

PRETREATMENT PROGRAM

ANNUAL REPORT

JANUARY 1, 2023 – DECEMBER 31, 2023



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***

February 24, 2023



**ENVIRONMENTAL MERIT AWARDS
02/2023**

Dear «Title» «Last_Name»:

The Narragansett Bay Commission (NBC) is proud to announce its twenty-eight annual NBC Environmental Merit Awards. 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 & 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:

<https://www.narrabay.com/programs-and-initiatives/environmental-merit-awards/>

Please download the application and return it by March 10, 2023 to:

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

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

Sincerely,



Kerry M. Britt
Pretreatment Manager

cc: Jim Kelly



March 7, 2023

**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 2022, 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 2023. 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:sm

cc: Pretreatment Engineers/Technicians



March 8, 2023

PERFECT COMPLIANCE

Mass Mailing

All SIUs - Both Districts

Dear «Title» «Last_Name»:

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.

Armbrust International, Ltd.
Electrolizing, Inc.
Hord Crystal Corporation
HP Services, Inc.
Induplate, LLC
Interplex Engineered Products, Inc.
Manchester Street, LLC
Materion Technical Materials, Inc.
Metallurgical Solutions, Inc.

Providence Metallizing Company, Inc.
Prysmian Cables and Systems USA, LLC
Rhode Island Heat Treating Company, LLC
Stackbin Corporation
Tanury Industries PVD, Inc.
Technodic, Inc.
Teknor Apex Company
Tiffany and Company
Truex, Inc.

An advertisement recognizing the achievements of these companies was published in the Providence Journal on February 24, 2023. Aligned herewith is a copy of the advertisement for your reference.

Sincerely,

Kerry M. Britt
Pretreatment Manager

KMB:sm





March 9, 2023

MASS MAILING

Categories 11 through 59 - Both Districts

List Attached

Dear «Title» «Last_Name»:

This letter is being sent to all industrial firms regulated by the Narragansett Bay Commission (NBC) Pretreatment Program to educate them about EPA regulations regarding Significant Non-Compliance (SNC). Federal pretreatment program regulations require the NBC to annually publish a list of all industrial users that violate any of the EPA SNC 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 NBC 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 NBC 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 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 NBC determines has adversely effected the operation or implementation of the Pretreatment Program.

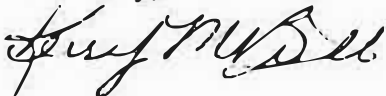
The EPA requires that the NBC must review each industrial user file every three (3) months for SNC criteria A and B, evaluating the user's previous six (6) month compliance status as can be seen from the enclosed EPA graphic. **If an industrial user exceeds the compliance percentages specified in the SNC criteria A or B, even for just one quarterly evaluation period, the user is in SNC 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 it'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.

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. This is required by your permit and is clearly stated on the Self-Monitoring Compliance Report form that must accompany each analysis. Please do not hesitate to contact the NBC Pollution Prevention staff of the Technical Analysis & Compliance Section (TAC) if your firm is experiencing compliance issues and would like assistance. 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 24, 2023, the names of 28 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 cost for this public notice. A copy of the 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 contact the Pollution Prevention staff of the TAC Section if the NBC can be of assistance with your compliance endeavors. Good luck maintaining full compliance during 2023.

If you 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,



Kerry M. Britt
Pretreatment Manager

KMB:sm

Enclosures

The Narragansett Bay Commission

PUBLIC NOTICE

Firms in Significant Non-Compliance

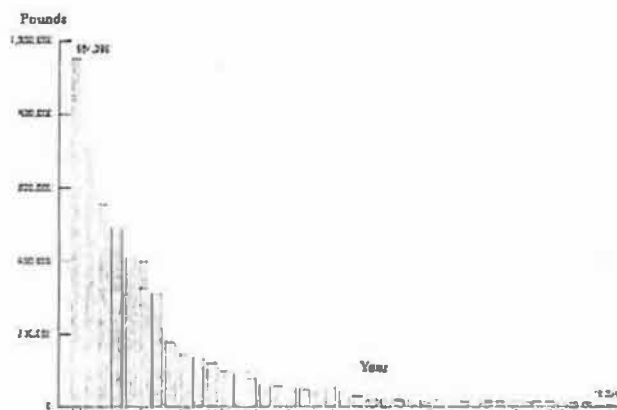


THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGULATION 40 C.F.R. 403.8(f) (2) (vii) and Section 1.10 of the Narragansett Bay Commission, Rules and Regulations require the NBC to publish annually the names of all industrial users in Significant Non-Compliance (SNC) with pretreatment standards and 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, 2021 through December 31, 2022. 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 non-compliance;
- (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, 1981-2022



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 wastewater 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 NRC 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 80,446 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 98.3% and 99.1% 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

Pawtucket

Company Name	Violations Cited	Present Status
DiGregorio Corporation	A1 (2), CN (2) Failure to submit reports on time (6)	Firm is now in compliance Reports have been received
Fully Rinsed Inc.	Failure to submit reports on time (6)	Reports have been received
Habro, Inc.	Failure to submit reports on time (6)	Reports have been received
New England Paper Tube Company	Failure to submit report on time (6)	Report has been received
Pastek Machine Company, Inc.	Failure to submit report on time (6)	Report has been received
R&D Manufacturing, Inc.	Failure to submit report on time (6)	Report has been received
Suvonis Manufacturing Corporation	Failure to submit reports on time (6)	Reports have not been received

Lincoln

Chemart Company	Failure to submit report on time (6)	Report has been received
Devion Pharmaceuticals LLC	BOD (2)	Firm is now in compliance
JAR Biskers Supply	BOD (1,2)	Firm is now in compliance
Michael Healy Design, Inc.	Failure to submit reports on time (6)	Reports have been received
Palate Pack	BOD (2) Failure to submit report on time (6)	Firm is now in compliance Report has been received

Cumberland

The Okonite Company	BOD (2)	Firm is now in compliance
Syngra Northeast, LLC	BOD (2)	Firm is now in compliance

Field's Point Service Area

Providence

Company Name	Violations Cited	Present Status
271 Technoson Partners, LLC	Failure to submit report on time (6)	Report has been received
AAMCO Transmission	Failure to submit report on time (6)	Report has been received
Fed-Rick Veal Company, Inc.	Failure to submit report on time (6)	Report has been received
Long Live Beer Works, Inc.	BOD (2)	Firm is now in compliance
Mals, Inc.	Failure to submit reports on time (6)	Reports have been received
Providence Brewing Company, LLC	Failure to submit report on time (6)	Report has been received
Providence Specialty Products, LLC	BOD (1, 2) O&C (1, 2) Failure to submit reports on time (6)	Firm is still experiencing compliance issues Reports have not been received
Quality Spraying Technologies	Failure to submit report on time (6)	Report has been received
Revival Foodworks and Brewery	Failure to submit reports on time (6)	Reports have not been received
United States Postal Service - Providence VMP	Failure to submit report on time (6)	Report has been received

Johnston

Eastern Screw Company	Failure to submit report on time (6)	Report has been received
Granite Marble and Granite, LLC	Failure to submit report on time (6)	Report has been received
R.I. Beef & Veal, Inc.	Failure to submit report on time (6)	Report has been received

North Providence

Yacht Club Bowling Works, Inc.	Failure to submit reports on time (6)	Reports have been received
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Vincent J. Mosiello, Chairman • Laurie A. Horridge, Executive Director

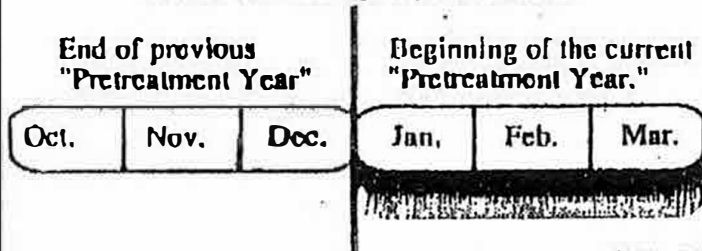
Narragansett Bay Commission • One Service Road • Providence, RI 02905 • 401-461-8848 • TDD 401-461-6549 • FAX 401-461-6540 • <http://www.narrabay.com>

Twitter: @narrabay • Facebook: www.facebook.com/narrabay • Instagram: @narrabay
The cost of this public notice will be billed to the firms listed above that were in significant non-compliance.

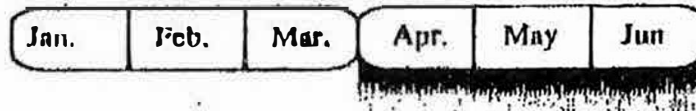
Determination of Industrial User (IU) Significant Noncompliance (SNC)

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 EVALUATION PERIOD



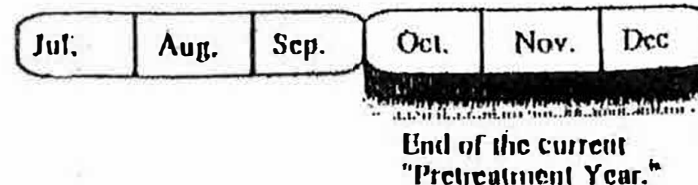
SECOND EVALUATION PERIOD



THIRD EVALUATION PERIOD



FOURTH EVALUATION 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).

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."

April 3, 2023



2022 SNC PUBLIC NOTICE

Dear «Title» «Last_Name»:

The Narragansett Bay Commission (NBC) is required by the EPA to publish annually the names of all firms in Significant Non-Compliance (SNC). As you may know, the name of your firm was published in the Providence Journal on February 24, 2023 as being in SNC with NBC or EPA regulations for the reporting period of October 1, 2021 through December 31, 2022. A copy of the Public Notice is enclosed for your information. The publication of your firm's name should have come as no surprise to you since a form letter dated March 9, 2023 was sent to all users explaining the NBC regulations, the SNC review criteria, and the consequences for non-compliance. In addition, your firm was notified by Notice of Violation citing each non-compliance event at the time the violation occurred, notifying you of the fact the name of your firm may be published for being in SNC.

Enclosed please find an invoice in the amount of \$60.00 for your share of the cost of the public notice. Your check must be made payable to the **Narragansett Bay Commission and mailed to the Pretreatment Section, 2 Ernest Street, Providence, RI 02905, no later than May 15, 2023. (Please do not send check to customer service with your pretreatment fee or consumption payment as this will result in billing errors.)**

Thank you for your anticipated prompt payment, and I urge you to comply with all your permit requirements and NBC/EPA regulations so that the NBC will not have to publish the name of your firm in the future. The NBC Technical Analysis & Compliance (TAC) Section is available to provide free technical assistance to your firm. To take advantage of the free NBC Pollution Prevention program, contact Mr. James Kelly at 461-8848, ext. 362.

Sincerely,

Kerry M. Britt
Pretreatment Manager

KMB:sm

Enclosures

cc: Leah Foster
Holly Ialongo, Esq.

The Narragansett Bay Commission

PUBLIC NOTICE

Firms in Significant Non-Compliance

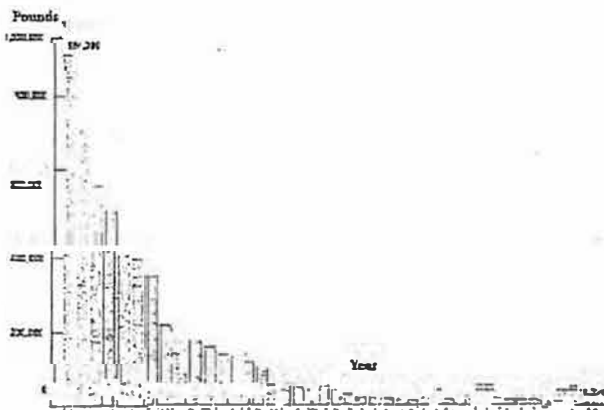


THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGULATION 40 C.F.R. 403.8(f) (2) (vi) and Section 1.10 of the Narragansett Bay Commission, Rules and Regulations require the NBC to publish annually the names of all industrial users in Significant Non-Compliance (SNC) with pretreatment standards and 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, 2021 through December 31, 2022. 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, 1961-2022



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 users. These discharge permits specify the level of pollutants that can be discharged in a firm's wastewater 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 permits 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 or 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 industrial discharges 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 96.3% and 99.1% respectively. Similar toxic loading reductions have been observed at the NBC Backlin 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.

Buildin Point Service Area

Pawtucket

Company Name	Violations Cited	Present Status
DKGraphics Corporation	A1 (2), CN (2)	Firm is now in compliance
Fully Recycled Inc.	Failure to submit reports on time (6)	Reports have been received
Hudson, Inc.	Failure to submit reports on time (6)	Reports have been received
New England Paper Tube Company	Failure to submit report on time (6)	Report has been received
Pastek Machine Company, Inc.	Failure to submit report on time (6)	Report has been received
R&D Manufacturing, Inc.	Failure to submit report on time (6)	Report has been received
Sutton's Manufacturing Corporation	Failure to submit reports on time (6)	Reports have not been received

Lincoln

Chemart Company	Failure to submit reports on time (6)	Report has been received
Dorwin Pharmaceuticals LLC	BOD (2)	Firm is now in compliance
J&R Embroid Supply	BOD (1,2)	Firm is now in compliance
Michael Healy Design, Inc.	Failure to submit reports on time (6)	Reports have been received
Palace Pack	BOD (2) Failure to submit reports on time (6)	Firm is now in compliance Report has been received

Cumberland

The Okonite Company	BOD (2)	Firm is now in compliance
Syngro NorthEast, LLC	BOD (2)	Firm is now in compliance

Field's Point Service Area

Providence

Company Name	Violations Cited	Present Status
Z77 Truckwren Partners, LLC	Failure to submit report on time (6)	Report has been received
AAMCO Transmissions	Failure to submit report on time (6)	Report has been received
Fed-Rick Veal Company, Inc.	Failure to submit report on time (6)	Report has been received
Long Live Beer Works, Inc.	BOD (2)	Firm is now in compliance
Matic, Inc.	Failure to submit reports on time (6)	Reports have been received
Providence Brewing Company, LLC	Failure to submit report on time (6)	Report has been received
Providence Specialty Products, LLC	BOD (1, 2) OdG (1, 2) Failure to submit reports on time (6)	Firm is still experiencing compliance issues Reports have not been received
Quality Spraying Technologies	Failure to submit report on time (6)	Report has been received
Revival Foodworks and Brewery	Failure to submit reports on time (6)	Reports have not been received
United States Postal Service - Providence VMF	Failure to submit report on time (6)	Report has been received

Johnston

Eastern Screw Company	Failure to submit report on time (6)	Report has been received
Greenline Marble and Granite, LLC	Failure to submit report on time (6)	Report has been received
R.J. Best & Son, Inc.	Failure to submit report on time (6)	Report has been received

North Providence

Yacht Club Bowling Works, Inc.	Failure to submit reports on time (6)	Reports have been received
--------------------------------	---------------------------------------	----------------------------



April 18, 2023

4/18/23 OPEN HOUSE LETTER

Dear Mr./Ms. :

In celebration of Rhode Island Clean Water Week, the Narragansett Bay Commission (NBC) will offer free public tours of its award-winning Field's Point Wastewater Treatment Facility in Providence on Saturday, April 29, 2023 from 10:00 AM to 1:00 PM.

The tours will include a look at the region's most sophisticated water quality lab, "touch-a-truck" and "touch-a-boat" with the NBC's maintenance and research vehicles, a clean water scavenger hunt, and other fun activities.

"This facility is simultaneously one of the oldest and most advanced clean water facilities in the nation," said NBC Chairman Vincent Mesoletta. "We're so excited to give the public the opportunity to 'look behind the curtain' and view the process that has made Narragansett Bay cleaner than it has been in 150 years."

In addition, the NBC will issue certificates of completion to all students who take the tour that may be redeemed for extra credit at school (but students are advised check with their teacher first).

"I am confident that anyone who experiences this tour will be amazed and appreciative by the clean water efforts in our community," Mesoletta added.

Members of the public can book a tour at 10:00 AM, 11:00 AM, or 12:00 noon by emailing nbcpr@narrabay.com. Spaces are limited. The tour will take approximately one hour.

The NBC joins seven other clean water agencies in Rhode Island offering free public tours during Rhode Island Clean Water Week. Information on other tours is available at riewa.org

Sincerely,

Kerry M. Britt
Pretreatment Manager

June 16, 2023



**2023 SUMMER SHUT DOWN LETTER
DATA BASE ATTACHED**

Dear «Title» «Last_Name»:

Typically, many industries shutdown their operations for a period of time during the summer months. Past operating experiences in the Narragansett Bay Commission (NBC) Districts have shown that large quantities of toxic and hazardous wastes have been indiscriminately dumped in significant quantities into the sewer system as part of an industry's "clean-up" procedure prior to their summer shutdown. This usually occurs in the last two weeks of June and throughout the month of July.

The two NBC Wastewater Treatment Facilities are secondary treatment facilities which utilize microorganisms to treat sanitary wastewater. These microorganisms work to reduce the amount of conventional pollutants discharged to Narragansett Bay from our treatment facilities. Slug discharges containing industrial pollutants can kill or severely impair the effectiveness of these microorganisms, thus creating a situation that would counter the efforts of the NBC to provide a clean bay for all to enjoy.

We urge all firms to dispose of their spent solutions properly, since it will be far less costly than the fines and legal expenses incurred if caught improperly disposing of these wastes. The NBC will be actively monitoring the sewer system during the upcoming vacation period to detect any illegal discharges. Industries found to be in violation of the NBC Rules and Regulations may be subject to a fine of up to \$25,000 per violation and/or thirty (30) days of imprisonment for criminally negligent violations. Therefore, we ask for your cooperation and request that you contact your chemical supplier or a licensed hazardous waste hauler to properly dispose of your spent concentrated solutions during your upcoming vacation shutdown.

Over the next few weeks in advance of the summer shutdown, the Pretreatment staff will be conducting site visits to every manufacturing facility to remind the waste operators regarding waste disposal requirements and to assist operators regarding their waste treatment and disposal options. This will help to ensure that firms do not experience any compliance problems associated with the vacation facility clean up. For more information regarding the proper disposal of waste from your facility or to report illegal dumping, contact the Pretreatment Program staff at 461-8848, ext. 490. Thank you for your continued cooperation with regard to properly treating all waste and enjoy your summer vacation.

Sincerely

Kerry M. Britt
Pretreatment Manager

Enclosure



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 96.8% reduction in heavy metal discharges to the Field's Point Facility since 1981. The cyanide loadings to this treatment facility were also reduced by 95.3% 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 have 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. Mesoletta, *Chairman*

Laurie A. Horridge, *Executive Director*

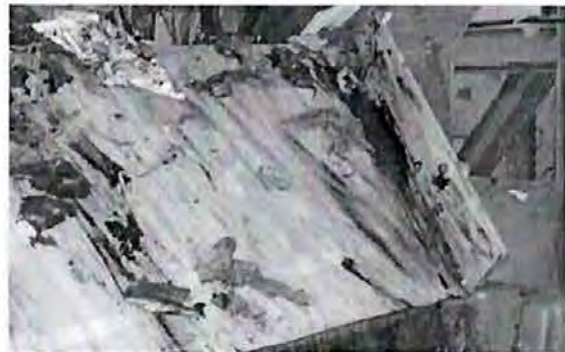
October 5, 2023



2023 MASS MAILING
Fuel Oil Users
List Attached

Dear «Title» «LastName»:

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: Pretreatment Staff

November 29, 2023



**MASS MAILING
2023 HOLIDAY SHUTDOWN LETTER
All IU and SIU (categories 11 thru 59)
List Attached**

Dear «Title» «Last_Name»:

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 will be conducting brief inspections 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:sm

Enclosure

cc: Pretreatment Engineers and Technicians



Narragansett Bay Commission

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

Vacation Shutdown Prohibited Sewer Discharges

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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*

***NEWSPAPER AND MAGAZINE
ARTICLES***

Boosting Nitrogen Levels in Narragansett Bay Could Increase Quahog Populations

But it would be a short-term fix for a long-term problem

By **Rob Smith** / ecoRI News staff

November 20, 2023

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Narragansett Bay quahog landings have been on the decline for the past 50 years. (istock)

PROVIDENCE — It was a good-news bad-news week for quahoggers on Smith Hill last week.

