. Closing, Selling, Moving the Business:

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

O. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

P. Permit Violations:

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC's Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC's NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Article 10 of the NBC's Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

Q. Revocation/Suspension of Permit:

1. Violations of the conditions of this permit, the NBC's Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the NBC's Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
 - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
 - b. Failure to report changes in operations or wastewater constituents;
 - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;

- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

R. Civil and Criminal Liability:

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the NBC's Rules and Regulations or State or Federal laws or regulations.

S. Duty to Comply:

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

T. Removed Substances:

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

U. Permit Modification/Renewal:

1. This permit may be modified for various reasons, including but not limited to the following:
 - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
 - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
 - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
 - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
 - e. Violation of any terms or conditions of the permit;
 - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
 - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
 - h. To correct typographical or other errors in the permit;
 - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
 - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Article 8 of the NBC's Rules and Regulations a minimum of ninety (90) days prior to the expiration date.

V. Integration:

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Article 8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Article 2 of the Rules and Regulations.

W. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

AE:NJD:ad

Attachments:

- Self Monitoring Compliance Report Form
- Continuous pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-Four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- List of Toxic Organic Compounds

Table 1

NBC Effluent Discharge Limitations
Bucklin Point District

<u>Parameter</u>	<u>Limitation (Max)</u>
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300.00*
Total Suspended Solids (TSS)	300.00*
Total Oil and Grease (Fats, Oils, and Grease)	125.0
Oil and Grease (mineral origin)	25.0
Oil and Grease (animal/vegetable origin)	100.0
pH range (at all times)	5.0 - 11.0 s.u.

<u>Parameter</u>	<u>Daily Maximum Concentration Limit (mg/l)</u>	<u>Monthly Average Concentration (mg/l)</u>
Arsenic (Total)	0.20	0.10
Cadmium (Total)	0.11	0.07
Chromium (Total)	2.77	1.63
Copper (Total)	1.20	1.20
Cyanide (Total)	0.50	0.50
Lead (Total)	0.69	0.29
Mercury (Total)	0.06	0.03
Nickel (Total)	1.62	1.62
Selenium (Total)	0.40	0.20
Silver (Total)	0.40	0.20
Tin (Total)	4.00	2.00
Zinc (Total)	1.67	1.39

All limitations are in units of mg/l unless otherwise specified.

* Exceeding this discharge limitation may be permitted but would be subject to a surcharge in accordance with rates approved by the Public Utilities Commission and in accordance with R.I.G.L. §39-1-1 et seq.

Table 2
Tiffany and Company

US EPA Effluent Discharge Limitations for
Parameters with Categorical Standards

Parameter	Daily Max. (mg/L)	Monthly Average (mg/L)
Cadmium (Total)	0.07	0.05
Copper (Total)	0.80	0.79
Cyanide (Total)	0.33	0.33
Silver (Total)	0.26	0.13

EPA discharge limits are based upon average production and flow data for the facility and the Non-Ferrous Precious Metal Forming Pretreatment Standards for New Sources 40CFR §471.45 and combined wastestream formula detailed below. See Attachment A of this permit for more details.

The US EPA Categorical Discharge Limitations are more stringent than NBC Effluent Discharge Limitations listed in Table 1. These categorical discharge limitations may be revised as a result of periodic reviews of production and flow data. Permittee will be periodically reviewed and discharge limitations may change as production and water usage change.

Combined Wastestream Formula (CWF)

Alternative Mass Limit Formula

$$M_{cwf} = (\sum M_i) * ((F_t - F_d) / (\sum F_i))$$

M_{cwf} = alternate mass limit for pollutant

M_i = categorical pretreatment standard mass limit for pollutant in stream i

F_i = average daily flow of stream i (minimum 30 day average)

F_d = average daily flow of dilute wastestream (minimum 30 day average)

F_t = average daily flow through the combined treatment facility (minimum 30 day average)

Categorical Discharge Limitation in mg/L

$$C = M_{cwf} / F_t$$

F = Average monthly flow through the combined treatment facility

Table 3

Tiffany and Company
Sampling Requirements

Month	Sample Location #1 Sample Port on the Discharge Line of the Final pH Adjustment Tank		Sample Location #2 Sample Port on the Discharge Line of the Oil/Water Separator in the Mechanical Room	
	Composite Sample	Parameters	Grab Sample	Parameters
January				
February	X	Cu, Ag		
March				
April	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN		
May				
June	X	Cu, Ag		
July				
August	X	Cu, Ag		
September				
October	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN	X	O&G
November				
December	X	Cu, Ag		

Legend

Cd - Cadmium Pb - Lead O&G - Total Oil and Grease (fats, oils, and grease)
Cr - Chromium Ni - Nickel
Cu - Copper Ag - Silver
CN - Cyanide Zn - Zinc

Attachment A

Tiffany and Company
Basis for EPA Discharge Limitations

Production Based Standards

Subpart D PSNS for Surface Treatment Rinse		
Pollutant or Pollutant Property	Maximum for Any One (1) Day	Maximum for Monthly Average
	mg/off-kg (pounds per million off-pounds) of precious metals surface treated	
Cadmium	0.21	0.093
Copper	1.17	0.616
Cyanide	0.179	0.074
Silver	0.253	0.105

Subpart D PSNS for Heat Treatment Contact Cooling Water		
Pollutant or Pollutant Property	Maximum for Any One (1) Day	Maximum for Monthly Average
	mg/off-kg (pounds per million off-pounds) of precious metals surface treated	
Cadmium	0.142	0.063
Copper	0.793	0.417
Cyanide	0.121	0.050
Silver	0.171	0.071

Subpart D PSNS for Shot Casting Contact Cooling Water		
Pollutant or Pollutant Property	Maximum for Any One (1) Day	Maximum for Monthly Average
	mg/off-kg (pounds per million off-pounds) of precious metals surface treated	
Cadmium	0.125	0.055
Copper	0.698	0.367
Cyanide	0.107	0.044
Silver	0.151	0.0631

Attachment A
(continued)

Tiffany and Company
Basis for EPA Discharge Limitations

Combined Wastestream Formula (CWF)

Alternative Mass Limit Formula

$$M_{cwf} = (\sum M_i) * ((F_t - F_d) / (\sum F_i))$$

M_{cwf} = alternate mass limit for pollutant

M_i = categorical pretreatment standard mass limit for pollutant in stream i

F_i = average daily flow of stream i (minimum 30 day average)

F_d = average daily flow of dilute wastestream (minimum 30 day average)

F_t = average daily flow through the combined treatment facility (minimum 30 day average)

Categorical Discharge Limitation in mg/L

$$C = M_{cwf} / F_t$$

F = Average monthly flow through the combined treatment facility

CERTIFICATE TO DISCHARGE

the following types of process water:

TREATED NON-FERROUS PRECIOUS METAL FORMING WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Tiffany and Company

300 Maple Ridge Drive

Cumberland, RI 02964

PERMIT NUMBER: B1506-017-0423

PERMIT EXPIRATION DATE: 04/30/2023

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

April 27, 2018

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL STEAM ELECTRIC POWER
GENERATOR WASTEWATER
DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B1604-008-0422

Company Name: **PAWTUCKET POWER ASSOCIATES, L.P.**

Facility Address: 181 Concord Street, Pawtucket, RI 02860

Mailing Address: 181 Concord Street, Pawtucket, RI 02860

Facility Vice-President: Mr. Dwayne Dychkowski

Facility Authorized Agents: Mr. Todd Annarummo, Ms. Susan Flash, Mr. Richard Taikowski,
Ms. Debby Lemay

User Classification: Steam Electric Power Generation

Categorical Standards Applicable: 40 CFR §423.17, Pretreatment Standards for New Sources

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with the Rules And Regulations For The Use Of Wastewater Facilities Within The Narragansett Bay Water Quality Management District (Rules and Regulations), **Mr. Dwayne Dychkowski and Pawtucket Power Associates, L.P.**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 20 pages with conditions A - W and Attachment A.

**This permit becomes effective on May 1, 2017
and expires on April 30, 2022.**

Noncompliance with any term or condition of this permit shall constitute a violation of the NBC's Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

April 28, 2017
Date

NOTE: The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Effluent Discharge Limitations:

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 18, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Article 5 of the NBC's Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC's facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC's facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee is classified as a Steam Electric Power Generator and, therefore must at all times comply with EPA Categorical Regulations 40 CFR §423.17, Pretreatment Standards for New Sources. EPA regulations require that Steam Electric Power Generators maintain full compliance with the EPA Total Copper maximum limit of 1.0 ppm for chemical metal cleaning wastes. In addition, EPA regulations require that the 126 pollutants listed in Table 2 of this permit shall not be discharged in any detectable amount in cooling tower blowdown as a result of cooling tower chemical additives, with exception to Total Chromium and Total Zinc. Cooling tower wastestreams contaminated with Chromium or Zinc as a result of chemical additives must be in full compliance with the EPA Total Chromium maximum limit of 0.2 ppm and the EPA Total Zinc maximum limit of 1.0 ppm for all cooling tower blowdown discharges. To demonstrate compliance with this requirement, the permittee may conduct an engineering study to verify that the chemicals added to the cooling tower will not result in the 126 pollutants listed in Table 2 of this permit being detectable in the cooling tower blowdown. If the engineering study is submitted and determined to be acceptable to the NBC, then the NBC local discharge limitations specified in Table 1 would become more stringent and the permittee must then maintain full compliance with these limits.
5. EPA Categorical Standards require that 126 Pollutants listed in Table 2 of this permit shall not be discharged in any detectable amount in the cooling tower blowdown as the result of cooling tower chemicals added. In lieu of monitoring, the permittee last submitted an engineering study in August 2012 demonstrating that the chemicals added to the cooling tower will not result in the 126 pollutants listed in Table 2 of this permit being detectable in the cooling tower blowdown. A revised study must be completed and received by May 30, 2017. Therefore the permittee must maintain full compliance with the NBC local limits specified in Table 1 of this permit which are more stringent.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC's facilities:
 - a. Treated Regenerant from Demineralization Equipment;
 - b. Heat Recovery Steam Generator (HRSG) Blowdown;
 - c. Auxiliary Boiler Blowdown;
 - d. Equipment Washdown;
 - e. Floor Washdown;
 - f. Carbon Filter Backwash;
 - g. Cooling Tower Discharges.
2. The permittee may continuously purge up to 60,000 gallons per day of cooling tower wastewater to the NBC's facilities provided that the discharge criteria referenced in Section A(4) are met at all times.
3. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

C. Prohibitions:

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations of the Narragansett Bay Commission. Prohibited discharges include, but are not limited to, the following:
 - a. Polychlorinated Biphenyl Compounds (PCB);
 - b. Fly Ash Transport Wastewaters;
 - c. Chemical Metal Cleaning Wastewaters;
 - d. Acidic Solutions with a pH less than 5.0 standard units;
 - e. Caustic Solutions with a pH greater than 11.0 standard units;
 - f. Degreasing Solutions;
 - g. Solvents;
 - h. Sludges;
 - i. Fuel or Lubricating Oils.
2. The permittee is prohibited from batch discharging the entire contents of the cooling tower or greater than 60,000 gallons per day of cooling tower wastewater without first obtaining approval from the NBC. In order to obtain approval, the contents of the cooling tower must be sampled in accordance with Section F(6) of this permit.
3. The permittee is prohibited from batch discharging the entire contents of the heat recovery steam generator without first obtaining approval from the NBC. In order to obtain approval, the contents of the heat recovery steam generator must be sampled in accordance with Section F(7) of this permit.

4. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 18, attached hereto and incorporated herein.
5. The permittee may only treat and/or discharge those solutions that were indicated as such on plans received by the NBC from the permittee on February 17, 1994. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals, or materials, including all prohibited substances as defined in the Rules and Regulations of the Narragansett Bay Commission, without written approval from the NBC.
6. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

D. Pretreatment Requirements:

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of five (5) sample locations must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the effluent discharge pipe of the oil/water separator, collecting all process discharges specified in Section B(1)(b, c, d, and e) of this permit.

Sample Location #2 - Final pH adjustment tank sample port, collecting all process discharges specified in Section B(1)(a) of this permit.

Sample Location #3 - Sample port on the effluent discharge pipe of the carbon filter backwash line, collecting all process discharges specified in Section B(1)(f) of this permit.

Sample Location #4 - Sample port on the discharge pipe of the cooling tower, collecting all process discharges specified in Section B(1)(g) of this permit.

Sample Location #5 - Sample port on the discharge pipe of the heat recovery steam generator blowdown line, collecting all process discharges specified in Section B(1)(b and c) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Locations #1, #2, #3, #4, and #5 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit. The discharge through Sample Location #4 must be in compliance with the EPA Steam Electric Power Generating Standards referenced in Sections A(4) and A(5) of the permit.

2. The permittee shall operate and maintain a pretreatment system in conformance with plans received by the NBC on February 14, 1994, October 27, 1995, and December 18, 1995. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

E. Cooling Tower Blowdown Requirements:

1. The permittee shall submit written certification monthly stating that the permittee has made no changes to the chemicals or dosage of chemicals routinely added to the cooling tower, as documented to the NBC in the engineering study referenced in Section A of this permit, during the previous one (1) month period. This certification must be made on the form designated Cooling Tower Chemical Certification, Attachment A.
2. Whenever the permittee changes the cooling tower chemicals, or alters the dosage of cooling tower chemicals added to the cooling tower, the permittee must conduct an engineering study to determine if the chemicals added to the cooling tower will cause detectable amounts in the cooling tower blowdown of the 126 pollutants listed in Table 2 of this permit.

F. Monitoring Requirements:

1. The permittee shall monitor the pH of the effluent discharge through Sample Locations #1 and #2 and record it continuously. The permittee shall report the results monthly in a summary report for each location giving the maximum, minimum and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The pH Monitoring Reports must be received by the NBC within thirty (30) days from the end of the month in which the data is recorded. The original recording charts must be maintained on site for a period of at least three (3) years.

2. The permittee shall conduct sampling over one (1) full normal operating day during the months of January, April, July, and October, until the expiration date of this permit.
 - a. A composite sample is to be collected which must consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the sample port on the effluent discharge pipe of the oil/water separator, Sample Location #1. The composite samples are to be collected, preserved and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Nickel (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)

- b. On the same day that the composite sampling listed in Section F(2)(a) is being conducted, the permittee shall collect four (4) grab samples from the sample port on the effluent discharge pipe of the oil/water separator, Sample Location #1. The grab samples must be collected in glass bottles, preserved and analyzed separately in accordance with EPA protocols for the following parameter:

Total Oil and Grease (fats, oils and grease)

The mathematical average of the four grab samples will be used to determine compliance with the NBC discharge limitation for Total Oil and Grease (fats, oils, and grease).

If no discharges occur from heat recovery/steam generating, equipment washing, and/or floor washing operations during the required sampling month, the permittee must notify the NBC in writing and sample the next heat recover/steam generating, equipment washing, and/or floor washing event.

3. During the months of January, April, July, and October, until the expiration date of the permit, the permittee shall collect one (1) grab sample from the final pH adjustment tank sample port, Sample Location #2. The grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Nickel (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)

If the tank is not discharged during the required sampling month, the permittee must notify the NBC in writing and sample during the next discharge of the tank.

- During the months of January, April, July, and October, until the expiration date of the permit, the permittee shall collect one (1) grab sample from the sample port on the effluent discharge pipe of the carbon filter backwash line, Sample Location #3. The grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Nickel (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)

If no discharges occur from backwashing operations during the required sampling month, the permittee must notify the NBC in writing and sample during the next backwash event.

- The permittee shall conduct sampling of the cooling tower over one full operating day during the months of January, April, July, and October, until the expiration date of the permit. A composite sample is to be collected which must consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the sample port on the discharge pipe of the cooling tower, Sample Location #4. The composite samples are to be collected, preserved and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Nickel (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)

If the cooling tower is not discharged during the required sampling month, the permittee must notify the NBC in writing and sample during the next discharge of the cooling tower.

- Prior to batch discharging the contents of the cooling tower or greater than 60,000 gallons per day of cooling tower wastewater, the permittee must collect one (1) grab sample from the sample port on the discharge pipe of the cooling tower, Sample Location #4. The grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Nickel (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)

Analytical results must be submitted to the NBC with a properly completed Self-Monitoring Compliance Report and chain of custody documentation requesting permission to discharge the contents of the cooling tower. The permittee may only batch discharge the contents of the cooling tower once approval is received from the NBC.

7. Prior to batch discharging the contents of the heat recovery steam generator, the permittee must collect two (2) grab samples from the sample port on the discharge pipe of the heat recovery steam generator blowdown line, Sample Location #5. One grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Nickel (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)

The other grab sample must be collected in a glass bottle, preserved, and analyzed separately in accordance with EPA protocols for the following parameter:

Total Oil and Grease (fats, oils, and grease)

Analytical results must be submitted to the NBC with a properly completed Self-Monitoring Compliance Report and chain of custody documentation requesting permission to discharge the contents of the heat recovery steam generator. The permittee may only batch discharge the contents of the heat recovery steam generator once approval is received from the NBC.

Table 3 attached hereto summarizes the sampling requirements for this facility.

8. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of sampling and at the end of sampling. These readings and the resultant total flow are to be submitted with the sampling results.
9. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
10. The permittee must compare the analytical report results with the NBC's effluent discharge limitations listed in Table 1. If there are any violations of the NBC's standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC's standards, excluding BOD, TSS and pH. The resampling results must be submitted to the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
11. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:

- a. Failure to meet effluent limitations;
- b. Change in production processes;
- c. Expansion or reduction of production;
- d. Change in water usage;
- e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

G. Record Keeping Requirements:

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
 - a. Amount of chemicals used on a monthly basis to provide pretreatment;
 - b. Amount of sludge generated on a monthly basis;
 - c. Completed manifest forms for hazardous materials;
 - d. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred;
 - e. The amount of chemicals added to provide pretreatment of batch discharges;
 - f. Maintenance performed on the pretreatment system including probe cleaning and calibration and other maintenance requests specified by inspectors of the NBC.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

H. Spill and Slug Prevention Control Plan:

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

I. Toxic Organic/Solvent Management Plan:

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

J. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR §403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350. Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notifications of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate

the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC's Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

K. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

L. Permit Fee:

The permittee agrees to pay an annual permit fee and all sewer user fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

M. Authorization To Do Business:

The permittee is a limited partnership. The permittee shall ensure the limited partnership be registered with the Rhode Island Secretary of State Corporations Division. Pawtucket Power Associates, L.P. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Pawtucket Power Associates, L.P. has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Pawtucket Power Associates, L.P. is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Pawtucket Power Associates, L.P. shall be subject to the terms and conditions of the permit as if named herein.

N. Closing, Selling, Moving the Business:

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

O. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

P. Permit Violations:

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC's Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC's NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Article 10 of the NBC's Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

Q. Revocation/Suspension of Permit:

1. Violations of the conditions of this permit, the NBC's Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the NBC's Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:

- a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
- b. Failure to report changes in operations or wastewater constituents;

- c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

R. Civil and Criminal Liability:

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the NBC's Rules and Regulations or State or Federal laws or regulations.

S. Duty to Comply:

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

T. Removed Substances:

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

U. Permit Modification/Renewal:

1. This permit may be modified for various reasons, including but not limited to the following:
 - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
 - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
 - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
 - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
 - e. Violation of any terms or conditions of the permit;
 - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
 - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
 - h. To correct typographical or other errors in the permit;
 - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
 - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Article 8 of the NBC's Rules and Regulations a minimum of ninety (90) days prior to the expiration date.

V. Integration:

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Article 8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Article 2 of the Rules and Regulations.

W. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

KL:AB:smb

Attachments:

- Self-Monitoring Compliance Report Form
- Continuous pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- List of Toxic Organic Compounds

Table 1
NBC Effluent Discharge Limitations
Bucklin Point District

<u>Parameter</u>	<u>Limitation (Max)</u>
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300.00*
Total Suspended Solids (TSS)	300.00*
Total Oil and Grease (Fats, Oils, and Grease)	125.0
Oil and Grease (mineral origin)	25.0
Oil and Grease (animal/vegetable origin)	100.0
pH range (at all times)	5.0 - 11.0 s.u.

<u>Parameter</u>	Daily Maximum Concentration Limit (<u>mg/l</u>)	Monthly Average Concentration (<u>mg/l</u>)
Arsenic (Total)	0.20	0.10
Cadmium (Total)	0.11	0.07
Chromium (Total)	2.77	1.63
Copper (Total)	1.20	1.20
Cyanide (Total)	0.50	0.50
Lead (Total)	0.69	0.29
Mercury (Total)	0.06	0.03
Nickel (Total)	1.62	1.62
Selenium (Total)	0.40	0.20
Silver (Total)	0.40	0.20
Tin (Total)	4.00	2.00
Zinc (Total)	1.67	1.39

All limitations are in units of mg/l unless otherwise specified.

* Exceeding this discharge limitation may be permitted but would be subject to a surcharge in accordance with rates approved by the Public Utilities Commission and in accordance with R.I.G.L. §39-1-1 et seq.