First, the good news. It may be possible to bump up the population of good-quality quahogs in the northern half of Narragansett Bay by releasing more nitrogen and other nutrients into the waters during the winter.

Nutrients such as nitrogen, which were abundant throughout Narragansett Bay thanks to near-centuries of human dumping and waste, are a key food source for phytoplankton, the microscopic organisms that are also the chief food source for quahogs.

Rhode Island's commercial shellfishermen have alleged the state's 20-year campaign to reduce nitrogen in the bay — primarily by enforcing strict limits at the 11 wastewater treatment plants that pipe effluent into state waters — has led to a direct reduction in the amount of wild quahogs caught every year.

It is a problem that the [joint study commission \(https://ecori.org/study-commission-hears-testimony-about-ocean-states-disappearing-quahogs/\)](https://ecori.org/study-commission-hears-testimony-about-ocean-states-disappearing-quahogs/), chaired by Rep. Joseph

Solomon, D-Warwick, and Sen. Alana DiMario, D-North Kingstown, was created to investigate at the end of the General Assembly's last legislative session.

Candace Oviatt, a professor from the University of Rhode Island's Graduate School of Oceanography, told the legislature's study commission that adding more nitrogen in Narragansett Bay during the winter would have no negative impacts on aquatic plants or wildlife later in the year.

"Our data suggests, based on two storms, the 2010 flood and the 2017 winter storms, the nitrogen that comes in the winter and causes big blooms does not cause summer hypoxia," she said.

And hypoxia is something environmental officials are keen to avoid. Hypoxic events, such as the 2003 Greenwich Bay fish kill, in which more than a million menhaden died, are times when there just isn't enough oxygen in the water to sustain life, whether fish, shellfish, or plant. Aquatic wildlife that is able to flee will flee, and anything that doesn't, dies.

The Rhode Island Department of Environmental Management has been working for nearly three decades to reduce the number of hypoxic events occurring in Narragansett Bay, and the nitrogen reductions mandated by the state are hinged around that policy, as well as the requirements of the federal Clean Water Act.

But Oviatt cautioned the commission against introducing more nitrogen as a universal fix.

"It's not a long-term possibility," she said. "As the waters [of the bay] get warmer and we experience more global climate change, there may be no more winter-spring [plankton] bloom."

Now the bad news. While adding nitrogen to increase phytoplankton might give a bump to shellfish in the short-term, quahog landings have been declining for more than five decades, well before state environmental officials embarked on a campaign to reduce nitrogen in the bay.

The short answer for a decline in quahog landings? There probably isn't one, at least according to Robinson Fulweiler, a professor and researcher at Boston University, who outlined for the study commission just how much has changed over the years in Narragansett Bay.

“I cannot in good science say that the decrease in productivity in Narragansett Bay is being driven solely by nitrogen,” Fulweiler told the commission. “The decrease happened before that.”

According to Fulweiler, Rhode Island has been dumping human waste into the bay since before the turn of the 20th century, and earlier Colonial accounts dating from the time of the founding of Rhode Island as an English colony describe a bountiful population of muscles, lobsters, and other shellfish.

Global climate change is significantly altering Narragansett Bay, Fulweiler said. The average annual rainfall in the bay has increased around half an inch every decade since 1895. Both air temperature around the watershed and surface water temperature have increased since 1960.

The summers are hotter, and so are the winters. Wind speed is on the decline, and cloudy days are on the rise, all factors that can play into how much phytoplankton — measured by proxy using chlorophyll in scientific studies — is produced in Narragansett Bay.

Data from URI's long-term [plankton study](https://web.uri.edu/gso/research/plankton/) (<https://web.uri.edu/gso/research/plankton/>) of Narragansett Bay shows the total

amount of chlorophyll, and by proxy, phytoplankton, found in the water column has been on a steady decline since 1970.

“It’s not just the nitrogen because there’s been a lot of other changes in the bay, and the big changes we consistently see have been happening from the mid-1970s on,” Fulweiler said. “I think that’s pointing toward some larger, regional, global changes that are in large part driving what we’re seeing.”

The study commission’s next meeting is expected sometime in December.

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EXPLORE

City of Providence Announces Phase II Construction to Allens Ave Hurricane Barrier Sewer Gates

Wednesday, November 1, 2023

Part of \$3 Million Investment in Fox Point Hurricane Barrier

PROVIDENCE, RI- Mayor Brett P. Smiley today announced that on November 13, the City will start the second phase of construction rehabilitating the Allens Avenue sewer gates, a critical part of the Fox Point Hurricane Barrier. This project is part of a \$3 million ARPA Revenue Recovery investment to rehabilitate the Fox Point Hurricane Barrier levee system, [announced earlier this year](#).

“I am proud of the investments we are making to our hurricane barrier, an incredibly important part of our city infrastructure that has long needed repairs,” said Mayor Brett P. Smiley. “This is one of the many ways my Administration is working to ensure the city is resilient and prepared should there be an emergency.”

Investing and improving the quality of the City’s infrastructure is a top priority of the Smiley Administration. The first phase of construction to repair and rehabilitate the Allens Avenue sewer main gates began in July and this second phase of construction will complete the replacement of the hydraulic gate operators at this location. The Allens Avenue sewer gates typically only close during severe coastal storms to prevent floodwaters and storm surge from entering the sewer system and flooding the city.

Beginning next year, the City will continue with the Hurricane Barrier investment plan and replace all the road plates at four of the street gates associated with the hurricane barrier levee system. These plates house the components needed to secure the street gates when they are closed during a severe coastal storm or hurricane.

The second phase of construction will begin Monday, November 13, 2023 and should conclude by early December. During this phase of construction, Allens Avenue will remain open to both north and southbound traffic but will be reduced to one lane in each direction around the work zone at the Allens Avenue Hurricane Barrier Street Gate.

The City of Providence has worked diligently with the Army Corps of Engineers, Rhode Island Department of Transportation, Rhode Island Public Transit Authority, Narragansett Bay Commission, Rhode Island Department of Environmental Management, and the University of Rhode Island to coordinate the project.

Women and Infants Hospital, Johnson and Wales University and City of Cranston to proactively advise <https://www.providenceri.gov/city-of-providence-announces-phase-ii-construction-to-allens-ave-hurricane-barrier-sewer-gates/>

residents and commuters of the traffic changes. The City also encourages residents and commuters to plan accordingly during these weeks.

For questions or more information please call 3-1-1.

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PROVIDENCE CITY HALL

[401-680-5000](tel:401-680-5000)

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Providence, Rhode Island 02903

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EXCLUSIVE: NBC Takes Initial Steps to Take “Unregulated” Recycling Facility and Maybe More

Friday, May 05, 2023

GoLocalProv News Team

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A letter in the court file from an outside attorney on behalf of the Narragansett Bay Commission (NBC) to the owners of the controversial Rhode Island Metals Recycling facility may be the first salvo in an effort to take control of the property that has been an environmental hot spot for more than a decade.

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And, the effort to reclaim the Rhode Island Metals Recycling site and other properties is being reviewed by NBC in conjunction with the Providence Redevelopment Agency. According to multiple sources with direct knowledge, the vision is to take properties to expand the laydown area for the offshore wind industry and to expand public access and usage of the waterfront. Under state law the properties could be taken through the powers of eminent domain.

A Decade of Violations

The Rhode Island Department of Environmental Management first cited the facility more than a decade ago. Then in 2016, a special master was appointed by Superior Court Judge Michael Silverstein. Since then, there has been no environmental enforcement and a near-endless series of legal machinations.

Rhode Island Metals Recycling has been cited for violations of both the Clean Water Act and the Oil Pollution Act -- those violations have been pending for years. The Rhode Island Attorney General is the lead prosecutor on those violations. Attorney General Peter Neronha has refused to answer questions about the lack of prosecution of the violations.

Just a month ago, [Rhode Island’s top environmental regulator voiced his frustration in an interview with GoLocal.](#)



Rhode Island Metals Recycling facility, called unregulated by DEM Director Terry Gray PHOTO: GoLocal drone

“Every time we find something on the site, we have to go back to court. That is the 100-plus times we have gone to court,” said Terry Gray, the Director of the Rhode Island Department of Environmental Management.

“Essentially, due to the travels of this case, the facility is unregulated,” said Gray.

“If you took this fresh and looked at these things from scratch, then it would be a significant enforcement case right as it sits today,” he added.

Rhode Island Metals Recycling Drone footage from the Waterfront



Letter to Owners of Metals Recycling

In the letter from Anthony Bucci, on behalf of NBC, dated April 24, 2023, to the owners of Rhode Island Metals Recycling, he writes, “The Narragansett Bay Commission (NBC) is currently investigating properties for future NBC projects. NBC is conducting a geotechnical investigation to determine the soil conditions at the aforesaid location. A boundary and topographical survey of the Property will also be performed. Some of the survey work may be performed with a drone.”

GoLocal has learned that NBC is looking at other properties along with the Rhode Island Metals Recycling property. One of the additional properties is the adjacent property — the so-called Cumberland Farms property.

GoLocal unveiled on April 12 that members of the ownership group who control Rhode Island Metals Recycling purchased that property in March for \$2.7 million.

NBC, which manages much of the state's wastewater system and treatment, has extensive powers under state law.

Presently, NBC is managing the biggest public works project in the state — phase 3 of the Combine Sewer Overflow. NBC's service area encompasses the metropolitan Providence and Blackstone Valley areas, which include Providence, North Providence, Johnston, Pawtucket, Central Falls, Cumberland, Lincoln, the northern portion of East Providence and small sections of Cranston and Smithfield.

Drone Video Takes Us Up Close on Rhode Island Metals Recycling Facility on ...



Letter from NBC to Rhode Island Metals Recycling included the following site map IMAGE: NBC



Rhode Island Metals Recycling owners purchased adjacent 9.8 property in March PHOTO: GoLocal

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- **NEW: Providence City Council Members to Oppose Proposed Allens Providence Recycling Application**
- **"This Facility is Unregulated," Says RI's Top Environmental Official**
- **Owners of "Unregulated" Site on Allens Ave Expand - Buy 9.8 Acre Adjacent Property**
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Narragansett Bay Commission Offers Free Clean Water Tours, Touch-a-Boat

Monday, April 24, 2023

GoLocalProv News Team

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In celebration of Rhode Island Clean Water Week, the Narragansett Bay Commission (NBC) will offer free public tours of its award-winning Field's Point Wastewater Treatment Facility in Providence on Saturday, April 29 from 10:00 AM to 1:00 PM.

The tours will include a look at the region's most sophisticated water quality lab, "touch-a-truck" and "touch-a-boat" with the NBC's maintenance and research vehicles, a clean water scavenger hunt, and other fun activities.

"This facility is simultaneously one of the oldest and most advanced clean water facilities in the nation," said NBC Chairman Vincent Mesoletta. "We're so excited to give the public the opportunity to 'look behind the curtain' and view the process that has made Narragansett Bay cleaner than it has been in 150 years."



PHOTO: NBC

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In addition, the NBC will issue certificates of completion to all students who take the tour that may be redeemed for extra credit at school (but students are advised check with their teacher first).

"I am confident that anyone who experiences this tour will be amazed and appreciative by the clean water efforts in our community," Mesoellea added.

Members of the public can book a tour at 10:00 AM, 11:00 AM, or 12:00 noon by emailing nbcpr@narrabay.com. Spaces are limited. The tour will take approximately one hour.

The NBC joins seven other clean water agencies in Rhode Island offering free public tours during Rhode Island Clean Water Week. Information on other tours is available at ricwa.org



NBC Chairman Vincent Mesoellea

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Phase II Construction on Allens Ave Hurricane Barrier Sewer Gates Starts Nov. 13

Sunday, November 05, 2023

GoLocalProv News Team

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The City of Providence will start the second phase of construction rehabilitating the Allens Avenue sewer gates, a critical part of the Fox Point Hurricane Barrier. This project is part of a \$3 million ARPA Revenue Recovery investment to rehabilitate the Fox Point Hurricane Barrier levee system, announced earlier this year.

Construction will begin on November 13.

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"I am proud of the investments we are making to our hurricane barrier, an incredibly important part of our city infrastructure that has long needed repairs," said Mayor Brett P. Smiley. "This is one of the many ways my Administration is working to ensure the city is resilient and prepared should there be an emergency."

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PHOTO: Global Panorama CC: 2.0

Beginning next year, the City will continue with the Hurricane Barrier investment plan and replace all the road plates at four of the street gates associated with the hurricane barrier levee system. These plates house the components needed to secure the street gates when they are closed during a severe coastal storm or hurricane.

The second phase of construction will begin Monday, November 13, 2023 and should conclude by early December. During this phase of construction, Allens Avenue will remain open to both north and southbound traffic but will be reduced to one lane in each direction around the work zone at the Allens Avenue Hurricane Barrier Street Gate.

The City has worked with the Army Corps of Engineers, Rhode Island Department of Transportation, Rhode Island Public Transit Authority, Narragansett Bay Commission, Rhode Island Hospital, Women and Infants Hospital, Johnson and Whales University, and City of Cranston to proactively advise residents and commuters of the traffic changes. The City also encourages residents and commuters to plan accordingly during these weeks.

For questions or more information please call 3-1-1.

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Plan to Move 50,000 Tons of "Hazardous" Material to Providence Neighborhood Draws Strong Criticism

Wednesday, June 14, 2023

GoLocalProv News Team

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The current condition of Rhode Island Recycled Metals. PHOTO: GoLocalProv

Previously, North Kingstown and East Providence blocked a proposal by the Narragansett Bay Commission (NBC) to move an estimated 50,000 tons of what has been described as "hazardous" material to their communities.

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Now, the NBC plan is to move the material to Providence and locate it on the site of the Rhode Island Recycled Metals facility and four other adjacent lots. The Rhode Island Recycled Metals facility has been the subject of ongoing legal fights between the owners and regulators.

The proposal, however, is drawing strong criticism.

The material that is being proposed to be moved to the Washington Park neighborhood in Providence comes from the construction of the third phase of the combined sewer overflow project now being constructed in Pawtucket.

"The residents here have had enough of the disrespectful and hazardous practices of all city agencies and private companies. The thought that anyone would remotely consider dumping the toxic unwanted 'sludge' here on Allens Avenue on the water's edge is beyond comprehension in 2023," said Linda Perry of the Washington Park Neighborhood Association.

Terry Gray, the Director of the Rhode Island Department of Environmental Management in recent months, **called the existing condition of Rhode Island Recycled Metals** a de facto "unregulated" facility due to his agency's inability to move forward with environmental enforcement. The site has been embroiled in legal battles for more than a decade.

Last week, **attorney Richard Land, the court-appointed special master for the Rhode Island Recycled Metals site**, in a hearing before Judge Brian Stern called the material NBC is proposing to locate to the Washington Park neighborhood "hazardous."

Plan Blasted

"There is no justice here. The environment suffers. We are literally suffering from years of neglect and unwanted pollution. I say train it all to another state after it is trucked to Quonset. Do not treat this South Providence Neighborhood of Washington Park as the eternal 'dumping ground' -- it will be our burial ground. There must be a better solution. Enough is enough," added Perry.

Perry's comment about disposing of the material out of state was one of the options identified by NBC's contractor in a 2021 report called the "Blast Rock Management Plan."

That report flagged the environmental issues with the material, stating, "Tunnel muck is akin to soil and is expected to be subject to Rhode Island Department of Environmental Management (RIDEM) regulations. The main environmental concern with the tunnel muck is the concentration of arsenic it contains and its lack of suitability to be used as fill material on construction projects."

The plan written by the contractor identified multiple disposal options — all at licensed facilities.

None of the options identified in the Blast Rock Management Plan recommended the disposal of material in a non-licensed disposal facility.

"Beneficial Use Determination" Application to Move Arsenic Laden Material to Providence

In late April, NBC filed for a "Beneficial Use Determination" application with DEM — seeking approval to bring the material to Providence and locate the waste across nearly 20 acres.

NBC and the Providence Redevelopment Agency have begun the preliminary process of taking the Rhode Island Recycled Metal property, adjacent property and three other parcels by eminent domain.

The Providence Redevelopment Agency's chairman Manuel Cordero has refused to respond to repeated questions about the PRA involvement in the plan.

Providence Mayor Brett Smiley similarly refused to answer if he supported the NBC plan.

The NBC filing with the Rhode Island Department of Environmental Management recognizes that the arsenic levels exceed standards.

Table 2 Summary of Disposal Facilities for Jurisdictional Tunnel Muck

Disposal Facility	Location	Hours/ Truck Trip	Arsenic Acceptance Criteria
Type 1 Rock			
Rhode Island Resource Recovery (RIRRC)	Johnston, RI	1.0	19 mg/kg
Marilyn's Landing	Bridgewater, MA	2.0	20 mg/kg
Dudley Reclamation Project	Dudley, MA	2.25	20 mg/kg
NEED Facility (permit pending)	Johnston, RI	1.0	Not Established
Type 2 Rock			
Southbridge Disposal Park	Southbridge, MA	2.5	40 mg/kg
Winchendon Landfill	Winchendon, MA	3.5	40 mg/kg
Clinton Landfill	Clinton, MA	2.5	40 mg/kg

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2021 NBC plan to dispose of arsenic-contaminated material at licenses facilities. SOURCE : Blast Rock Management Plan

The NBC application states:

The material will contain heavy metals that occur naturally in the bedrock along the tunnel alignment.

Most notably, arsenic has been detected at concentrations that often exceed the RIDEM Direct Exposure Criteria (DEC) concentration of 7 parts per million (ppm). Beryllium, manganese, and thallium have also been found to exceed RIDEM DEC concentrations. It should be noted that the Massachusetts DEP's published natural background level for arsenic is 20 ppm, which allows for beneficial reuse at out-of-state facilities but at added cost due to hauling distances and possible tipping fees.

NBC Defends the Plan

In an email to GoLocal, Jamie Samons of the Narragansett Bay Commission said, "Some of this material excavated from the tunnel, but not all, contains a naturally-occurring hazardous substance (arsenic) above the State's limit established for direct contact. While the material contains a naturally-occurring hazardous substance, this material is NOT hazardous waste, which is an entirely separate class of material. RIDEM allows for the reuse of this type of material (e.g., tunnel rock) on a case-by-case basis through a Beneficial Use Determination (BUD) process."

She said, "The material does not meet the regulatory definition of 'hazardous waste' or a 'solid waste.' 'Solid Waste' is the terminology used by RIDEM in its guidelines for approving material under a Beneficial Use Determination. As such, the application form uses that terminology. NBC is exploring all disposal options that lower the cost for disposal for NBC ratepayers while fully complying with all environmental regulations. RIDEM has a program that may allow for beneficial reuse of the excavated bedrock. One beneficial reuse is using the material as fill to raise the elevation of the land about the base flood elevation and then capping with clean material so that the land is available for development. Typically, property adjacent to waterways may need fill to raise the elevation



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Providence Mayor Brett Smiley refused to answer questions about NBC's plan PHOTO: File

about the flood plain (which is why we have looked at properties adjacent to waterways). NBC is exploring this option as it may be more cost-effective than transporting the material to out-of-state landfills."

Samons added, "While the crushed bedrock does not fall under any existing RIDEM solid or hazardous waste regulations, we recognize that it must be managed in a responsible manner and that it is not suitable for all end uses. We have gone through significant efforts to identify existing environmentally compromised sites in Rhode Island that can be beneficially remediated and economically developed utilizing this material. In the end, through the BUD process, the final site receiving the crushed rock will be capped and secured for proper and safe future development/utilization."

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Infrastructure Bank closes on \$77M Green Bond for R.I. water projects

By **PBNSta** - 06/23/2023



THE RHODE ISLAND Infrastructure Bank has closed on a \$77.3 million Green Bond to support clean water projects for the Narragansett Bay Commission and other communities.

PROVIDENCE – The Rhode Island Infrastructure Bank has closed on a \$77.3 million Green Bond to support clean water projects for the Narragansett Bay Commission and the communities of East Greenwich, East Providence, Middletown, Woonsocket and Warwick. The Green Bond also will support drinking water projects in the city of Providence.

“Thanks to the Bipartisan Infrastructure Law, Rhode Island’s Clean and Drinking Water State Revolving Funds are receiving nearly \$400 million in funding for projects across the state,” Jeffrey Diehl, CEO of the infrastructure bank, said in a statement. “We are using this bond sale to speed up the flow of financing so our cities, towns and quasi-public

entities can get to work on major infrastructure projects.”

The funds are slated to upgrade wastewater treatment plants, build new pump stations, install new sewer mains and to repair or replace drinking water mains and service lines.

The infrastructure bank is the state’s central hub for financing infrastructure improvements for municipalities, businesses and homeowners. The bond received a rating of AAA from Fitch Ratings and AAA from S&P Global Ratings, according to Diehl.

The projects receiving bond proceeds include:

Narragansett Bay Commission: \$47.6 million for Combined Sewer Overflow Phase III, Fields Point Wastewater Treatment Facility upgrades, and other upgrade and replacement projects.

Warwick: \$20 million for the rehabilitation of Cedar Swamp Force Main and completion of sewer installation in the city’s Bayside neighborhood.

Providence/Providence Water Supply Board: \$5.5 million for water distribution improvements, including cleaning, relining, repair and replacement of water mains, transmission lines, service lines and valves.

East Greenwich: \$4.9 million for wastewater treatment plant facility upgrades.

East Providence: \$2.5 million for water pollution abatement and resiliency improvements to Booth Avenue and Bold Point Park areas.

Woonsocket: \$2.3 million for the replacement of the Manville Road pump station and repairs at Woonsocket Regional Wastewater Treatment Facility.

Middletown: \$1 million for the replacement of the Paradise Avenue Pump Station Force Main.

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TECHNOLOGY

New Hampshire IT Company Expands Into R.I. With New Technology Center, Warehouse



By Becca Roberts

Last updated Nov 15, 2023



blue
mantis

BLUE MANTIS, a New Hampshire-based IT company, recently expanded into Rhode Island with the opening of a new Technology Innovation Center in Pawtucket.

PAWTUCKET – A New Hampshire IT company recently expanded into the Ocean State with the opening of a new Technology Innovation Center.

Blue Mantis, a New Hampshire-based company that provides digital technology services and consulting, hosted a ribbon-cutting ceremony for the center last Thursday. The 15,000 square foot facility at 670 Narragansett Park Dr. will consist primarily of storage space for the company's IT infrastructure in advance of deliveries, with 8,000 square meters reserved for this purpose.


In the remaining space, the center will provide customers with physical and digital resources such as testing labs, meeting rooms, enhanced security measures and other technical equipment and tools, Blue Mantis says.


Although the company’s physical presence in the Ocean State is new, it already counts Rhode Island companies and organizations such as the Narragansett Bay Commission, Providence Equity Partners, Paolino Properties and Salve Regina University among its clients.

“In keeping with our mission to help customers navigate the future, we are encouraging greater on-site collaboration at the center,” Josh Dinneen, president of Blue Mantis, said in a statement, “with our technicians and engineers to help them “to help optimize the delivery of solutions and adapt quickly to the dynamics of today’s distributed workforce.”

The expansion in Rhode Island is part of the company’s broader, aggressive growth and hiring push, said Blue Mantis spokesman Tim Hurley. Blue Mantis, originally based in Maine, moved its headquarters to New Hampshire earlier this year.

Jacquelyn Voghel is an employee at PBN. You can reach her at Voghel@PBN.com.

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Friday February 23rd, 2024

METRO

New R.I. special legislative commission hopes to address declining quahog population

Legislators, researchers, environmentalists, fishermen meet again to discuss potential depletion factors



Media by [Emily Suong](#) | The Brown Daily Herald



By [Tom Li](#)
Metro Editor

October 31, 2023 | 8:02pm EDT

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A new state joint legislative commission studying the recent **decrease** of the Narragansett Bay’s harvested quahogs — a **hardshell clam** native to Rhode Island — held its second meeting Oct. 24.

The Special Legislative Commission to Study and Provide Recommendations on the Issues Relating to the Reduced Catch of Quahogs in Narragansett Bay, **established** earlier this year, is **co-chaired** by State Rep. Joseph Solomon Jr. (D-Warwick) and State Sen. Alana DiMario (D-North Kingstown, Narragansett, New Shoreham).

The commission **consists** of 13 members, including representatives from the Rhode Island Department of Environmental Management, the Rhode Island Shellfisherman's Association, professors at the University of Rhode Island and Roger Williams University and industry and environmental organization members.

The commission grew out of constituent concerns earlier this year about the quahog population, according to Solomon. "We sat everybody down — from environmental management to shellfishermen (to) the University of Rhode Island — and we discussed what was going on," he said.

"No one was 100% sure as to what was causing it," Solomon said. "At that point, we decided that it's really necessary to create a study commission to get to the bottom of it."

The commission's first meeting was **held** on Sept. 19. At both sessions, members **presented** general information about the gradual quahog depletion in Narragansett Bay and research findings related to various hypotheses explaining the decline.

David Borkman, principal environmental scientist at the RIDEM's Office of Water Resources and a Quahog Commission member, told The Herald that multiple factors are contributing to quahog depletion.

"It's easier to think in a one-dimensional model of 'This goes in, quahogs come out,'" he said. "In reality, it's a pretty complicated ecosystem."

The amount of nitrogen in Narragansett Bay and its relation to **hypoxia** — low concentrations of dissolved oxygen in the water — is one of the primary factors the commission is examining, according to Borkman. **Research** points to potential correlations between nitrogen concentrations and rates of hypoxia. Quahogs in the early stages of development are especially vulnerable to low-oxygen environments, he explained.

"When they're in the water and settle, if they don't have sufficient oxygen, they'll die and never have time to grow into an adult, harvestable (and) edible-size quahog," Borkman said.

Hypoxia may also help quahog populations. Quahogs are "not going to move a heck of a lot," Borkman said. "They're in the mud, and they can move slightly, but they're not going to migrate away from predators." Low concentrations of oxygen in water can reduce the number of predators searching for quahogs.

Other factors contributing to quahog depletion include climate change and warming waters, Borkman said. Warmer water temperatures have caused phytoplankton, a plant plankton and quahog food source, to be eaten by other marine life earlier in the season.

Borkman also pointed to changes in other species as another determinant in the decline of quahog populations. In particular, he noted the increasing abundance of **blue crabs**, which feed on smaller, fingernail-sized quahogs before they reach maturity.

Michael McGiveney, president of the R.I. Shellfisherman's Association and a member of the Quahog Commission, noted his first-hand experiences with the quahog decline. "The lower Bay, the West Bay, places that used to be very productive for the industry are now not reproducing at all," he said.

"We're the canaries in the coal mine, basically," he said, adding that people are unable to stay in the industry due to the declining quahog population. "The catch per unit effort — what the individual fisherman is catching — (is) nearly half of what it used to be."

Save The Bay — a local environmental advocacy **organization** concerned with conservation in Narragansett Bay — has also been involved in the Quahog Commission, according to Narragansett Baykeeper Mike Jarbeau, Save The Bay's representative on the commission. As part of his role as baykeeper, Jarbeau monitors environmental developments in the bay.

Jarbeau said that, as a large advocacy organization, he sees Save The Bay as bringing a general public perspective to the commission. “We care about the quahog as a traditional, important species in Rhode Island, but we also care about the health and well-being of Narragansett Bay in general,” he said.

Solomon highlighted the urgency of proactively addressing environmental issues in the bay. According to Solomon, the commission hopes to meet every two months until early next year to be able to introduce legislation on the issue before the end of the next legislative session.

“If there’s something that we can do legislatively ... before it becomes a major problem, then we have to because we have to preserve (the Narragansett) Bay for generations ahead,” he added.

Borkman said he hopes that the commission can create a list of short and long-term goals that can be implemented by both state agencies and other stakeholders in the fishing industry, particularly given the clam’s significance to the state.

“The quahog is iconic in Rhode Island. It’s a big part of Rhode Island culture,” and has been for centuries, he said. “It’s an important cultural symbol in addition to being an important fishery and good food.”



Tom Li

Tom Li is a Metro Editor covering the Health & Environment and Development & Infrastructure beats. He is from Pleasanton, California, and is concentrating in Economics, International & Public Affairs and French & Francophone Studies. He is an avid RIPTA enthusiast and enjoys taking (and criticizing) personality tests in his free time.

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Number of Ocean State Beach Closures Highest in Nearly 20 Years

By Rob Smith / ecoRI News staff

August 21, 2023

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Monitoring water quality at beaches in highly developed areas, such as Warren Town Beach, is a critical tool in protecting public health. (Frank Carini/ecoRI News)

PROVIDENCE — There is still a month left of summer, and Rhode Island has already seen the highest number of beach closures in nearly two decades.

According to data from the state Department of Health's [beach monitoring \(https://health.ri.gov/beaches/\)](https://health.ri.gov/beaches/) program, freshwater and saltwater beaches around the state have been closed for a combined 284 days since Memorial Day, the highest number of closures recorded since 2006.

Beaches are closed by order of DOH when they test positive for elevated levels of enterococci bacteria; anything higher than the sample standard of 60 colony forming units (CFU) per 100 milliliters of water is closed until the tests produce a clean result again.

The bacteria represent a small but significant health risk to swimmers. Swimming in contaminated water can cause gastroenteritis, an inflammation of the stomach and intestines that can cause symptoms such as vomiting, headaches, and fever. It can also result in ear, eye, and throat infections, and in more serious cases, salmonella.

Historically, especially in Narragansett Bay, beach water contamination was closely tied to rainfall and stormwater runoff. Simply put, if a great amount of rain fell on Rhode

Island during the summer it would often lead to beach closures. Stormwater runoff, from roadways, parking lots, and other impervious surfaces, wash contaminated water into the bay and other waterbodies, elevating the level of enterococci.

The situation has improved greatly over the past 15 years, according to DOH, as municipalities around the state, and the Narragansett Bay Commission's combined sewer overflow abatement program, have improved stormwater management up and down the bay. An increase in rainfall no longer always means an increase in the number of beach closures.

And it shows in this year's data. Warwick, a city that has long struggled (<https://ecori.org/better-sewage-management-in-warwick-helps-upgrade-part-of-greenwich-bay-for-shellfishing/>) to fully implement sewers in its coastal areas, was issued 14 closure orders by DOH, around a third of all orders issued so far this year. But those closure orders amount to less than 20% of the total closure days throughout the state.

It is the state's inland, freshwater beaches that are seeing some of the highest number of closure days this summer, according to DOH data. South Kingstown's Camp Hoffman takes the top prize, closed for a total of 27 days since Memorial Day across two separate closure orders for elevated levels of enterococci.

Foster's Ginny-B Campground saw the second-highest number of beach closure days, racking up 19 closed days across two separate closure orders.

(Technically, Georgiaville Pond Beach in Smithfield has the greatest number of beach closure days at 41, but it's just not for enterococci concentrations. The DOH dashboard lists the beach as closed as of July 12 because of cyanobacteria blooms (<https://ecori.org/toxic-blue-green-algal-blooms-becoming-more-common/>), which will likely keep it closed for the rest of the year.)

No matter the location of the waterway, the culprit in Rhode Island stays the same. Jane Sawyer, an environmental scientist working in the state Department of Environmental Management's Division of Water Resources, said that runoff is an issue in every city and town in Rhode Island.

“In a sustained downpour, everything that’s on a hard surface, including waste and associated bacteria, gets swept up, carried away, and emptied into local streams, ponds, rivers, Narragansett Bay, and ultimately the ocean,” Sawyer said.

The temperatures may have been relatively mild in Rhode Island this summer, but it sure has been wet. According to the National Weather Service, by mid-August, Rhode Island had recorded 12.5 inches of precipitation since June 1, 4 inches higher than the normal level expected.

Climate change’s impact on the state’s rainfall patterns is expected to have an affect on stormwater runoff, according to Sawyer.

“With the more frequent and more intense thunderstorms we’re experiencing, the volume of water overwhelms the drainage systems and can move pollution to Rhode Island waterways,” she said.

And the state’s freshwater ponds may feel the brunt of climate change. Saltwater beaches have the advantage of being on or near the open ocean, where waves, winds, and currents can quickly flush out any pollutants. Freshwater ponds, lacking those advantages, take far longer to flush out bacteria.

DEM said it is progressively addressing bacteria sources throughout the state by improving stormwater management and enforcing the cesspool phaseout. The agency said it has also hired a scientist to work on lake management and assist entities with water quality improvements and habitat conditions.

The state is also getting an extra shot in the arm this year. Earlier this month, the Environmental Protection Agency announced it was awarding Rhode Island \$228,000 in grants to support water quality monitoring and public notification programs at local beaches.

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LOCAL

Beach bum blues: Rain, beach closings have made it a tough summer for beach lovers

Attendance is down nearly 7% at state beaches, and the DEM is hoping for a strong August.



Jack Perry

Providence Journal

Published 5:14 a.m. ET Aug. 14, 2023 | Updated 4:48 p.m. ET Aug. 15, 2023

Rainy days can deliver a deflating one-two punch to beach lovers.

First, who wants to go to the beach when it's raining? Pow!

Second, heavy rain can dump pollutants from roads and parking lots into the water, prompting the state to close beaches, a painful blow that can last days after the rain has cleared and the sunshine has returned. Wham!

So far in the summer of 2023, Rhode Island beach lovers have already lost more days to closings than they'd lost in any full summer over the last 14 years. Meanwhile, attendance at state beaches from May through July was down nearly 7% from last year, according to the state Department of Environmental Management.

Blame it on the rain

The state's big ocean beaches flush quickly and aren't often closed due to pollutants flowing from land. That's more likely to happen to town and city beaches in Upper Narragansett Bay or swimming areas at ponds and lakes. But the heavy rainfall Rhode Island has seen this summer is the likely culprit in both the closings and the low beach attendance.

"As always, we answer to the weather," says Michael Healey, chief public information officer for the DEM.

July, typically the best month for hitting the beach, was especially soggy. The Providence area had 8.37 inches of rain in July, well beyond its normal amount of 2.91 inches, according to

the National Weather Service.

Who wants to hit the beach when it's 58 degrees and rainy?

June wasn't as rainy, with a total of 3.54 inches, slightly below the normal amount of 3.84, but the timing stank. Providence recorded rain on at least one day of every June weekend, including a whopping 1.30 inches on June 17, a Saturday. Besides that, the month as a whole was nearly 5 degrees cooler than normal, according to the weather service.

In June, attendance at Rhode Island's eight state beaches was down 27% compared with June 2022, according to Healey, but July showed improvement, as it was down only about 7% compared with 2022.

Based on traffic counts, the DEM estimates that 465,421 people visited Rhode Island's state beaches from May through July this summer, down 34,116 from last year's 499,328.

"I think the numbers show we are coming back, and we hope that by Labor Day we'll be close to matching last year's numbers," Healey said.

How many beach days has Rhode Island lost?

As of last Friday, Rhode Island beachgoers had lost 213 days at salt and freshwater beaches because of beach closings due to high bacteria counts, according to the state Department of Health. That compares with 169 closings in the summer of 2022 and 182 in 2021. (One lost beach day represents a single beach on a single day, so when conditions close several beaches, as is often the case, the result is a multiple.)

The "significant increase" is mostly attributable to the big rainstorms this summer, said Joseph Wendelken, public information officer for the Health Department.

"Sudden, heavy rain results in a lot of stormwater," Wendelken said. "Stormwater runoff from roads, parking lots and other impervious surfaces transports contamination (including bacteria) to our fresh and salt water beaches. The sources of this contamination are often pet waste and wildlife waste. This is why we tend to see more closures in the Upper Bay, where beaches are in more-urban areas with more impervious surfaces."

The Department of Health tests the water at beaches from Memorial Day through Labor Day, according to Wendelken. In general, water quality has improved, leading to fewer closings, according to the Department of Health.

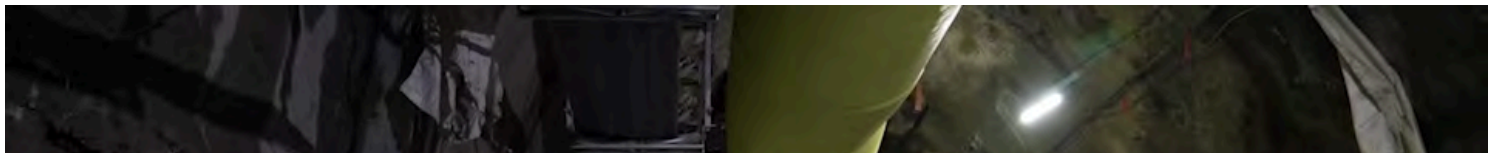
The department gives much of the credit to the Narragansett Bay Commission's combined sewer overflow abatement program, which stores stormwater during heavy rainfall to ensure it's treated before entering Narragansett Bay.

Additionally, Wendelken noted, many municipalities, including Barrington, Bristol and Newport, have installed stormwater improvement projects at and around their beaches, while "Warwick has removed thousands of cesspools and installed municipal sewer connections in the Oakland Beach area."

Indeed, the last summer that Rhode Island lost more than 213 beach days to pollution was 2009, when beaches were closed for a total of 230 days. The Providence area had a record 10.52 inches of rain that July. This July's 8.37 inches ranks second-highest for July.

As of Friday, the state's list showed 48 beaches had been closed for at least one day this summer. Just one state beach is on that list, Scarborough North, closed on July 6 and 7.

Beach attendance numbers aren't available for August, but on Thursday, the Department of Health announced swimming would be prohibited at four beaches. Bam!



SUBSCRIBER EXCLUSIVE

Giant RI sewer project is cleaning Narragansett Bay. But is it too costly for ratepayers?

Most people will never set eyes on the costliest public works project in RI history, but they'll see its impact in cleaner water and high sewer bills.

Alex Kuffner The Providence Journal

Published 5:00 AM EDT May. 18, 2023 | **Updated 5:00 AM EDT May. 18, 2023**

KRIS CRAIG, THE PROVIDENCE JOURNAL

Some things you should take away from this story

Narragansett Bay Commission's decades-long, nearly \$1.7-billion effort to create a subterranean tunnel network to capture overflows of polluted stormwater and sewage is in its final phase.

When completed in 2027, it will bring RI into full compliance with the Clean Water Act. Already, water in Narragansett Bay is cleaner and clearer than in generations.

But progress has come with a steep price for ratepayers, with the annual bill for a typical household tripling from when work started in 2000 to 2015, when phase two wrapped up.

Questions also remain about whether the overflow tunnels will be able to accommodate the heavier, longer rainstorms of a warming planet.