Table 2
List of 126 Priority Pollutants
40 CFR §423.17 Appendix A

Volatiles

Acrolein
 Acrylonitrile
 Benzene
 Bromoform
 carbon tetrachloride
 Chlorobenzene
 Chlorodibromomethane
 Chloroethane
 2-chloroethylvinyl ether
 Chloroform
 Dichlorobromomethane
 1,1-dichloroethane
 1,2-dichloroethane
 1,1-dichloroethylene
 1,2-dichloropropane
 1,3-dichloropropylene
 Ethylbenzene
 methyl bromide
 methyl chloride
 methylene chloride
 1,1,2,2-tetrachloroethane
 Tetrachloroethylene
 Toluene
 1,2-trans-dichloroethylene
 1,1,1-trichloroethane
 1,1,2-trichloroethane
 Trichloroethylene
 vinyl chloride

Acid Compounds

2-chlorophenol
 2,4-dichlorophenol
 2,4-dimethylphenol
 4,6-dinitro-o-cresol
 2,4-dinitrophenol
 2-nitrophenol
 4-nitrophenol
 p-chloro-m-cresol
 Pentachlorophenol
 Phenol
 2,4,6-trichlorophenol

Base/Neutral

Acenaphthene*
 Acenaphthylene*
 Anthracene*
 Benzidine
 benzo (a) anthracene*
 benzo (a) pyrene*
 3,4-benzofluoranthene*
 benzo (ghi) perylene*
 benzo (k) fluoranthene
 Bis (2-chloroethoxy) methane
 Bis (2-chloroethyl) ether
 Bis (2-chloroisopropyl) ether
 Bis (2-ethylhexyl) phthalate
 4-bromophenyl phenyl ether
 butylbenzyl phthalate
 2-chloronaphthalene
 4-chlorophenyl phenyl ether
 Chrysene*
 dibenzo (a, h) anthracene*
 1,2-dichlorobenzene
 1,3-dichlorobenzene
 1,4-dichlorobenzene
 3,3-dichlorobenzidine
 diethyl phthalate
 dimethyl phthalate
 di-n-butyl phthalate
 2,4-dinitrotoluene
 2,6-dinitrotoluene
 di-n-octyl phthalate
 1,2-diphenylhydrazine
 (as azobenzene)
 fluoranthene*
 fluorene*
 hexachlorobenzene
 hexachlorobutadiene
 hexachlorocyclopentadiene
 hexachloroethane
 indeno (1,2,3-cd) pyrene*
 isophorone
 nitrobenzene
 n-nitrosodimethylamine
 n-nitrosodi-n-propylamine
 n-nitrosodiphenylamine
 Phenanthrene*
 Pyrene*
 1,2,4-trichlorobenzene
 Naphthalene*

* = Polynuclear Aromatic
 Hydrocarbons

Pesticides

aldrin
 alpha – BHC
 beta – BHC
 gamma – BHC
 delta – BHC
 chlordane
 4,4' – DDT
 4,4' – DDE
 4,4' – DDD
 dieldrin
 alpha-endosulfan
 beta-endosulfan
 endosulfan sulfate
 endrin
 endrin aldehyde
 heptachlor
 heptachlor epoxide
 toxaphene

Polychlorinated Biphenyls

PCB-1242
 PCB-1254
 PCB-1221
 PCB-1232
 PCB-1248
 PCB-1260
 PCB-1016

**Other Toxic Pollutants and
 Total Phenol**

Antimony, Total
 Arsenic, Total
 Beryllium, Total
 Cadmium, Total
 Chromium, Total
 Chromium, Hexavalent
 Copper, Total
 Lead, Total
 Mercury, Total
 Nickel, Total
 Selenium, Total
 Silver, Total
 Thallium, Total
 Zinc, Total
 Asbestos
 Cyanide, Total
 Phenols, Total
 TCDD (Dioxin)

Table 3

Pawtucket Power Associates, L.P.
Sampling Requirements

Month	Sample Location #1 Sample Port on the Effluent Discharge Pipe of the Oil/Water Separator				Sample Location #2 Final pH Adjustment Tank Sample Port		Sample Location #3 Sample Port on the Effluent Discharge Pipe of the Carbon Filter Backwash Line		Sample Location #4 Sample Port on the Discharge Pipe of the Cooling Tower	
	Composite Sample	Parameters	Grab Sample*	Parameters	Grab Sample	Parameters	Grab Sample	Parameters	Composite Sample	Parameters
January	X	Cd, Cr, Cu, Pb Ni, Zn	X	O & G	X	Cd, Cr, Cu, Pb Ni, Zn	X	Cd, Cr, Cu, Pb Ni, Zn	X	Cd, Cr, Cu, Pb Ni, Zn
February										
March										
April	X	Cd, Cr, Cu, Pb Ni, Zn	X	O & G	X	Cd, Cr, Cu, Pb Ni, Zn	X	Cd, Cr, Cu, Pb Ni, Zn	X	Cd, Cr, Cu, Pb Ni, Zn
May										
June										
July	X	Cd, Cr, Cu, Pb Ni, Zn	X	O & G	X	Cd, Cr, Cu, Pb Ni, Zn	X	Cd, Cr, Cu, Pb Ni, Zn	X	Cd, Cr, Cu, Pb Ni, Zn
August										
September										
October	X	Cd, Cr, Cu, Pb Ni, Zn	X	O & G	X	Cd, Cr, Cu, Pb Ni, Zn	X	Cd, Cr, Cu, Pb Ni, Zn	X	Cd, Cr, Cu, Pb Ni, Zn
November										
December										

Legend

Cd - Cadmium Pb - Lead O & G – Total Oil and Grease (fats, oils, and grease)
 Cr - Chromium Ni - Nickel
 Cu - Copper Ag - Silver
 CN - Cyanide Zn - Zinc

*These grab samples are to be collected on the same day that the composite sample is collected. Each grab must be collected, preserved, and analyzed separately.

Attachment A

Cooling Tower Chemical Certification

For the Month of _____, 20__

Company Name: _____

Address: _____

RETURN TO:
Narragansett Bay Commission
Pretreatment Program
2 Ernest Street
Providence, RI 02905-5502

I, _____, as authorized representative of
_____, do hereby decree that the cooling
tower

chemicals used and the cooling tower chemical dosages were not altered in any way during the
past

month. I am aware that if the chemicals used or the additive dosages are altered, then an
engineering

study must be immediately conducted to demonstrate that the changes will not cause detectable
amounts of the 126 priority pollutants in the cooling tower blowdown.

I certify under penalty of law that this document and all attachments were properly prepared
under my direction or supervision in accordance with a system designed to assure that qualified
personnel properly gather and evaluate the information submitted. Based on my inquiry of the
person or persons who manage the system, or those responsible for gathering the information, the
information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I
am aware that there are significant penalties for submitting false information including the
possibility of fine and imprisonment for known violations.

Authorized Representative Signature

Date

CERTIFICATE TO DISCHARGE

the following types of process water:

STEAM ELECTRIC POWER GENERATION WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Pawtucket Power Associates, L.P.

181 Concord Street

Pawtucket, RI 02860

PERMIT NUMBER: B1604-008-0422

PERMIT EXPIRATION DATE: 04/30/2022

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

April 28, 2017
Initial Date of Issuance

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager

***TYPICAL LANDFILL LEACHATE
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: P3412-010-1024

Company Name: **RHODE ISLAND RESOURCE RECOVERY CORPORATION**

Facility Address: 65 Shun Pike, Johnston, R.I. 02919

Mailing Address: 65 Shun Pike, Johnston, R.I. 02919

Facility Executive Director: Mr. Michael Sabitoni

Facility Authorized Agents: Mr. Joseph Brennan, Mr. Brian Card, Mr. Joseph Reposo,
Ms. Inga Hoit, Mr. Patrick Doyle

User Classification: Landfill Operations

Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Michael Sabitoni**, in his capacity as Executive Director of Rhode Island Resource Recovery Corporation, and **Rhode Island Resource Recovery Corporation.**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 18 pages with conditions A - T and Attachment 1.

**This permit becomes effective on November 1, 2019
and expires on October 31, 2024.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

October 29, 2019
Date

NOTE: The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Effluent Discharge Limitations:

1. The Permittee shall at all times comply with the effluent limitations specified in Table 1 on page 16, and Table 2 on page 17, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The Permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The Permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The Permittee shall not discharge more than 650,000 gallons per day. The Permittee shall not exceed a maximum discharge flow rate of 38,000 gallons per hour. The daily average flow rate shall not exceed 27,000 gallons per hour. The Permittee agrees not to exceed the specified maximum daily and hourly flow restrictions and must notify the NBC in advance of any exceedances of the aforementioned flow rates.
5. The Permittee shall comply with interim discharge limitations specified in this section. The NBC may revise the interim limitations at any time. The NBC is performing a local discharge limitation analysis to determine parameter concentrations that will replace the interim limitations. Until such time the local discharge limitations for the Field's Point district are established by the NBC and approved by the DEM, the Permittee must comply with the interim limitations in effect. The Permittee shall comply with the following interim discharge limitations:

	<u>Daily Maximum Limitation</u>	<u>Monthly Average</u>
Arsenic (Total)	0.60 mg/L	0.40 mg/L
Ammonia*	5.0 mg/L	
Nitrate + Nitrite*	10.0 mg/L	
Non-Biodegradable Organic Nitrogen*	100.0 mg/L	

*The interim effluent discharge limitations for Ammonia, Nitrate+Nitrite and Non-Biodegradable Organic Nitrogen are seasonal limitations. These interim limits are effective May 1st through October 31st of every year.

The interim discharge limitations are specified in Table 2 on page 17.

B. Permitted Discharges:

1. The Permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
 - a. Treated Landfill Leachate;
 - b. Treated Discharges from the OU1/Phase 1 Site;
 - c. Gas Line Condensate;
 - d. Oil/Water Separator Discharges.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

C. Prohibitions:

1. The Permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
 - a. Electroplating Solutions;
 - b. Cyanide Solutions;
 - c. Acidic Solutions with a pH less than 5.0 standard units;
 - d. Caustic Solutions with a pH greater than 11.0 standard units;
 - e. Degreasing Solutions;
 - f. Solvents;
 - g. Sludges;
 - h. Fuel or Lubricating Oils;
 - i. Gasoline;
 - j. Benzene;
 - k. Radioactive Wastes;
 - l. Hazardous Wastes;
 - m. Trucked or hauled waste of any type.
2. The Permittee is strictly prohibited from accepting wastewater from the combustion condensate and gas conditioning and compression operations conducted by Rhode Island LFG Genco, LLC without receiving written approval from the NBC. The valve in Manhole Number 5 must remain locked out at all times.
3. The Permittee is strictly prohibited from accepting and treating wastewater from any other source or business through the SBR pretreatment system without first obtaining written approval from the NBC on any such discharge.

4. New or existing companies located on Rhode Island Resource Recovery Corporation property are strictly prohibited from connecting to the NBC sewer system without obtaining a NBC Sewer Connection Permit or discharging to the NBC system via the Rhode Island Resource Recovery Corporation discharge system without prior NBC approval.
5. The Permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or waste streams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 16, and Table 2 on page 17, attached hereto and incorporated herein.
6. The Permittee may only treat and/or discharge those solutions that were indicated as such on plans submitted to the NBC by the Permittee on July 14, 2014, September 19, 2014, and September 26, 2014. The Permittee is strictly prohibited from discharging any other tanks, solutions, chemicals, or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
7. The Permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

D. Pretreatment Requirements:

1. The Permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of two (2) sample locations must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the final equalization tank, collecting all process discharges specified in Section B(1) (a and b) of this permit.

Sample Location #2 - Sample port on the discharge line of the oil/water separator located near the SBR Administration Building, collecting all process discharges specified in Section B(1)(d) of this permit.

The Permittee is prohibited from discharging dilution waste streams into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Locations #1 and #2 must be in compliance with the effluent limitations specified in Section A, Table 1, and Table 2 of this permit.

2. The Permittee shall operate and maintain pretreatment systems in conformance with plans submitted to the NBC on July 14, 2014, September 19, 2014, and September 26, 2014. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The Permittee shall add a carbon source to the SBR pretreatment system throughout April of each year to accelerate biological nutrient removal processes and shall operate the system to the fullest extent necessary to achieve and maintain compliance with the interim discharge limitations for nitrogen compounds specified in Table 2 of this permit.
4. The Permittee has installed a Proline Promag L 400 electro-magnetic meter on the discharge line of the SBR pretreatment system. This magnetic water meter will be used for NBC billing purposes and is prohibited from being reset by Rhode Island Resource Recovery Corporation. The meter must be equipped with magnetic strips and the casing must be fitted with a lock to ensure the meter will not be reset. The key for the magnetic meter must be given solely to the NBC Customer Service Section. The Proline Promag L 400 electro-magnetic meter must be inspected on a monthly basis, cleaned accordingly, and calibrated quarterly until the expiration date of this permit. A meter reading from the last day of each month is to be submitted to the NBC Customer Service Section on the first day of following month.
5. The Permittee is responsible for properly operating and maintaining the pretreatment systems to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

E. Monitoring Requirements:

1. The Permittee shall monitor the pH of the effluent discharge and record it continuously. The Permittee shall report the results monthly in a summary report giving the maximum, minimum, and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The Permittee shall record the volume of landfill leachate discharged to the NBC sewer system on a daily basis on the pH Monitoring Report. The pH Monitoring Report must be received by the NBC within thirty (30) days from the end of the month in which the data is recorded. The original recording chart must be maintained on site for a period of at least three (3) years.

- The Permittee shall conduct routine monitoring from the sample port on the discharge line of the final equalization tank, Sample Location #1, one day each week for nitrogen compounds during the period from May 1st through October 31st of each year. The weekly composite samples must be collected, preserved, and analyzed separately in accordance with EPA protocols for the following parameters:

Nitrogen Parameters:

Ammonia (Total)	Nitrate + Nitrite Total Nitrogen	Total Kjeldahl Nitrogen
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- The Permittee shall conduct sampling over one (1) full normal operating day during the months of January, February, March, April, May, June, July, August, September, October, November, and December, until the expiration date of this permit. The monthly samples must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Metals:

Arsenic (Total)	Copper (Total)	Nickel (Total)
Cadmium (Total)	Lead (Total)	Silver (Total)
Chromium (Total)	Mercury (Total)	Zinc (Total)

Nitrogen Parameters:

Ammonia (Total)	Nitrate + Nitrite Total Nitrogen	Total Kjeldahl Nitrogen
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Other Parameters:

Cyanide
Total Oil & Grease (fats, oils, and grease)
Total Toxic Organics (TTO)
Biochemical Oxygen Demand (BOD₅)
Total Suspended Solids (TSS)

The sampling protocols for the parameters listed above are detailed in Attachment 1 of this permit.

Table 3 attached hereto summarizes the sampling requirements for this facility.

- All discharge meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of sampling and at the end of sampling. These readings and the resultant total flow are to be submitted with the sampling results.

5. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The Permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the Permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
6. The Permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1 and Table 2. If there are any violations of the NBC standards, the Permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding BOD, TSS and pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the Permittee became aware of the initial violation of the standards.
7. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
 - a. Failure to meet effluent limitations;
 - b. Change in production processes;
 - c. Expansion or reduction of production;
 - d. Change in wastewater flows;
 - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

F. Record Keeping Requirements:

1. The Permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
 - a. Amount of chemicals used on a monthly basis to provide pretreatment;
 - b. Amount of sludge generated on a monthly basis;
 - c. Completed manifest forms for hazardous materials;
 - d. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration and other maintenance requests specified by inspectors of the NBC;
 - e. Quarterly calibrations, cleaning and daily meter readings from the Proline Promag L 400 electro-magnetic meter referenced in Section D(4) of this permit.

2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the Permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the Permittee for a period of at least three (3) years following resolution of such litigation or dispute.

G. Spill and Slug Prevention Control Plan:

The Permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

H. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the Permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350. Within five (5) days following an accidental discharge, the Permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the Permittee.

2. Routine Notification of Operational Changes

The Permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the Permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the Permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the Permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the Permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The Permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the Permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure;
- f. Cell liner failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the Permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

I. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the Permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

J. Permit Fee:

The Permittee agrees to pay an annual permit fee and all sewer user fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The Permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

K. Closing, Selling, Moving the Business:

If the Permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the Permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

L. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The Permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

M. Permit Violations:

1. Enforcement Costs

The Permittee agrees to hold harmless and indemnify and/or reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The Permittee agrees to hold harmless and indemnify and/or reimburse the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the Permittee, either individually or by interaction with other wastes.

3. Violations of the NBC Permit

The Permittee agrees to hold harmless and indemnify and/or reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the Permittee, either individually or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

N. Revocation/Suspension of Permit:

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
 - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
 - b. Failure to report changes in operations or wastewater constituents;
 - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
 - d. Failure to adhere to an approved compliance schedule;
 - e. Failure to comply with administrative orders or settlement agreements;
 - f. Failure to pay authorized fees and user charges;
 - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the Permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Narragansett Bay Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

O. Civil And Criminal Liability:

Nothing in this permit shall be construed to relieve the Permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

P. Duty To Comply:

1. The Permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the Permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Q. Removed Substances:

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

R. Permit Modification/Renewal:

1. This permit may be modified for various reasons, including but not limited to the following:
 - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
 - b. Material or substantial alterations or additions to Permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
 - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
 - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
 - e. Violation of any terms or conditions of the permit;
 - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
 - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
 - h. To correct typographical or other errors in the permit;
 - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
 - j. Upon request of the Permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the Permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

S. Integration:

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

T. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

NPD:KMB:smb

Attachments:

- Self-Monitoring Compliance Report Form
- Continuous pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories

Table 1

NBC Effluent Discharge Limitations
Field's Point District

<u>Parameter</u>	<u>Limitation (Max)</u>
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300.00*
Total Suspended Solids (TSS)	300.00*
Total Oil and Grease (fats, oils and grease)	125.0
Oil and Grease (mineral origin)	25.0
Oil and Grease (animal/vegetable origin)	100.0
pH range (at all times)	5.0 - 11.0 s.u.

<u>Parameter</u>	Daily Maximum Composite for 1 day (<u>mg/l</u>)	Average 10 day (<u>mg/l</u>)
Cadmium (Total)	0.11	0.07
Chromium (Total)	2.77	1.71
Copper (Total)	1.20	1.20
Cyanide (Total)	0.58	0.58
Lead (Total)	0.60	0.40
Mercury (Total)	0.005	0.005
Nickel (Total)	1.62	1.62
Silver (Total)	0.43	0.24
Zinc (Total)	2.61	1.48

All limitations are in units of mg/l unless otherwise specified.

* Exceeding this discharge limitation may be permitted but may be subject to a surcharge in accordance with rates approved by the Public Utilities Commission and in accordance with R.I.G.L. §39-1-1 et seq.

Table 2

NBC Interim Effluent Discharge Limitations

<u>Parameter</u>	<u>Daily Maximum Limitation</u>	<u>Monthly Average</u>
Arsenic (Total)	0.60 mg/L	0.40 mg/L
Ammonia*	5.0 mg/L	
Nitrate + Nitrite*	10.0 mg/L	
Non-Biodegradable Organic Nitrogen*	100.0 mg/L	
Maximum Daily Flow	650,000 gallons/day	
Maximum Flow Rate	38,000 gallons/hour	
Daily Average Flow Rate	27,000 gallons/hour	

*The interim effluent discharge limitations for Ammonia, Nitrate+Nitrite and Non-Biodegradable Organic Nitrogen are seasonal limitations. These interim limits are effective May 1st through October 31st of every year.

Table 3

Rhode Island Resource Recovery Corporation
Sampling Requirements

Sample Location #1				
Sample Port on the Discharge Line of the Final Equalization Tank				
Monthly			Weekly	
Month	Composite Sample	Parameters	Composite Sample	Parameters
January	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, Nitrate+Nitrite, TKN, TN		
February	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, Nitrate+Nitrite, TKN, TN		
March	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, Nitrate+Nitrite, TKN, TN		
April	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, Nitrate+Nitrite, TKN, TN		
May	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, Nitrate+Nitrite, TKN, TN	X	Ammonia, Nitrate+Nitrite, TKN, TN
June	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, Nitrate+Nitrite, TKN, TN	X	Ammonia, Nitrate+Nitrite, TKN, TN
July	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, Nitrate+Nitrite, TKN, TN	X	Ammonia, Nitrate+Nitrite, TKN, TN
August	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, Nitrate+Nitrite, TKN, TN	X	Ammonia, Nitrate+Nitrite, TKN, TN
September	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, Nitrate+Nitrite, TKN, TN	X	Ammonia, Nitrate+Nitrite, TKN, TN
October	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, Nitrate+Nitrite, TKN, TN	X	Ammonia, Nitrate+Nitrite, TKN, TN
November	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, Nitrate+Nitrite, TKN, TN		
December	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, Nitrate+Nitrite, TKN, TN		

Legend

Cd – Cadmium
 Cr – Chromium
 Cu – Copper
 CN – Cyanide
 Pb – Lead

Hg – Mercury
 Ni – Nickel
 Ag - Silver (Total)
 Zn - Zinc (Total)

O&G - Total Oil & Grease (fats, oils & grease)
 BOD – Biochemical Oxygen Demand
 TSS – Total Suspended Solids
 TTO – Total Toxic Organics
 TKN - Total Kjeldahl Nitrogen
 TN - Total Nitrogen

*Cyanide and Total Oil & Grease samples are to be collected as four grab samples over the course of the day in accordance with Attachment 1.

Attachment 1

Monitoring Protocols

There are two types of samples that can be collected, composites and grab samples.

Composite samples are to consist of equal volume grab samples collected every half hour or collected continuously with a composite sampler.

Grab samples are samples collected at one time.

Metals samples are to be collected as composite samples. The pH of the metals sample is to be adjusted to below 2.0 standard units (s.u.) by the addition of nitric or sulfuric acid and refrigerated until analysis. The parameters for metals analysis are:

Arsenic (Total)	Copper (Total)	Nickel (Total)
Cadmium (Total)	Lead (Total)	Silver (Total)
Chromium (Total)	Mercury (Total)	Zinc (Total)

Nutrient samples are to be collected as composite samples. Nutrient samples are to be preserved immediately upon collection by adding sulfuric acid to the sample to lower the pH to below 2.0 s.u. The samples must be refrigerated until analysis which must be completed within 28 days. The parameters that must be analyzed are:

Ammonia (Total)	Nitrate + Nitrite	Total Kjeldahl Nitrogen
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Samples for Biochemical Oxygen Demand (BOD₅) and Total Suspended Solids (TSS) are to be collected as composite samples. No preservation chemicals are needed for these parameters.

The Permittee may collect one composite sample for the aforementioned parameters. The composite sample may be poured off into three separate bottles. One bottle each for metals, nutrient, and BOD/TSS.

Cyanide: Four (4) grab samples shall be collected at equidistant time intervals over the entire operating day (i.e. one (1) sample every two (2) hours over the course of an eight (8) hour operating day). Each grab sample must be preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.6 grams of ascorbic acid must be added. The sample should then be retested for chlorine residual, and if it is present, the addition of ascorbic acid should be repeated. Once residual chlorine has been eliminated from the sample, the pH of the sample must be checked and elevated to greater than 12.0 standard units by the addition of sodium hydroxide, if necessary. Once the grab sample has been preserved to a pH greater than 12.0 standard units and no chlorine residual is

detected, it may be composited with the other grab samples collected on that operating day. The composite of the four (4) preserved grab samples must be refrigerated until analysis and must be analyzed within fourteen (14) days of collection.

Total Oil and Grease (fats, oils, and grease): Four (4) grab samples shall be collected at equidistant time periods over the entire operating day (i.e. one (1) sample every two (2) hours over the course of an eight (8) hour operating day). Each grab sample must be collected in a glass bottle, preserved, and analyzed separately in accordance with EPA protocols. The mathematical average of the four results must be reported to determine compliance with the NBC discharge limitation of 125 ppm for Total Oil and Grease.

Total Toxic Organics (TTO) shall be conducted by collecting two separate samples according to the following procedures:

- a. ***Volatile Organic Compounds Sampling*** - Four (4) grab samples are to be collected at equidistant time periods over the entire operating day (i.e. one (1) sample every two (2) hours over the course of an eight (8) hour operating day). Each grab sample is to be collected in a glass bottle with a Teflon lined cap with a volume of either 25 or 40 ml. Each grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e. 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0 - 4°C until analysis. No air bubbles may be present in any grab sample or that sample must be discarded. Each grab sample is to be analyzed separately and the mathematical average reported. Alternatively, the grab samples may be composited in the laboratory at a temperature of 0 - 4°C immediately before analysis. All samples must be analyzed within three (3) days of collection for the Volatile Organic Compounds (purgeables) fraction of the Total Toxic Organics (TTO) list enclosed.
- b. ***Acid, Base, and Neural Fraction Sampling*** - Collect a composite sample, which is to consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. A minimum of 1,000 ml (1L) of wastewater is to be collected in an amber glass bottle with a Teflon lined cap and submitted for analysis. Each grab sample must be preserved immediately upon sample collection according to EPA protocols prior to compositing with other preserved grab samples. If an automatic composite sampler is used, it must be as free as possible of plastic tubing and other potential sources of contamination; if the sampler includes a peristaltic pump, use a minimum length of properly cleaned

silicone rubber tubing. The sampler must utilize glass sampling containers. The samples must be refrigerated to a temperature of 0-4°C during sample collection and must be immediately preserved once the sample collection process is completed. The samples must be tested for residual chlorine with potassium iodide paper. If chlorine residual is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e. 80mg per liter of sample collected). The sample should then be retested for chlorine residual, if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample must be stored in the dark until analysis. All samples must be extracted within seven (7) days of collection and must be analyzed within forty (40) days of extraction for the **Acid, Base and Neutral** fraction of the Total Toxic Organics (TTO) list enclosed.

CERTIFICATE TO DISCHARGE

the following types of process water:

LANDFILL LEACHATE DISCHARGES

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Rhode Island Resource Recovery Corporation

65 Shun Pike

Johnston, RI 02919

PERMIT NUMBER: P3412-010-1024

PERMIT EXPIRATION DATE: 10/31/2024

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

October 29, 2019
Initial Date of Issuance

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager

***TYPICAL BREWERY
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: P3604-001-0525
Company Name: **271 TOCKWOTTEN PARTNERS, LLC**
Facility Address: 271 Tockwotten Street, Providence, RI 02912
Mailing Address: 461 Main Street, Pawtucket, RI 02860
Facility President: Mr. William Luby
Facility Authorized Agent: Ms. Stacy Taoiano
User Classification: Brewery Operations
Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. William Luby and 271 Tockwotten Partners, LLC**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 16 pages with conditions A - U.