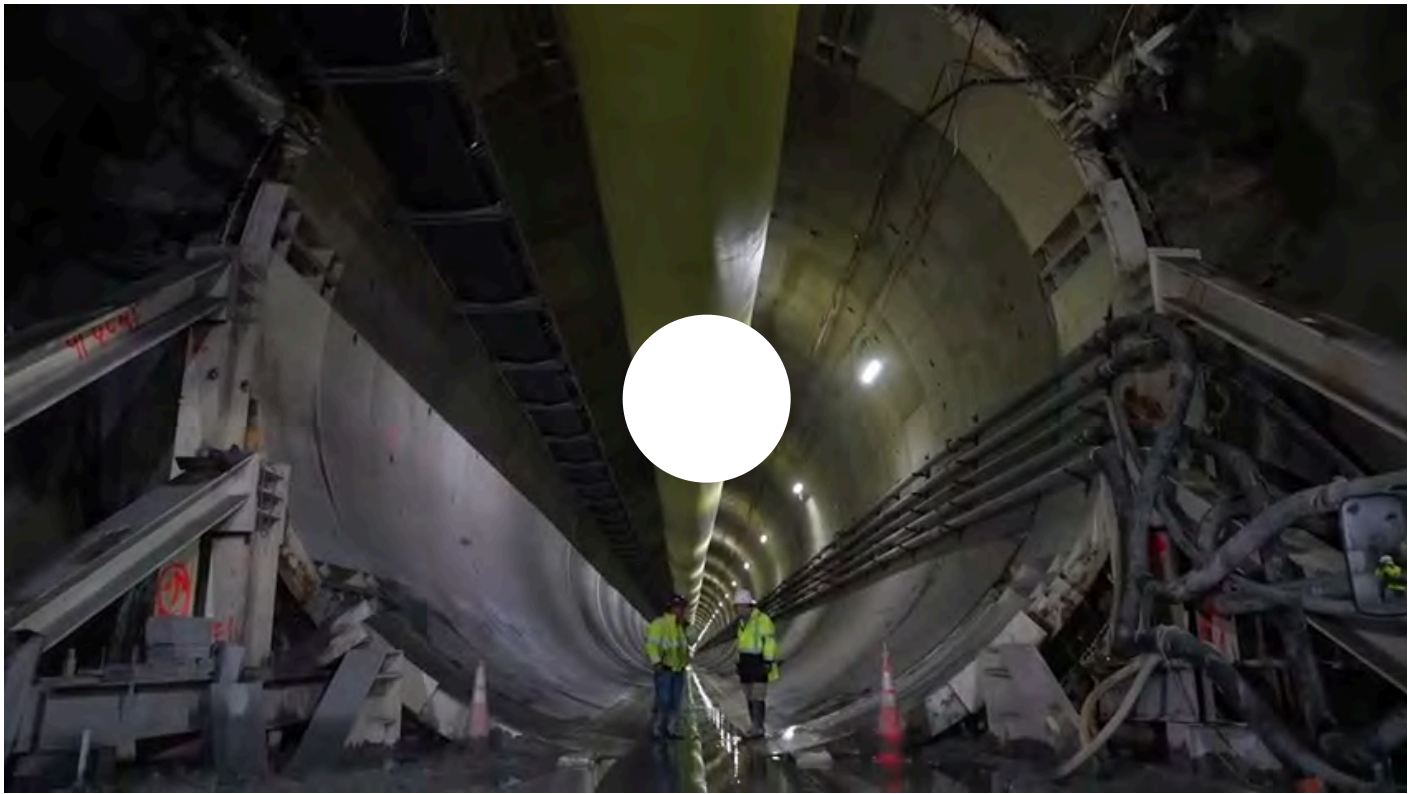
PAWTUCKET — Digging a 30-foot-wide tunnel deep underground, through bedrock, is slow work.

Ron Marshall measures progress in tiny increments. The tunnel-boring machine that he pilots chews through a mere 25 millimeters of rock face a minute. He knows the rotating cutter head at the front of the enormous machine is doing its job by the vibrations he feels in the control booth.

But as far as getting a sense of how fast the machine is advancing at any given moment, he has to rely on the sophisticated array of digital screens in front of him. It's not like being in a car, where he can just look out the window at the scenery rushing by.

“You look at the wall and you barely see it move,” Marshall said.

Welcome to the biggest public works project Rhode Island has ever seen — or, to be precise, has not actually seen.



CSO overflow tunnel

The 2.2-mile CSO overflow tunnel under Pawtucket will be able to store about 92 Olympic-sized swimming pools of overflow when it's completed.

Advertisement

Talk to enough people about the Narragansett Bay Commission's decades-long, nearly \$1.7-billion effort to create a subterranean tunnel network to capture overflows of polluted stormwater and sewage and you're bound to hear it described as the largest construction project that most people will never set eyes upon.

All this hidden work is in service to Narragansett Bay. Runoff from rains, especially when mixed with household waste, is one of the leading threats to the body of water at the heart of

Rhode Island. The runoff transports the bacteria that closes beaches and shellfish beds, as well as nutrients that causes dangerous algae blooms.

What's at stake: How 'tunnel muck' sparked a fight between RI agencies and why it will cost taxpayers

So, during the biggest storms, when the commission's wastewater pipes are overloaded with rainfall rushing from roofs, sidewalks and streets into drains, the excess stormwater mixed with effluent will be channeled into storage tunnels instead of being discharged untreated. When the storm clouds part, the mixture is pumped back to the surface, cleaned up and finally released into the rivers that empty into the Bay.

The first two phases of what's known as the "combined sewer overflow project" wrapped up in Providence nearly a decade ago. They included a 26-foot diameter, 3-mile tunnel that begins beneath downtown and follows the Providence River to the commission's treatment plant at Fields Point.

The improvements in water quality since then have been nothing short of astonishing. And more is on the way.

The commission is now in the thick of phase three. Dubbed Restored Waters RI, the centerpiece is the construction of a 2.2-mile tunnel along the east bank of the Seekonk River in Pawtucket that will be able to store about 92 Olympic-sized swimming pools of stormwater overflow when completed.

If you're one of the few to make the journey below ground, you'll get a sense of the immense scale of the project.



Pilot Ron Marshall keeps an eye on monitors in the control room of the machine that is boring a tunnel through bedrock along the east bank of the Seekonk River in Pawtucket.

KRIS CRAIG, THE PROVIDENCE JOURNAL

How do you dig a 2.2-mile tunnel underground? Very slowly

The new tunnel starts at Bishop Point, just north of the commission's other treatment facility at Bucklin Point in East Providence. It's reached through a gaping hole in the earth that measures 62 feet in diameter and 155 feet deep. Construction crews made the drop shaft by drilling and blasting their way down.

The width was necessary to make room for the powerful machine needed to bore the tunnel through the Rhode Island Formation, the thick layer of sedimentary rock created 300 million years ago that underlies Narragansett Bay.

Made in Germany by tunnel technology company [Herrenknecht](#), the machine was shipped to the project site, lowered down in pieces, then reassembled underground to its full 300-foot length.



A shrine to Saint Barbara, the patron saint of miners, sits on a table at the entrance to the tunnel.

KRIS CRAIG/THE PROVIDENCE JOURNAL

Because the bedrock in Pawtucket starts at a shallower depth, the tunnel here is about half as deep as its Providence counterpart. Workers reach the bottom of the drop shaft via elevator, a far cry from the swinging cage hooked up to a crane that people had to clamber into to get down to the Providence tunnel.

At the bottom, they're greeted by a tabletop statue of Saint Barbara, the patron saint of miners. That's where a transport vehicle picks them up to take them through the completed portion of the tunnel to where the work is currently underway.

So far, crews working in three shifts around the clock have made it about half a mile. The tunnel machine breaks up the rock using the 34-foot-diameter cutter head mounted to its front end. The head rotates at about three revolutions per minute, its 64 steel disc cutters grinding into the rock as it turns.

The rubble is taken out by conveyor belt while precast concrete rings are brought in to support the newly mined section of tunnel. Each ring measures 6 feet wide. On a good day, crews will place and grout 10 rings over the full 24 hours.

'It's an indestructible industry': [Why RI can't stop building self-storage](#)

On a recent afternoon, it was a five-minute ride to the end of the tunnel where the boring machine was located — just underneath the Boys & Girls Club of Pawtucket, according to a map that Marshall pulled up on one of his screens. The controls keep him on a precise route north, hugging the bank of the river. He's alerted to any deviation larger than 20 millimeters.



Precast concrete rings are stacked up before being installed to reinforce newly mined sections of tunnel. On a good day, crews will place and grout 10 rings in 24 hours.

KRIS CRAIG/THE PROVIDENCE JOURNAL

The machine had come to a stop, and crews were inspecting the head to see if any of the cutters needed to be replaced. Cutters may last a week or longer, depending on the geology of the rock, said Anissa Larej, a shift engineer with CBNA, which is partnering with Barletta Heavy Division in the joint venture that's building the tunnel.

Up to this point, the machine had encountered a lot of sandstone and shale, relatively soft rocks that have made forward progress easy.

“We’ve been quite lucky since we started,” says Larej, a native of France who has also worked on tunnels in Europe and Australia.

Work already done has 'exceeded expectations' in restoring Narragansett Bay

On a brilliant spring morning, an environmental monitoring crew took water samples from Narragansett Bay to measure dissolved oxygen and pH levels and carry out other tests.

Just as they do every week at stations around the Bay, they lowered a Secchi disk from a boat to check water clarity, stringing out line until they couldn't see its black-and-white face anymore. One foot out, 2 feet, 3 feet, finally stopping at 10.4 feet.

“That’s as clear as clear can be,” said Jeffrey Tortorella, a monitoring field supervisor with the Narragansett Bay Commission.

Just about everyone with a stake in Narragansett Bay agrees that the work done on the combined sewer system has yielded big results. The project has captured 14.7 billion gallons of overflow to date.

Bacteria counts in New England’s largest estuary have been cut in half since the second phase wrapped up in 2014. The water in the Bay is cleaner and clearer than it’s been in generations.

So much so that city and state officials are working to allow swimming again at the beach at Sabin Point Park in East Providence close to a century after anyone last went into the water there. It would be the northernmost beach in the Bay.



Shellfishermen use long-handled bullrakes to scoop clams from the bottom of the Providence River in Barrington in May 2021, when the state opened the waters for quahogging for the first time in 75 years.

DAVID DELPOIO/THE PROVIDENCE JOURNAL, FILE

In May 2021, in the most noticeable sign yet of the improvements, the Department of Environmental Management reopened quahog beds at the mouth of the Providence River that had been closed as far back as records go — at least 75 years. On the first morning they were allowed back in the river, more than 200 shellfishermen raked the muddy bottom off Conimicut in Warwick for the state’s iconic clam.

Mike McGiveney, president of the Rhode Island Shellfisherman’s Association, described the reopening as “a gamechanger for our industry.”

For the wild shellfishing industry in Rhode Island, a culturally significant part of the Ocean State’s seafood economy, the sewer project has been an undoubted success. Swaths of the Bay that were once off-limits when heavy rains drove contaminated waters out of outfalls now remain unaffected. The percentage of acre-days open for shellfishing — a measurement that accounts for time and area — climbed from 49% in 2000 to 89% in 2022.

It’s little surprise that the work has had an impact. The commission operates the largest wastewater treatment system in the state, serving 10 cities and towns and 40% of the state’s

population. Its combined sewer outfalls are located on and around the Seekonk and Providence rivers, at the headwaters of the Bay.

But nobody foresaw the amount of progress.

“It’s exceeded expectations,” said Joseph Haberek, administrator of surface water protection for the DEM. “We wouldn’t have expected it to have done as well as it has.”

High school wood shop class is unique: [Marine carpentry teaches lifelong skills](#)

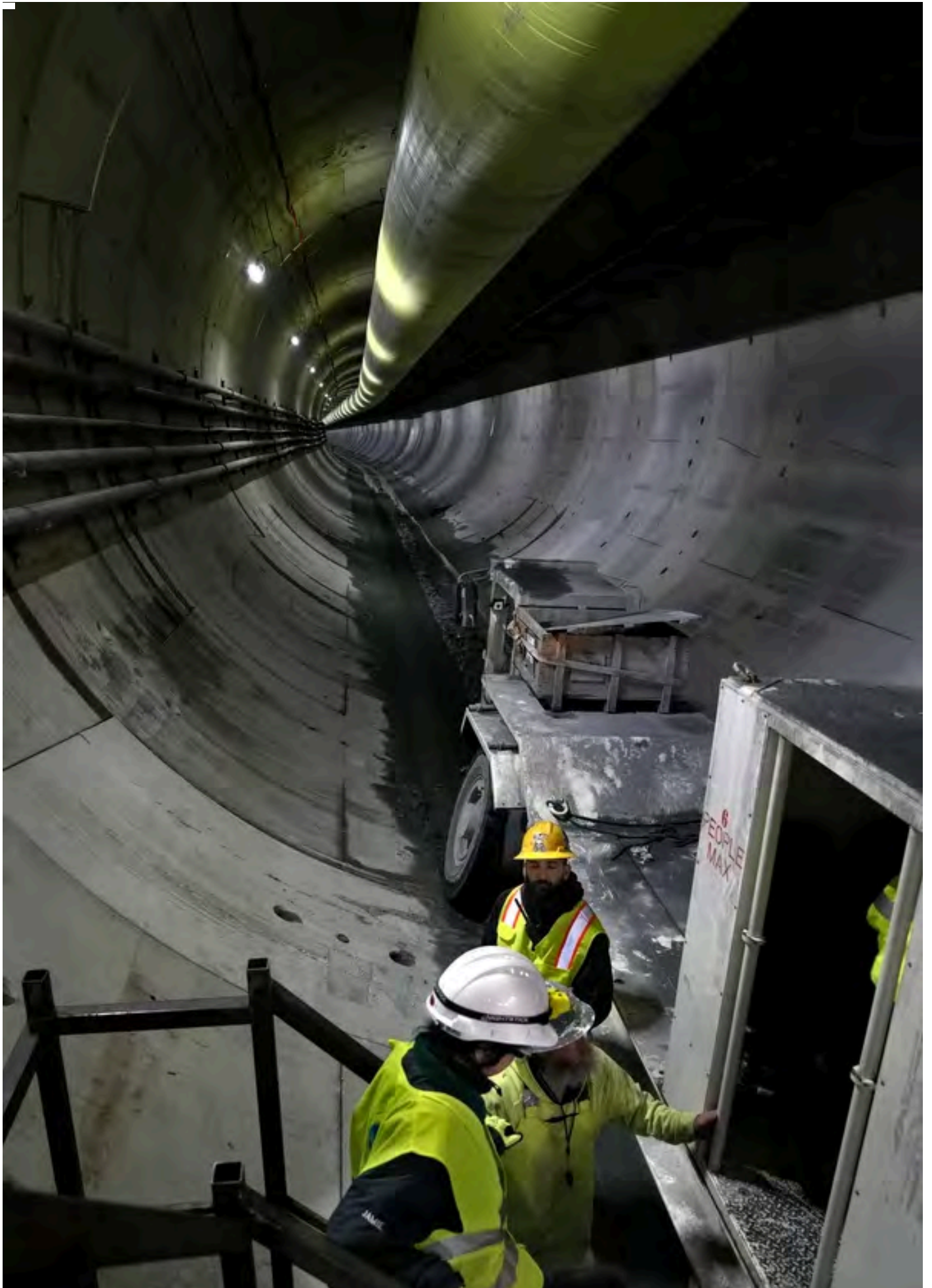
An antiquated wastewater system and grease clumps the size of soccer balls

The root of pollution in the Bay goes all the way back to Colonial times, when households deposited the waste from their toilets and sinks directly into rivers and streams.

As Providence grew into the seventh-largest city in the nation, its sewage became a hazard to public health. In 1854, the city faced its second cholera outbreak in five years, with the majority of the 159 deaths occurring around the Moshassuck River, according to historical records.

Dr. Edwin Snow, the city’s superintendent of health at the time, attributed the deaths near the river to its putrid waters.

Advertisement





After entering the tunnel, workers are taken on a five-minute ride to where the boring machine is located.

KRIS CRAIG/THE PROVIDENCE JOURNAL

“It was as filthy as any common sewer, and the stench arising from it, at times, pervaded the whole neighborhood,” he wrote. “At any time, during the summer, numerous fishes might be seen floating on the surface, which had been killed by the poisonous water. At any time, cats, dogs and hogs might be seen in the water, in every stage of decomposition.”

It wasn't just household waste flowing into the river. Snow traced industrial contamination back to a woolen mill, a bleachery, a tripe works, and slaughterhouses known to make the water running from a swamp into the river “colored with blood.”

The solution was the construction in the 1870s of a combined sewer system that carried toilet waste along with rainwater and snowmelt through 65 outfalls directly into Providence's rivers and its harbor. Recognizing the need for treatment, the city built a series of interceptors to convey the wastewater to Fields Point, where, in 1901, the third chemical precipitation plant in the nation, and the largest of its type ever built, went into operation.

The treatment plant soon became strained as Providence's population continued to expand. For a time, the city barged and dumped loads of sludge directly into the Bay. Even as the plant was modernized, it fell into disrepair, to the point that by the 1970s, 65 million gallons of untreated or partially treated wastewater were flowing into the Bay on a daily basis, and boaters reported seeing clumps of grease the size of soccer balls floating on the water's surface.

Passage of the Clean Water Act in 1972 forced change. The Narragansett Bay Commission was formed as a quasi-public agency to take over operations from the city. The plant underwent a \$100-million upgrade, and in 1995 the Environmental Protection Agency named it the best facility of its size in the country. Meanwhile, the commission took over the plant at Bucklin Point and carried out much-needed improvements there, too.

But that only took care of part of the problem. Rulemaking following the adoption of the Clean Water Act also required that overflows of wastewater be drastically reduced.



A look up at the 62-foot tunnel opening from the bottom of the 155-foot drop shaft. Workers descend via elevator.

KRIS CRAIG/THE PROVIDENCE JOURNAL

Pipes that combine sewage and stormwater, which was the norm in the 19th century, are still in use today in parts of the country with some of the earliest infrastructure, primarily in the Northeast and around the Great Lakes. But they're considered an antiquated design prone to being overwhelmed.

In cities like Providence, Pawtucket and Central Falls, where two-thirds of the land area is paved over, there are few places for runoff to go but down a storm drain.

During severe storms, when sewer pipes fill to capacity, overflows spill into waterways, conveying bacteria, oil, grease, chemicals and heavy metals picked up from streets and sidewalks. Fertilizer washes in from lawns, fueling algae blooms that deplete oxygen and cause fish kills. Stormwater also carries road sand and other sediment, clogging rivers like the Woonasquatucket, which was notorious for the islands visible at low tide until it was dredged over the last several years.

Facing fines of up to \$25,000 a day for violations, the commission had to act. It couldn't simply plug up the outfalls, because it would have caused backups into basements and onto

streets. In 2001, under a consent agreement with the DEM, it launched the tunnel project, starting with the \$359-million repository under Providence and followed by the construction of ancillary pipes at a cost of \$197 million.

The current and final \$1.1-billion phase would bring the system into full compliance with the Clean Water Act.

The price of cleaner water: Higher sewer bills for ratepayers in Greater Providence

Progress has come with a steep price.

The tunnel network is the most expensive public works project in Rhode Island history. When completed, the total cost could be \$1.7 billion.

That cost has been felt in the bills for the commission's customers, which number 400,000 residents and 8,000 businesses. The annual bill for a typical household in the Greater Providence area tripled from when work started in the early 2000s to 2015, after the second phase wrapped up.

For the commission's service area, the U.S. Environmental Protection Agency defines a sewer rate to be a high burden if it exceeds 2% of median household income. While the rate has remained under that threshold across the entire customer base, that's not the case for tens of thousands of households earning less than \$25,000 a year.

Providence Journal reporters, construction workers and tunnel officials look up after taking an elevator to the tunnel opening. Since December, crews working around the clock have completed about a quarter of the 2.2-mile tunnel.

KRIS CRAIG/THE PROVIDENCE JOURNAL

At the commission meeting to approve the project's third phase, some questioned whether further water quality enhancements justified additional cost increases. At a subsequent hearing before state regulators four years ago, Seth Magaziner, who was then Rhode Island General Treasurer, expressed support for the project but called the higher rate required to pay for the work an economic hardship.

“That is money that these individuals will not have to pay for basic needs like food and medicine, will not have on hand to help cover emergencies, and will not be able to use to save for retirement or higher education,” said Magaziner, who now represents Rhode Island's 2nd Congressional District in Congress.

But the commission maintains that its rates are in the mid-range when compared with other sewer authorities in Rhode Island and the nation. A 2022 survey of 28 major cities nationwide that included Boston, New York and Philadelphia found that the commission's rates were lower than the average. The same was true in a survey of Rhode Island communities.

The EPA's approval of a \$269-million low-interest loan for phase three and permission to extend the project timeline by 15 years are aimed at easing the ratepayer impacts.

But rates are still expected to climb nearly 30% over the next five years under a proposal before regulators. If approved, the typical bill would increase from \$519 a year today to \$678 in 2027.