**This permit becomes effective upon receipt
and expires on May 31, 2025.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

August 20, 2020
Date

NOTE: The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Effluent Discharge Limitations:

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 15, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
 - a. Brewery Operation Wastewater;
 - b. Mash Rinse Washwater;
 - c. Lauter Tun Rinse Washwater;
 - d. Wort Kettle/Whirlpool Rinse Washwater;
 - e. Fermentor Rinse Washwater;
 - f. Lagging Tank Washwater;
 - g. Brite Beer Tank Washwater;
 - h. Kegging Washwater;
 - i. Boiler Blowdown.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

C. Prohibitions:

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:

- a. Waste Beer and Off-Specification Product;
 - b. Spent Mash, Grains, and Yeast;
 - c. Tank Heels/Bottoms;
 - d. Non-Contact Cooling Water;
 - e. Acidic Solutions with a pH less than 5.0 standard units;
 - f. Caustic Solutions with a pH greater than 11.0 standard units;
 - g. Degreasing Solutions;
 - h. Solvents;
 - i. Sludges;
 - j. Fuel or Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 15, attached hereto and incorporated herein.
 3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans submitted to the NBC by the permittee on July 15, 2020 and August 12, 2020. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
 4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

D. Pretreatment Requirements:

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of two (2) sample locations must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Waste sample port downstream of the clean-in-place system and pH Buffering tank, collecting all process discharges specified in Section B(1)(a through h) of this permit.

Sample Location #2 - Sample port on the discharge line of the boiler, collecting all process discharges specified in Section B(1)(i) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Locations #1 and #2 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee shall install, operate, and maintain a pretreatment system in conformance with plans submitted to the NBC on April 2, 2020, July 15, 2020, and August 12, 2020. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

E. Monitoring Requirements:

1. The permittee shall monitor the final pH and volume of each treated batch discharge and shall record the data in the pretreatment system logbook referenced in Section G(1) of this permit. The final pH and volume of each batch discharge is to be reported to the NBC monthly on a summary report within thirty (30) days from the end of the month in which the data was recorded. (See sample copy enclosed).
2. During the first full normal week of operations, the permittee shall conduct wastewater sampling on each of four (4) consecutive operating days as follows:
 - a. A composite sample is to be collected on each of the four (4) consecutive days. Each of the four (4) composite samples is to consist of equal volume grab samples collected prior to each batch discharge of the clean-in-place system over the operating day. The samples are to be collected from the waste sample port downstream of the clean-in-place system and pH Buffering tank, Sample Location #1. Each of these four (4) composite samples are to be collected, preserved, and analyzed in accordance with EPA protocols separately for the following parameters:

Biochemical Oxygen Demand (BOD₅)
Total Suspended Solids (TSS)
 - b. The analytical results are to be received by the NBC by September 30, 2020. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). These results are to be accompanied by a certified laboratory analysis sheet including chain of custody documentation, indicating the EPA approved test procedure for each parameter listed. A completed Self-Monitoring Compliance Report form must also accompany each set of results (see sample copy enclosed).

3. The permittee shall conduct sampling over one (1) full normal operating day during the months of January, April, July, and October until the expiration date of this permit. The permittee must collect a composite sample which must consist of equal volume grab samples collected prior to each batch discharge of the clean-in-place system over the operating day. The samples are to be collected from the waste sample port downstream of the clean-in-place system and pH Buffering tank, Sample Location #1. The composite samples collected during each sampling month are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand (BOD₅)
Total Suspended Solids (TSS)

Table 2 attached hereto summarizes the sampling requirements for this facility.

4. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of sampling and at the end of sampling. These readings and the resultant total flow are to be submitted with the sampling results.
5. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
6. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding BOD, TSS and pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
7. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
 - a. Failure to meet effluent limitations;
 - b. Change in production processes;
 - c. Expansion or reduction of production;
 - d. Change in water usage;
 - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

F. Record Keeping Requirements:

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
 - a. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred;
 - b. The amount of chemicals added to provide pretreatment of batch discharges;
 - c. pH readings taken during the course of providing batch treatment of any process wastewater and the amount of sludge generated, where applicable;
 - d. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration, and other maintenance requests specified by inspectors of the NBC.

2. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the boiler operation, including but not limited to the following:
 - a. A listing of each boiler facility blowdown visual inspection documenting the date, time, person conducting the blowdown and the appearance of the blowdown. This procedure ensures that a prohibited material is not discharged;
 - b. A listing of the date of each fuel tank filling.

3. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

G. Spill and Slug Prevention Control Plan:

Within one (1) month from the effective date of this permit, the permittee must complete and submit the NBC guidance document entitled Spill and Slug Prevention Control Plan for NBC Sewer Users. This plan shall include detailed plans of equipment and structures that have been or will be installed to prevent incidental or accidental spills of untreated wastewater, raw materials, and/or hazardous materials from entering the NBC facilities. This plan shall include a description of the operating procedures to contain and handle the spill and shall address all items in the enclosed copy of the plan. The permittee must obtain NBC approval of the Spill and Slug Prevention Control Plan. Within one (1) month from the approval date of the Spill and Slug Prevention Control Plan, the permittee must implement the NBC approved Spill and Slug Prevention Control Plan and must maintain the plan in effect at all times.

H. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

The permittee must maintain all associated facilities to ensure that incidental and accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

I. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

J. Permit Fee:

The permittee agrees to pay an annual permit fee and all sewer user fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

K. Authorization To Do Business:

The permittee is a limited liability company. The permittee shall ensure the limited liability company be registered with the Rhode Island Secretary of State Corporations Division. 271 Tockwotten Partners, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event 271 Tockwotten Partners, LLC has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event 271 Tockwotten Partners, LLC is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of shall be subject to the terms and conditions of the permit as if named herein.

L. Closing, Selling, Moving the Business:

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

M. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

N. Permit Violations:

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

O. Revocation/Suspension of Permit:

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:

- a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
- b. Failure to report changes in operations or wastewater constituents;
- c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

P. Civil And Criminal Liability:

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

Q. Duty To Comply:

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

R. Removed Substances:

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

S. Permit Modification/Renewal:

1. This permit may be modified for various reasons, including but not limited to the following:
 - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
 - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
 - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
 - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
 - e. Violation of any terms or conditions of the permit;
 - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
 - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
 - h. To correct typographical or other errors in the permit;
 - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
 - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

T. Integration:

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

U. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

EJS:NJD:smb

Attachments:

- Self-Monitoring Compliance Report Form
- Batch pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- Spill and Slug Prevention Control Plan

Table 1

NBC Effluent Discharge Limitations
Field's Point District

<u>Parameter</u>	<u>Limitation (Max)</u>
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300.00*
Total Suspended Solids (TSS)	300.00*
Total Oil and Grease (fats, oils and grease)	125.0
Oil and Grease (mineral origin)	25.0
Oil and Grease (animal/vegetable origin)	100.0
pH range (at all times)	5.0 - 11.0 s.u.

<u>Parameter</u>	<u>Daily Maximum Composite for 1 day (mg/l)</u>	<u>Average 10 day (mg/l)</u>
Cadmium (Total)	0.11	0.07
Chromium (Total)	2.77	1.71
Copper (Total)	1.20	1.20
Cyanide (Total)	0.58	0.58
Lead (Total)	0.60	0.40
Mercury (Total)	0.005	0.005
Nickel (Total)	1.62	1.62
Silver (Total)	0.43	0.24
Zinc (Total)	2.61	1.48

All limitations are in units of mg/l unless otherwise specified.

* Exceeding this discharge limitation may be permitted but would be subject to a surcharge in accordance with rates approved by the Public Utilities Commission and in accordance with R.I.G.L. §39-1-1 et seq.

Table 2

271 Tockwotten Partners, LLC
Sampling Requirements

Sample Location #1		
Waste Sample Port Downstream of the Clean-In-Place System and pH Buffering Tank		
Month	Composite	Parameters
January	X	BOD, TSS
February		
March		
April	X	BOD, TSS
May		
June		
July	X	BOD, TSS
August		
September		
October	X	BOD, TSS
November		
December		

Legend

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

CERTIFICATE TO DISCHARGE

the following types of process water:

BREWING OPERATIONS WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

271 Tockwotten Partners, LLC

271 Tockwotten Street

Providence, RI 02912

PERMIT NUMBER: P3604-001-0525

PERMIT EXPIRATION DATE: 05/31/2025

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

August 20, 2020

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL ZERO PROCESS
WASTEWATER-SANITARY
DISCHARGE PERMIT***



ZERO PROCESS WASTEWATER - SANITARY DISCHARGE PERMIT

Permit Number: P4100-108-0525
Company Name: **MORGAN MILL METALS, LLC**
Facility Address: 25 Morgan Mill Road, Johnston, RI 02919
Mailing Address: 25 Morgan Mill Road, Johnston, RI 02919
Facility President: Mr. Cameron McElroy
Facility Authorized Agent: Mr. Joseph Vallese
User Classification: Zero Discharge Precious Metal Refining and Laboratory Operations
Categorical Standards Applicable: None

In accordance with R.I.G.L. §46-25-1 et. seq. and the Rules and Regulations For The Use Of Wastewater Facilities Within The Narragansett Bay Water Quality Management District, the Narragansett Bay Commission hereby grants a Zero Process Wastewater-Sanitary Discharge Permit to **Mr. Cameron McElroy and Morgan Mill Metals, LLC**, hereinafter jointly referred to as **Permittee**. This permit authorizes the permittee to discharge only sanitary wastewater into the NBC's facilities in accordance with the terms and conditions of this permit. The discharge of any process wastewater streams to the NBC's sewer system shall constitute a violation of the permit. This permit consists of 13 pages with conditions A - T and Attachment A.

**This permit is effective on June 1, 2020
and expires on May 31, 2025.**

Noncompliance with any term or condition of this permit shall constitute a violation of the NBC's Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

May 22, 2015
Date

Mr. Cameron McElroy and Morgan Mill Metals, LLC hereby consents to this Zero Process Wastewater-Sanitary Discharge Permit. In so consenting, appropriate officers of **Morgan Mill Metals, LLC** have personally read and understood each of the numbered provisions in this Zero Discharge Permit. This permit allows **Morgan Mill Metals, LLC** to continue to discharge sanitary wastewater into the Narragansett Bay Commission sewer system while operating a process wastewater recycle system on the premises.

A corporation organized under the laws of _____,
composed of officers as follows:

<u>Please Type or Print</u>	<u>Signature</u>	
_____ President	_____	_____ Date
_____ Vice President	_____	_____ Date
_____ Secretary	_____	_____ Date
_____ Treasurer	_____	_____ Date

I have read and understood the NBC's Rules and Regulations and the conditions and procedures contained in this permit.

Company Authorized Agent(s) _____
Title _____
Signature _____

**Company
Seal**

NOTE: The NBC will accept the person(s) named on page 2 of this permit as the company's authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the company's by-laws or per a vote of the directors if the company is a corporation; a general partner or proprietor if the company is a partnership or sole proprietorship respectively; or a duly authorized representative, the individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the company. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Zero Process Discharge-Wastewater Recycle Pretreatment System Requirements:

1. The permittee shall operate and maintain a Zero Process Discharge Wastewater Recycle Pretreatment System as proposed in the plans that have been received by the NBC on May 11, 2010, March 29, 2012, and May 16, 2013. This pretreatment system shall be used specifically for the use of recycling wastewater or eliminating discharges from the following operations:
 - a. Precious Metal Reclaiming and Refining;
 - b. Analytical Laboratory.
2. The permittee shall make no changes to the process tanks or pretreatment system without first submitting plans to the NBC for approval. Only those solutions indicated as being discharged to the treatment system on the plans received by the NBC on May 11, 2010, March 29, 2012, and May 16, 2013 may be treated on-site in the pretreatment equipment.
3. If any problems with the evaporation and recycle systems arise or if the permittee would like to connect to the sewer for the purpose of discharging any process wastewater streams, the permittee must notify the NBC, in writing, and obtain written approval from the NBC before resuming discharge or making any physical changes to process tanks, the pretreatment evaporation and recycle systems, or associated piping.
4. The permittee shall cap off and seal all process wastewater sewer drain lines in the facility and no process wastewater may be discharged to the sewer through sanitary or any other sewer connection.
5. The permittee shall post signs at all sanitary sewer connections stating the following: "Discharge of Chemicals Prohibited by Rhode Island Law".
6. Failure to notify NBC personnel prior to resuming process wastewater discharges to the sewer may be considered an intentional violation of the NBC's Rules and Regulations.

B. Prohibitions:

1. The permittee is strictly prohibited from discharging any type of process wastewater streams to the NBC sewer system including all prohibited substances as defined in the Rules and Regulations of the Narragansett Bay Commission. Prohibited discharges include but are not limited to the following:

- a. Precious Metal Reclaiming and Refining Wastestreams;
 - b. Cooling Wastewaters;
 - c. Rinse Solutions;
 - d. Soap Cleaning Solutions;
 - e. Cyanide Solutions;
 - f. Acid/Alkaline Solutions;
 - g. Vibratory/Tubbing Wastewaters;
 - h. Metal Cleaning Solutions;
 - i. Degreasing Solutions;
 - j. Solvents;
 - k. Sludges.
2. The permittee is strictly prohibited from discharging any process wastewater or sanitary wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 13, attached hereto and incorporated herein.
 3. The permittee shall not use portable pumps and flexible hoses within the facility for transfer of solutions without written authorization from the NBC.
 4. The permittee is strictly prohibited from discharging any process wastestreams from the precious metal reclaiming and refining operations. Discharging these process wastestreams will result in the facility being classified as a Centralized Waste Treatment Facility and, therefore, must at all times comply with EPA Categorical Regulations 40 CFR §437.16, Subpart A - Metals Treatment and Recovery Pretreatment Standard for New Sources. The permittee must notify the NBC, in writing, at least sixty (60) days and obtain written approval from the NBC prior to discharging categorical wastestreams so that the required permit modifications may be made.

C. Record Keeping Requirements:

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
 - a. Amount of sludge generated on a monthly basis;
 - b. Completed manifest forms for hazardous materials;
 - c. Maintenance performed on the pretreatment system and other maintenance requests specified by inspectors of the NBC.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

D. Certification of No Discharge:

The permittee shall submit written certification monthly stating that the permittee has made no process wastewater discharges to the sewer during the previous one (1) month period. This certification must be received within thirty (30) days from the end of the required reporting month. This certification must contain monthly water meter readings and must be made on the form designated as Zero Process Wastewater Discharge Certification, Attachment A.

E. Spill and Slug Control Plans:

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

F. Toxic Organic/Solvent Management Plan:

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

G. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781. Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

H. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

I. Permit Fee:

The permittee agrees to pay an annual permit fee and all sewer user fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

J. Authorization To Do Business:

The permittee is a limited liability company. The permittee shall ensure the limited liability company be registered with the Rhode Island Secretary of State Corporations Division. Morgan Mill Metals, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Morgan Mill Metals, LLC has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Morgan Mill Metals, LLC is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Morgan Mill Metals, LLC shall be subject to the terms and conditions of the permit as if named herein.

K. Closing, Selling, Moving the Business:

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to selling or ceasing business and/or disposing of any process waste associated with the move or the cessation of business.

L. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

M. Permit Violations:

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC's Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC's NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Article 10 of the NBC's Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

N. Revocation/Suspension of Permit:

1. Violations of the conditions of this permit, the NBC's Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the NBC's Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:

- a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
- b. Failure to report changes in operations or wastewater constituents;
- c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the

facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

O. Civil and Criminal Liability:

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the NBC's Rules and Regulations or State or Federal laws or regulations.

P. Duty To Comply:

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Q. Removed Substances:

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

R. Permit Modification/Renewal:

1. This permit may be modified for various reasons, including but not limited to the following:
 - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
 - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;

- c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
- d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
- e. Violation of any terms or conditions of the permit;
- f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
- g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
- h. To correct typographical or other errors in the permit;
- i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
- j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Article 8 of the NBC's Rules and Regulations a minimum of ninety (90) days prior to the expiration date.

S. Integration:

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Article 8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Article 2 of the Rules and Regulations.

T. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

AB:NJD:ad

Attachments:

RCRA Handbook
Monthly Zero Process Wastewater Discharge Certification

Table 1

NBC Effluent Discharge Limitations
Field's Point District

<u>Parameter</u>	<u>Limitation (Max)</u>
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300.00*
Total Suspended Solids (TSS)	300.00*
Total Oil and Grease (fats, oils and grease)	125.0
Oil and Grease (mineral origin)	25.0
Oil and Grease (animal/vegetable origin)	100.0
pH range (at all times)	5.0 - 11.0 s.u.

<u>Parameter</u>	Daily Maximum Composite for 1 day (<u>mg/l</u>)	Average 10 day (<u>mg/l</u>)
Cadmium (Total)	0.11	0.07
Chromium (Total)	2.77	1.71
Copper (Total)	1.20	1.20
Cyanide (Total)	0.58	0.58
Lead (Total)	0.60	0.40
Mercury (Total)	0.005	0.005
Nickel (Total)	1.62	1.62
Silver (Total)	0.43	0.24
Zinc (Total)	2.61	1.48

All limitations are in units of mg/l unless otherwise specified.

* Exceeding this discharge limitation may be permitted but would be subject to a surcharge in accordance with rates approved by the Public Utilities Commission and in accordance with R.I.G.L. §39-1-1 et seq.

Attachment A

Zero Process Wastewater Discharge Certification

For the Month of _____, 20__

Company Name: _____

Address: _____

RETURN TO:
Narragansett Bay Commission
Pretreatment Program
2 Ernest Street
Providence, RI 02905-5502

I, _____, as authorized representative of
_____, do hereby decree that no process wastewater was discharged into
the Narragansett Bay Commission sewer system for the past month.

Date of Meter Readings: _____

<u>Meter Number</u>	<u>Water Meter Readings</u>	<u>Units (cf, gal.)</u>
Meter #1	_____	_____
Meter #2	_____	_____
Meter #3	_____	_____

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

Authorized Representative Signature

Date

***TYPICAL SEPTAGE HAULER
WASTEWATER DISCHARGE PERMIT***

NARRAGANSETT BAY COMMISSION SEPTAGE DISCHARGE PERMIT

Permit Number: B8000-146-0525
Company Name: **RW SCHOFIELD & SONS LLC**
Company President: Mr. Ronald Schofield
Facility Address: 4420 Diamond Hill Road, Cumberland, RI 02864
Mailing Address: P.O. Box 7614, Cumberland, RI 02864
DEM License Number: 338

In accordance with Title 46, Chapter 25 (Act) of Rhode Island General Laws and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), the Narragansett Bay Commission (NBC) hereby authorizes **Mr. Ronald Schofield and RW Schofield & Sons LLC**, hereinafter jointly referred to as **Permittee**, to discharge residential quality septage to the NBC Lincoln Septage Receiving Station. The Permittee must adhere to the terms, conditions, and procedures of this permit, the Rules and Regulations, and all other applicable federal, state, and local regulations. Any changes to the information initially provided to the NBC by the Permittee in the permit application must immediately be reported to the NBC. This permit is not transferable without the written consent of the NBC. If the Permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

The permittee is authorized to discharge residential quality septage to the NBC Lincoln Septage Receiving Station from the vehicles listed in Attachment A of this permit. This permit consists of two pages with Conditions 1 through 15 and Septage Permit Attachment A.

The permittee shall at all times follow the procedures specified in Attachment A of this permit for adding new septage vehicles and for discharging at the NBC Lincoln Septage Receiving Station.

**This permit becomes effective on June 1, 2020
and expires on May 31, 2025.**

Noncompliance with any terms or conditions of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by fines and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission**:

Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

Date

CONDITIONS

All terms used herein unless otherwise indicated shall be construed as defined under Section 1.2 of the Rules and Regulations.

1. Location of Discharge: Septage may be discharged only at the NBC Lincoln Septage Receiving Station or other authorized location as the Commission may designate.

2. Origins of Septage: Septage to be discharged to the Commission's facilities must originate from domestic sources within the geographic boundaries of the State of Rhode Island.

3. Prohibitions: The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. The discharge of grease or septage loads containing grease is strictly prohibited by this permit. Mixing or blending of grease with septage loads is strictly prohibited. The permittee is strictly responsible for ensuring that loads containing grease are not taken to the NBC Lincoln Septage Receiving Station or enforcement action may result against the permittee.

4. Procedures for Discharging Septage: The permittee agrees to adhere to the NBC Septage Discharge Procedures, as detailed in Septage Discharge Permit Attachment A.

5. Permit Fee: The permittee agrees to pay an annual permit fee if applicable and all other fees assessed by the Commission in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I. General Law 39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

6. Records Retention: Records which substantiate any information supplied in permit applications, load manifest forms and any other informational requirements of the Rules and Regulations, or any applicable state or federal law, are to be kept by the permittee for a period of three (3) years, unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of three (3) years following resolution of such litigation or dispute.

7. Jurisdiction: This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

8. Integration: This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of the Rules and Regulations.

9. Transfer of Permit Prohibited: Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred, or sold to a new owner, new user, or different vehicle without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said business referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property. The new owner must apply for and be issued a new permit before discharges will be allowed.

10. Enforcement Costs: The permittee agrees to reimburse the Commission for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a Court of competent jurisdiction.

11. Damage to the Facilities: The permittee agrees to indemnify and hold harmless the Commission from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the Commission and caused by discharges from the permittee, either singly or by interaction with other wastes. If, after the discharge, further analysis of the waste shows it to be in violation of the Commission's wastewater discharge limitations, the Commission may impose fines, pursuant to R.I. General Laws 46-25.

12. Violation of the Commission's Permit: The permittee agrees to reimburse the Commission for any penalty and additional operating expense incurred by the Commission for violations of the Commission's NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes. Violations of this permit include but are not limited to the following: unauthorized discharge into Commission facilities, discharge without a load ticket or properly completed manifest form, failure to pay fees, and violation of any other applicable laws or regulations.

13. Penalties for Violations: Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

14. Revocation of Permit: Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, discharging or dumping grease, discharging septage into unauthorized locations, falsification of documents, including permit applications or manifest, etc.

15. Duty to Comply/Civil and Criminal Liability: The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements. Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

Septage Discharge Permit Number B8000-146-0525
Attachment A
RW Schofield & Sons LLC

PERMITTED VEHICLES:

VEHICLE TYPE	REGISTRATION NUMBER	TRUCK VIN NUMBER	CAPACITY (GALLONS)
TANKER-PETERBILT	RI 93573	2NP2HJ6X3LM641459	1,914

Procedure for Adding Vehicle(s) to the Permit

1. The permittee must obtain appropriate registrations, insurance and DEM permits for the vehicle(s).
2. The permittee must make an appointment with the NBC Pretreatment personnel to determine the volume of the vehicle(s).
3. The volume of the vehicle is to be determined under NBC oversight as follows:
 - a. The empty vehicle is to be brought to the NBC treatment plant at a scheduled time to be inspected to ensure that it is empty.
 - b. The vehicle will then be weighed empty.
 - c. The vehicle will then be brought back to the NBC plant to be filled with plant water.
 - d. The vehicle will then be reweighed full.
 - e. The vehicle may discharge this water back at the NBC plant.
The difference in weight will be used to determine the volume of the vehicle in gallons.
4. The permittee will be responsible to pay any costs associated with weighing the vehicle(s).
5. NBC personnel will affix a computer chip and volume sticker to the vehicle(s).
6. The Wastewater Discharge Permit will then be revised to include the additional vehicle(s).
7. The permittee may not discharge septage to the NBC receiving station from the new vehicle(s) until the revised permit is issued.