Questions remain about a future with more rain

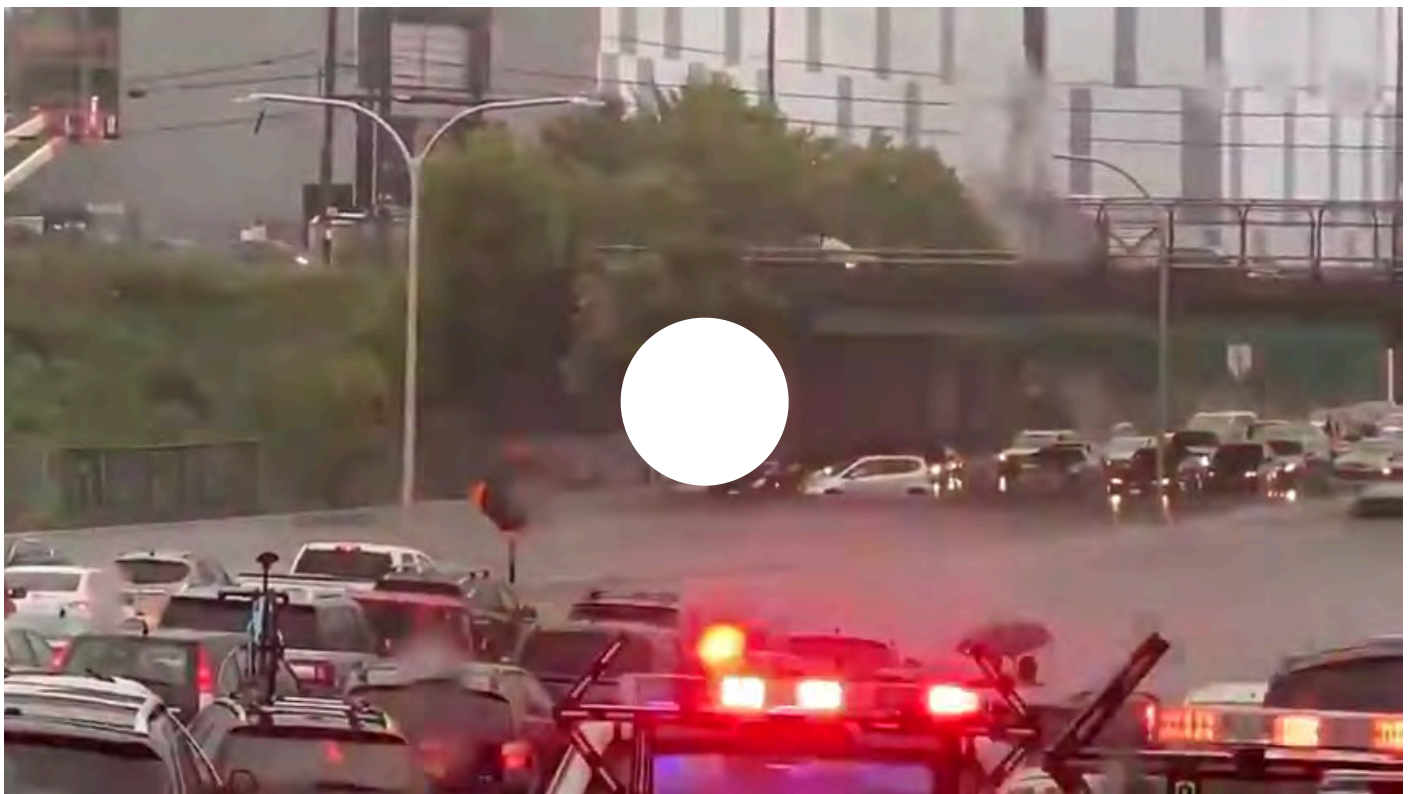
The first two phases of the combined sewer project in Providence took care of about 60% of overflows from the commission's wastewater system. The third phase, addressing overflows in Central Falls and Pawtucket, aims to bring that figure up to 98%.

“You’ll never take care of everything, because water always wins,” says commission spokeswoman Jamie Samons.

What she means is that there’s only so much that engineers can plan for when it comes to something as unpredictable as the weather.

The tunnel network is designed to handle anything up to a three-month storm — an event expected to happen four times a year that would total 1.6 inches of rain over six hours. The model for the biggest storm the system can handle was developed in 1985, but it's considered conservative, even when compared with more recent guidelines in the state stormwater design manual and those used by the National Oceanic and Atmospheric Administration.

As expected, overflows from the Providence side of the system dropped dramatically after the first tunnel was finished, falling from around 40 to 50 events per year before it went into use down to the single digits in most years afterward, according to a 2016 analysis.



Watch as flood waters close Interstate 95 in Providence

Traffic was brought to a standstill on Labor Day as flood waters inundated I95 through Providence.

TMX

But for a year like 2010, those numbers don’t tell the full story. Seven of the nine overflows that year were bunched in a six-week period in the spring during historic levels of rainfall that

caused floods across the state. The result was that the 570 million gallons in overflows in just that period exceeded the total volumes in all of 2007 or 2008, respectively.

The flooding 13 years ago was anomalous — some described it as a 500-year event, one that has a 0.2% chance of happening in any year — but the warming planet is changing rainfall patterns. It has meant more rain overall in the Northeast. In Rhode Island since 2001, when the Narragansett Bay Commission began construction of the tunnel system, the annual totals in 15 of the 22 years have exceeded the benchmark of 45.6 inches used to help determine the project's capacity.

Dodging deluges : Swamped during the Flood of 2010, R.I. wastewater-treatment plants are trying to avoid a repeat as sea levels rise

More: Collapsed roads, flooded basements, submerged cars: Flood risk growing in New England

In addition, because higher temperatures increase evaporation from land and oceans and a warmer atmosphere holds more water, the frequency of extreme rainfall events, the primary cause of overflows, is increasing. What that could mean for Rhode Island is more storms like the one that hit Providence on Labor Day last year, which shut down Route 95 after dumping, according to one report, 8 inches of rain on the city. The rain was coming so fast that it filled the Providence storage tunnel in an hour.

Even if the tunnel is not big enough for a storm like that — arguably, no feasible storage system would be — it still served a valuable purpose by taking in the “first flush” of runoff that contains the highest levels of pollutants.

But the event was also a reminder that traditional, big public works made of concrete won't entirely solve the problem caused by stormwater. Smaller projects spread across watersheds that collect runoff and allow it to seep into the soil, such as rain gardens, drainage swales or tree wells, must also play a role. Haberek, of the DEM, describes efforts to take care of runoff before it reaches storm drains as a “hedge against climate change.”

More: Too much rain too fast: Why I-95 drains were unable to handle Monday's historic storms

The commission plans to incorporate this type of green infrastructure into its investments in Pawtucket and Central Falls and has committed to spend a total of \$40 million on such work. They'll be things like a project the commission partnered on with Central Falls to overhaul

Macomber Stadium, which included installation of an infiltration system under the soccer fields there that collects stormwater from the surrounding neighborhoods.

“We don’t take climate change lightly,” said Dave Bowen, engineering manager with the commission. “We’re not closing our eyes to these things.”

A project that's invisible to most

The commission broke ground on phase three in March 2021, starting with the main drop shaft to the tunnel and a second vertical shaft that will be connected to a pump station.

Upon completion, when the Pawtucket tunnel fills with sewer overflows, the contents will be pumped to the Bucklin Point plant for treatment before being discharged into the Seekonk River.

Work started on the tunnel in December. It still has a long way to go. Of the 1,722 concrete rings that will line it, only 350 have been installed. The commission expects the project to wrap up in 2027. But the green infrastructure proposals and other pieces of phase three are pushing the timeline out to 2041 for the whole combined sewer overflow project to finish — 40 years after it began.



Vincent Mesolella, chairman of the Narragansett Bay Commission, tours the tunnel site to gauge progress of the digging. Work on the final leg began in December and is expected to wrap up in 2027.

KRIS CRAIG/THE PROVIDENCE JOURNAL

Vincent Mesolella has been at the helm of the Narragansett Bay Commission for the entirety of the project. A board member since the commission's formation in 1980 and chairman for the last 32 years, he says the work is proceeding smoothly.

“At the end of the day, we will finish on time and under budget,” he said.

As the elevator brought him and other visitors back to the surface from visiting the new tunnel, Andy Latosek, an inspector with construction company MWH, told a story about going straight from the project site at the end of one shift into a Cumberland Farms wearing his work jacket and mud-splattered muck boots.

People in the store asked him what he'd been doing. He explained that he was building a tunnel in Pawtucket.

“They'd tell me there's no tunnel in Pawtucket,” Latosek recounted with a smile. “And I'd say, ‘Yes, there sure is.’”

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Time to Tax Stormwater Runoff to Better Protect Ocean State's Impaired Waters

By Frank Carini / ecoRI News columnist

December 14, 2023

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Little effort has been made to keep stormwater from this Portsmouth, R.I., site of four new self-described 'luxury homes' from running onto a road that ends at the East Passage of Narragansett Bay about a mile away. (Frank Carini/ecoRI News)

IMPERVIOUS COVER

CITY/TOWN	2004
Barrington	14%
Bristol	20%
Burrillville	5%
Central Falls	38%
Charlestown	6%
Coventry	8%
Cranston	19%
Cumberland	13%
East Greenwich	11%
East Providence	20%
Exeter	3%
Foster	3%
Glocester	4%
Hopkinton	5%
Jamestown	9%
Johnston	15%
Lincoln	16%
Little Compton	6%
Middletown	18%
Narragansett	12%
New Shoreham	5%
Newport	30%
North Kingstown	14%
North Providence	31%
North Smithfield	9%
Pawtucket	26%
Portsmouth	13%

Providence	37%
Richmond	6%
Scituate	4%
Smithfield	9%
South Kingstown	7%
Tiverton	8%
Warren	16%
Warwick	24%
West Greenwich	5%
West Warwick	26%
Westerly	16%
Woonsocket	40%
Inland	7%
Coastal	14%
Rhode Island	12%

The percentage of impervious cover by Rhode Island municipality. Source: [An Assessment of Impervious Surface Areas in Rhode Island](https://www.jstor.org/stable/25177072) (<https://www.jstor.org/stable/25177072>). (Watershed Counts)

About 14% of the Ocean State's most valuable watershed is covered by streets, driveways, parking lots, and roofs. The tidal wave of polluted stormwater rushing off acres of asphalt, concrete, and shingles every time it rains or snow melts sends bacteria, nutrients, and other contaminants into the region's signature resource. Beaches and shellfish beds are closed, toxic algae blooms, and money is lost.

Narragansett Bay's 700 billion gallons of water cover nearly 150 square miles, and its watershed nurtures thousands of species of fauna and flora. Several estimates have suggested the total value of the natural resources of the bay's watershed exceeds several billion dollars annually.

New England's largest estuary, however, isn't the only Rhode Island waterbody being stressed by stormwater runoff. Most of the state's brooks, streams, rivers, ponds, lakes, and drinking water reservoirs are threatened by the pollutants streaming off Rhode Island's vast collection of impervious surfaces. (Treated lawns also send fertilizer and pesticides into waterways.)

Impervious cover in Rhode Island's 39 municipalities ranges from 3% (Exeter and Foster) to 40% (Woonsocket). When impervious cover is between 10% and 25%, nearby streams show clear signs of degradation. More than 25% coverage? Fuhgeddaboutit. Seven municipalities have impervious cover percentages above 25. (Impervious surfaces also exacerbate flooding.)

But when such cover is less than 10%, streams support a wide range of life. Less than half (17) of the municipalities in the state feature less than 10% impervious cover. The municipal average is 12%.

The natural world — e.g., forests and wetlands — soak up stormwater, store it, and filter its pollutants. Pavement doesn't offer those complimentary services.

Rhode Island's [list of impaired waters](https://dem.ri.gov/programs/water/publications/303d.php) (<https://dem.ri.gov/programs/water/publications/303d.php>) is long. For instance, stormwater runoff [contaminates](https://ecori.org/2018-8-24-aquidneck-islands-water-pressure-uncompromising/) (<https://ecori.org/2018-8-24-aquidneck-islands-water-pressure-uncompromising/>) all seven Newport Water Division reservoirs on Aquidneck Island, to the point that they are all considered impaired by the state and the Environmental Protection Agency. The water that comes out of Portsmouth, Middletown, and Newport faucets is clean, but that comes with great cost and effort.

Late last month, state officials [advised](https://dem.ri.gov/press-releases/blue-green-algae-bloom-indian-lake) (<https://dem.ri.gov/press-releases/blue-green-algae-bloom-indian-lake>) the public to avoid yet another Rhode Island waterbody — this time, Indian Lake in South Kingstown — because of another toxic blue-green algae (cyanobacteria) bloom.

Stormwater runoff is a problem for every Rhode Island city and town. (City of Richmond, Va.)

Every Rhode Island municipality is dealing with its stormwater runoff problem in both expensive and commonsense ways, but lost among the Narragansett Bay Commission's successful combined sewer overflow project (<https://www.narrabay.com/programs-and-initiatives/combined-sewer-overflow/>) and the continuous promotion of rain gardens, rain barrels, permeable pavers, and swales

is a tool that has received far less attention: stormwater utility districts, which are more equitable than continually relying on higher property taxes.

A stormwater utility district (<https://www.epa.gov/green-infrastructure/paying-stormwater-benefits-utility>), an idea first introduced in the United States in the mid-1970s, is essentially a tax designed to generate funding for stormwater management and to discourage the overuse of asphalt and concrete.

Basically, it is to stormwater what a sewer utility is to sewage, or what a water utility is to drinking water. A stormwater utility district generates revenue through user fees that are based upon the amount of stormwater generated on a property. The revenue generated supports the maintenance and upgrade of existing storm-drain systems, flood-control measures, and water-quality programs.

Stormwater utility districts help address the climate crisis and shift the tax burden away from homeowners.

About 2,000 U.S. municipalities employ such districts, according to the EPA, but none in Rhode Island.

In 2013, seven municipalities at the head of Narragansett Bay — Central Falls, Cranston, East Providence, North Providence, Pawtucket, Providence, and Warwick — explored the idea of creating a regional stormwater utility to provide a long-term solution to stormwater management.

A year earlier, the town of Bristol published a stormwater utility district report (<https://www.bristolri.gov/wp-content/uploads/2020/10/2012-Stormwater-Utility-Study-PDF.pdf>). The 29-page document listed key rationales for establishing such a utility: 1) it isn't as dependent on the vagaries of the annual budget process like taxes are; 2) the fee is based on a well-thought-out stormwater program to meet the needs and demands of the community; 3) it can adapt to changing program and funding

needs; 4) the cost is borne by the user on the basis of demand placed on the drainage system and receiving waters.

Those who own oversized homes surrounded by lawn and pavement, big-box stores, strip malls, massive parking lots, waterfront scrapyards, and legions of real estate — to name just a few — pay more in taxes, because they generate more stormwater pollution.

“In every community there are good, even compelling, reasons to improve the way stormwater programs are executed and funded,” according to the Bristol study.

“Reasons might be a popular stream that is becoming increasingly impacted, a lack of riparian park space, decaying drainage infrastructure and mounting complaints, unfunded regulatory mandates, local flooding, financial pressures, loss of fish, beach closings, a roadway or bridge collapse, or lawsuits.”

In typical Rhode Island fashion, neither effort has moved past the study stage.

The [Rhode Island Stormwater Management and Utility District Act of 2002](http://webserver.rilin.state.ri.us/BillText/BillText02/HouseText02/H7327.pdf)

(<http://webserver.rilin.state.ri.us/BillText/BillText02/HouseText02/H7327.pdf>).

authorizes municipalities to create stormwater management districts, “to eliminate and prevent the contamination of the state’s waters and to operate and maintain existing stormwater conveyance systems.”

In 2006, the East Providence Waterfront Commission considered creating a stormwater utility. The idea evaporated.

Two years later, Narragansett considered creating a stormwater district. After the completion of an initial study, the pursuit of such a utility was postponed until a “more favorable political climate arose.” Town officials are still waiting for the climate to change.

In the meantime, as heavier rainfalls become more frequent, flooding worsens, waterbodies are burdened with ever more pollution, and the costs to address the two problems continue to increase. Public health continues to be threatened and recreational opportunities lost.

The time is now for Rhode Island to move past the indolent held-for-further-study stage and actually create stormwater utility districts. Or, at the very least, provide tax breaks to property owners who replace asphalt, concrete, and even lawn with gardens and meadows; install rain barrels; and plant trees, but not after first cutting a clump of others down.

Note I: In Newton, Mass. (<https://www.newtonma.gov/government/public-works/water-sewer-division/stormwater-resources>), homeowners pay a stormwater fee of \$114 annually. All other properties pay \$0.0470 per square foot of impervious surface — except if the square footage charge multiplied by the total impervious area of the parcel equals less than \$150, then the annual fee is \$150. The city offers abatements against this fee for residents/business owners who undertake specific actions to reduce the impact of runoff, such as rain barrels and rain gardens.

Note II: About 60% of the Narragansett Bay watershed (<https://ecori.org/2013-6-15-massachusetts-plays-key-role-in-keeping-narragansett-bay-bea-html/>) resides in Massachusetts, but 90% of the bay's waters are in Rhode Island.

Frank Carini can be reached at frank@ecori.org. His opinions don't reflect those of ecoRI News.

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A FRANK TAKE

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Where Have All the Quahogs Gone?

By Colleen Cronin, Joanna Detz, and Rob Smith / ecoRI News staff

December 14, 2023

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ecoRI News reporters Rob Smith and Colleen Cronin examine why quahogs are vanishing from Narragansett Bay. Some shellfishers are saying the bay is “too clean” to support a robust quahog population.

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This transcript was edited for clarity and length.

Colleen Cronin

Welcome to the Blab Lab, a twice-monthly podcast from reporters of ecoRI News where we unpack the critical environmental issues facing southern New England. I’m reporter Colleen Cronin. And today I’m here with my colleague, Rob Smith, to talk about the state of quahogs in the Quahog State.

Hi, Rob.

Rob Smith

Hi, Colleen.

Colleen Cronin

How are you doing today?

Rob Smith

I'm doing pretty good. How are you?

Colleen Cronin

Good. Thanks for coming on the show to talk about bivalves.

Rob Smith

Thanks for having me. Yeah, they're bivalves.

Colleen Cronin

Before we get started, because I wasn't sure of the answer to that question, can you tell us what a quahog is?

Rob Smith

It's just a really fancy name for a clam. They're also called hard clams. They're kind of a symbol of Rhode Island. They go in stuffies. They're usually found in the bay, wild. So they're sort of just clams and they dig into the ground. But they're clams and they

filter feed and they pump gallons and gallons of water, filtering out their food in the bay every day.

Colleen Cronin

Why are they so important here in Rhode Island?

Rob Smith

We have dozens and dozens of guides who are quahoggers who go out, well just really shellfisherman, who go out and harvest them wild in the bay, like you fish, regular fish, but they use like a bow rake and some other stuff. And then they sell them to wholesalers, who sell them to restaurants, who sell them to people.

Colleen Cronin

All right. So that's cool to know that it's not just a fake town, in "Family Guy." And there's no town called Quahog?

Rob Smith

There's no town called Quahog.

Colleen Cronin

OK, good to know. So how are these clams doing these days?

Rob Smith

So we don't know how the actual clams are doing. But what we do know is that those quahoggers and shellfishermen are catching less than they have been historically.

Quahog landings have been on the decline for decades. And there's a study commission going on right now to investigate why they're catching less and less quahogs. And if you look at some of the they posted on the General Assembly's website, you see this long decline stretching from maybe the 1970s to the 1960s to today that they're just catching less and less. The stat is they caught 900,000 pounds of quahogs last year. And there's no, really, I don't know how many trucks that is. But to give you a better idea of how much they've declined, maybe 30 years ago, you'd have 1,000 quahoggers, you'd have 1,000 guys or gals out there, up and down Narragansett Bay, working along the shoreline, working in quahog boats, trying to harvest, you know, whatever amount they need to sell to make a living. There was probably 1,000, maybe 20 or 30 years ago. These days, it's less than 200. I think it's between 150 and 200 now, and that's because they're just not catching enough quahogs to be able to sustain their jobs, basically.

Colleen Cronin

So the title of quahogger is kind of dissipating?

Rob Smith

It seems it does seem to be vanishing. Yeah.

Colleen Cronin

Wow. And what do the fishermen, quahoggers, have to say about this?

Rob Smith

Well, they're rightly distressed, let's say, it is their living. Many of them have been doing it for decades. I think Jody King, who's, he's a very well-known quahogger based out of Warwick, has said, you know, he doesn't need to do this job. He's got multiple

master's degrees. He does it because he really loves it. But it's not a job he can hand to his son for his son to do or recommend for a young person to do for the next generation of quahoggers because it's not sustainable, because the numbers are on a slow, steady decline.

Colleen Cronin

And do we have any idea what's causing the decline?

Rob Smith

The short answer is no. We don't really have an idea, which I find to be a compelling and invigorating answer, that there's something we don't know that's going on in Narragansett Bay. The short answer is no, we don't know. We have vague theories. The shell fishermen think the bay's getting too clean ...