Septage Facility Discharge Procedures

1. The permittee must establish and maintain an account with a positive cash balance with the NBC Customer Service Section.
2. The permittee must ensure each vehicle permitted to discharge must have a computer chip, permitted vehicle decal and volume decal affixed to it.
3. The permittee must ensure the manifest form is completed in its entirety prior to proceeding to the septage facility and submitted to the NBC operator when the vehicle is checked in.
4. The permittee must ensure the volume of the vehicle meets NBC volume/time restrictions.
5. The NBC operator must scan the computer chip affixed to the vehicle.
6. Activate the gate and enter the facility.
7. Obtain a sample of the load from the discharge line of the vehicle.
8. The NBC operator will test the sample and may approve truck for discharge or may reject the load.
9. After NBC approval is granted, the permittee must connect the hose to the station receiving port and may begin discharge.
10. After the discharge is complete, disconnect the hose.
11. The permittee must wash any drippage and/or spillage into drains.
12. The permittee must exit the station.

***TYPICAL RESTAURANT
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: P8500-700-0825

Company Name: **CHANNTHATHIM, INC.**

Facility Address: 787 Hope Street, Providence, RI 02906

Mailing Address: 787 Hope Street, Providence, RI 02906

Facility President: Mr. Sochea Pol

Facility Authorized Agent: Mr. Sochea Pol

User Classification: Restaurant/Food Preparation Operations

Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Sochea Pol and Channthathim, Inc.**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 13 pages with conditions A - T.

**This permit becomes effective on September 1, 2020
and expires on August 31, 2025.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

August 18, 2020
Date

NOTE: The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Effluent Discharge Limitations:

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 13, attached hereto and incorporated herein. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
2. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following waste, solutions, or process wastewater streams to the NBC facilities:
 - a. Treated Food Preparation Wastewater;
 - b. Treated Dish, Pot, and Equipment Washwater.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

C. Prohibitions:

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
 - a. Fryolator/Cooking Oils and Grease;
 - b. Ground Food, Food Products, or Solid Kitchen Waste;
 - c. Degreasing Solutions;
 - d. Solvents;
 - e. Sludges;
 - f. Fuel or Lubricating Oils.

2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1, attached hereto and incorporated herein.
3. The permittee is prohibited from discharging any solution or chemicals which might interfere with the proper operation of the automatic grease removal unit or may cause a violation of the Rules and Regulations.
4. The use of garbage grinders, food macerators, or other equipment used for the purpose of discharging solid waste to the sewer system is strictly prohibited.

D. Pretreatment Requirements:

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge pipe from the automatic grease removal unit, collecting all process discharges specified in Section B(1)(a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit at all times.

2. The permittee has installed an automatic grease removal unit in conformance with the plans approved by the NBC on August 26, 2015. The grease removal unit shall be fully operational on a twenty-four (24) hour basis whenever kitchen operations are being conducted.
3. The permittee is responsible for operating and maintaining the automatic grease removal unit so that the effluent limitations are met at all times. The permittee shall also be responsible for maintaining all records pertaining to the operation of the grease removal unit including, but not limited to, the following:
 - a. The automatic grease removal unit with all associated strainers must be inspected every workday to determine whether the system is functioning normally or in need of cleaning, grease disposal or any corrective measures;

- b. A grease removal unit logbook must be maintained at the permittee's facility and must be located near the grease removal unit. The logbook must include such information as outlined under Section F, Record Keeping Requirements. The logbook must be kept on the premises at all times and available to NBC personnel for their review;
 - c. Only kitchen wastewater from pot sinks, wok stations, and dinnerware/utensil prerinsing operations may be discharged into the automatic grease removal unit. Sanitary waste, dishwasher wastewater and other wastewater may not be discharged to the grease removal unit.
4. The permittee must install additional grease removal equipment that conforms with Section 1.4.15 of the Rules and Regulations if determined necessary by the NBC to ensure that effluent limitations are met at all times. Plans of the pretreatment system must be submitted to the NBC for approval before beginning construction, should installation of additional grease removal system be required.

E. Monitoring Requirements:

No regularly scheduled wastewater monitoring reports are required of the permittee. The NBC may, at any time, change the monitoring requirements specified in this permit. Conditions that may result in the imposition of monitoring requirements include, but are not limited to, the following:

- a. Inspections or samplings performed by NBC personnel;
- b. An increase in the seating capacity of the facility;
- c. An increase in flow to the grease removal unit;
- d. Discovery of additional information unavailable to the NBC at the time this permit was prepared;
- e. Improper maintenance of a grease removal unit;
- f. Failure to meet the NBC effluent discharge limitations.

F. Record Keeping Requirements:

1. The permittee must inspect and maintain the automatic grease removal unit at least once per day and record in a logbook the time and date (month, day, and year) of the inspection, each grease removal activity, and the name of the individual conducting the activity. Maintenance activities which must be documented in a logbook include the following:
 - a. Cleaning and emptying of the solids basket;
 - b. Cleaning of the wiper blades;

- c. Cleaning of the trough;
 - d. The estimated amount of grease removed;
 - e. Wet vacuuming of the grease removal unit.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable state or federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

G. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

The permittee must maintain all associated facilities to ensure that incidental and accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system. Operational changes that may affect the quality or quantity of the process wastestream include, but are not limited to, the following:

- a. Restaurant expansion;
- b. Removal of equipment or installation of additional equipment;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate

the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- c. Changes in food preparation methods.

3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. Grease removal unit heating element failure;
- b. Grease removal unit timing unit failure;
- c. Grease removal unit wiper blade failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

H. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

I. Permit Fee:

The permittee agrees to pay an annual permit fee and all sewer user fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

J. Authorization To Do Business:

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Channthathim, Inc. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Channthathim, Inc. has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Channthathim, Inc. is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Channthathim, Inc. shall be subject to the terms and conditions of the permit as if named herein.

K. Closing, Selling, Moving the Business:

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to selling or ceasing business and/or disposing of any process waste associated with the move or the cessation of business.

L. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

M. Permit Violations:

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

N. Revocation/Suspension of Permit:

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
 - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
 - b. Failure to report changes in operations or wastewater constituents;
 - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
 - d. Failure to adhere to an approved compliance schedule;
 - e. Failure to comply with administrative orders or settlement agreements;
 - f. Failure to pay authorized fees and user charges;
 - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

O. Civil And Criminal Liability:

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

P. Duty To Comply:

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Q. Removed Substances:

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

R. Permit Modification/Renewal:

1. This permit may be modified for various reasons, including but not limited to the following:
 - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
 - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
 - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
 - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
 - e. Violation of any terms or conditions of the permit;
 - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
 - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
 - h. To correct typographical or other errors in the permit;
 - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
 - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

S. Integration:

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

T. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

AC:NJD:smb

Attachments:

Designation of Authorized Agent Form
RCRA Handbook
Automatic Grease Removal Unit Logsheet

Table 1

NBC Effluent Discharge Limitations
Field's Point District

<u>Parameter</u>	<u>Limitation (Max)</u>
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300.00*
Total Suspended Solids (TSS)	300.00*
Total Oil and Grease (fats, oils and grease)	125.0
Oil and Grease (mineral origin)	25.0
Oil and Grease (animal/vegetable origin)	100.0
pH range (at all times)	5.0 - 11.0 s.u.

<u>Parameter</u>	<u>Daily Maximum Composite for 1 day (mg/l)</u>	<u>Average 10 day (mg/l)</u>
Cadmium (Total)	0.11	0.07
Chromium (Total)	2.77	1.71
Copper (Total)	1.20	1.20
Cyanide (Total)	0.58	0.58
Lead (Total)	0.60	0.40
Mercury (Total)	0.005	0.005
Nickel (Total)	1.62	1.62
Silver (Total)	0.43	0.24
Zinc (Total)	2.61	1.48

All limitations are in units of mg/l unless otherwise specified.

* Exceeding this discharge limitation may be permitted but would be subject to a surcharge in accordance with rates approved by the Public Utilities Commission and in accordance with R.I.G.L. §39-1-1 et seq.

CERTIFICATE TO DISCHARGE

the following types of process water:

**TREATED FOOD PREPARATION WASTEWATER AND
TREATED DISH, POT, AND EQUIPMENT WASHWATER**

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Channthathim, Inc.

787 Hope Street

Providence, RI 02906

PERMIT NUMBER: P8500-700-0825

PERMIT EXPIRATION DATE: 08/31/2025

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

August 18, 2020
Initial Date of Issuance

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager

***TYPICAL DENTIST
WASTEWATER DISCHARGE PERMIT***

WASTEWATER DISCHARGE PERMIT

Permit Number: P9400-410-0724

Company Name: **BARBARA BILDER, D.M.D.**

Facility Address: 116 Wayland Avenue, Providence, RI 02906

Mailing Address: 116 Wayland Avenue, Providence, RI 02906

Facility President: Dr. Barbara Bilder

Facility Authorized Agent: Dr. Barbara Bilder

User Classification: Dental Operations

Categorical Standards Applicable: 40 CFR §441.30, Pretreatment Standards for
Existing Sources

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Dr. Barbara Bilder and Barbara Bilder, D.M.D.**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 15 pages with conditions A - U and Attachment A.

**This permit becomes effective on August 1, 2019
and expires on July 31, 2024.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

Date

NOTE: The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Effluent Discharge Limitations:

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee is classified as a dentist and therefore, must at all times comply with 40 CFR §441.30, Pretreatment Standards for Existing Sources as well as the NBC Best Management Practices for the Management of Waste Dental Amalgam.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
 - a. Treated Dental Wastewater Containing Amalgam;
 - b. Dental Process Wastewaters.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

C. Prohibitions:

1. The permittee is strictly prohibited from discharging any prohibited substances as detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
 - a. X-Ray Processing Rinsewater, Developer, and Fixer Solutions;
 - b. Dental Amalgam;
 - c. Elemental Mercury;
 - d. Untreated Dental Wastewater Containing Amalgam;
 - e. Acidic Solutions with a pH less than 5.0 standard units;
 - f. Caustic Solutions with a pH greater than 11.0 standard units;
 - g. Solvents;
 - h. Sludges.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
3. Non-sanitary discharges other than those specified in Section B of this permit are prohibited unless specifically approved by the NBC in writing.
4. No chemicals, oils, solutions and/or materials including solid substances such as towels, casts, etc. in quantities or of such size capable of causing obstruction to the flow in sewers may be discharged to the sewer unless specifically approved by the NBC in writing.
5. Discharging of chemicals or solutions containing materials listed in the attached List of Toxic Pollutants (Table 2) is strictly prohibited if said discharge would result in violation of NBC limitations in Table 1.

D. Pretreatment Requirements:

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the amalgam separator, collecting all process discharges specified in Section B(1)(a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.
3. The permittee shall adhere to all mandatory best management practices of the NBC Best Management Practices on the management of Waste Dental Amalgam.
4. In accordance with 40 CFR §441.30, Pretreatment Standards for Existing Sources and Option 1 of the NBC Best Management Practice for the Management of Waste Dental Amalgam, the permittee shall install, operate and maintain an amalgam separator which is ISO 11143 certified to an efficiency of 99% removal in accordance with the plans submitted to the NBC on August 4, 2004. The amalgam separator shall be fully operational whenever discharges from dental procedures are occurring.
5. The permittee shall maintain the amalgam separator. Maintenance activities include but are not limited to the following:
 - a. The permittee must inspect the separator weekly to ensure proper operation;
 - b. The permittee must adhere to all manufacturers specifications for maintenance of the separator;
 - c. The maintenance activities must be documented in a logbook as required by Section G(1) of this permit.
6. The permittee shall maintain chair side traps on all dental chairs to capture large amalgam particles from cuspidors and vacuum systems. Chair side traps must be inspected daily and cleaned or replaced as necessary. Disposable traps or material from reusable traps must be placed in a labeled storage container. The permittee may only rinse a trap if necessary and only in a designated sink that is plumbed with appropriate flow restriction to an NBC approved amalgam separator.
7. The permittee shall ensure that all vacuum pumps are equipped with filters. The permittee shall replace the filter at least once per month or more frequently if necessary. Removed filters should be held over a spill tray to capture any accumulated water from the trap. The water should be carefully decanted without losing any visible amalgam. The decant water, if free of visible amalgam, may be discharged to the sewer through an NBC approved amalgam separator. Dry-turbine vacuums must be inspected to ensure there is no built up sludge in the air/water separator. Collected sludge must be disposed of properly as a mercury containing waste.

8. The permittee shall use a NBC approved cleaner for disinfection of amalgam and/or mercury contaminated vacuum lines, instruments, or equipment. The use oxidizing or acidic cleaners, including but not limited to bleach, chlorine, iodine and peroxide that have pH lower than 6 or greater than 8 is prohibited.
9. The permittee has designated one sink for equipment washing. This sink must be plumbed to the amalgam separator through a sample location. Signs stating "Equipment Washing Only" must be posted at this sink. Flow restrictors must be installed on the discharge pipes of this sink to prevent overwhelming the amalgam separator.
10. The permittee has designated five (5) sinks for sanitary use only. The permittee shall post signs at these sinks stating "Sanitary Use Only". Washing of equipment, instruments, filters, and capsules in these sinks is strictly prohibited.

E. Certification of Compliance with Best Management Practice:

The permittee shall submit written annual certification of compliance with Best Management Practices for the Management of Waste Dental Amalgam for the period from December to November. The certification must be made on the form designated as Best Management Practice Certification, Attachment A, and must be received within thirty (30) days after the period for which the certification is being made.

F. Monitoring Requirements:

No wastewater monitoring will be required by this permit. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:

- a. Failure to meet effluent limitations;
- b. Change in production processes;
- c. Expansion or reduction of production;
- d. Change in water usage;
- e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

G. Record Keeping Requirements:

1. The permittee shall be responsible for maintaining onsite physically or electronically the manufacturers operating manual for the amalgam separator. In addition, a logbook documenting all records pertaining to the amalgam separator including, but not limited to, the following:
 - a. Date (month, day and year) of each trap and separator inspection and service activity;
 - b. The location of each trap and separator being serviced;
 - c. All routine and non-routine activities conducted (i.e. cleaning, maintenance, filter replacement);
 - d. Date of amalgam retaining container or equivalent container replacement;
 - e. Date when amalgam is picked up or shipped for proper disposal, including name of the permitted or licensed treatment, storage or disposal facility receiving the amalgam retaining containers;
 - f. Signature of person conducting activity.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

H. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

The permittee must maintain all associated facilities to ensure that incidental and accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

Amalgam Separator Failure

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

I. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

J. Permit Fee:

The permittee agrees to pay an annual permit fee and all sewer user fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

K. Authorization To Do Business:

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Barbara Bilder, D.M.D. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Barbara Builder, D.M.D has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Barbara Bilder, D.M.D is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Barbara Bilder, D.M.D. shall be subject to the terms and conditions of the permit as if named herein.

L. Closing, Selling, Moving the Business:

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

M. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

N. Permit Violations:

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

O. Revocation/Suspension of Permit:

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
 - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
 - b. Failure to report changes in operations or wastewater constituents;
 - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
 - d. Failure to adhere to an approved compliance schedule;
 - e. Failure to comply with administrative orders or settlement agreements;
 - f. Failure to pay authorized fees and user charges;
 - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

P. Civil and Criminal Liability:

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

Q. Duty To Comply:

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

R. Removed Substances:

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

S. Permit Modification/Renewal:

1. This permit may be modified for various reasons, including but not limited to the following:
 - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
 - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
 - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
 - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
 - e. Violation of any terms or conditions of the permit;
 - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;

- g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
- h. To correct typographical or other errors in the permit;
- i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
- j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

- 2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

T. Integration:

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

U. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

MM:NJD:ad

Attachments:

Designation of Authorized Agent Form
RCRA Handbook

Table 1

NBC Effluent Discharge Limitations
Field's Point District

<u>Parameter</u>	<u>Limitation (Max)</u>
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300.00*
Total Suspended Solids (TSS)	300.00*
Total Oil and Grease (fats, oils and grease)	125.0
Oil and Grease (mineral origin)	25.0
Oil and Grease (animal/vegetable origin)	100.0
pH range (at all times)	5.0 - 11.0 s.u.

<u>Parameter</u>	<u>Daily Maximum (Composite for 1 day) (mg/l)</u>	<u>Average (10 day) (mg/l)</u>
Cadmium (Total)	0.11	0.07
Chromium (Total)	2.77	1.71
Copper (Total)	1.20	1.20
Cyanide (Total)	0.58	0.58
Lead (Total)	0.60	0.40
Mercury (Total)	0.005	0.005
Nickel (Total)	1.62	1.62
Silver (Total)	0.43	0.24
Zinc (Total)	2.61	1.48

All limitations are in units of mg/l unless otherwise specified.

* Exceeding this discharge limitation may be permitted but would be subject to a surcharge in accordance with rates approved by the Public Utilities Commission and in accordance with R.I.G.L. §39-1-1 et seq.

Table 2

List of Toxic Pollutants

The following list of Toxic Pollutants has been designated pursuant to Section 307(a)(1) of the Clean Water Act.

VOLATILES EPA METHOD 624	BASE/NEUTRAL - EPA METHOD 625	PESTICIDES - EPA METHOD 625
acrolein	acenaphthene *	aldrin
acrylonitrile	acenaphthylene *	alpha-BHC
benzene	anthracene *	beta-BHC
bromoform	benzidine	gamma-BHC
carbon tetrachloride	benzo (a) anthracene *	delta-BHC
chlorobenzene	benso (a) pyrene *	chlordan
chlorodibromomethane	3,4-benzofluoranthene *	4,4'-DDT
chloroethane	benzo (ghi) perylene *	4,4'-DDE
2-chloroethylvinyl ether	benzo (k) fluoranthene	4,4'-DDD
chloroform	bis (2-chloroethoxy) methane	dieldrin
dichlorobromomethane	bis (2-chloroethyl) ether	alpha-endosulfan
1,1-dichloroethane	bis (2-chloroisopropyl) ether	beta-endosulfan
1,2-dichloroethane	bis (2-ethylhexyl) phthalate	endosulfan sulfate
1,1-dichloroethylene	4-bromophenyl phenyl ether	endrin
1,2-dichloropropane	butylbenzyl phthalate	endrin aldehyde
1,3-dichloropropylene	2-chloronaphthalene	heptachlor
ethylbenzene	4-chlorophenyl phenyl ether	heptachlor epoxide
methyl bromide	chrysene *	PCB-1242
methyl chloride	dibenzo (a,h) anthracene *	PCB-1254
methylene chloride	1,2-dichlorobenzene	PCB-1221
1,1,2,2-tetrachloroethane	1,3-dichlorobenzene	PCB-1232
tetrachloroethylene	1,4-dichlorobenzene	PCB-1248
toluene	3,3'-dichlorobenzidine	PCB-1260
1,2-trans-dichloroethylene	diethyl phthalate	PCB-1016
1,1,1-trichloroethane	dimethyl phthalate	toxaphene
1,1,2-trichloroethane	di-n-butyl phthalate	
trichloroethylene	2,4-dinitrotoluene	
vinyl chloride	2,6-dinitrotoluene	
	di-n-octyl phthalate	
	1,2-diphenylhydrazine	
	(as asobenzene)	
	fluoranthene *	
	fluorene *	
	hexachlorobenzene	
	hexachlorobutadiene	
	hexachlorocyclopentadiene	
	hexachloroethane	
	indeno (1,2,3-cd) pyrene *	
	isophorone	
	naphthalene *	
	nitrobenzene	
	N-nitrodimethylamine	
	N-nitrosodi-n-propylamine	
	N-nitrosodiphenylamine	
	phenanthrene *	
	pyrene *	
	1,2,4-trichlorobenzene	
	* = Polynuclear Aromatic Hydrocarbons	
		OTHER TOXIC POLLUTANTS AND TOTAL PHENOL
		Antimony, Total
		Arsenic, Total
		Beryllium, Total
		Cadmium, Total
		Chromium, Total
		Chromium, Hexavalent
		Copper, Total
		Lead, Total
		Mercury, Total
		Nickel, Total
		Selenium, Total
		Silver, Total
		Thallium, Total
		Zinc, Total
		Asbestos
		Cyanide, Total
		Phenols, Total
		TCDD (Dioxin)

Attachment A

Best Management Practice Certification

For the 12-month period from _____, 20__ to _____, 20__

Company Name: _____

Address: _____

RETURN TO:
Narragansett Bay Commission
Pretreatment Program
2 Ernest Street
Providence, RI 02905-5502

I, _____, as authorized representative of
_____, do hereby decree that the Narragansett Bay
Commission Best Management Practices for the Management of Waste Dental Amalgam have
been fully complied with for the past twelve month period.

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

Authorized Representative Signature

Date

CERTIFICATE TO DISCHARGE

the following types of process water:

TREATED DENTAL WASTEWATER CONTAINING AMALGAM AND DENTAL PROCESS WASTEWATERS

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Barbara Bilder, D.M.D.

116 Wayland Avenue

Providence, RI 02906

PERMIT NUMBER: P9400-410-0724

PERMIT EXPIRATION DATE: 07/31/2024

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

Initial Date of Issuance

Kerry M. Britt, Pretreatment Manager

ATTACHMENT VOLUME I

SECTION 3

***VARIOUS PRETREATMENT
PROGRAM DOCUMENTS***

***NBC SPILL AND SLUG PREVENTION
CONTROL & COUNTERMEASURES
PLAN GUIDANCE DOCUMENT***



**SPILL AND SLUG PREVENTION CONTROL PLAN
FOR NARRAGANSETT BAY COMMISSION
SEWER USERS**

COMPANY NAME: _____

FACILITY ADDRESS: _____

MAILING ADDRESS: _____

**PRIMARY PERSON RESPONSIBLE
FOR SPILL CONTROL PREVENTION:** _____

DAYTIME EMERGENCY PHONE NUMBER: _____

AFTER HOURS EMERGENCY PHONE NUMBER: _____

The Narragansett Bay Commission's (NBC) Rules and Regulations for the Use of Wastewater Facilities (Article 8.9) require each user to provide protection from accidental discharge of prohibited materials and substances to the sewer. The user is required to provide detailed plans showing equipment and a brief description of operating procedures utilized to prevent these discharges.

This document was developed to assist you in determining what measures you need to implement and to properly document the spill prevention control procedures utilized at your facility; therefore, you must complete this document.

Section A: Description of Discharge Practices and Storage Areas

1. List all sources of routine sewer discharges and describe the method of discharge:

Source of Discharge	Method of Discharge
Example: Electroplating Discharges	Pumped to sewer via pretreatment system

2. List all sources of non-routine sewer discharges of an infrequent nature such as batch discharges, which may occur only once per year:

Source of Discharge	Method of Discharge
Example: Annual Power Washing of Plating Room Floors	Gravity flow to pretreatment system

2. What procedures are utilized to prevent adverse impacts on the NBC sewage facility due to accidental spills? Examples of these procedures may include periodic inspection and maintenance of storage areas, and special procedures utilized during loading and unloading operations.

3. List emergency response equipment available and procedures to be utilized in the event of a spill.

Section C: Spills From Boiler and Fuel Depot Areas

This section must be completed if fuels, or fuel oils are stored at your facility or chemicals are stored in the boiler area. Be sure to show the location of any floor drains, trenches, yard drains or other connections to the sewer or pretreatment system from the boiler facility and fuel storage area(s) in the sketch required in Section A(4). Also, show any berms or sumps that would be used to contain spills. Indicate the capacity of each holding area in gallons.