Colleen Cronin

Too clean?

Rob Smith

So if you grew up in Rhode Island (Colleen is from the Cape so we will forgive her), if you grew up in Rhode Island of a certain age, if you're basically a millennial, my age or older, Narragansett Bay was not nice when you were growing up. I grew up in North Kingstown, and I remember the town beach smelling some smells. North Kingstown's town beach is like right on the bay, sort of above the West Passage. And you know, we were taught by our parents, growing up, "Don't swim there. It's kind of gross. The bay is kind of gross. Go to like the south shore or somewhere in Westerly or Charlestown to go swim because the bay is kind of grody and nasty and you can't swim there." It's much cleaner today. Until about 10 or 15 years ago, the bay was overloaded with a lot

of nutrients like nitrogen and phosphorus that cause a lot of havoc within the environment. If you live near a, perhaps a freshwater pond that has had a blue green algae bloom in the last couple of years, 'cause that's also a problem in freshwater ponds across the state, that's sort of similar to what was happening to the bay. What happens with those algae blooms is it's too much nitrogen and nutrients going into our freshwater body. And then that causes negative impacts on all the other living organisms that aren't algae. In 2003, in Greenwich Bay, which is still not quite as clean as the bay proper, there was a fish kill in 2003 that killed 1 million menhaden from hypoxia, which is a, it's sort of a state of very low dissolved oxygen in the water. And fish and other organisms do need some oxygen in the water to be able to breathe. And in times when there isn't a lot of oxygen in the water, organisms will flee if they can, or just die, which is sad. So you had a lot of low oxygen events throughout the Bay when it was overloaded with stuff like nitrogen and phosphorus. And those were primarily coming because we dumped sewage into the bay. So the bay has gotten cleaned from a nitrogen perspective, because the DEM, the Department of Environmental Management, has really cracked down on wastewater treatment plants, cleaning up and treating what gets dumped in the bay. And that's that was, for a long time, a big source of nitrogen.

Colleen Cronin

So, you know, when I think about the bay being cleaner, I just wrote a story about eelgrass. And how it perhaps is coming back in some areas because the bay is cleaner than it used to be.

Rob Smith

Eelgrass used to go all the way up, deep into the Providence River, up almost where we are, I think, now. Like in colonial times, there are writings of people seeing eelgrass

up that far in the bay and today, it's completely. The environment of the bay in the last 400 years, post-European settlement, is just entirely different.

Colleen Cronin

It's so interesting. And I guess in my mind, I think about the cleaning as being a good thing. So why are the fishermen hypothesizing that it's a bad thing?

Rob Smith

So nutrients, like nitrogen, are key food, not for the quahogs or clams, but for the plankton and phytoplankton. Quahogs or hard clams eat phytoplankton as their food source. So if there's not nitrogen in the water, the phytoplankton isn't, you know, reproducing enough for the quahogs to eat. And when animals don't eat, they tend to die off. There's a couple of data points. There was, we had the 2010 floods in Rhode Island where we had a series of intense rainstorms in 2010. The example I always think of, the Warwick Mall flooded, and a lot of areas of the Pawtuxet River flooded, and some sewer treatment plants flooded. And that went into, untreated sewage, into the bay. And then I think the following summer, I don't know if it's summer 2010 or 2011, they saw a pulse or like a small boom in quahog landings because there were more quahogs because there was more nitrogen in certain areas of the bay.

Colleen Cronin

Interesting. So that's one theory. Are there any other theories out there about what could be doing this?

Rob Smith

It's not just a Rhode Island problem is the thing. So it would be really nice if it was just a problem of nitrogen and nutrients and the phytoplankton and the quahogs. But it's

not that simple. quahog landings are down, up and down the Eastern seaboard. I know it's a state symbol. But they're also found literally everywhere else along these coasts.

Colleen Cronin

Don't tell Rhode Islanders that.

Rob Smith

In Chesapeake Bay, in many places around the eastern seaboard of the United States are also reporting declining catches and quahogs and other shellfish. And we really don't know why. There's a lot of different things that's happening with the bay, air temperature is getting warmer, water temperatures getting warmer. There's a lot of different factors that are changing that makes it difficult to point toward one specific factor during this. And that's why I said at the top, there's really no easy answers to this, which I think makes it more interesting. But I'm a big ol' weirdo. But the short answer for that is there's a lot of different things happening in the bay because of climate change. And almost all of them are probably being caused by climate change. And that may be changing sort of how the bay, and the phytoplankton, the quahogs work in a way we don't really know or understand just yet. We can't really pinpoint the one thing, although it would be nice.

Colleen Cronin

So there's this commission that you talked about, what does the commission hope to accomplish?

Rob Smith

That would probably depend on who you ask on it. There's, I think, four quahoggers on it. Some legislators, people from the Narragansett Bay Commission, which is, very

quickly, sort of like the sewage commission, sort of, and people from DEM and CRMC. And they're hoping to investigate and find out why. I know the quahoggers definitely want more nitrogen injections in the bay. There's room for nitrogen injections in the bay, there's definitely room for that without compromising the water quality in the bay. When you see like a beach closure, it's not because of too much nitrogen, it's because of too much fecal coliform, which is what it sounds like.

Colleen Cronin

What do you think comes after the commission?

Rob Smith

I don't entirely know there's room for those nitrogen injections. And that'll help in the short term, but the long term? I don't know.

Colleen Cronin

So stuffies...

Rob Smith

I don't know too much about where your stuffies come from. But I would be surprised if it's just from our Rhode Island shellfishermen.

Colleen Cronin

And here's the most important question I have to ask. Do you like stuffies?

Rob Smith

No, I don't like seafood. I don't like the smell, the taste, the texture. It offends all five of my senses. All seafood, not just stuffies or quahogs or clams. I don't like fish either.

Colleen Cronin

Well, I can't agree. But that is what it is. Thank you so much, Rob, for coming on the show today and thank you to our listeners for following along. We want to thank Vanessa Carlton for letting us use her song "Willows" for our theme song, which you hear at the beginning and end of every episode. We also want to thank Jo, who is the publisher of ecoRI and one of our editors on the podcast editing and mixing the episode and fixing all of my editing mistakes. If you have any questions, tips or podcast ideas, email me at colleen@ecori.org. And until next time, if you want to read more Rhody environmental news, you can visit our website: ecori.org.

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BLAB LAB PODCAST

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VIEW COMMENTS

How 'tunnel muck' sparked a fight between RI agencies and why it will cost taxpayers



Patrick Anderson

The Providence Journal

Published 5:00 a.m. ET May 11, 2023

Key Points

The fate of thousands of tons of debris, excavated as part of the Combined Sewer Overflow Phase 3 tunnel, has been a political hot potato for the last four years.

The Rhode Island Airport Corporation recently torpedoed a proposal to use the tunnel rock as part of a larger effort to build a Rhode Island home for an electric sea-glider startup from Massachusetts.

Part of the dispute hinged on whether the so-called "tunnel muck" constitutes hazardous waste that would pose an environmental threat.

If "beneficial reuse" of the debris can't be found, the Narragansett Bay Commission is set to pay \$55 million for disposal.

PAWTUCKET — One hundred fifty feet beneath School Street, a boring machine grinds through the Pawtucket bedrock, digging the last and most expensive piece of the largest public works project in Rhode Island history.

Behind it, thousands of tons of gray shale and sandstone chips roll off a conveyor belt each day into the backs of waiting dump trucks. When digging for the 2.2-mile sewer overflow tunnel is done, the machine will have chewed up and spit out 1.2 million cubic yards of rock, or "muck," as the tunnel workers call it.

Where that pulverized earth ends up has been one of the muckier questions in Rhode Island over the last four years, triggering a series of political spats and turf wars up and down Narragansett Bay.

The latest quarrel is still smoldering at Quonset Point in North Kingstown, where the Rhode Island Airport Corporation recently torpedoed a proposal to use the tunnel rock as part of a

larger effort to build a Rhode Island home for a venture-backed, media-darling electric sea-glider startup from Massachusetts.

Airport corporation lawyers accused the quasipublic agencies that run Quonset Business Park and the Providence-area sewer system of trying to exert State House political muscle to dump the tunnel rock at Quonset State Airport, threatening the runway used by the Air National Guard and risking arsenic pollution in Narragansett Bay.

Quonset officials accused airport executives of jeopardizing Rhode Island's years-long effort to grow the maritime "blue" economy, while the chairman of the tunnel-digging Narragansett Bay Commission described their behavior as "absolutely reprehensible" and "obstructionism."

Fiscal, political and environmental costs of tunnel rock disposal

There's more at stake in the Quonset project than a real estate deal.

The cost of finding a home for the tons of rock from the Bay Commission's Combined Sewer Overflow Phase 3 tunnel is ultimately funded by Providence area sewer ratepayers, whose bills have climbed in recent years, partly as a result of the \$1.5-billion project.

The taxpayer cost for shoring up crumbling seawalls at the airport could also climb due to the spat.

And if there are environmental concerns about the tunnel muck, they extend beyond Quonset. Even as the Bay Commission awaits the final destination of the majority of the rock, the dump trucks leaving the dig site now are carrying it just down the street to a planned park on the east bank of the Seekonk River.

Relations between the feuding bureaucrats got so tense last year that Steven King, executive director of the Quonset Development Corporation and one of the advocates of bringing tunnel fill to North Kingstown, resorted to French to get his point across.

"I began my career as an Army Engineer Officer with service in Operation Desert Storm," King wrote to airport corporation officials last year in an email obtained by The Journal through an Access to Public Records Request. "The U.S. Army Regimental motto is

Essayons. It is French for 'Let Us Try.' Rather than inaction and another 40 years of lost opportunity. I say Essayons!"

The proposal: Using tunnel debris to prepare site of sea-glider plant

Like many big ideas, Regent Craft's plan to revolutionize short-haul coastal travel with a fleet of hydrofoiling boat-planes emerged from the labs at the Massachusetts Institute of Technology.

But by the end of 2021, Regent's founders wanted to escape the land-locked confines of Burlington, Massachusetts, where they moved after Cambridge, for a place where they could design, build, test and eventually launch their electric sea-gliders on the water.

Always eager to poach a promising business from the Bay State, Rhode Island Commerce Corporation staffers under then-Secretary Stefan Pryor thought they knew just the place Regent should go.

They pitched the growing company on moving to the Quonset Business Park in North Kingstown, and sweetened the pot with up to \$13 million in state tax credits.

There was at least one problem. Quonset, the decommissioned air base-turned-port-industrial park, is filling up, and the kind of waterfront real estate where a company could launch new sea-gliders was in particularly short supply. They looked at space adjacent to Electric Boat's massive submarine hull factory and land now ticketed to be a wind farm staging area. Neither fit the bill.

However, there is a roughly 50-acre piece of unused waterfront land next to the main runway at Quonset State Airport that's large enough to put a 300,000-square-foot factory with some room left over to build some hangars for general aviation tenants who want to use the airport. The parcel has been unused since the Navy left, in part because the land is in a flood plain. Building there wouldn't be cheap.

But King knew that the Narragansett Bay Commission was just about to begin digging Phase 3 of the Combined Sewer Overflow project, part of its two-decade effort to stop stormwater from polluting Narragansett Bay, and that the project would be generating a huge quantity of crushed rock that could be used as fill at little to no cost.

After all, Narragansett Bay Commission Chairman Vincent Mesolella had been trying without luck to find a home for the CSO tunnel rock for years.

Under a plan developed by King and Mesolella, Quonset would lease the land from the airport, have the Bay Commission bring the tunnel rock over to elevate the waterfront airport parcel by around 7 feet, then build a factory to sublease to Regent. The project would also include a new access road to the factory, reconstruction of a crumbling seawall and \$11 million from the Bay Commission.

It would all need the approval of a host of government agencies, from state environmental regulators to the Rhode Island Department of Transportation, which owns the land, and the Federal Aviation Administration, which regulates airports.

From late 2021 through the spring of last year, employees of Quonset, Regent, Commerce and the airport corporation exchanged plans, discussed lease terms and drew up the outlines of a multiphase deal to find a permanent home for the sea-glider company.

But the issue of elevating the land with tunnel fill set off red flags with airport executives. So on May 3, 2022, King and Mesolella brought their proposal to a meeting with executives from the airport corporation and heads of the state Department of Environmental Management and the Coastal Resources Management Council in state Sen. Louis DiPalma's State House office.

And that's when things started to get testy.

The dispute: Is the tunnel rock 'hazardous waste'?

There is no transcript of what was said at the May 3 meeting in DiPalma's office, but the emails and letters sent in the months that followed, obtained through records requests to multiple agencies, show that King and Mesolella's pitch didn't have the desired effect.

Later that month, the airport corporation's assistant vice president of human resources and internal legal affairs, Brittany Morgan, forwarded a letter from the Federal Aviation Administration outlining all the hoops the state would have to jump through to elevate the Quonset Airport site.

King wrote back that there was "Nothing surprising in the FAA letter" and asked if he could have engineering consultants visit the property to do a site assessment.

Morgan would only offer to pass the request to test the soil on to the FAA, and on June 6 wrote back that King "appears to take issue with the [FAA] regulations," without specifying what the issue might be.

Two days later, Narragansett Bay Commission Executive Director Laurie Horridge emailed Morgan to say Mesolella was "meeting with the governor's office tomorrow" to discuss the plan and asked her to forward everything the airport corporation had sent to the FAA.

And Mesolella wrote a letter dated the same day to airport corporation CEO Iftikhar Ahmad accusing airport representatives of misrepresenting the Quonset plan to the federal government.

The dispute that rumbled on through the summer was equal parts scientific and semantic. It turned on whether the potential Pawtucket bedrock fill was "hazardous," "contaminated" or "solid waste," and whether the plan would improve part of the airport or turn it into a "hazardous waste landfill."

Mesolella said DEM officials had indicated at the May 3 meeting that the use of the fill at Quonset was fine, and had approved it for use as fill next to the Bay Commission's wastewater treatment plan at Bucklin Point in East Providence. (Around 40% of the tunnel rock is expected to go to Bucklin Point.)

Morgan's repeated use of the colloquial term "tunnel muck" to describe the potential fill appeared to particularly rankle the Bay Commission.

"I'm confident that whatever exists on your site is significantly worse than anything we plan to bring to it," Mesolella wrote. "In addition, the plan is to fill and cap the property — hence a remediation plan at no cost to you."

He went on.

"It is absolutely reprehensible that we are experiencing such a level of obstructionism from RIAC. Furthermore, I am suspicious as to the representations made by RIAC to the FAA as terms used in the FAA's response letter mirror those used by RIAC staff during the May 3

meeting with Sen. DiPalma. In fact, it is my firm belief that someone at RIAC deliberately misrepresented the proposed project to the FAA in an effort to block the project from moving forward."

If the intent was to soften the airport corporation's stance, Mesolessa's letter hardened it instead.

The airport corporation lawyered up, retaining three attorneys, including Joe Rodio Jr., a friend of Gov. Dan McKee's who had chaired his gubernatorial transition team, and Mike Donegan, a central player in killing a 2019 Narragansett Bay Commission plan to dispose of tunnel rock at East Providence's South Quay. It also hired separate environmental and engineering consultants.

On June 17, Morgan fired back an eight-page letter saying that airport consultants suspect there is enough arsenic or potential acid leaching from the bedrock to turn it into a political and legal liability for the airport. It could also "maintain(s) the consternation of environmental groups like Save The Bay."

"As clearly evidenced by the substance and tone of your letter, you intend to exert pressure on RIAC to force it into a decision that is favorable to you," Morgan wrote. "There are a plethora of federal and state laws on such unwarranted pressures. RIAC will not be complicit in misleading the public and its regulatory agency, nor will it succumb to unwarranted pressures to do the same."

Since the airport land had been given to the state by the federal government when Quonset Naval Air Station closed in 1974, any attempt to transfer it or use it for non-aeronautic purposes would need to be cleared by the FAA, with the airport corporation, manager of the state's aviation assets, acting as official sponsor.

To try to ease the airport corporation's concerns that it wasn't getting a good deal, King reconfigured the proposal into a land swap, where the airport would get some Quonset-owned land on the opposite side of the runways at the Air National Guard base.

And eventually, after Airport Corporation concerns over "potential lack of new revenue," Quonset offered to buy Parcel 4 outright for an amount described as the airport corporation's "asking price," according to a letter King wrote in an August letter to McKee's chief of staff,

Antonio Afonso, warning that the failure to get a deal done threatened to exacerbate Rhode Island's reputation of having a bad business climate.

Again, the airport corporation was unmoved, and at that point, the Quonset tunnel fill plan was effectively dead, and plans for Regent's factory were in serious jeopardy.

Same site, but a new plan for building Regent factory

Asked in an interview last month why the airport was so set against the proposal, Morgan, now the airport's chief operating officer, said the FAA didn't like the plan to fill land near Quonset Airport, and the airport corporation has to respect the wishes of its regulator and a major source of funding.

Asked if the FAA's objections were in writing anywhere, Morgan said the concerns were expressed only in conversations.

"If it was [the Narragansett Bay Commission's] arsenic-laden tunnel muck, then anytime we had to move that soil there was going to be significant environmental issues we would have to take into consideration," Morgan said. "It's really critical that RIAC be the one that has control over those developments."

Wouldn't the environmental regulators at DEM and CRMC be better equipped than airport consultants to say whether the tunnel rock met their regulations?

"Our attorney spoke to legal counsel for DEM, who confirmed that they would treat it as hazardous," Morgan said.

While the airport corporation didn't want to lease any land to Quonset or use tunnel rock near a runway, it did like the idea of building a home for Regent, and it set out to do the project itself.

In December, Regent and the airport corporation signed a non-binding memorandum of understanding to work toward building a sea-glider facility on the same airport parcel that had been the subject of months of debate.

Instead of raising the whole property away from floodwaters, Regent is going to build its factory on stilts, Morgan said.

And the airport hopes to land FAA grants to fund \$37 million worth of improvements to the seawalls surrounding not just the Regent parcel, but the whole airport.

Whether all of that will come to fruition in a slowing economy is unknown.

In the meantime, Regent is leasing a smaller space at Quonset and may at some point move into part of the \$35-million Quonset Multimodal Offshore Wind Transport and Training complex being built for offshore wind farm workers north of the airport.

So what will become of all that tunnel muck?

Where does that leave the Narragansett Bay Commission and its hundreds of thousands of cubic yards of unwanted rock?

"To be determined," Mesolella told The Journal from a construction trailer next to the tunnel dig site.

This isn't the first time the Narragansett Bay Commission has needed a home for tunnel fill.

The first phase of the CSO project, which was finished in 2008, dug an even deeper tunnel (lower bedrock) underneath Providence.

Some of the rock from the Phase 1 tunnel in Providence was used in the I-Way relocation of Route 195, while some went to construction supplier Smithfield Peat and the state's Central Landfill. (Phase 2 didn't involve deep tunneling.)

In 2019, the agency tried to quietly seize the 45-acre section of East Providence waterfront known as the South Quay to deposit tunnel rock there.

When the owners of the Quay and East Providence Mayor Roberto DaSilva found out about the plan, they rushed to the State House to kill it and preserve the parcel for a wind turbine staging facility still in the financing stages. (The fact that Mesolella, a former state lawmaker, had personally tried to buy property at or around the Quay to build a hotel didn't help the commission's public relations case).

With the Quay out of the picture, the Narragansett Bay Commission is set to pay its tunnel contractor \$55 million to dispose of the tunnel rock, according to agency spokeswoman

Jamie Samons.

If the agency can find a "beneficial reuse" for the rock, that could reduce the cost. Mesolella said the Bay Commission would likely negotiate a credit with the contractor depending on how large the savings end up being.

The worst outcome might be having it end up in the Central Landfill in Johnston, which is running out of space for conventional garbage.

"The material has value; we (and the Rhode Island Resource Recovery Commission) want to keep it out of the Central Landfill to save valuable landfill space," Samons wrote in an email. "If we can find use for it close to home, we will need fewer truck miles to remove it from the construction site and ultimately may lead to reduced costs."

The Narragansett Bay Commission serves sewer customers in Providence, North Providence, Johnston, Pawtucket, Central Falls, Cumberland, Lincoln, the northern portion of East Providence and small sections of Cranston and Smithfield.