1. What types of fuel are stored in these areas? (i.e., gasoline, diesel, kerosene, #4 fuel oil, #6 fuel oil, etc.)

2. Are the fuel tanks above ground_____ or below ground_____? Provide the capacity of each tank in gallons:

3. Indicate provisions (i.e., alarms, sight glasses, etc.) and filling procedures that will minimize the risk of overfilling a tank.

4. Is the storage tank equipped with an overflow pipe or relief valve or some other equipment in the tank or pipe chase network that would allow fuel to spill during a filling procedure? ___ Yes ___ No

5. If a tank is overfilled and fuel escapes through the tank vent pipe, where would the spilled fuel discharge?

6. What measures and spill containment equipment are in place to contain spillage from an overfilled tank?

7. Are boiler treatment or other chemicals stored in the boiler facility or fuel depot areas? ___ Yes ___ No

If yes describe chemicals:

8. Detail spill containment provided for chemicals stored in this area.

9. If a spill should occur in the fuel depot or boiler facility, how would it be cleaned up and disposed?

10. Are there any normal process discharges such as boiler blowdown or steam condensate to the sewer or pretreatment system from physical plant operations? _____Yes _____No

11. Does the boiler utilize a hot water or steam operated oil preheater? _____Yes _____No

If so, does the condensate from the preheater discharge to the sewer? _____Yes _____No

If so, what measures are in place to detect an oil discharge to the sewer resulting from a leak within the preheater core?

Section D: Spills That Discharge to Pretreatment Systems

This section must be completed in the case where a spill will discharge to a pretreatment system.

1. For each area listed in Section A(3) that a spill would discharge to the pretreatment system, you must provide the following information:

Area	Solution	Pretreatment Collection Vessel
Example: Plating	CN Bearing Solutions	CN Destruct Tank
Example: Plating	Non-CN Bearing Solution	Batch A/A Tank

2. During non-working hours, what procedures will be followed to prevent spills from discharging directly through pretreatment to the sewer without proper treatment? (e.g., shut off sump pump, close valve to sump, etc.)

3. What procedures or facilities are in place to prevent highly concentrated or incompatible solutions (such as plating baths, oils, solvents, etc.), which the pretreatment system was not designed to treat, from reaching the pretreatment system?

Section E: Notification Procedures

1. The sewer user must maintain an approved Spill and Slug Prevention Control and Countermeasure Plan and all associated facilities at all times to ensure that incidental and accidental spills are not able to enter the NBC sewer system. In the case of a slug or accidental discharge to the facilities, it is the responsibility of the sewer user to notify the NBC of the incident immediately by calling the NBC's Pretreatment Section at 461-8848. During non-business hours contact the NBC at its 24 Hour Emergency Hotline number, 222-6781 if located in the Field's Point District or at 434-6350 if located in the Bucklin Point District.
2. Within five days following an accidental discharge, the sewer user shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences.

Section F: Certification

I certify under penalty of law that this Spill and Slug Control Plan and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who maintain the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I certify that this facility will fully implement and maintain the Spill and Slug Control Plan at all times.

SIGNATURE AND TITLE OF AUTHORIZED COMPANY REPRESENTATIVE

DATE

Attachment A*

Area/Room: _____
List Chemicals Stored in Area: _____

List the Volume of the Largest Container in Area: _____

Are there open floor drains or sewer connections in this area? _____

List spill control measures in place: _____

List capacity of spill containment area(s). Please note, the capacity of the containment area must be a minimum of 110% the volume of the largest container.

Detail how a spill would be contained during working hours. _____

Detail how a spill would be contained during non-working hours. _____

How will spills from this area be cleaned up and disposed? _____

If currently there are no spill containment measures in this area, detail proposed measures to provide spill containment for chemicals and solutions in this area and the timeframe necessary to implement these measures.

* Please make additional copies of this attachment for all areas of your facility.

***NBC TOXIC ORGANIC/SOLVENT
MANAGEMENT PLAN GUIDANCE
DOCUMENT***



**NARRAGANSETT BAY COMMISSION
TOXIC ORGANIC/SOLVENT
MANAGEMENT PLAN**

COMPANY NAME: _____

MAILING ADDRESS: _____

PHONE NUMBER: _____

PLAN PREPARED BY: _____

In accordance with Section 7.2 of the Narragansett Bay Commission's (NBC) Rules and Regulations for the Use of Wastewater Facilities, the NBC may require any user who discharges into the facilities to provide information relating to discharges into the facilities to ensure compliance with prescribed pretreatment methods and regulations. Federal pretreatment standards, including those for metal finishers and electroplaters (40 CFR 413.03 and 433.12), require many industrial users to periodically monitor their wastestream for Total Toxic Organics (TTO's). Federal law allows the Industrial User to develop, implement and maintain a Toxic Organic/Solvent

Management Plan, which once approved by the NBC, allows the Industrial User a waiver from performing the expensive and routine TTO monitoring.

In order to provide for the control of solvents and toxic organics which are not permitted to be discharged to the NBC sewerage facilities, the NBC is requiring, as a condition of the industrial sewer user's Wastewater Discharge Permit, that a Toxic Organic/Solvent Management Plan be prepared and submitted to the NBC in lieu of the regular monitoring for toxic organic compounds and solvents.

This form has been developed as a guidance document by the NBC Pretreatment Section to assist sewer users who must prepare a Toxic Organic/Solvent Management Plan. When completed, submitted and approved by the NBC this document will constitute the facility's Toxic Organic/Solvent Management Plan. The user will then be responsible to maintain all items indicated in this plan to ensure that solvents and toxic organic compounds are not discharged into the NBC sewerage system.

Section A – Estimated Annual Solvent Purchases and Usages:

Does your firm use any solvents, chemicals or compounds containing any of the toxic organic compounds listed on the EPA table of toxic organics attached to this document, or any other solvents, such as xylene, acetone, etc., not listed on the attached table? _____

If yes, you must complete all sections of this Toxic Organic/Solvent Management Plan. If no, you must sign the certification Section F of this plan.

List the type and estimated amount of solvents or toxic organic chemicals purchased and used yearly at this facility and provide a brief description detailing the usage of the chemical. A list of EPA toxic organic compounds is attached for your information. In addition to the compounds on this list, any other solvents purchased or used on the premises must be included (i.e. Acetone, 100 gallons/yr., used for paint removal).

Solvent	Use of Solvent	Estimated Gallons Annually Purchased

Section B – Estimate of Solvents Stored and Annually Disposed:

You must account for the total gallons of each solvent or toxic organic chemical listed in Section A. Indicate the estimated volume of each chemical presently stored on site and the estimated volume disposed of annually by

each method of disposal (e.g. reclamation, contract hauler, consumption in product, evaporation, sewer discharge or other) and the total estimated gallons on site and disposed of annually. **The total gallons listed here for each chemical must equal the total gallons listed in Section A for the same chemical.**

Solvent	Gallons Typically Stored On Site	GALLONS DISPOSED ANNUALLY						Total Gallons Stored, Used, or Disposed Annually
		Discharged In Wastewater	Evaporated During Usage	Reclaimed On-site	Shipped Off-site	Consumed or Retained In Product	Other (Indicate Gallons & Disposal Method)	

Section C – Wastewater Analysis:

Has your process wastewater ever been analyzed for any or all of the toxic organic compounds or solvents listed in Section A?

_____ Yes _____ No

If yes, please attach a copy of the analysis. If no, this monitoring must be conducted and the analytical results for each toxic organic compound and solvent listed in Section A must be attached to the plan.

Section D – Solvent Process Operations:

1. For each of the toxic organic compounds or solvents listed in Section A, provide a brief description of the process in which the chemical is used and describe in detail the work methods used to prevent and prohibit toxic organic and solvent dragout, drippage and spillage from entering the wastewater discharged from the facility.

2. For any solvent listed in Section B as being discharged in the wastewater, please provide a brief description detailing the discharge method, practice, procedure, or process operation resulting in each solvent discharge.

Section E – Spill Control Procedures:

Describe the spill control procedures in effect for the toxic organic compounds and solvent on the premises. This would include measures taken in both the chemical storage area and in the work area to prevent incidental and accidental spillage from entering the NBC sewerage system. Measures to prevent and control spillage may include berms, sealed floor drains, absorbent material, etc. Indicate the volume of the largest vessel within each storage area and the capacity of the storage area itself. Please note that a storage area is required to contain a minimum of 110% the capacity of the largest vessel stored within it.

Section F – Certification Statement:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry or the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, concluding the possibility of fine

and imprisonment for knowing violations. I hereby certify that based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation for Total Toxic Organics (TTO), to the best of my knowledge and belief, no dumping of concentrated toxic organic compounds into the wastewaters has or does occur. I further certify that this facility is implementing and will abide by this Toxic Organic/Solvent Management Plan as submitted to the NBC.

SIGNATURE OF AUTHORIZED COMPANY REPRESENTATIVE

TITLE

DATE

List of Toxic Pollutants

The following List of Toxic Pollutants has been designated pursuant to Section 307(a)(1) of the Clean Water Act.

Volatiles

EPA Method 624

arolein
acrylonitrile
benzene
bromoform
carbon tetrachloride
chlorobenzene
chlorodibromomethane
chloroethane
2-chloroethylvinyl ether
chloroform
dichlorobromomethane
1,1-dichloroethane
1,2-dichloroethane
1,1-dichloroethylene
1,2-dichloropropane
1,3-dichloropropylene
ethylbenzene
methyl bromide
methyl chloride
methylene chloride
1,1,2,2-tetrachloroethane
tetrachloroethylene
toluene
1,2-trans-dichloroethylene
1,1,1-trichloroethane
1,1,2-trichloroethane
trichloroethylene
vinyl chloride

Acid Compounds

EPA Method 625

2-chlorophenol
2,4-dichlorophenol
2,4-dimethylphenol
4,6-dinitro-o-cresol
2,4-dinitrophenol
2-nitrophenol
4-nitrophenol
p-chloro-m-cresol
pentachlorophenol
phenol
2,4,6-trichlorophenol

Base/Neutral

EPA Method 625

* acenaphthene
* acenaphthylene
* anthracene
benzidine
* benzo (a) anthracene
* benzo (a) pyrene
* 3,4-benzofluoranthene
* benzo (ghi) perylene
benzo (k) fluoranthene
bis (2-chloroethoxy) methane
bis (2-chloroethyl) ether
bis (2-chloroisopropyl) ether
bis (2-ethylhexyl) phthalate
4-bromophenyl phenyl ether
butylbenzyl phthalate
2-chloronaphthalene
4-chlorophenyl phenyl ether
* chrysene
* dibenzo (a, h) anthracene
1,2-dichlorobenzene
1,3-dichlorobenzene
1,4-dichlorobenzene
3,3-dichlorobenzidine
diethyl phthalate
dimethyl phthalate
di-n-butyl phthalate
2,4-dinitrotoluene
2,6-dinitrotoluene
di-n-octyl phthalate
1,2-diphenylhydrazine
(as azobenzene)
* fluoranthene
* fluorene
hexachlorobenzene
hexachlorobutadiene
hexachlorocyclopentadiene
hexachloroethane
* indeno (1,2,3-cd) pyrene
isophorone
* naphthalene
* nitrobenzene
N-nitrosodimethylamine
N-nitrosodi-n-propylamine
N-nitrosodiphenylamine
* phenanthrene
* pyrene
1,2,4-trichlorobenzene

Pesticides

EPA Method 625

aldrin
alpha – BHC
beta – BHC
gamma – BHC
delta – BHC
chlordane
4,4' – DDT
4,4' – DDE
4,4' – DDD
dieldrin
alpha-endosulfan
beta-endosulfan
endosulfan sulfate
endrin
endrin aldehyde
heptachlor
heptachlor epoxide
PCB-1242
PCB-1254
PCB-1221
PCB-1232
PCB-1248
PCB-1260
PCB-1016
toxaphene

Other Toxic Pollutants and Total Phenol

Antimony, Total
Arsenic, Total
Beryllium, Total
Cadmium, Total
Chromium, Total
Chromium, Hexavalent
Copper, Total
Lead, Total
Mercury, Total
Nickel, Total
Selenium, Total
Silver, Total
Thallium, Total
Zinc, Total
Asbestos
Cyanide, Total
Phenols, Total
TCDD (Dioxin)

*= Polynuclear Aromatic Hydrocarbons

***NBC SIGNIFICANT INDUSTRIAL USER
ANNUAL INSPECTION CHECKLIST***

NARRAGANSETT BAY COMMISSION



Annual Inspection Checklist
For Significant Industrial Sewer Users

Company Name: _____ Engineer: _____
Contact Person(s): _____ Date: _____
Other Person(s) in Attendance: _____
Company Classification: Electroplater _____ Metalfinisher _____
Other (specify): _____

Part I - Outstanding Requirements/Progress Since Last Inspection

(a) What progress was required of the firm since the last annual inspection? _____

(b) Has required work been completed? Yes No
If no, when will it be completed? _____

(c) What work has facility initiated on its own to improve wastewater discharge?

(d) Has facility expanded/scaled down operations? Yes No
If yes, describe. _____

(c) Who operates the pretreatment system? _____

(d) List all water using operations that are **not** pretreated (e.g. casting, tubbing, boiler blowdown, cooling water, etc.). _____

(e) Is there an operation and maintenance manual maintained on site for pretreatment system? Yes No N/A

(f) Are there any spare parts maintained on site for the pretreatment equipment? Yes No N/A

If yes, list spare parts. _____

(g) Has system been installed according the NBC specifications? Yes No N/A

If no, what needs to be corrected? _____

* Check pretreatment system piping, decant ports, transfer pumps, pH recording probe location, etc.

(h) Has system been installed according to NBC approved plans? Yes No N/A

If no, what needs to be corrected? _____

* Compare plans with existing system.

- (i) Have changes been made to process operations or pretreatment system without NBC notification and approval? Yes No

If yes, detail changes. _____

- (j) Are any hydroxide sludges or other sludges produced at this facility from pretreatment operations? Yes No

If so, indicate type of sludge, volume, and source (e.g. Hydroxide sludge from clarifier, etc.) _____

- (k) Is any type of sludge discarded in the trash? Yes No
If yes, specify. _____

- (l) Are any concentrates or other hazardous materials removed by hazardous waste contractors (e.g. spent solvents, etc.)? Yes No

If yes, list types and amounts. _____

- (m) Does the facility utilize ion-exchange resins? Yes No
If yes, are ion-exchange columns regenerated on site? Yes No
If yes, how often are columns regenerated? _____

How is regenerate material disposed of? _____

How are columns regenerated? _____

Has the Pretreatment staff observed and sampled during the regeneration procedure? Yes No

If no, be sure to observe and arrange sampling of the regenerant.

Part III - Maintenance and Record Keeping

(a) Is pH recording/reporting required? Yes No

(i) Are pH charts being maintained? Yes No N/A

(ii) Do pH charts agree with monthly reports? Yes No N/A
If no, detail inaccuracies. _____

(iii) Are the pH charts being dated properly (month, day, and year)?
Yes No N/A

(b) Provide the following pre-inspection pH calibration data:

NBC pH Pen # _____ Date of Calibration: _____
(mm/dd/yy)

(c) Are facility pH probes in calibration at the time of the inspection?
Yes No N/A

pH readings: NBC _____ s.u. Company _____ s.u.

* If discrepancy is greater than 0.5 s.u., and NBC instrument is verified to be in calibration, deficiency should be noted.

(d) How often are pH and/or ORP probes cleaned and calibrated? _____

(e) If discrepancy was observed, check instruments using the company's buffer solutions and complete the following:

	<u>#1</u>	<u>#2</u>	<u>#3</u>
pH of buffer			
pH using NBC instrument			
pH registered by facility instrument			
Expiration date of buffer			

If discrepancy was observed, a post inspection calibration check must be performed at Pretreatment lab on the same day as the inspection and the following must be completed:

- a) NBC Instrument pH in buffer 4.0: _____
- b) NBC Instrument pH in buffer 7.0: _____
- c) NBC Instrument pH in buffer 10.0: _____

(f) Is the facility required to maintain a logbook? Yes No

If yes, is the logbook being maintained? Yes No

Does the logbook properly document the following?

(i) Batch discharges? Yes No N/A

(ii) Chemicals used for pretreatment system? Yes No N/A

(iii) Sludge generated on a daily, weekly, or monthly basis?
 Yes No N/A

(iv) Maintenance performed on pretreatment system? Yes No N/A

(v) Visual inspecting data for boiler room discharges? Yes No N/A

(vi) Grease interceptor inspection? Yes No N/A

(g) Is spill control in the boiler room satisfactory? Yes No N/A
 If no, what will be required to ensure proper containment in the boiler room?

(h) Based upon the facility inspection and observations noted in d, e, f, and g above, is the existing SSPCP accurate and sufficient? Yes No N/A
 If no, why? _____

(i) Is submission of a Toxic Organic/Solvent Management Plan (TO/SMP) necessary? Yes No

(j) Has TO/SMP been submitted? Yes No N/A

(k) Has TO/SMP been approved? Yes No N/A

(l) Is there proper containment of solvents as stated in the TO/SMP? Yes No N/A

(m) Is the existing TO/SMP accurate and sufficient? Yes No N/A

Part V - Process Flow Measurement

(a) How many flow meters are used to measure process wastewater discharges?

(b) Complete the following table for each process

<u>Location</u>	<u>Process Operation Monitored</u>	<u>Readings</u>	<u>Units</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

- (c) Are these flow meter readings an accurate measurement of process flows?
Yes No N/A
- (d) If not, list user's estimate of the percent of total flow used for process water.
____%
- (e) Based upon _____, for the period from _____ to _____, the average daily process flow is _____GPD.
- (f) Based upon daily flow calculation, is user properly classified for permit fee billing purposes?
Yes No N/A

Part VI - Sampling Procedures

- (a) Where should representative samples be taken for NBC and self-monitoring?

- (b) Are samples taken here presently? Yes No
If no, why not? _____

- (c) Are non-contact cooling water or other dilution streams discharged upstream of the sampling location?
Yes No
- * Check degreaser cooling water and steam condensate discharge lines.
- (d) Must the combined wastestream formula be used to determine compliance with EPA categorical pretreatment standards? (e.g. Does wastewater discharge through more than one (1) location?)
Yes No
- (e) Does the firm conduct its own sample collection? Yes No
If not, specify: _____
- (f) Is method of sample collection acceptable? Yes No
If no, why not? _____

- (g) If firm is a metalfinisher, does cyanide sampling satisfy EPA requirements? Yes No N/A

If no, what must be changed? _____

- (h) Are sample collection procedures adequate?

(i) Samples refrigerated after collection? Yes No N/A

(ii) Proper preservation techniques used? Yes No N/A

(iii) How long are samples held before delivery to the laboratory for analysis? _

PART VII - LABORATORY ANALYSIS

- (a) Is a commercial laboratory used? Yes No

If so, which lab? _____

- (b) Is commercial lab state certified? Yes No N/A

- (c) For in-house analysis:

(i) Are duplicate samples analyzed? Yes No N/A

(ii) Are spiked samples used? Yes No N/A

(iii) Are equipment and instruments calibrated and maintained?
Yes No N/A

(iv) Is there a quality assurance plan in effect? Yes No N/A

(v) Is in-house lab state certified? Yes No N/A

(vi) If yes, request and attach copy of in-house lab certification and approved parameters.

Part VIII - User Education

(a) Educate users about each of the following:

Significant Non-Compliance (SNC) Criteria: Yes No

NBC Mission Statement: Yes No

Purpose and Types of NBC Inspections: Yes No

Monitoring and Reporting Requirements/Procedures: Yes No

Comments: _____

(b) Was the area outside the facility inspected? Yes No

Was litter observed? Yes No

If yes, educate the user of the impacts of litter on the sewer system.

***NBC INDUSTRIAL USER
INSPECTION CHECKLIST***

NARRAGANSETT BAY COMMISSION

Inspection Checklist
For Industrial Users

Company Name: Tech./Eng.:
Person(s) Met With: Date:
Company Classification:

Part I - Requirements/Progress Since Last Inspection

- (a) What was required of the firm since last inspection?
(b) Has required work been completed? Yes No
If no, when will it be completed?

Part II - Pretreatment Equipment and Process Operations

- (a) List areas of the facility that were inspected:
Process Operations
Pretreatment Operations
Other:
(b) Have changes been without NBC notification and approval Yes No
If yes, detail changes.

Part III - Maintenance and Record Keeping

- (a) Is pH recording required? Yes No
(b) Are facility pH probes in calibration at the time of the inspection? Yes No N/A
pH readings: NBC s.u. Company s.u.
* If discrepancy is greater than 0.5 s.u., and NBC instrument is verified to be in calibration, deficiency should be noted.
(c) How often are pH probes cleaned and calibrated?
(d) Is the facility required to maintain a logbook? Yes No
If yes, is the logbook being maintained? Yes No N/A
If no, please specify

***NBC DENTAL FACILITY
INSPECTION CHECKLIST***

NARRAGANSETT BAY COMMISSION



Inspection Checklist For Dental Facilities

Company Name: _____
Facility Address: _____
Inspection Date: _____ NBC Inspector(s): _____
Person(s) met with: _____

Part I – Facility Information

- (1) Company Owner: _____
- (2) Contact Person: _____
- (3) Phone Number: _____
- (4) Hours of Operation: _____
- (5) Type of Dental Facility: _____
- (6) Make/Model of Amalgam Separator: _____

Part II - Requirements/Progress Since Last Inspection

- (1) What was required of the firm since the last inspection? _____

- (2) Has required work been completed? Yes No
If no, when will it be completed? _____

- (3) Have all required reports (BMP Certification, SMCRs) been submitted on time? Yes No
If no, discuss the ramifications of late submittals and SNC with the user _____

- (4) Has the firm been in compliance for the past 12 month period? Yes No
If no, detail the compliance issues and discuss with the user. _____

Part III – Amalgam Separator Maintenance/Installation Information

(1) Has the amalgam separator been installed according to NBC approved plans? * Yes No
If no, what needs to be corrected? _____

* Compare plans with existing system.

(2) Have changes been made without NBC notification and approval? [gu "P q
If yes, detail changes. _____

(3) Unit accessible? Yes No

(4) Solids container was present and operational? Yes No

(5) Level of sediment in solids collection container: _____

(6) Date solids container was last replaced/emptied: _____

(7) Sample port was properly installed? Yes No

(8) Unit has been properly maintained? Yes No

(9) How is waste amalgam disposed of? _____

(10) Type of vacuum pumps installed: _____
Verify that vacuum pump is equipped with a filter.

(11) Number of sinks discharging to the separator: _____
Verify that all sinks discharging to the separator are properly designated for equipment washing only.

(12) Are chair side traps present on all dental chairs? Yes No
Verify that chair side traps are being inspected daily and cleaned or replaced as necessary.

(13) Type of line cleaner used: _____

(14) Is elemental mercury stored onsite? If yes, how is it stored and disposed of? _____

Part IV – X-Ray Processor System Information

- (1) Is x-ray processing performed at this facility? Yes No
- (2) Are there discharges to the sewer from x-ray processing operations? Yes No
If yes, detail discharges. _____

- (3) Is there a silver recovery unit in place? Yes No
- (4) Has silver recovery unit been installed according to NBC approved plans?, [gu""P q
If no, what needs to be corrected? _____

- *Compare plans with existing system.
- (5) Sample port was properly installed? Yes No
- (6) Unit has been properly maintained? Yes No

Part V – Record Keeping

- (1) Is the facility required to maintain an amalgam separator logbook? Yes No
- (2) Does the amalgam separator logbook properly document the following?
- a. The date of each separator inspection and service activity? Yes No
 - b. The location of each trap and separator being serviced? Yes No
 - c. All routine and non routine activities conducted (i.e. cleaning, maintenance, filter replacement)? Yes No
 - d. Signature of person conducting activity? Yes No
- (3) Is the facility required to maintain a x-ray processor system logbook? Yes No
- (4) Does the x-ray processor system logbook properly document the following?
- a. Amount of chemicals used (i.e. fixer, developer)? Yes No N/A
 - b. Completed manifest forms for hazardous materials? Yes No N/A
 - c. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred? Yes No N/A
 - d. Maintenance performed on the pretreatment system? Yes No N/A

Part VI - User Education

(1) Educate users about each of the following:

NBC Dental BMP Program:	Yes	No
Permit/Logbook Requirements:	Yes	No
Monitoring and Reporting Requirements/Procedures:	Yes	No

Comments: _____

What will be required of firm? _____

***NBC FOOD PREPARATION
ESTABLISHMENTS INSPECTION
CHECKLIST***

NARRAGANSETT BAY COMMISSION



Inspection Checklist For Food Preparation Establishments

Inspection Date: _____

Company Name: _____

Facility Address: _____

Technician/Engineer: _____

Person(s) met with: _____

Part I - Facility Information

- (1) Company Owner: _____
- (2) Contact Person: _____
- (3) Type of GRU: _____
- (4) Brand of GRU: _____
- (5) Size of GRU: _____
- (6) Type of food served: _____
- (7) Hours of Operation: _____
- (8) Seating Capacity: _____
- (9) Based upon seating capacity, is user properly classified for permit fee billing purposes? Yes No
- (10) Menu on file? Yes No
- (11) Drive through window? Yes No

Part II - Requirements/Progress Since Last Inspection

- (1) What was required of the firm since the last inspection? _____
- (2) Has required work been completed? Yes No N/A
If no, when will it be completed? _____

Part III - GRU Maintenance/Installation Information

- (1) Has grease removal system been installed according to NBC approved plans? *
Yes No N/A

If no, what needs to be corrected? _____

* Compare plans with existing system.

- (2) Have changes been made without NBC notification and approval? (kitchen fixtures, menu, grease removal unit, etc.) Yes No N/A

If yes, detail changes. _____

- | | | | |
|---|-----|----|-----|
| (3) Unit accessible? | Yes | No | N/A |
| (4) Power supplied to GRU? | Yes | No | N/A |
| (5) GRU solids basket was present and operational? | Yes | No | N/A |
| (6) Solids basket had been emptied? | Yes | No | N/A |
| (7) GRU wiper blades were fully operational? | Yes | No | N/A |
| (8) GRU trough was clean and operational? | Yes | No | N/A |
| (9) GRU timer was fully operational? | Yes | No | N/A |
| (10) GRU installed in accordance with NBC requirements? | Yes | No | N/A |
| (11) Sample port was properly installed? | Yes | No | N/A |
| (12) Grease container present? | Yes | No | N/A |
| (13) Unit has been properly cleaned? | Yes | No | N/A |
| (14) How is waste grease disposed of? _____
_____ | | | |

Part IV - Record Keeping

- | | | | |
|--|-------|--------|---------|
| (1) Is the facility required to maintain a logbook? | Yes | No | N/A |
| If yes, logbook is required to be maintained | Daily | Weekly | Monthly |
| Is the logbook being maintained at the required frequency? | Yes | No | |
- (2) Does the logbook properly document the following?
- | | | | |
|--|-----|----|-----|
| a. Cleaning and emptying of solids basket? | Yes | No | N/A |
| b. Cleaning of wiper blades? | Yes | No | N/A |
| c. Cleaning of trough? | Yes | No | N/A |
| d. Estimated amount of grease removed? | Yes | No | N/A |
| e. Wet vacuuming of the GRU? | Yes | No | N/A |
| f. Thickness of the grease layer (passive)? | Yes | No | N/A |
| g. Mandatory monthly cleanings incl. amount of grease removed, date, time (passive)? | Yes | No | N/A |
| h. Maintenance performed? | Yes | No | N/A |
| i. Physical receipts for each pump-out retained? | Yes | No | N/A |

Part V - User Education

- (1) Educate users about each of the following:

NBC Grease Removal Program:	Yes	No	N/A
Permit/Logbook Requirements:	Yes	No	N/A
Monitoring and Reporting Requirements/Procedures:	Yes	No	N/A

Comments: _____

What will be required of firm? _____

***NBC SEPTAGE TRUCK
INSPECTION CHECKLIST***

Lincoln Septage Facility
Septage Truck Inspection Checklist

Inspector : _____
Inspection Date: _____
Septage Hauler: _____
Vehicle Inspected: _____
Drivers Name: _____

Vehicle Inspection

Registration OK?	<input type="checkbox"/> Yes	<input type="checkbox"/> No – Call State Police
Insurance Card Ok?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
NBC Volume Sticker In Place	<input type="checkbox"/> Yes	<input type="checkbox"/> No – Issued NOV
NBC Permitted User Sticker in Place	<input type="checkbox"/> Yes	<input type="checkbox"/> No – Issued NOV
NBC Computer Chip In Place	<input type="checkbox"/> Yes	<input type="checkbox"/> No – Issued NOV

Paperwork Review

Manifest Properly Completed Yes No – Issued Nov and Refuse Load.

If No, List Problems: _____

Waste Discharge Inspection

pH of Waste: _____ s.u.

Was grease observed in Sample? Yes No - If yes, Refuse Load and Collect Sample for Evidence.

Was grease observed in lakeside? Yes No - If yes, Stop Load Discharge and Collect Sample.

Educational Procedure Review

Manifest Paperwork Completion procedure was reviewed with driver Yes No
Grease Policy reviewed with driver Yes No

Other Comments: _____

***NBC SAMPLING, REPORTING, AND
CHAIN OF CUSTODY FORMS***



The Narragansett Bay Commission
Pretreatment Program
2 Ernest Street
Providence, RI 02905

**Field's Point District
Self-Monitoring Compliance Report**

Company Name: _____

Address of Premises Sampled: _____

Date(s) Sampled: _____

Permit Sampling Month Satisfied: _____

Samples Taken By: _____
(Name) (Company)

Samples Analyzed By: _____
(Company)

Type of Sample: Grab _____ Composite _____

If Grab Sample, what time(s) was sample taken? _____

If Composite Sample, describe how composite was taken _____

Where was sample taken? _____

Water Meter Readings (List readings for all meters discharging to sampling location)

	#1	#2	#3
Closing Reading:	_____	_____	_____
Opening Reading:	_____	_____	_____
Total:	_____	_____	_____
Units (Circle One):	Cubic Feet/Gallons	Cubic Feet/Gallons	Cubic Feet/Gallons
Other (Specify):	_____	_____	_____

Were any batch discharges sampled? _____ Yes _____ No

What tank was sample taken from? _____

Indicate volume of batch discharge: _____

Is this analysis a resampling required to demonstrate compliance with a previous violation?

_____ Yes _____ No

What is the sample identification number(s) or the analytical report identification number(s) indicated on the analytical report(s) being submitted? _____

Is this analysis in full compliance with NBC standards listed on the back of this form?

_____ Yes _____ No

If your firm was in violation, what was the cause of the violation? _____

What steps will be taken by your firm to ensure full compliance with NBC standards on a continuous basis? _____

When will these steps be implemented? _____

If your firm is not in full compliance with the NBC standards, U.S. EPA Regulations, 40 CFR 403.12g (2) requires that you notify the NBC at 461-8848 within 24 hours of becoming aware of the violation and that your firm resample and analyze for the parameter(s) in violation of the NBC standards. The results after resampling must be submitted to the NBC no later than thirty (30) days following the date that you became aware of the initial violation of the standards.

Please attach the laboratory analysis sheet. Indicate on this sheet the method of analysis used for each parameter listed. Sampling and analysis shall be performed in accordance with the techniques prescribed by federal regulations (40 CFR, Part 136).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. In lieu of monitoring for Total Toxic Organics, I hereby certify that based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitations for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic/solvent management plan submitted to the NBC.

Signature of Authorized Company Representative

Date

Report will be returned if form is not properly completed and signed.

NBC Field's Point Effluent Discharge Limitations*

Parameter	Maximum Daily Concentration Limit (mg/l)	Monthly Average Concentration (mg/l)
Cadmium (Total)	0.11	0.07
Chromium (Total)	2.77	1.71
Copper (Total)	1.20	1.20
Cyanide (Total)	0.58	0.58
Lead (Total)	0.60	0.40
Mercury (Total)	0.005	0.005
Nickel (Total)	1.62	1.62
Silver (Total)	0.43	0.24
Zinc (Total)	2.61	1.48
Parameter	Limitation (Maximum)	
Total Toxic Organics (TTO)	2.13	
Biochemical Oxygen Demand (BOD)	300.00 **	
Total Suspended Solids (TSS)	300.00 **	
Total Oil and Grease (fats, oils and grease)	125.00	
Oil and Grease (mineral origin)	25.00	
Oil and Grease (vegetable origin)	100.00	
pH range (at all times)	5.0 - 11.0 s.u.	

* All parameters in mg/l unless otherwise specified.

** Exceeding this discharge limitation may be permitted but would be subject to a surcharge in accordance with rates approved by the Public Utilities Commission and in accordance with R.I.G.L. §39-1-1 et seq.



The Narragansett Bay Commission

Pretreatment Program
2 Ernest Street
Providence, RI 02905

**Bucklin Point District
Self-Monitoring Compliance Report**

Company Name: _____

Address of Premises Sampled: _____

Date(s) Sampled: _____

Permit Sampling Month Satisfied: _____

Samples Taken By: _____
(Name) (Company)

Samples Analyzed By: _____
(Company)

Type of Sample: Grab _____ Composite _____

If Grab Sample, what time(s) was sample taken? _____

If Composite Sample, describe how composite was taken _____

Where was sample taken? _____

Water Meter Readings (List readings for all meters discharging to sampling location)

	#1	#2	#3
Closing Reading:	_____	_____	_____
Opening Reading:	_____	_____	_____
Total:	_____	_____	_____
Units (Circle One):	Cubic Feet/Gallons	Cubic Feet/Gallons	Cubic Feet/Gallons
Other (Specify):	_____	_____	_____

Were any batch discharges sampled? _____ Yes _____ No

What tank was sample taken from? _____

Indicate volume of batch discharge: _____

Is this analysis a resampling required to demonstrate compliance with a previous violation?

_____ Yes _____ No

What is the sample identification number(s) or the analytical report identification number(s) indicated on the analytical report(s) being submitted? _____

Is this analysis in full compliance with NBC standards listed on the back of this form?

_____ Yes _____ No

If your firm was in violation, what was the cause of the violation? _____

What steps will be taken by your firm to ensure full compliance with NBC standards on a continuous basis? _____

When will these steps be implemented? _____

If your firm is not in full compliance with the NBC standards, U.S. EPA Regulations, 40 CFR 403.12g (2) requires that you notify the NBC at 461-8848 within 24 hours of becoming aware of the violation and that your firm resample and analyze for the parameter(s) in violation of the NBC standards. The results after resampling must be submitted to the NBC no later than thirty (30) days following the date that you became aware of the initial violation of the standards.

Please attach the laboratory analysis sheet. Indicate on this sheet the method of analysis used for each parameter listed. Sampling and analysis shall be performed in accordance with the techniques prescribed by federal regulations (40 CFR, Part 136).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. In lieu of monitoring for Total Toxic Organics, I hereby certify that based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitations for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic/solvent management plan submitted to the NBC.

Signature of Authorized Company Representative

Date

Report will be returned if form is not properly completed and signed.

NBC Bucklin Point Effluent Discharge Limitations*

Parameter	Maximum Daily Concentration Limit (mg/l)	Monthly Average Concentration (mg/l)
Arsenic (Total)	0.20	0.10
Cadmium (Total)	0.11	0.07
Chromium (Total)	2.77	1.63
Copper (Total)	1.20	1.20
Lead (Total)	0.69	0.29
Mercury (Total)	0.06	0.03
Nickel (Total)	1.62	1.62
Selenium (Total)	0.40	0.20
Silver (Total)	0.40	0.20
Tin (Total)	4.00	2.00
Zinc (Total)	1.67	1.39
Cyanide (Total)	0.50	0.50
Parameter	Limitation (Maximum)	
Total Toxic Organics (TTO)	2.13	
Biochemical Oxygen Demand (BOD)	300.00 **	
Total Suspended Solids (TSS)	300.00 **	
Total Oil and Grease (fats, oils and grease)	125.00	
Oil and Grease (mineral origin)	25.00	
Oil and Grease (vegetable origin)	100.00	
pH range (at all times)	5.0 - 11.0 s.u.	

* All parameters in mg/l unless otherwise specified.

** Exceeding this discharge limitation may be permitted but would be subject to a surcharge in accordance with rates approved by the Public Utilities Commission and in accordance with R.I.G.L. §39-1-1 et seq.



TWENTY-FOUR (24) HOUR VIOLATION NOTIFICATION FAX FORM

Fax To: Narragansett Bay Commission
(401) 461-0170

Company Name: _____

Facility Address: _____

This is to notify the Narragansett Bay Commission (NBC) that the above-referenced facility violated the NBC discharge limitations for the following parameter(s):

<u>Sampling Date of Violation</u>	<u>Parameter</u>	<u>Concentration</u>

I certify that I have just become aware of the above-referenced violation(s) within the past twenty-four (24) hours and will immediately resample this wastestream for the parameter(s) exceeding the NBC discharge limitations.* I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Initial sampling and all resampling results must be submitted within 30 days of the sample date. Please note, resampling must continue until four consecutive samples show compliance with NBC discharge limitations.

Signature of Authorized Agent

* Resampling is not required for exceeding BOD or TSS limits.

**CONTINUOUS DISCHARGE
PH MONITORING REPORT**
MONTH OF: _____ 20 ____



Company Name: _____
Address: _____

Return to: **Narragansett Bay Commission**
Pretreatment Section
2 Ernest Street
Providence, RI 02905

Date	MAXIMUM pH	MINIMUM pH	AVERAGE pH (VISUAL)	VOLUME/WATER METER READING IF REQUIRED*	COMMENTS
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations. I certify the above data has been reported directly from the recording chart of the final pH recorder and is reported to an accuracy of 0.1 standard units.

Signature

Date

Name (Print)

Title

*INDICATE IF GALLONS OR CUBIC FEET

**BATCH DISCHARGE
Ph MONITORING REPORT**
MONTH OF: _____ 20 ____



Company Name: _____
Address: _____

Return to: **Narragansett Bay Commission**
Pretreatment Section
2 Ernest Street
Providence, RI 02905

Date	Batch Discharge I		Batch Discharge II		Batch Discharge III		Batch Discharge IV		COMMENTS
	Final pH	Vol.	Final pH	Vol.	Final pH	Vol.	Final pH	Vol.	
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
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27									
28									
29									
30									
31									

Please indicate the method used to measure pH: _____

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Signature

Date

Name (Print)

Title

Zero Process Wastewater Discharge Certification

For the Month of _____, 20__

Company Name: _____

Address: _____

RETURN TO:

Narragansett Bay Commission

Pretreatment Program

2 Ernest Street

Providence, RI 02905

I, _____, as authorized representative of

_____, do hereby decree that no process wastewater was discharged into

the Narragansett Bay Commission sewer system for the past six (6) month period.

Date of Meter Readings: _____

<u>Meter Number</u>	<u>Water Meter Readings</u>	<u>Units (cf, gal.)</u>
Meter #1	_____	_____
Meter #2	_____	_____
Meter #3	_____	_____

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Signature

Date

Attachment A

Zero Process Wastewater Discharge Certification

For the Six (6) Month Period from

_____ to _____

Company Name: _____

Address: _____

RETURN TO:
Narragansett Bay Commission
Pretreatment Program
2 Ernest Street
Providence, RI 02905-5502

I, _____, as authorized representative of _____, do hereby decree that no process wastewater was discharged into the Narragansett Bay Commission sewer system for the past six (6) month period.

Date of Meter Readings: _____

<u>Meter Number</u>	<u>Water Meter Readings</u>	<u>Units (cf, gal.)</u>
Meter #1	_____	_____
Meter #2	_____	_____
Meter #3	_____	_____

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

Authorized Representative Signature

Date

Attachment A

Best Management Practice Certification

For the 12-month period from _____, 20__ to _____, 20__

Company Name: _____

Address: _____

RETURN TO:
Narragansett Bay Commission
Pretreatment Program
2 Ernest Street
Providence, RI 02905-5502

I, _____, as authorized representative of
_____, do hereby decree that the Narragansett Bay
Commission Best Management Practices for the Management of Waste Dental Amalgam have been
fully complied with for the past twelve month period.

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

Authorized Representative Signature

Date

NARRAGANSETT BAY COMMISSION SAMPLE SUBMISSION SHEET

SOURCE: _____ EMDA# _____ DATE: _____
 STREET: _____ SAMPLER # _____ TIME: _____
 CITY/STATE: _____ COLLECTED BY: _____
 SAMPLE LOCATION: _____ FACILITY CONTACT: _____
 INSTRUCTIONS: _____

PARAMETERS FOR ANALYSIS*

Cd _____	Ag _____	BOD (5 day) _____
Cr (Total) _____	Zn _____	TSS _____
Cr (Hex.) _____	Hg _____	FOG _____
Cu _____	CN (Total) _____	TPH _____
Pb _____	VOC _____	() _____
Ni _____	Ext _____	() _____

*All analyses done according to 40 CFR part 136. Results reported in mg/l unless specified otherwise.

FIELD AND PRESERVATION DATA

Sample Information					Preservation Chemicals Added								
Sample No.	Sample Time Start/Stop	Analyze For	Sample Type (G) or (C)	Initial pH	Nitric Acid (ml)	Hydro-Chloric Acid (ml)	Res. Cl (+) or (-)	Lead Acetate (+) or (-)	NaOH (ml)	Ascorbic Acid (g)	Other	Final pH	Sealed By
A													
B													
C													
D													
E													
F													
G													
H													
I													
J													
K													
L													
M													

Did user accept a split or replicate sample?

Sample	A	B	C	D	E	F	G	H	I	J	K	L	M	Signature
Yes														
No														

Meter Readings	Meter #1	Meter #2	Meter #3	Meter #4
Close				
Open				
Total	(c.f., gals)	(c.f., gals)	(c.f., gals)	(c.f., gals)

REMARKS _____

CHAIN OF CUSTODY

Samples transferred by: _____
 Samples received by: _____
 DATE: _____ TIME: _____

Samples transferred by: _____
 Samples received by: _____
 DATE: _____ TIME: _____

Samples transferred by: _____
 Samples received by: _____
 DATE: _____ TIME: _____

RESULTS REPORTED BY: _____

RESULTS REPORTED ON: _____

NARRAGANSETT BAY COMMISSION

Source _____

Sample ID _____

Initials of Collectors: _____

Place of Collection: _____

Date Sampled _____ Time Sampled _____

Analysis Requested _____

Rec'd From _____ Date _____

Rec'd By _____ Time _____

NARRAGANSETT BAY COMMISSION

Source _____

Sample ID _____

Initials of Collectors: _____

Place of Collection: _____

Date Sampled _____ Time Sampled _____

Analysis Requested _____

Rec'd From _____ Date _____

Rec'd By _____ Time _____

CUSTODY SEAL

DATE _____

SIGNATURE _____

QEC

Quality Environmental Containers
800-255-3950 • 304-255-3900

CUSTODY SEAL

DATE _____

SIGNATURE _____

QEC

Quality Environmental Containers
800-255-3950 • 304-255-3900

DEFINITION OF AN AUTHORIZED AGENT



An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the company's by-laws or per a vote of the directors if the company is a corporation; a general partner or proprietor if the company is a partnership or sole proprietorship respectively; or a duly authorized representative, the individual designated on the permit application or permit cover page, if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the company. Please complete the Designation Of Authorized Agent section below if you wish to designate additional authorized agents. The Narragansett Bay Commission will not accept documents signed by persons other than the company's authorized agent(s) or authorized representative(s).

DESIGNATION OF AUTHORIZED AGENT

I, _____ certify that I am the _____ of
_____ and that _____
is authorized to make submittals to the Narragansett Bay Commission on behalf of _____
_____ and that said submittals are duly signed for and
in behalf of said corporation by authority of its governing body, and are within the scope of
its corporate powers.

Corporate Seal

Signature of Corporation Official

Date

***NBC ONE-TIME COMPLIANCE
REPORT FOR DENTAL FACILITIES***



Narragansett Bay Commission
One-Time Compliance Report for Dental Facilities
40CFR441.50 Dental Point Source Category

The United States Environmental Protection Agency (EPA) finalized the Dental Point Source Category (40CFR441) on July 14, 2017. This form must be completed under 40CFR441.50, which requires all dental facilities to complete and submit a one-time compliance report to the local Pretreatment Program.

Practice Name: _____

Premise Address: _____

Mailing Address: _____

List all dentists affiliated with this practice:

Name:	Email address:
_____	_____
_____	_____
_____	_____
_____	_____

Primary Contact for Practice: Name: _____
Email Address: _____
Phone Number: _____

Type(s) of Dentistry Performed:

General Dentistry	Yes _____	No _____
Orthodontics	Yes _____	No _____
Periodontics	Yes _____	No _____
Endodontics	Yes _____	No _____
Prosthodontics	Yes _____	No _____
Oral and Maxillofacial Surgery	Yes _____	No _____
Other (please detail)	_____	

This practice began operations prior to July 14, 2017 Yes _____ No _____

This practice places and/or removes dental amalgam on a regular or an infrequent basis:
Yes _____ No _____

An ISO 11143 (or ANSI/ADA 108-2009) certified amalgam separator (or equivalent device) has been installed to capture amalgam bearing waste streams. Yes _____ No _____

Please provide the make and model of the amalgam separator:

Make: _____ Model: _____

Date the amalgam separator was installed: _____

An equivalent device has been installed at the facility: Yes _____ No _____

Please provide the make and model of the equivalent device:

Make: _____ Model: _____

Date the device was installed: _____

How many chairs are at this facility? _____

How many chairs are connected to the amalgam separator or equivalent device? _____

How many sinks (used for instrument washing) are connected to the amalgam separator or equivalent device? _____

I certify the amalgam separator or equivalent device is designed and is being properly maintained and operated in accordance with NBC Best Management Practices. Yes _____ No _____

Maintenance is performed by onsite personnel: Yes _____ No _____

If yes, describe operation and maintenance procedures:

A vendor has been contracted to operate and maintain the amalgam separator or equivalent: Yes _____ No _____

If yes, provide the contact person, company name, address and phone number of your vendor:

If the amalgam separator or equivalent device that is presently installed needs to be replaced, an amalgam separator or equivalent device meeting the requirements of the NBC Best Management Practices for the Management of Waste Dental Amalgam (NBC BMP) as well as 40CFR441.30(a)(1) or 40CFR441.30(a)(2) must be installed. The amalgam separator must be ISO 11143 certified with a 99% removal rate or equivalent device must be installed.

The dental practice complies with the best management practices outlined in the NBC BMP and 40CFR441.30(b) or 40CFR441.40. These best management practices include but are not limited to:

- Waste amalgam including but not limited to dental amalgam from chair side traps, screen, vacuum pumps, filters, dental tools, cuspidors, or collection devices is strictly prohibited from being discharged to the sewer system.
- Elemental mercury is strictly prohibited from being discharged to the sewer system.
- All equipment that comes in contact with amalgam must be operated and maintained in accordance with manufacturers specifications.
- Equipment coming in contact with amalgam, including piping, must not be cleaned with oxidizing or acidic cleaners, including but not limited to bleach, chlorine, iodine, and peroxide that have a pH lower than 6.0 standard units (su) or greater than 8.0 su. These types of cleaners may increase the dissolution of mercury.

Certification Statement

As per 40CFR441.50(a)(2) this one-time compliance report must be signed and certified by a responsible corporate officer, a general partner or proprietor if the dental practice is a partnership or sole proprietorship, or a duly authorized representative in accordance with 40CFR403.12(l).