The annual sewer rate for a single-family home is \$562, and by fiscal year 2027-2028, rates are projected to be \$703 per year, Samons said, although that is not entirely due to the CSO project.

DiPalma, now chairman of the Senate Finance Committee, became interested in the CSO-Quonset-Regent issue after learning about it as chairman of Senate Oversight last year.

Although the Regent factory might still happen, he said all of the bickering points to something wrong in the process, and a better "win-win" outcome was possible. He would have preferred that environmental regulators or the FAA decide whether the tunnel rock was appropriate fill, rather than the leaders of rival organizations.

"We have not come to a logical conclusion here," he said. "There is something systemically wrong, and I don't know what it is. Unless we fix that, this could happen again."

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The Narragansett Bay Commission



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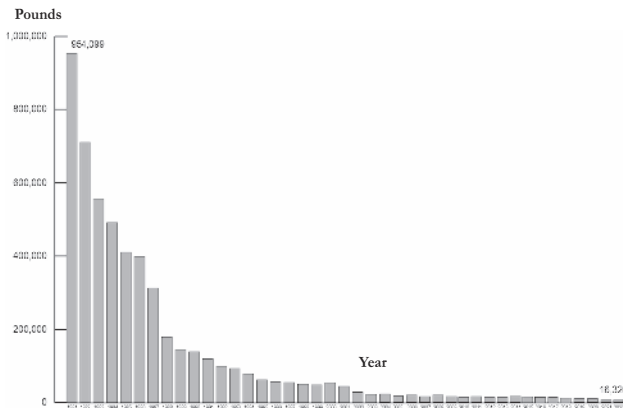
Firms in Significant Non-Compliance

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGULATION 40 C.F.R. 403.8(f) (2) (vii) and Section 1.10 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, 2021 through December 31, 2022. 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;
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- (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, 1981-2022



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 98.3% and 99.1% 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

Pawtucket		
Company Name	Violations Cited	Present Status
DiGregorio Corporation	As (2), CN (2)	Firm is now in compliance
Fully Rooted Inc.	Failure to submit reports on time (6)	Reports have been received
Hasbro, Inc.	Failure to submit reports on time (6)	Reports have been received
New England Paper Tube Company	Failure to submit report on time (6)	Report has been received
Piatek Machine Company, Inc.	Failure to submit report on time (6)	Report has been received
R&D Manufacturing, Inc.	Failure to submit report on time (6)	Report has been received
Summit Manufacturing Corporation	Failure to submit reports on time (6)	Reports have not been received
Lincoln		
Chemart Company	Failure to submit report on time (6)	Report has been received
Denison Pharmaceuticals LLC	BOD (2)	Firm is now in compliance
JAR Bakers Supply	BOD (1,2)	Firm is now in compliance
Michael Healy Designs, Inc.	Failure to submit reports on time (6)	Reports have been received
Palate Pack	BOD (2)	Firm is now in compliance
	Failure to submit report on time (6)	Report has been received
Cumberland		
The Okonite Company	BOD (2)	Firm is now in compliance
Synagro Northeast, LLC	BOD (2)	Firm is now in compliance

Field's Point Service Area

Providence		
Company Name	Violations Cited	Present Status
271 Tockwotten Partners, LLC	Failure to submit report on time (6)	Report has been received
AAMCO Transmission	Failure to submit report on time (6)	Report has been received
Fed-Rick Veal Company, Inc.	Failure to submit report on time (6)	Report has been received
Long Live Beer Works, Inc.	BOD (2)	Firm is now in compliance
Mahr, Inc.	Failure to submit reports on time (6)	Reports have been received
Providence Brewing Company, LLC	Failure to submit report on time (6)	Report has been received
Providence Specialty Products, LLC	BOD (1, 2) O&G (1, 2)	Firm is still experiencing compliance issues
	Failure to submit reports on time (6)	Reports have not been received
Quality Spraying Technologies	Failure to submit report on time (6)	Report has been received
Revival Foodworks and Brewery	Failure to submit reports on time (6)	Reports have not been received
United States Postal Service - Providence VMF	Failure to submit report on time (6)	Report has been received
Johnston		
Eastern Screw Company	Failure to submit report on time (6)	Report has been received
Granite Marble and Granite, LLC	Failure to submit report on time (6)	Report has been received
R.I. Beef & Veal, Inc.	Failure to submit report on time (6)	Report has been received
North Providence		
Yacht Club Bottling Works, Inc.	Failure to submit reports on time (6)	Reports have been received

Vincent J. Mesolella, *Chairman* • Laurie A. Horridge, *Executive Director*
 Narragansett Bay Commission • One Service Road • Providence, RI 02905 • 401-461-8848 • TDD 401-461-6549 • FAX 401-461-6540 • <http://www.narrabay.com>
 Twitter: @narrabay • Facebook: www.facebook.com/narrabay • Instagram: @narrabay
 The cost of this public notice will be billed to the firms listed above that were in significant non-compliance.

NARRAGANSETT BAY COMMISSION

Perfect Compliance

in recognition of Significant Industrial User Perfect Compliance in 2022

The Narragansett Bay Commission recognizes these Significant Industrial User companies for perfect regulatory compliance with Pretreatment Program regulations during 2022:



Armbrust International, Ltd.	Electrolizing, Inc.
Hord Crystal Corporation	HP Services, Inc.
Induplate LLC	Interplex Engineered Products, Inc.
Manchester Street, LLC	Materion Technical Materials, Inc.
Metallurgical Solutions, Inc.	Providence Metallizing Company, Inc.
Prysmian Cables and Systems USA, LLC	Rhode Island Heat Treating Company, LLC
Stackbin Corporation	Tanury Industries PVD, Inc.
Technodic, Inc.	Teknor Apex Company
Tiffany and 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. Mesolella, *Chairman* • **Laurie A. Horridge**, *Executive Director*

One Service Road, Providence, RI 02905

401-461-8848 • www.narrabay.com

NBC NEWSLETTERS



NBC Pipeline

January 2023

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 New Year's Day	2 New Year's Day OBSERVED	3	4	5	6 Full Moon Payday	7
8	9	10	11	12	13	14
15	16 Martin Luther King, Jr. Day HOLIDAY	17 Board of Commissioners Meeting 11 AM	18	19	20 Payday	21
22 Chinese New Year	23	24	25	26	27	28
29	30	31				



News Briefs...

NBC Casual Day Fund Update

In December, the NBC Casual Day Fund Committee conducted its annual raffle at the COB Employee Appreciation event after a 2-year hiatus due to COVID. The raffle has been done virtually over the last 2 years to choose a winner to pick a 501(c)(3) charitable organization of their choice to make a donation.

The winner for this year is **Brendan McLean** who chose St. Jude Children's Research Hospital. The NBC will donate \$500 on his behalf. In addition, the NBC donated \$500 to the Boys & Girls Club of Pawtucket as well as many cold weather necessities for those in need.

A big **THANK YOU** to all those who donated this month to help someone in need stay warm this winter season!



Congratulations!

To Environmental Chemist **Kim Sandbach!** Kim received the 2022 Water Environment Federation (WEF) Laboratory Analyst Excellence Award. This award recognizes individuals for outstanding performance, professionalism, and contributions to the water quality analysis profession. Kim has been invited to the 2023 Annual NEWEA Conference to accept the award at the end of January.



To Pretreatment Manager **Kerry Britt!** Kerry was re-elected to Chair of the New England Regional Pretreatment Coordinator Association at their annual conference in October. This association is made up of a group of pretreatment professionals located in EPA Region 1 who are responsible for addressing current pretreatment issues, assisting approved and non-approved pretreatment programs with pretreatment questions and providing education for all pretreatment personnel within the region.

Welcome...



Meet Laurie Jean!

Laurie started on December 18th as a Legal Administrative Assistant. She is originally from Haiti and previously worked as an immigration paralegal.



Meet Abby Ernest-Beck!

Abby joined NBC on January 1st as an Environmental Scientist. Abby is from the west coast, studying environmental science at the Western WA University. She loves to mountain bike and surf in her free time.



Meet Michael Gervais!

Michael joined the Bucklin Point team on January 1st as an Operator I.

Be a superhero like Amelia: **DONATE BLOOD**

Narragansett Bay Commission

Thursday, January 12, 2023
9:00 AM - 1:00 PM
COB Main Conference Room
1 Service Road, Providence

DONATIONS BY APPOINTMENT!
Scan the QR Code to Book
(walk-ins will be welcomed if availability permits at time of arrival)
Sponsor Code 0665

All presenting donors will be entered into a weekly drawing to win a gift card for an Apple or Google Watch!
January 5 - January 31 - Learn more at ribc.org/watch

Eat, hydrate, bring identification with you.

Rhode Island Blood Center
800.283.8385 • ribc.org #ribbloodcenter

December Employee Promotions

Wishing the following NBC employee success in their new position...

Emily Petteruti was promoted to Purchasing Manager

COVID-19 Rapid Test Data

COVID Rapid Test data, as of Saturday, 12/31/2022

Negative Tests:	2181
Positive Tests:	34
Invalid Tests:	7
Tests Administered:	2222

Ocean State Jeepsters Toy Run

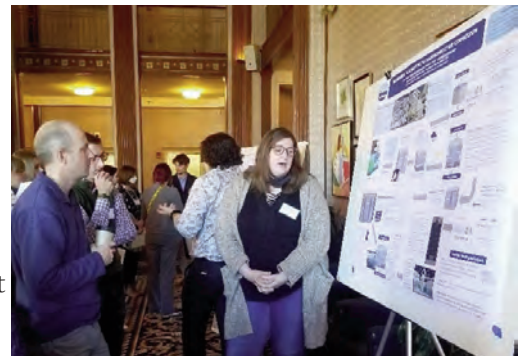
Anthony Ciacciarelli and the Ocean State Jeepsters collected and donated food and toys to the Burrville Police Department for their adopt a family program for the Holiday season. It's the season of giving all year round for the OS Jeepsters, thank you Anthony and the rest of the OS Jeepsters for your continued charitable work and giving back to the local communities!



NBC Staff Attend NEERS Conference

Three members of the Technical Analysis and Compliance (TAC) section recently had the privilege to attend the New England Estuarine Research Society's (NEERS) fall conference in Providence this November. The event was organized and hosted by the EPA and URI representatives as an opportunity for scientists and students to present and discuss their research in coastal systems. There was a wide range of fascinating presentations, including historical changes to coastal watersheds, community outreach initiatives for protecting coastal ecosystems and providing equitable community access to open spaces, biogeochemistry within estuaries, and tracking of habitat and wildlife throughout the region.

NEERS hosts conferences twice per year at various locations in the New England/New York region. Being local this year, many of the talks and posters focused on Narragansett Bay in particular. Some of the researchers at the



conference used NBC monitoring data in their studies. Christopher Knightes (US EPA, Narragansett RI) utilized NBC fixed site and Seabird profile data in his presentation "Simulating Hypoxia in Narragansett Bay: Developing and Applying Mechanistic Water Quality Fate and Transport Model". Environmental data were incorporated into a Water Quality Analysis Simulation Program (WASP) model with the focus on modeling the fluctuations between nutrients and hypoxia throughout Narragansett Bay to predict patterns and seasonal trends. Knightes' model revealed that recycling of nitrogen from the sediments is a major source of this nutrient into the water column. This modeling study is closely related to the NBC's ROMS model collaboration with Dr. Chris Kincaid, and NEERS was a good opportunity to coordinate a future group discussion regarding the different modeling efforts for Narragansett Bay.



Continued on the next page.

TAC Senior Environmental Scientist Eliza Moore and Environmental Compliance Technical Assistant Bethany Lewis proudly represented the NBC by presenting two posters to a very curious crowd.

“Wastewater Treatment by the Narragansett Bay Commission” guided viewers along the path wastewater takes through Field’s and Bucklin Point before finally ending as final effluent and biosolids. “Narragansett Bay Commission CSO Abatement: History and Future Plans” guided participants through the three phases of the abatement project; its features, impacts, timeline, and the cost involved. Great job to both of them!

During the business meeting portion of the conference Eliza was also elected to be NEERS Secretary. Congratulations to her and good luck in the position!



The conference ended with the choice of two field trips; one was to visit the Save the Bay Center and constructed wetland on Field’s Point, and the other was a tour of the Field’s Point Treatment Plant. Assistant Operations Manager Eric Bogosian joined Eliza to lead a tour for nine conference attendees, including researchers from the US EPA, URI Graduate School of Oceanography, and even creators of Waterfire. Thank you to everyone who put the tour together and came out on a Saturday to walk people through the treatment process!

— Submitted by Nicole Skyleson

P-Bruins Offer



The P-Bruins are offering NBC a great special for upcoming games this month. Games are on **Friday, January 13th @ 7:05 PM** and **Sunday, January 15th @ 3:05 PM**. Tickets are just \$24 per person for 100 level tickets and include a P-Bruins hat.

How to purchase?

Visit www.ProvidenceBruins.com/GroupTickets, make your selection for number of tickets and use promo code **NARRABAY** at checkout.



This year’s Holiday Employee Appreciation Events were a huge success with lots of good food and lots of fun! The COB employees wore their ugliest Holiday sweaters for the special occasion and participated in some competitive games and fun activities.



Rich Bernier, Pedro Sanders and Nathan Daggett were chosen for having the ugliest, most festive holiday sweaters.

Christine Cooper won *Guess How Many Ornaments are in the Vase*. Christine guessed that there were 120 and there were 103 in the vase, her guess was the closest.

Casandra Bennett won the holiday trivia.






NBC Pipeline

February 2023

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Calendar of Events *for February*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2  Groundhog Day	3 Payday	4
5 Full Moon	6	7	8	9	10 Payday	11
12  Superbowl	13	14  Valentine's Day	15	16	17 Payday	18
19	20  Presidents' Day HOLIDAY	21	22 Ash Wednesday	23	24	25
26	27	28				

What to Watch

For all our wastewater guros if you haven't checked this show out already put this on your list of things to watch! See what these #WastewaterHeroes are up to in sewer systems all across America on the Discovery Channel or Discovery+.



News Briefs...

BP Completes Successful Plant Shutdown

Kudos to Bucklin Point for a quick and efficient plant shutdown at the beginning of January!

The shutdown was needed to repair a leak in two of the final clarifier tanks and lasted about five hours.

Repairs were started in the early morning hours during low flows. A lot of preparation and coordination was needed to make this happen and was truly a team effort among various NBC departments.

Preparations began the day before the planned shutdown, pumping down an aeration tank and primary tank should they need to store flow. Flows during the shutdown were diverted to wet weather tanks to store until the flow could be pumped back for full treatment once the repair was complete.

A lot was learned from this experience for any future shutdowns! Great job, everyone!



Photo Credit: Marc Pariseault

January Employee Promotions & Retirements

Wishing the following NBC employee success in their new positions and a happy, healthy retirement...

Jae Pezzullo was promoted to Assistant Purchasing Manager
Patty Pinilla was promoted to Purchasing Coordinator
Pedro Sanders was promoted to IM Supervisor

Alice Marchessault retired on January 6th
Brenda Smith retired on January 27th

Welcome...

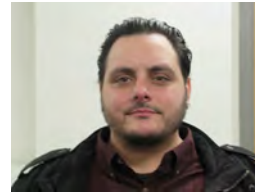
Meet Maryann Sourivong!



Maryann started on January 29th as NBC's Quality Assurance Coordinator. She is from the Providence area

and is a recent graduate of UMass Amherst. She is an avid runner, loves to watch Grey's Anatomy and spend time with her 2 dogs.

Meet Joseph Palma!



Started on January 15th as an IM Operator II. Joe previously worked for a trucking company and likes to ski and travel to his favorite destination, the Bahamas.

Meet James Lanosa!



James aka Jamie started on January 29th as an IM Operator II. Jamie is from Fall River, MA and enjoys playing Poker.

COVID-19 Rapid Test Data

COVID Rapid Test data, as of Wednesday February 1st...

Negative Tests: 2215
Positive Tests: 35
Invalid Tests: 7

Tests Administered: 2257

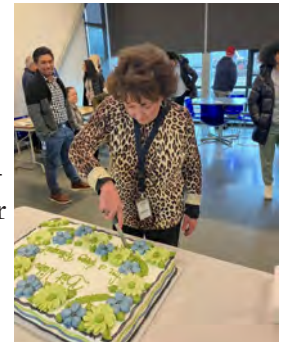
Baby Girl Medina on the Way

Construction and Engineering staff celebrated dad-to-be **Jeremy Medina** on January 26th. Jeremy and his wife Bria were expecting a baby girl on January 28th but it looks like baby Medina will be a February baby after all. Best of luck to you both!



NBC Celebrates 36 years with Brenda Smith

The NBC celebrated **Brenda Smith's** retirement at Twin Oaks Restaurant on Wednesday, January, 25th with her NBC friends and family, and one last hoorah with everyone in the office the next day for cake to wish her farewell. Brenda was with the NBC for 36 years before officially retiring on January 27th. The NBC will miss her dearly, wishing her nothing but the best in her retirement.



Pictured: Manny, Crystine, Brenda & Brenda's sister Jean.

Kim Sandbach Accepts Award at the Annual NEWEA Conference

The annual NEWEA Conference took place January 22nd - 25th at the Boston Marriot Copley Place. Kim Sandbach was awarded the WEF Laboratory Analyst Excellence Award in recognition of outstanding performance, professionalism and contributions to the water quality analysis profession as mentioned in the January Pipeline. Well-deserved Kim, Congratulations!



NBC Watershed Explorers Finish Winter Water Testing

Watershed Explorers completed their winter water testing data for the month of January. Students were able to compare their results to their fall water testing to see if there have been any changes since the change of season.



Student from Community Prep in Providence

Results at all of the schools local watersheds have been fairly good for pH, nitrate, phosphate, and dissolved oxygen; for fecal coliform, all sites have been positive. Fecal coliform tests almost always turn out positive due to the animals that call these local watersheds home.

The Future of Managing Biosolids

In November, several NBC staff and other wastewater professionals traveled to the outskirts of Albany, NY, to visit Biowaste Pyrolysis Solutions (BPS) and meet with its president, Samuel Sylvetsky. Pyrolysis is an emerging technology for treating biosolids.

In the past, NBC managed biosolids by all the common methods, both directly and by using a 3rd party. NBC used incineration, land application and disposal in a landfill over the past decades. However, today, biosolids processors struggle to meet growing demand with dwindling options. Prices have risen for biosolids handling, especially in the densely populated Northeast, and concerns persist in this sector about aging infrastructure, landfill capacity, fate of pollutants, tightening regulations, climate impacts and energy costs. These are important factors to consider when making long-term decisions that can affect reliability of WWTF operations as well as potential liability.

Pyrolysis holds promise as new way to manage biosolids but so far only a few firms have commercially demonstrated the technology. Biosolids must be managed in ways that minimize risk of exposure to harmful substances such as pathogens, heavy metals and per-and polyfluoroalkyl substances (PFAS), as well as compounds such as oxides of nitrogen and sulfur that form when biosolids are incinerated. Many believe pyrolysis lowers these risks because the compounds are significantly destroyed, stabilized or not formed in large quantity. Limited analytical data has been emerging from facilities that process biosolids that may support claims.

Pyrolyzing biosolids is not the same as incinerating them in a sewage sludge incinerator (SSI). While both technologies release the internal energy in the raw biosolids and result in production of a gas and a solid, pyrolysis thermally decomposes the volatile/organic fraction of the biosolids, transforming it into a valuable and potentially renewable fuel gas. Combusting that gas releases enough heat to run the process and dry much of the incoming biosolids cake. Pyrolysis tends to be more efficient and cleaner than incineration.

The NBC team saw the pyrolysis occurring at BPS and the various byproduct/waste streams that need to be managed, including solid residue, air emissions and wastewater discharge. Not all aspects of the technology performed as intended: the cake dryer installed in 2020 never worked and there was a lot of heat lost/wasted from the operation. BPS knows how to improve pyrolysis operation but may have to work with an established third party to integrate a dryer into the system.