I am a responsible corporate officer, a general partner or proprietor (if the dental practice is a partnership or sole proprietorship), or a duly authorized representative in accordance with 40CFR403.12(l) of the above named dental practice, and certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Agent:

Print Name

Signature

Phone Number

Email Address

Date: _____

This One-Time Compliance Report must be maintained onsite and be available for review, either in physical or electronic form, during inspections as long as this dental practice is in operation or until there is a change in ownership.

ATTACHMENT VOLUME I

SECTION 4

***SAMPLE NBC ENFORCEMENT
LETTERS, NOTICES, AND ORDERS***

NOTICE OF VIOLATION
FAILURE TO MEET STANDARDS (USER SAMPLE)

November 02, 2020

Mr. Manuel Macedo
U.S. Postal Service - P&DC
24 Corliss Street
Providence, RI 02904-9997



Dear Mr. Macedo

The sample results for October which were received by this office on October 20, 2020 indicate that you are in violation of discharge limitations for the following:

Sample Location # 1

Sample Date	Parameter	Sample Type	Sample Result	Standard Type	Max. Limit	Avg. Limit
10/14/2020	LEAD	Grab	0.626	LOCAL	0.60	0.40

As a condition of your Wastewater Discharge Permit, these discharge limitations must be met at all times. Failure to meet the standards may result in the Commission initiating enforcement action against your firm and the publication of your company's name in the Commission's annual list of firms in Significant Non-Compliance which is published each year in the PROVIDENCE JOURNAL. Based upon these results, you must immediately resample your process discharge for the parameter(s) in violation noted above. You must continue this weekly sampling until four (4) consecutive weekly reports indicate full compliance with NBC discharge limitations. Results must be submitted for NBC review within three (3) weeks from the sampling date.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact the NBC at 461-8848 ext. 391.

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle C. Gannon".

Kyle C. Gannon
Pretreatment Technician

NOTICE OF VIOLATION
FAILURE TO MEET STANDARDS (NBC SAMPLE)

December 02, 2020

Mr. John Arakelian
Unique Plating Company
66 Mill Street
Johnston, RI 02919



Dear Mr. Arakelian

Enclosed please find the results of the analyses performed by the Narragansett Bay Commission (NBC) Laboratory on a sample taken by the Bay Commission personnel at your facility on October 27, 2020. These results indicate that you are in violation of Narragansett Bay Commission (NBC) discharge limitations for the following:

Sample Location # 1

Sample Date	Parameter	Sample Type	Sample Result	Standard Type	Max. Limit	Avg. Limit
10/27/2020	NICKEL	Composite	3.59	LOCAL	1.62	1.62
10/27/2020	CADMIUM	Composite	0.15	LOCAL	0.11	0.07

As a condition of your Wastewater Discharge Permit, these discharge limitations must be met at all times. Failure to meet the standards may result in the Commission initiating enforcement action against your firm and the publication of your company's name in the Commission's annual list of firms in Significant Non-Compliance which is published each year in the PROVIDENCE JOURNAL. Based upon these results, you must immediately resample your process discharge for the parameter(s) in violation noted above. You must continue this weekly sampling until four (4) consecutive weekly reports indicate full compliance with NBC discharge limitations. Results must be submitted for NBC review within three (3) weeks from the sampling date.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact the NBC at 461-8848 ext. 391.

Sincerely,

Nathan P. Daggett
Principal Pretreatment Engineer

WASTEWATER SAMPLE ANALYSIS



Company Name: Unique Plating Company
Company Address: 66 Mill Street
Johnston, RI 02919
Location Name: Sample Location # 1
Type of Sample: Composite
Date of Sample: October 27, 2020

Parameter	Concentration (mg/l)
CADMIUM	0.15
CHROMIUM	0.075
COPPER	0.285
CYANIDE	0.052
LEAD	0.075
NICKEL	3.59
SILVER	0.025
ZINC	0.06

Reviewed By:


Nathan P. Daggett
Principal Pretreatment Engineer

NOTICE OF VIOLATION
AVERAGE LIMIT VIOLATION



November 02, 2020

Mr. Michael O'Keefe
Ecological Fibers, Inc.
730 York Avenue
Pawtucket, RI 02861

Dear Mr. O'Keefe:

The results of sampling conducted at your firm for the month of September-2020 show that you are in violation of average discharge limitations for the following:

Sample Location # 1

Parameter	# of Analyses	Standard Type	Avg. Conc.	Avg. Limit	Type
ZINC	17	LOCAL	3.25	1.39	NBC MONTHLY

As a condition of your Wastewater Discharge Permit and as required by U.S. EPA regulations, monthly average discharge limitations must be met at all times. Failure to meet the monthly average standards may result in the NBC initiating enforcement action against your firm and the possible publication of your company's name in the NBC annual list of firms in Significant Non-Compliance which is published each year in the PROVIDENCE JOURNAL. Therefore it is important to always be in compliance with the monthly average discharge concentration, in addition to the maximum discharge limit. It is strongly recommended that you sample early each required sampling month to allow adequate time to resample in that month, should the initial result indicate that the monthly average limit was exceeded.

Please note the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact the NBC at 401.461.8848 ext. 391. If you have any questions regarding this letter, please contact me at 401.461.8848 ext. 490.

Sincerely,

A handwritten signature in cursive script that reads "Edward J. Stenovitch".

Edward J. Stenovitch
Pretreatment Engineer

Notice of Violation
Failure to Meet Standards (Manhole)



November 19, 2020

Mr. George Tanury
G. Tanury Plating Company
100 Railroad Avenue
Johnston, RI 02919

Dear Mr. Tanury:

The Narragansett Bay Commission (NBC) regularly conducts surveillance monitoring of its users. This monitoring is done by installing automatic samplers in manholes located up and down stream of a company, effectively isolating that company. The samplers are programmed to collect composite samples of the wastewater discharging through the manhole.

On September 30, 2020 the NBC conducted surveillance manhole sampling up and down stream of your facility. The analytical results from the down stream manhole indicate noncompliance with the following parameters:

<u>Parameter</u>	<u>Sampling Type</u>	<u>Results</u> <u>(mg/L)</u>	<u>Daily Maximum</u> <u>(mg/L)</u>	<u>Average</u> <u>(mg/L)</u>
Copper	Composite	1.24	1.20	1.20
Cyanide	Composite	1.35	0.58	0.58

It has been determined that your firm is the source of the non-compliant wastewater since the upstream results were in compliance for these parameters. You must submit a report by December 15, 2020 detailing the cause of the high concentration of metals and cyanide with a proposal to ensure that wastewater from your facility is in compliance at all times.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help firm achieve and maintain compliance, contact the NBC at 461-8848 ext. 391.

If you have any questions regarding this letter, please contact me at 461-8848 ext. 490.

Sincerely,

Nathan Daggett
Principal Pretreatment Engineer

Attachment



Manhole Sample Analysis

Company: G. Tanury Plating Company
Address: 100 Railroad Avenue
Johnston, RI 02919
Date of Sample: September 30, 2020
Type of Sample: Composite

<u>Parameter</u>	<u>Upstream Manhole Concentration (mg/L)</u>	<u>Downstream Manhole Concentration (mg/L)</u>
Cadmium	<0.015	<0.015
Chromium	<0.075	<0.075
Copper	0.04035	1.242
Lead	<0.075	0.1620
Nickel	<0.050	1.139
Silver	<0.025	<0.025
Zinc	0.1564	0.1123
Cyanide	0.00456	1.35

Reviewed by:

Nathan J. Dean
Assistant Pretreatment Manager

Notice of Violation
Failure to Immediately Report Violation

August 05, 2020



Mr. Dean Fredrickson
Shaw's Supermarket Store #7443
P.O. Box 20, Dept. # 81014
Boise, ID 83726

Dear Mr. Fredrickson:

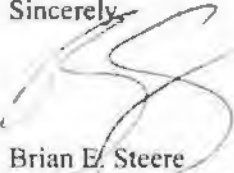
The Self-Monitoring Compliance report which was received by this office on July 29, 2020 indicated non-compliance with the NBC discharge limitations. EPA regulations, 40CFR. 403.12g(2), require that you notify the Narragansett Bay Commission (NBC) within 24 hours of becoming aware of this violation.

You failed to comply with this regulation since you did not notify the NBC within the 24 hour reporting period. This is not acceptable. In the future you must report any discharge violation within 24 hours by contacting me at 461-8848 or by using the attached FAX notification form.

In addition to notifying the NBC immediately regarding the violation, EPA regulations require that you repeat the sampling and analyses for the parameter(s) in violation and submit the resample results within thirty (30) days of becoming aware of the initial violation of the standards. Please note that the NBC requires that you begin weekly wastewater sampling for the parameter(s) in violation until such time that four (4) consecutive weekly sampling reports indicate full compliance with the NBC discharge limits. Failure to comply with these regulations and requirements may result in the initiation of enforcement action against your firm.

If you should have any questions regarding this matter, contact me at 461-8848 ext. 490.

Sincerely,



Brian E. Steere
Pretreatment Technician

NOTICE OF VIOLATION
NOTICE OF PH VIOLATIONS



November 02, 2020

Mr. Joseph Accaoui
Tanury Industries
6 New England Way
Lincoln, RI 02865

Dear Mr. Accaoui

I have reviewed the October pH Monitoring Report submitted on October 29, 2020. Based upon this report, your facility has exceeded the pH discharge limitation as follows:

LOW LIMIT VIOLATIONS

1

HIGH LIMIT VIOLATIONS

6

Effluent discharge to the Narragansett Bay Commission (NBC) sewer system must have a pH between the range of 5.0 - 11.0 standard units (s.u.) at all times. Discharging effluent with a pH value of less than 5.0 s.u. or higher than 11.0 s.u. is prohibited. pH effluent, that does not fall in the accepted range, may not be discharged to the NBC sewer system, even if the discharge is only for a short period of time. You must immediately take the steps necessary to prevent future violations from occurring. We will review future monitoring reports to ensure compliance with this parameter.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact the NBC at 461-8848 ext. 391.

Please feel free to contact me at 461-8848 if you have any questions regarding this matter.

Sincerely,

Handwritten signature of Edward J. Stenovitch in cursive.

Edward J. Stenovitch
Pretreatment Engineer

November 09, 2020



Mr. Michael Deltoro
B. Deltoro & Sons, Inc.
393 Harris Avenue
Providence, RI 02909

Dear Mr. Deltoro:

The sampling results to satisfy October which were received by this office on November 05, 2020 indicate that your firm has exceeded Narragansett Bay Commission (NBC) surcharge limitations for the following:

Sample Location # 1

Sample Date	Parameter	Sample Type	Sample Results	Surcharge Limitation
10/30/2020	BOD	COMPOSITE	1520	300
10/30/2020	TSS	COMPOSITE	2740	300

Exceeding the BOD or TSS standards of 300 ppm will be permitted but may be subject to a surcharge. The NBC does not require resampling for the BOD or TSS parameters when exceeding these surcharge limits.

You may contact me at 461-8848 if you have any questions on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Gannon", is written over a horizontal line.

Kyle C. Gannon
Pretreatment Technician

NOTICE OF VIOLATION
FAILURE TO SUBMIT COMPLIANCE REPORT



December 01, 2020

Ms. Lisa Costantino
Ron's Pastry Gourmet
170 Royal Little Drive
Providence, RI 02904-1860

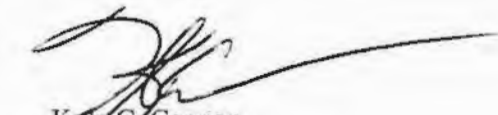
Dear Ms. Costantino:

In accordance with your Wastewater Discharge Permit, it is necessary for you to submit compliance monitoring results for the month(s) of:

Sample Location # 1
October-2020

To date, the Commission has not received a copy of these analytical results. Until a certified copy of the results and a Self-Monitoring Compliance Report are received, you are in violation of the terms of your permit. Failure to submit compliance monitoring results within thirty (30) days of the due date will result in your firm being in Significant Non-Compliance with the NBC and EPA regulations and will automatically result in the publication of the name of your firm in the Providence Journal. Please note that the NBC will bill you for the cost of this public notice. In addition, the Commission may initiate enforcement action against your firm for failing to submit reports on time. Should such an enforcement action be initiated, administrative penalties of up to \$25,000 per violation per day can be assessed.

Sincerely,



Kyle C. Gannon
Pretreatment Technician

**NOTICE OF VIOLATION
FAILURE TO SUBMIT PH MONITORING REPORT**



November 02, 2020

Mr. Stephen Pogorilich
Summit Manufacturing Corporation
248 Pine Street
Pawtucket, RI 02860

Dear Mr. Pogorilich:

In accordance with your Wastewater Discharge Permit, it is necessary for you to submit pH results for the month(s) of:

Sample Location # 1
September 2020

To date, the Commission has not received a copy of the above referenced pH monitoring report(s). Until a signed copy of the above referenced pH monitoring report(s) are received, you are in violation of the terms of your permit. Failure to submit pH monitoring results within thirty (30) days of the due date will result in your firm being in Significant Non-Compliance (SNC) with the NBC and EPA regulations and will automatically result in the publication of the name of your firm in the NBC annual list of violators published in the Providence Journal. Please note that the NBC will bill you for the cost of this public notice. In addition, the Commission may initiate enforcement action against your firm for failing to submit reports on time. Should such an enforcement action be initiated, administrative penalties of up to \$25,000 per violation per day can be assessed.

Sincerely,


Nathan P. Daggett
Principal Pretreatment Engineer

**NOTICE OF VIOLATION
FAILURE TO SUBMIT BMP CERTIFICATION**



December 3, 2020

Dr. Charles M. Riotto
Angell Street Dental Associate
425 Angell Street
Providence, RI 02906-4403

Dear Dr. Riotto:

In accordance with your permit issued by the Narragansett Bay Commission (NBC), it is necessary for you to submit a Certification for the period ending:

October 2020

To date, the NBC has not received a copy of the above referenced certification. Until a signed copy of the above referenced certification is received, you are in violation of the terms of your permit. Failure to submit this Certification within thirty (30) days of the due date will result in your firm being in Significant Non-Compliance (SNC) with the NBC and EPA regulations and will automatically result in the publication of the name of your firm in the NBC annual list of violators published in the Providence Journal. Please note that the NBC will bill you for the cost of this public notice. In addition, the Commission may initiate enforcement action against your firm for failing to submit reports on time. Should such an enforcement action be initiated, administrative penalties of up to \$25,000 per violation per day can be assessed.

Sincerely,

A handwritten signature in black ink, appearing to read "KCG", is written over a horizontal line.

Kyle C. Gannon
Pretreatment Technician

KCG:smb

NOTICE OF VIOLATION
FAILURE TO SATISFY NBC REQUIREMENTS



December 01, 2020

Mr. Angel Baez
La Sonrisa Cafeteria Restaurant
320 Broad Street
Providence, RI 02907

Dear Mr. Baez:

Per the requirements of letter(s) from this office, the following item was required to be completed and/or submitted by the due date indicated below:

Required Submittal	Notice	Issue Date	Due Date
Permit Application	Letter	7/15/2020	8/14/2020

You must satisfy the past due NBC requirement as detailed in the above referenced documents. Your failure to complete the aforementioned requirement within thirty (30) days from the specified due date will place your firm in Significant Non-Compliance (SNC) with Commission regulations and will automatically result in the publication of the name or your firm as a violator in the PROVIDENCE JOURNAL. Your continued failure to complete this requirement may result in the initiation of enforcement action against your firm. Please note that the Commission can assess administrative and civil penalties of up to \$25,000 per violation per day should an enforcement action be initiated.

If you should have any questions regarding this matter, contact me at 461-8848 ext 490.

Sincerely,


Kyle C. Gannon
Pretreatment Technician

NOTICE OF VIOLATION
LETTER OF DEFICIENCY



January 21, 2020

Mr. Frank DeFruscio
DiFruscia Industries, Inc.
1425 Cranston Street
Cranston, RI 02920-6739

Certified Mail
Return Receipt Requested

1L 7108 2133 3937 9774 3780

RE: 20-A Starr Street, Johnston, RI

Dear Mr. DeFruscio:

This letter serves to summarize the Narragansett Bay Commission (NBC) inspection of your facility conducted on January 7, 2020. During the inspection, the following deficiency was noted:

Your firm was not maintaining a logbook documenting pretreatment chemical consumption of sodium hypochlorite. You must immediately begin recording the aforementioned information in your pretreatment system logbook. Please note, should your firm require assistance with logbook requirements, I am available to assist your firm.

Failure to correct the above-mentioned deficiency can result in the initiation of enforcement action against your firm. Please note that the NBC can assess administrative penalties of up to \$25,000 per violation per day. In addition to the aforementioned deficiency, the following is required of your firm:

The inspection was conducted due to elevated concentrations of copper, nickel, and zinc detected in a manhole downstream of your facility on December 19, 2019. You indicated the cause may be from a leak which occurred in the steam coil in your firm's brass cyanide tank causing contamination of the boiler. Therefore, you must begin recording visual inspections of the boiler blowdown at your facility to ensure future contamination of the boiler does not occur, which in turn could overwhelm your pretreatment system with metals and/or cyanide. Attached please find a revised Section H of your Wastewater Discharge Permit to reflect this change. All other terms and conditions of your existing Wastewater Discharge Permit remain in full effect.

Page 2
DiFruscia Industries, Inc.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact Mr. James Kelly at 461-8848, ext. 262.

If you have any questions, please contact me at 461-8848, ext. 490.

Sincerely,

A handwritten signature in black ink, appearing to read "N. Daggett", with a long horizontal flourish extending to the right.

Nathan P. Daggett
Principal Pretreatment Engineer

NPD:smb

Enclosure

cc: Kerry M. Britt
Holly R. Ialongo, Esq.

**NOTICE OF VIOLATION
LETTER OF DEFICIENCY**



August 6, 2020

Mr. Devin Kelly
Isle Brewers Guild, LLC
461 Main Street
Pawtucket, RI 02860-2913

Certified Mail
Return Receipt Requested

91 7108 2133 3937 9771 2526

Dear Mr. Kelly:

I have reviewed your June 2020 pH monitoring report, which was received by the Narragansett Bay Commission (NBC) on July 8, 2020. As stated in Section I(3) of your permit, your firm is required to notify the NBC in the event of pretreatment equipment failure or malfunction by the close of the next full business day. On the pH monitoring report in the comments section, you indicated that the probe suffered a malfunction. Your firm failed to notify the NBC of the malfunction as required by your permit.

Failure to correct deficiencies within the time frame specified could result in the initiation of enforcement action against your firm. Please note that the NBC can assess administrative penalties of up to \$25,000 per violation per day.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact Mr. James Kelly at 461-8848, ext. 262.

If you have any questions regarding this matter or require further assistance, please contact me at 461-8848, ext. 490.

Sincerely,

A handwritten signature in black ink, appearing to be "KCG", is written over a horizontal line.

Kyle C. Gannon
Pretreatment Technician

KCG:smb

NARRAGANSETT BAY COMMISSION

ADMINISTRATIVE ORDER # FP-01-20

IN THE MATTER OF:

**CARDI CORPORATION
400 LINCOLN AVENUE
WARWICK, RI 02888**

**ADMINISTRATIVE ORDER
AND
PENALTY ASSESSMENT**

AND

ANTONIO CARDI, PRESIDENT

LEGAL AUTHORITY

The following findings are made and order issued pursuant to the authority vested in the Narragansett Bay Commission (NBC) under Rhode Island General Laws (R.I. Gen. Laws) Title 46 Chapter 25, the Narragansett Bay Commission Act (the Act) as amended, and the NBC Rules and Regulations for *Use of the Wastewater Facilities*, 835-R1CR-20-00-1 (Rules and Regulations). The Act established the NBC to acquire, plan, construct, extend, improve, operate and maintain the sewerage system and treatment facilities in the district. The Act authorizes the NBC to establish a sewage pretreatment program and to enforce any violations of the Act and any rule, regulation, permit or administrative order issued pursuant thereto. The Act authorizes the NBC to collect fees, charges, and assessments from any person so assessed. Further, the Act states that each person so assessed shall pay the fees, charges, or assessments within the time frame prescribed by the Rules and Regulations.

R.I. Gen. Laws § 46-25-25.2 prescribes that persons violating §§ 46-25-25 through 46-25-25.3 of the Act or of any permit, rule, regulation, or order issued pursuant thereto shall be subject to a civil penalty of not more than twenty-five thousand dollars (\$25,000) per day for each violation and authorizes the NBC to obtain actual costs and reasonable attorney's fees incurred by the NBC in seeking compliance, penalties, or damages. Furthermore, R.I. Gen. Laws § 46-25-25.3 provides that any person found guilty of violating, willfully or with criminal negligence, any of the aforementioned provisions or of any permit, rule, or regulation issued pursuant thereto shall be punished by a fine of not more than twenty-five thousand dollars (\$25,000) and/or imprisonment of not more than one year for each enumerated violation.

Section 1.10.1 of the Rules and Regulations prescribes that NBC may implement administrative and/or judicial responses if a user is in violation of any provision of state or federal requirements, the Act, the Rules and Regulations, a permit, or an order issued by the

NBC. Administrative penalties are assessed based on the penalty matrix contained in § 1.10.10 of the Rules and Regulations.

STATEMENT OF FACTS

1. Cardi Corporation (Cardi Corp.) is a Domestic Profit Corporation formed under the laws of the State of Rhode Island and registered with the Rhode Island Secretary of State, that discharges treated groundwater containing pollutants into the NBC's facilities.
2. Cardi Corp. is a Significant Industrial User of the NBC's facilities as defined in § 1.2 of the Rules and Regulations.
3. Mr. Antonio Cardi (Cardi) is an individual who is President of Cardi Corp.
4. Cardi Corp. was contracted to replace a sewer interceptor on Allens Avenue in Providence which required dewatering of the site (the Project) and was required to obtain a Wastewater Discharge Permit from the NBC and adhere to the terms therein throughout the Project.
5. In accordance with the Act and the Rules and Regulations, NBC issued Permit #P4012-077-0424 (the Permit) to Cardi Corp. and Cardi (collectively hereinafter the Permittee) on or about June 5, 2019, authorizing the Permittee to discharge treated groundwater into the NBC's facilities so long as the Permittee adhered to the conditions of the Permit and complied with the Rules and Regulations.
6. Pursuant to the Permit and the Rules and Regulations, Permittee was required to monitor its treated groundwater discharged to the NBC's system for the duration of the Project and submit monthly analytical results and Self-Monitoring Compliance Reports to the NBC within 30 days after the end of the month when samples were collected.
7. Numerous Notices of Violation (NOVs) were issued to Cardi Corp. between September 3, 2019 and October 5, 2020, for failure to submit analytical compliance monitoring results (See Attachment I). Numerous phone calls were also made to Cardi Corp. during that time period as reminders to submit the required analytical results to the NBC.
8. Pursuant to the Permit and the Rules and Regulations, Permittee was required to maintain a logbook documenting any maintenance performed on its pretreatment system.
9. Numerous Notices of Violation (NOV) were issued to Cardi Corp. between October 2, 2019 and March 4, 2020, for failure to timely submit Pretreatment Maintenance Log Sheets (See Attachment II). Numerous phone calls were also made to Cardi Corp. during that time period as reminders to submit the required Pretreatment Maintenance Log Sheets to the NBC.
10. Cardi Corp. ceased discharging to the NBC sewer system in September 2019 and the Permit was terminated on September 30, 2019.

THEREFORE, based on the above findings, Cardi Corp. and Cardi are hereby notified of the following violations:

Violation A: Failure to submit Self-Monitoring Compliance results.

Violation B: Failure to submit Pretreatment Maintenance Log Sheets on time.

**THE FOLLOWING LAWS AND REGULATIONS APPLY
TO THE ABOVE VIOLATIONS:**

(The citations listed below represent only selected excerpts from the referenced statutes, codes, rules and regulations. Actual documents should be consulted for complete texts.)

EPA - CODE OF FEDERAL REGULATIONS

40 CFR § 403.2 Objectives of general pretreatment regulations

By establishing the responsibilities of government and industry to implement National Pretreatment Standards this regulation fulfills three objectives:

- (a) To prevent the introduction of pollutants into POTWs which will interfere with the operation of a POTW, including interference with its use or disposal of municipal sludge;
- (b) To prevent the introduction of pollutants into POTWs which will pass through the treatment works or otherwise be incompatible with such works; and
- (c) To improve opportunities to recycle and reclaim municipal and industrial wastewaters and sludges.

40 CFR § 403.12 Reporting requirements for POTW's and industrial users.

(c) *Record-keeping requirements.* (1) Any Industrial User and POTW subject to the reporting requirements established in this section shall maintain records of all information resulting from any monitoring activities required by this section, ...

GENERAL LAWS OF RHODE ISLAND

General Powers: § 46-25-5:

(10) To establish a sewage pretreatment program, and to require as a condition, to the grant or reissuance of any approval, license, or permit required under the program, that the person applying for the approval, license, or permit, pay to the commission a reasonable fee based on the cost of reviewing and acting upon the application and based on the costs of implementing the program. ...

(16) To issue orders of general or specific applicability to carry out the purposes of the project.

(17) To have and exercise all powers necessary or convenient to effect its purposes.

(18) To impose administrative penalties in accordance with the provisions of § 46-25-25.4.

Orders as to Pretreatment of Sewage: § 46-25-25:

(a) Without limiting the generality of the foregoing, the authority hereby vested in the commission shall include the authority to limit, reject, or prohibit any direct or indirect discharge of pollutants or combination of pollutants, as defined by applicable federal or state law, into the facilities of the project; to require that any person or class of user shall cause pollutants from his or her property, prior to their entry into the facilities of the project, to be submitted to such pretreatment standards and requirements as the commission may prescribe by rule or regulation. The commission shall prescribe such rules and regulations for pretreatment as in the opinion of the commission:

(1) Are required by applicable federal or state law,

(2) Are required under the terms of the project's federal permit(s), or

(3) Are necessary and appropriate for the project.

(b) The commission shall have the authority to issue or deny permits to any person for the direct or indirect discharge of any pollutants into the facilities of the project; to require the development of a compliance schedule by each person to insure compliance with such pretreatment as the commission may prescribe. No person shall discharge any pollutant into the facilities, except as in compliance with the provisions of this section, and any rules and regulations promulgated hereunder, and pursuant to the terms and conditions of a permit.

(c) The commission may, by regulation, order, permit, or otherwise require any person who discharges into the facilities of the project to:

(1) Establish and maintain such records:

(2) Make such reports:

(3) Install, calibrate, use, and maintain such monitoring equipment or methods, including where appropriate, biological monitoring methods:

(4) Sample such discharges and effluents, in accordance with such methods, at such locations, at such intervals, and in such manner as the commission shall prescribe; and

(5) Provide such other information relating to discharges into the facilities of the project as the commission may reasonably require to insure compliance with prescribed pretreatment. The information shall include, but not be limited to, those records, reports, and procedures required by applicable federal law.

(d) Notwithstanding any other provision of this section, the commission shall have the authority, and shall prescribe the appropriate procedures, after informal notice to the discharger, immediately and effectively to halt or prevent any discharge of pollutants into the facilities of the project which reasonably appears to present an imminent endangerment to the health or welfare of persons. ...

Civil penalties: § 46-25-25.2:

(a) Any person who shall violate the provisions of §§ 46-25-25 — 46-25-25.3, or of any permit, rule, regulation, or order issued pursuant thereto, shall be subject to a civil penalty of not more than twenty-five thousand dollars (\$25,000) per day for each violation.

(b) The commission shall, in the same manner as cities and towns authorized under the provisions of § 45-6-2.3(a)(4), issue regulations to obtain actual costs and reasonable attorney's fees incurred by the commission in seeking compliance, penalties, or damages.

Enforcement authority and procedure: § 46-25-25.4:

(a) The commission shall have authority to seek legal or equitable relief in the federal court or in the superior court of Providence county to enforce the requirements of §§ 307(b) and (c), 402(b)(8) and other applicable sections of the Federal Water Pollution Control Act, also known as the Clean Water Act, 33 U.S.C. § 1251 et seq., and any regulations implementing those sections or authorized by this chapter and/or by chapter 12 of this title. Whenever, on the basis of any information available to the commission, the commission has reasonable grounds to believe that a person has violated any provision of §§ 46-25-25 through 46-25-25.6 or any permit, rule, regulation or order issued pursuant thereto the commission may institute administrative, civil or criminal proceedings in the name of the commission. The commission shall not be required to enter into any recognizance or to give surety for costs prior to instituting such proceedings. The commission has the authority to order any person who violates any

provision of §§ 46-25-25 through 46-25-25.6, any permit, rule, regulation or order issued pursuant thereto to cease and desist the violation, or to remedy the violation and to impose administrative penalties. ...

**NBC'S RULES AND REGULATIONS FOR THE USE OF THE
WASTEWATER FACILITIES**

SECTION 1.5 Discharge Requirements, Limitations, and Prohibitions

1.5.6 Specific Discharge Prohibitions

- A. Certain substances are specifically prohibited from being discharged into the NBC's facilities. These prohibited substances include, but are not limited to, the following:
 - 1. Groundwater, stormwater, and surface waters, roof runoff, tidewater, subsurface drainage, noncontact cooling water, and uncontaminated industrial process waters, unless approved by the NBC. (See § 1.4 of this Part)

1.7.2 User Documentation

- A. The NBC may, by regulation, order, permit, or otherwise, require any person who discharges into the facilities to:
 - 1. establish and maintain records;
 - 2. make reports;
 - 3. install, calibrate, use and maintain monitoring equipment or methods (including where appropriate, biological monitoring methods);
 - 4. sample and/or analyze discharges and effluents (in accordance with the method, at the locations, at the intervals, and in the manner as the NBC shall prescribe); and/or
 - 5. provide other information relating to discharges into the facilities of the project as the NBC may reasonably require to ensure compliance with prescribed pretreatment. Such information shall include, but not be limited to, those records, reports and procedures required by applicable State and Federal law.

SECTION 1.8 Wastewater Discharge Permit System

1.8.5 Permit Conditions

- A. Wastewater discharge permits shall be expressly subject to specific permit provisions contained therein as well as to provisions of this Part and all other regulations, user charges, and fees established by the NBC. Wastewater discharge permits may include such conditions as are reasonably deemed necessary by the NBC to prevent Pass Through or Interference, protect the quality of the water body receiving the treatment plant's effluent, protect worker health and safety, facilitate sludge management and disposal, protect ambient air quality, and protect against damage to the NBC's facilities. Such conditions may include, but are not limited to, the following:
4. Requirements for the submission of periodic self-monitoring compliance reports, which shall include, but not be limited to, volume or rates of flow, concentrations of controlled pollutants, or other information that relates to the generation of waste;
 5. Requirements for maintaining and submitting technical reports and plant records relating to wastewater discharges;
 6. Daily average and daily maximum discharge rates, or other appropriate conditions when pollutants subject to limitations and prohibitions are proposed or present in the user's wastewater discharge permit;
 13. Any other reasonable conditions necessary to ensure compliance with the provisions of R.I. Gen. Laws § 46-25-1 et seq., or any state and Federal laws, rules, and regulations.

SECTION 1.9 Wastewater Monitoring and Reporting

1.9.1 Records and Monitoring

- A. All users who discharge or propose to discharge wastewater directly or indirectly to the facilities shall maintain records which substantiate any information supplied in permit applications. Such records shall include, but not be limited to, pH tapes, chemical usage data, log sheets, hazardous waste manifests, water meter readings, effluent monitoring reports, self-monitoring compliance reports and any other informational requirements of these Rules and Regulations or required by a user's Wastewater Discharge Permit or any applicable state and Federal laws and regulations. These records are to be kept for a period of three (3) years unless there is pending a dispute of litigation involving the subject of these records, in which case these records are to be kept for a period of three (3) years following resolution of such litigation or dispute.

1.9.3 Monitoring and Analysis of Process Wastewater

A. Sampling and analysis of industrial wastewater for the purpose of compliance determinations with respect to § 1.5 of this Part prohibitions and limitations shall be done through industry self-monitoring and through monitoring done by the NBC. All analyses, including sampling results submitted in support of any application reports, evidence, or required by any permit or order shall be performed in accordance with the techniques prescribed in 40 C.F.R. Part 136 (2018, incorporated herein by reference, not including later amendments) or, if 40 C.F.R. Part 136 (2018) does not contain sampling or analytical techniques for the pollutant in question, in accordance with procedures approved by EPA. The NBC may, at its discretion, require an independent laboratory to conduct the sampling and analysis at the user's own cost.

1. Self-Monitoring Requirements:

- a. Self-monitoring results must be accompanied by a certified laboratory analysis sheet, indicating the EPA approved test procedure for each parameter analyzed. The user must also submit a self-monitoring report with the results on a form prescribed by the NBC.
- b. All Self-Monitoring Reports must be signed and certified in accordance with § 1.9.10 of this Part.
- c. If any sampling performed by a user indicates any violation(s) of discharge limitations, the user shall notify the NBC within twenty-four (24) hours of becoming aware of the violation(s). The user shall repeat the analysis immediately for the parameters determined to be in violation and submit the resampling results to the NBC within thirty (30) days after becoming aware of the violation(s).

2. Sample Collection:

- a. Except as indicated in (3) below, wastewater samples collected for purposes of determining user compliance with pretreatment standards and requirements must be obtained using flow proportional composite sample collection techniques. In the event that flow proportional sampling is not feasible, the NBC may authorize the use of a time proportional sampling.
- b. For automatic samplers, the intake line hose must be at least 1/4 in. (0.6 cm) internal diameter and the velocity in the intake line must be maintained at least at 2 feet per second.
- c. Samples for oil and grease, temperature, pH, cyanide, phenols, toxicity, sulfides, and volatile organic chemicals must be obtained using a grab sample.

3. Analysis of Wastewater Samples:

- a. Laboratory analysis and sample preservation of industrial wastewater samples for user self-monitoring and compliance monitoring by the NBC

shall be performed in accordance with EPA approved methods. Where applicable, the laboratory must be certified by the state in which it is located.

SECTION 1.10 Enforcement

1.10.1 Administrative Enforcement Options

- A. The NBC may implement any combination of the following administrative and/or judicial responses if a user is in violation of any provision of state or Federal requirements, the R.I. Gen. Laws Chapter 46-25, this Part, a permit, or an order issued by the NBC.
1. Issue a Notice of Violation;
 2. Require the User to attend a mandatory compliance meeting at the NBC Corporate Office during business hours, or at any other reasonable time, to discuss its violations or alleged violations, the remedial actions that it might take, and the actions that the NBC might take under the Act and the this Part;
 3. Issue an Administrative Order requiring any action that the NBC is authorized to require;
 4. Enter into a Consent Order or Settlement Agreement with the user;
 5. Revoke, modify, deny, suspend, or refuse to renew a Permit issued under the Act;
 6. Terminate or suspend sewer services provided to the user;
 7. Assess a civil administrative penalty;
 8. Institute a court action for civil penalties, criminal fines and/or other criminal punishment, injunctive relief, reimbursement of costs and/or damages resulting from a violation or threatened violation; and/or any other relief authorized by law or regulation.

ORDER

THEREFORE, based on the above findings and violations, Cardi Corp. and Cardi are hereby ORDERED to:

1. Submit all outstanding analytical results to the NBC within twenty-one (21) days of receipt of this Order.
2. Pay an Administrative Penalty to the NBC of **\$10,000.00 (Ten Thousand Dollars)** within twenty-one (21) days of receipt of this Order.

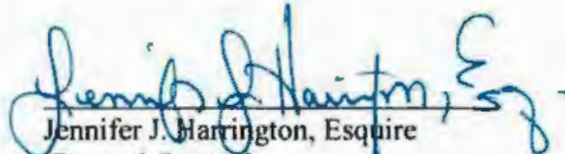
Pursuant to R.I. Gen. Laws §§ 46-25-25(d) and 42-17.1-2(21) and Section 1.10 of the Rules and Regulations, **Cardi Corp.** and **Cardi** have the right to file a written request with the Executive Director for a hearing on said alleged violations within ten (10) days of service of this notice to show cause why it should not be found in violation of the Rules and Regulations and why enforcement action should not be taken against it. If a hearing is requested within the ten (10) day time period, the NBC shall provide written notice to **Cardi Corp.** and **Cardi** of the date, time, and place for the hearing. If **Cardi Corp.** and **Cardi** fail to request a hearing within the aforementioned time frame, this Order shall automatically become an immediate compliance order and **Cardi Corp.** and **Cardi** shall be deemed to have waived the right to an adjudicatory hearing on the above cited violations.

IF CARDI CORP. AND CARDI WAIVE THEIR RIGHT TO AN ADMINISTRATIVE HEARING WITHIN TEN (10) DAYS AND FAIL TO COMPLY WITH THE REQUIREMENTS LISTED IN THE ABOVE ORDER, THEN CARDI CORP. AND CARDI ARE DEEMED TO BE IN DEFAULT. THE EXECUTIVE DIRECTOR OR HER DESIGNEE MAY FOR GOOD CAUSE SHOWN DEFER ANY OF THE COMPLIANCE DATES PRESCRIBED HEREIN. BE ADVISED THAT FAILURE TO COMPLY WITH THE TERMS OF THIS ORDER MAY SUBJECT CARDI CORP. AND CARDI TO CIVIL AND/OR CRIMINAL PENALTIES OF UP TO \$25,000 PER DAY PER VIOLATION PURSUANT TO R.I. GEN. LAWS §§ 46-25-25.2 AND 46-25-25.3.

FOR THE NARRAGANSETT BAY
COMMISSION,

10-23-2020

Date


Jennifer J. Harrington, Esquire
General Counsel

CERTIFICATION

I hereby certify that on the **23rd of October, 2020**, true and accurate copies of the within **ADMINISTRATIVE ORDER AND PENALTY ASSESSMENT** were sent by certified mail, return receipt requested to the following individuals:

1. Antonio Cardi, *President*
Cardi Corporation
400 Lincoln Avenue
Warwick, RI 02888

2. Antonio Cardi
88 Varnum Drive
East Greenwich, RI 02818

10-23-20
Date


Juvel Grande
General Counsel Assistant

ATTACHMENT I

Failure to submit self-monitoring compliance reports:

Month	# of NOVs Issued	Date NOVs Issued	Status
July 2019	14	September 3, 2019 October 1, 2019 November 1, 2019 December 4, 2019 January 2, 2020 February 3, 2020 March 2, 2020 March 31, 2020 April 30, 2020 June 1, 2020 June 30, 2020 July 31, 2020 September 3, 2020 October 5, 2020	Outstanding
August 2019	13	October 1, 2019 November 1, 2019 December 4, 2019 January 2, 2020 February 3, 2020 March 2, 2020 March 31, 2020 April 30, 2020 June 1, 2020 June 30, 2020 July 31, 2020 September 3, 2020 October 5, 2020	Outstanding
September 2019	11	December 4, 2019 January 2, 2020 February 3, 2020 March 2, 2020 March 31, 2020 April 30, 2020 June 1, 2020 June 30, 2020 July 31, 2020 September 3, 2020 October 5, 2020	Outstanding

ATTACHMENT II

Failure to timely Pretreatment System Maintenance Log Sheets:

Due Date	# of NOVs Issued	Date NOVs Issued	Status
September 30, 2019	6	October 2, 2019 November 5, 2019 December 4, 2019 January 6, 2020 February 3, 2020 Mach 4, 2020	Received March 5, 2020

**NARRAGANSETT BAY COMMISSION
ADMINISTRATIVE ORDER # FP-01-20**

IN THE MATTER OF:

**Cardi Corporation
400 Lincoln Avenue
Warwick, RI 02888**

AND

**Antonio Cardi
88 Varnum Drive
East Greenwich, RI 02818**

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**ADMINISTRATIVE ORDER
AND
PENALTY ASSESSMENT**

CONSENT ORDER

WHEREAS, the Narragansett Bay Commission Act (the Act), codified at Rhode Island General Laws (R.I. Gen. Laws) Title 46, Chapter 25, established the Narragansett Bay Commission (the NBC) to acquire, plan, construct, improve, operate and maintain the publicly owned sewage treatment facilities in the district. The Act vests authority in the NBC to establish a sewage pretreatment program and to enforce any violations of the provisions of the Act, and any rule, regulation, permit or administrative order issued pursuant thereto; and

WHEREAS, Cardi Corporation (Cardi Corp.) is a domestic profit corporation formed under the laws of the State of Rhode Island and registered with the Rhode Island Secretary of State; and

WHEREAS, Mr. Antonio Cardi (Cardi) is the President of Cardi Corp.; and

WHEREAS, Cardi Corp. was contracted to replace a sewer interceptor on Allens Avenue in Providence, RI, which required dewatering of the site (the Project) and discharge of treated groundwater containing pollutants into the NBC's facilities, and Cardi Corp. was therefore required to obtain a Wastewater Discharge Permit from the NBC and adhere to the terms therein throughout the Project; and

WHEREAS, on or about June 5, 2019, NBC issued Permit #P4012-077-0424 (the Permit) to Cardi Corp. and Cardi (collectively hereinafter the Permittee), authorizing the Permittee to discharge treated groundwater from the Project into the NBC's facilities so long as the Permittee adhered to the conditions of the Permit and complied with the NBC *Rules and Regulations for Use of the Wastewater Facilities* (835-RICR-20-00); and

WHEREAS, on or about October 23, 2020, the NBC issued Administrative Order and Penalty Assessment #FP-01-20 (Administrative Order #FP-01-20) against the Permittee alleging that the Permittee had violated the Act and the NBC's Rules and Regulations promulgated

thereunder, specifically citing Permittee for: (a) failure to submit self-monitoring compliance results; and (b) failure to submit pretreatment maintenance log sheets on time; and

WHEREAS, in lieu of proceeding to an administrative hearing, the NBC and Permittee by their duly authorized representatives, have determined that it is in the best interest of all the parties and in the public interest to resolve the claims alleged in Administrative Order #FP-01-20 by the terms of the agreement set forth herein; and

WHEREAS, the NBC finds that this Consent Order is a reasonable and fair settlement and adequately protects the public interest in accord with the Act.

NOW, THEREFORE, before the taking of any testimony, without any adjudication or admission of any issue of fact or law, and upon consent and agreement of the parties to this Consent Order it is hereby **ORDERED** that:

JURISDICTION

1. The NBC has jurisdiction over the subject matter of this Consent Order and the parties consenting hereto pursuant to R.I. Gen. Laws § 46-25-25. In accordance with R.I. Gen. Laws § 46-25-25.4 the Superior Court for Providence County has jurisdiction to enforce the provisions of this Consent Order.

APPLICATION

2. The provisions of this Consent Order shall be binding upon Permittee, its officers, agents, employees, successors and assigns.

TERMS AND CONDITIONS

3. ADMINISTRATIVE PENALTY

- A. The NBC has determined that Ten Thousand Dollars (\$10,000) is a fair and reasonable administrative penalty to assess against Permittee with regard to Administrative Order #FP-01-20.
- B. Payment of said Ten Thousand Dollars (\$10,000) shall be made upon execution of this Consent Order.
- C. Payment shall be by check made due and payable to "Narragansett Bay Commission - Environmental Enforcement Fund" and mailed, postage prepaid, to the attention of Holly Ialongo, Esquire, Chief Legal Counsel, Narragansett Bay Commission, One Service Road, Providence, Rhode Island, 02905.

4. FORCE MAJEURE:

- A. In the event there is any dispute as to whether all or a portion of Permittee's failure to comply with any of the requirements under this Consent Order was caused by

circumstances beyond its reasonable control, Permittee shall have the burden of proof to show:

- (i) that the noncompliance was caused solely by circumstances beyond Permittee's reasonable control; and
 - (ii) that each continued day of noncompliance that resulted was caused solely by circumstances beyond Permittee's reasonable control; and
 - (iii) that Permittee employed all reasonable mitigating measures to minimize the duration and impact of the noncompliance.
- B. The granting of relief from any obligations by the operation of Section 4A above shall have no effect on any other obligations enumerated under this Consent Order.
- C. The provisions in Section 4A above shall be inoperative unless Permittee notifies the Pretreatment Program Manager in writing, within fourteen (14) days from the start of any noncompliance, of its belief that all or any portion of the noncompliance is solely the result of circumstances beyond its reasonable control.

GENERAL PROVISIONS

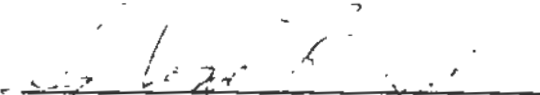
5. This Consent Order is not a permit and in no way relieves Permittee of its responsibility to comply with any permit or any subsequent amendments thereto that may be issued by the NBC.
6. This Consent Order shall constitute full and final satisfaction for the violations alleged in Administrative Order #FP-01-20 and discharge any liability of Permittee to the NBC for all violations and claims arising from the factual allegations contained in Administrative Order #FP-01-20.
7. Permittee hereby consents to the issuance of this Consent Order as a final order by the NBC's Executive Director. In so consenting, appropriate officers of Permittee have personally read and understood all of the terms and conditions of this Consent Order.
8. Permittee hereby waives its right to the hearing provided by Section 1.10 of the NBC's Rules and Regulations or judicial proceedings in this matter, other than a proceeding to enforce the terms of this Consent Order.
9. This Consent Order shall not constitute any admission of fact by Permittee or determination of liability of Permittee for the violations alleged in Administrative Order #FP-01-20 or this Consent Order.
10. By this Consent Order, the NBC does not waive any rights or remedies available to it for any violation by Permittee of Federal or State laws or regulations not contained in Administrative Order #FP-01-20 or this Consent Order.

11. Nothing herein shall be construed to limit the authority of the NBC to undertake any action against any person, including Permittee in response to conditions, which may present imminent and substantial endangerment to the public health, welfare or the environment.
12. Permittee shall be responsible for all reasonable court costs and attorneys fees incurred by the NBC in collecting any outstanding penalties due under this Consent Order.
13. Any modification of this Consent Order shall be in writing and shall not take effect unless approved in writing by NBC and Permittee.
14. This Consent Order shall terminate when Permittee has complied with all the terms and conditions of this Consent Order as set forth herein.

Signatures on following page.


CONSENTED TO:

FOR CARDI CORPORATION:


Antonio Cardi

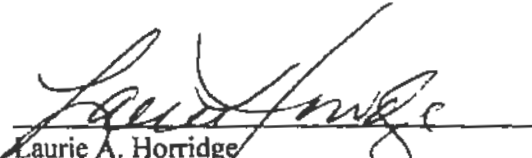
1/1/21
Date

FOR ANTONIO CARDI:

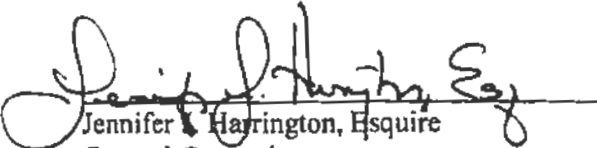

Antonio Cardi

1/1/21
Date

FOR THE NARRAGANSETT BAY COMMISSION:


Laurie A. Horridge
Executive Director
Narragansett Bay Commission
Corporate Building
One Service Road
Providence, RI 02905

1/5/21
Date


Jennifer Harrington, Esquire
General Counsel
Narragansett Bay Commission
Corporate Building
One Service Road
Providence, RI 02905

1/4/21
Date