BPS is now in the process of designing a 2nd generation pyrolyzer. The new system may achieve an 80% thermal efficiency. Currently, they're seeking to install and pilot just the 2nd generation pyrolyzer at a WWTF that already produces enough dried cake and has storage capacity. They plan to have more information on pricing and possibly drying options in 2023. The setbacks we heard about were disappointing, however we were encouraged to hear BPS is committed to making forward progress since a system like theirs may prove to be a viable option for NBC in the future.

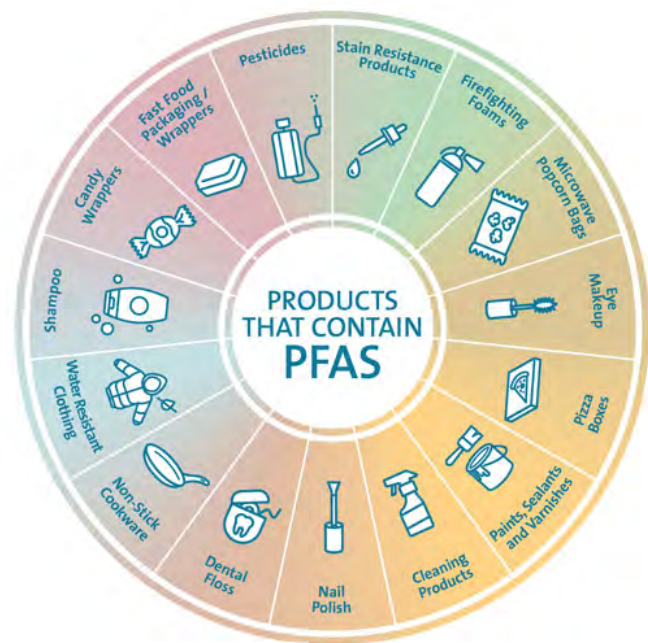


Photo Credit: Veolia

— Submitted by Barry Wenskowicz



NBC Pipeline

March 2023

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Calendar of Events *for March*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
					Payday	
5	6	7 Board of Commissioners Meeting 11 AM Full Moon	8 International Women's Day	9	10	11
12 Daylight Saving Time Begins	13	14 Pi Day	15	16	17  Payday	18
19  St. Joseph's Day	20  First Day of Spring	21	22 First Day of Ramadan	23 World Water Day	24 NBC Career Day with Central Falls High School	25
26	27	28	29	30	31 Payday	

News Briefs...

Welcome to the World Noa Medina!

NBC Facilities Engineer **Jeremy Medina** and wife Bria welcomed a beautiful baby girl on February 2nd. Noa Imani Medina made her arrival at 5:58 AM weighing 8 lbs 7oz., 20.5 inches long.

Everyone is happy and healthy, but mom and dad could use some sleep! Vovo **Joe Medina** is over the moon on the birth of his first grandchild.

Congratulations to the Medina family!



NBC Receives Environmental Achievement Award for Excellence in Public Education

NBC was awarded the NACWA's National Environmental Achievement Award (NEAA) in Public Information and Education, Executive Director Laurie Horridge accepted the award on behalf of NBC at the 2023 NACWA Winter Conference in Sonoma, California.

The Award honors an agency for their inventive efforts to educate the public on the effects of wastewater treatment and pollution control on the environment. The NBC received this award for the animated video *Water Works!*

The NBC worked with an outside vendor to create this short animated video on how the NBC treats and cleans wastewater. The video goes in detail from start to finish on what each step of the process looks like, traveling from your toilet to NBC's wastewater treatment facilities. Once clean, the water is then released into the Providence or Seekonk Rivers and eventually flows into Narragansett Bay. The video was created to help showcase our facilities during the pandemic when education opportunities weren't possible and the public were not allowed to come for tours. To watch the video please visit: [NBC Water Works!](#)



Welcome...

Meet Nicholas DaSilva!



Nicholas started in February as NBC's new Legal Counsel. He completed his undergrad at URI and Law school at

N.E. Law Boston. Nick and his wife reside in Pawtucket and are expecting a baby boy this month.

Meet Edward Guadalupe!



Edward started on February 12th as an IM Operator II.

Meet Ross Gambino!



Ross Joined the NBC team the end of February as a BP Operations Supervisor. Ross is from Stamford, CT and

enjoys playing golf in his free time.

COVID-19 Rapid Test Data

COVID Rapid Test data, as of Tuesday, February 28th..

Negative Tests: 2215

Positive Tests: 35

Invalid Tests: 7

Tests Administered: 2257

March P-Bruins Offer



NBC's P-Bruins March offer is for any of their March home games on March 11th, 12th, 15th and 19th with their special even this month on March 19th.

They'll be holding their first ever Teddy Bear Toss game! For those unfamiliar, a Teddy Bear Toss game has everyone bring a stuffed teddy bear to the game and when the Bruins score their first goal, everyone throws their bears onto the ice! They'll be donating all the bears to their community partners with the main goal to raise money for Hasbro Children's Hospital!

Throughout the night, they'll be selling bears at a donation of \$10 per bear, as well as holding a 50/50 raffle, auctioning autographed Bruin's memorabilia, and other fundraising aspects to raise as much as possible!

Tickets will be \$24 for 100 Level tickets and include a P-Bruins hat.

Tickets can be purchased at www.Providence-Bruins.com/GroupTix, make your selection and use promo code **NARRABAY.**

Contact Talia Cheshier at x394 for any questions.

Casual Day Charitable Giving Fund Raffle

Thank you to all the NBC employees who suggested charities for the Casual Day raffle. The charities chosen were randomly picked from a pool of suggestions submitted. The four organizations chosen will receive a \$500 donation from the Casual Day Fund.



URI Science & Engineering Fellows Program, submitted by CJ Spellman

Alzheimer's Association, submitted by Cas Bennett, Cheryl Pescarino, and Gina Cofone

Tomorrow Fund, submitted by Holly Ialongo

American Diabetes Association, submitted by Cheryl Pescarino

Thank you for all your suggestions and please remember the Committee accepts suggestions on a rolling basis.

Best Wishes on your Retirement, Art & Betty!

In February NBC celebrated two long-time NBC employees on their retirement.

Control Systems Administrator **Art Sheridan** retired on February 3rd after 39 years with NBC. Art is the second longest-serving NBC employee, with Sam Celone beating him by just 1 year! Staff celebrated with him before his last day on February 2nd with cake and lots of farewells.



Senior Environmental Chemist **Elizabeth Teixeira** retired on February 10th after 34 years with NBC. Elizabeth was presented a 'Golden Flask' reward for her many years of service, hard work, dedication before her last day.



Thank you, Art and Betty, for your many years of service at NBC, wishing you all the best in your retirement!



The Lab team would like to give a shout out to the **Maintenance team** and especially to **Norman Rodolewicz** and **Norman Ellinwood** for their work on creating such a fantastic golden flask. Great job!





NBC Pipeline

April 2023

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Calendar of Events *for April*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1 April Fools Day
2 Palm Sunday	3 Blood Drive 9 AM - 1 PM COB Main Conference Room	4	5 Passover Begins	6 Full Moon	7 Good Friday	8
9 	10	11 Board of Commissioners Meeting 11 AM	12	13 Passover Ends	14 Payday	15
16	17	18	19	20	21 Payday	22 Earth Day
23	24 	25	26 WATER WEEK April 23- 29th	27 Administrative Professionals Day	28 Payday	29 FP Open House 10 AM - 1 PM
30	<p>HR staff had a special guest at their window in the early morning hours of Thursday March 30th, a very large male turkey. Must be something good on that side of the building. Last year around this time a groundhog was spotted in the same area.</p> <p style="text-align: right;">— Submitted by Kristen Petit</p>					

News Briefs...

2023 Earth Day River Clean Up Grant Recipients

Earth Day Clean Ups are right around the corner and NBC is excited to announce the grantees for the 2023 Earth Day River Clean Up Grant Program.



2022 Earth Day grant recipient, *The Squantum Association*.

Grantees for this year are:

Woonasquatucket River Watershed Council, Rhode Island Clean Water Association, The Squantum Association, Blackstone River

Watershed Council/Friends of the Blackstone, City of Central Falls, The Empowerment Factory, Save the Bay, Neutaconkanut Hill Conservancy, Inc., BVTC/Keep Blackstone Valley Beautiful, Town of Smithfield, Waterman Street Dog Park Association, Partnership for Providence Parks, Lincoln Conservation Commission, City of East Providence Public Works, and Edgewood Waterfront Preservation Association.

Hundreds of volunteers from these organizations will gather in the coming month to remove thousands of pounds of tires and debris from the beds and banks of the rivers, ponds and shorelines, as well as creating restoration and/or beautification projects for RI during these annual Earth Day clean ups. The goal is to help these organizations improve our local communities.

Wellness Incentive Credits

If you have not already taken advantage of the \$500 offered to you through NBC's wellness incentives, click the link below for a list of programs that you may still have time to complete. All wellness appointments must be complete by June 30, 2023.



Click Here: [Wellness Incentive Credits](#)

Welcome...

Meet Keon Kilgore!



Keon started on March 12th as an Operator I for BP.

Meet Duane Barnes!



Duane started on March 26th as NBC's Information Security Manager. Duane has his Masters degree in

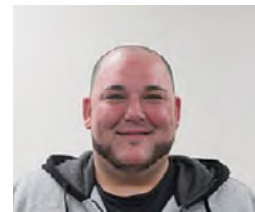
Cyber Security and previously worked for Seacorp. In his free time he enjoys doing Crossfit.

Meet Giselle Lama!



Giselle started on March 26th as a Fiscal Clerk.

Meet Anthony Marfeo!



Anthony started on on March 26th as an Operator I at FP. Anthony is from the Providence area.

COVID-19 Update

COVID Rapid Test data, as of Friday, March 31st..

Negative Tests: 2270

Positive Tests: 35

Invalid Tests: 7

Tests Administered: 2312



Raise your hand if you are a grandfather! IT Senior Database and Linux Administrator **Israel Morales** welcomed a granddaughter Arlli Faith in March. Congratulations to Israel and the entire family!



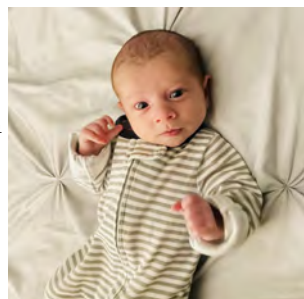
To Technical Analysis and Compliance Manager, **Jim Kelly** for being appointed as one NEIWPCC's (New England Interstate Water Pollution Control Compact) newest commissioners.

IM Senior Inspector, **Anthony Ciacciarelli** being the next Smithfield Sewer Commissioner! Anthony will be sworn in before Smithfield's April Town Council meeting.

To Assistant Customer Care Supervisor, **Kayla Bessette** on the birth of her baby girl, Emery! Emery was born on February 24th weighing 8lbs 2oz and 19 inches long.



To Legal Counsel, **Nicholas DaSilva** on the birth of his baby boy Nico! Nico was born on March 5th weighing 6lbs 6 oz and 18 inches long.



WQSB Celebrates Pi Day with a Pot Luck Pie Buffet

On March 14th, the Water Quality Sciences Building celebrated Pi Day with a potluck pie buffet! Pi Day is named because March 14th looks awfully similar to 3.14..., the mathematical constant known as Pi! With sweet and savory contributions from the Lab, Environmental Monitoring, and Technical Analysis and Compliance sections, it was a deliciously good time.

This group spends a LOT of time with numbers, and it was a great opportunity to enjoy the lighter side of math. Thank you to all the bakers and contributors who made this so much fun.



— Submitted by *Eliza*

March Employee Promotions & Changes

Wishing the following NBC employee success in their new positions...

Liam Walsh promoted to Process Monitor

Nathan Dean promoted to Environmental Monitoring Manager

John Zuba promoted to Permits Coordinator

Bernard Harwood promoted to Assistant E&I Technician

Veronica Amaral promoted to Billing Analyst

Nigel Yattaw promoted to Maintenance Supervisor

2023 Three-Week Walking Program

To jump start a healthy beginning to spring the NBC will be offering a Three-Week Walking Program The walking program starts April 9th and is open to all NBC employees, however only eligible employees can receive the \$100.00 wellness incentive. Fill out the forms attached in Crystine Marandola's announcement email at the end of the three weeks and send the forms to HR. Qualified employees will receive the wellness incentive after the program ends. Any questions please contact **Crystine** at **x376**.



NBC Celebrates RI Clean Water Week with an Open House

In celebration of Rhode Island Clean Water Week, the NBC will offer free public tours of the **Field's Point Wastewater Treatment Facility on Saturday, April 29th from 10:00 AM to 1:00 PM.**

The tours will include a look at the region's most sophisticated water quality lab, "touch-a-truck" and "touch-a-boat" with the NBC's maintenance and research vehicles, a clean water scavenger hunt, and other fun activities. In addition, the NBC will issue certificates of completion to all students who take the tour that may be redeemed for extra credit at school (but students are advised check with their teacher first).

Staff are encouraged to bring family and friends to "look behind the curtain" and view the process that has made Narragansett Bay cleaner than it has been in 150 years. **You can book a tour at 10:00 AM, 11:00 AM, or 12:00 noon by contacting Jamie Samons at x377 or jsamons@narrabay.com.** Spaces are limited. The tour will take approximately one hour.

The NBC joins seven other clean water agencies in Rhode Island offering free public tours during Rhode Island Clean Water Week. Information on other tours is available at ricwa.org



Photo Credit: Mike Hernandez

NBC Hosts Career Day for Central Falls High School Students

Students and teachers from Central Falls High School visited Field's Point on March 24th. Students toured the WWTF and WQSB where students were introduced to various career paths within operating a WWTF. Special Guest Bill Patenaude of RI DEM made an appearance during their break to discuss careers in operations and licensing.

Thank you **Angelina Glater, Kim Sandbach** and **Peter Gnocchi** for being wonderful tour guides of the WQSB.

Thank you **Sara Nadeau** for showing students what a day-in-the-life of an environmental monitor is all about. Thank you **Nathan Boiros** for making sure the lunchroom and other facilities were clean and able to accommodate our guests.



Many of the student showed interest and asked great questions about careers. NBC may have a future intern or employee from this field trip!

Introducing NBC's New Information Security Manager and the Need for Cyber Security

Hi NBC! My name is Duane Barnes, and I am the new Information Security Manager for NBC. To begin, I would like to discuss the need for cybersecurity and why it's so important for not only organizations, but also for each individual. In 2021, cybercrime cost the world \$6 trillion. By 2025, these costs will increase to \$10.5 trillion.

Cybercrime is an increasingly serious problem, and to address it, strong cybersecurity is critical for organizations and individuals.



Governments, for-profit companies, not-for-profit organizations, everyday people, and educational institutions are all at risk of cyberattacks and data breaches. With digital transformation and adoption on the rise, the number of attacks will grow as digital technologies evolve, the number of devices and users increase, and the global supply chains become more complex. As data and technology become more critical to our everyday lives, the risk to our privacy and need for technological availability increases ever more so. There are many steps that individuals and organizations can take to securing their data, and it all starts with some education and basic best practices.

I look forward to being a vital part of NBC's Information Security program, and I look forward to meeting everyone along this journey.

—Duane



NBC Pipeline

May 2023

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 May*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1	2	3	4	5 Cinco De Mayo Full Moon	6
7	8	9	10	11	12	13
14	15	16	17	18	19 Payday	20
		Board of Commissioners Meeting 11 AM		NBC Watershed Explorers Conference at Goddard Park		
21	22	23	24	25	26	27
28	29	30	31		Payday	

Wellness Incentive Credits

If you have not already taken advantage of the \$500 offered to you through NBC's wellness incentives, click the link below for a list of programs that you may still have time to complete. All wellness appointments must be complete by June 30, 2023.



Click Here: [Wellness Incentive Credits](#)

News Briefs...

NBC Honors Eighteen Companies in Perfect Compliance

This year marks the NBC's 28th Annual Environmental Merit Award celebration and after a three-year hiatus, awards were presented in-person at the Mare Rooftop on April 19th honoring eighteen companies in the NBC service area for perfect compliance. NBC recognizes those companies among its 1500 permitted users who have achieved perfect regulatory compliance and outstanding pollution prevention in the previous year.

Special guest Speaker of the House Joseph Shekarchi attended the event and spoke to guests on the importance of what NBC does as well as these companies on their efforts for pollution prevention; they are truly making a difference in our local communities.



Chairman Mesolella & House Speaker Joseph Shekarchi



Chairman Mesolella & Staff for Manchester Street, LLC., merit award recipient.

NBC has one of the most successful pretreatment programs in the country. Kerry Britt, NBC's Pretreatment Manager, and her entire staff are repeatedly recognized for their excellence and expertise. Congratulations to the eighteen companies and the NBC Pretreatment team for all their efforts!

The companies in perfect compliance include: Armbrust International, Ltd., Electrolizing, Inc., Hord Crystal Corporation, HP Services, Inc., Induplicate LLC, Interplex Engineered Products, Inc., Manchester Street, LLC, Materion Technical Materials, Inc., Metallurgical Solutions, Inc., Providence Metallizing Company, Inc., Prysmian Cables and Systems USA, LLC, Rhode Island Heat Treating Company, LLC, Stackbin Corporation, Tanury Industries PVD, Inc., Technodic, Inc., Teknor Apex Company, Tiffany and Company, Truex, Inc.

Welcome...

Meet Victoria Stromberg!



Tori started on April 23rd as a Pretreatment Technician. She has a bachelor's degree in Environmental Studies with a minor in Biological Anthropology. Tori previously interned with Mystic Aquarium before coming to NBC.

Meet Jessica Toporoski!



Jess will start on May 7th as an HR Representative. She has her masters in Human Resources. She loves to travel, go to baseball games and Billy Joel concerts.

Meet Sasha Rivera!



Sasha will start on May 21st as a Customer Care/Fiscal Clerk. She is from the Providence area and loves to travel with family and visit new places.

COVID-19 Update

COVID Rapid Test data, as of Friday, April 27th...

Negative Tests: 2279

Positive Tests: 36

Invalid Tests: 7

Tests Administered: 2322



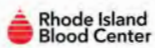
Narragansett Bay Commission

Your blood drive had
19 presenting donors
 Resulting in **16** donations
 Helping to save up to **48** lives!

Next Drive:
Wednesday, June 21st



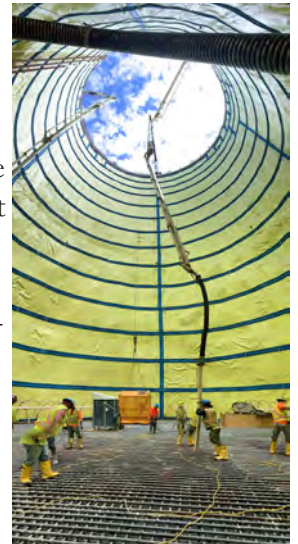
Sponsor Code 0665



800.283.8385 • ribc.org #ribloodcenter

Pawtucket Tunnel Update...

On Saturday April 15th the Pawtucket Tunnel project team made the largest concrete placement to date. Approximately 2,000 cubic yards, or 180 truck-loads, of concrete was placed at the base of the circular tunnel pump station shaft which is approximately 150 feet below ground level. The slab was so big that it required a special cooling system to control the concrete temperature during the initial seven day curing period. The placement began at 3:00 AM and it completed at about 11:00 PM.



— Submitted by Greg Waugh

Employee Spotlight - FP Staff Work Quickly to Save Plant from a RIPDES Violation

On Sunday, April 23rd, FP Operations Manager **Nathan Boiros** received a call at approximately 1:30 AM from the Operations Supervisor **Andrew Iasimone** explaining that the influent gate to one of the final clarifiers suddenly broke and was stuck in the open position. It was raining heavily, and solids tend to accumulate in the final clarifiers as plant flow increases. Andrew also explained that due to the gate being stuck open, solids accumulated so much in the final clarifier that the TSS was elevated in the chlorine contact tank and was getting worse.

Andrew and Nathan decided to call in two Maintenance Mechanics to evaluate the gate operation and hopefully close it. **Norman Rodolewicz** and **Mark Taylor**, both Mechanic IIs, were called in for the repair. Nathan also arrived on scene since the plant was in jeopardy of a RIPDES violation if the situation was not resolved quickly. In the meantime, the Operations Supervisor Andrew Iasimone along with Process Monitor **John Cavanagh** operating SCADA made technical adjustments to the process to reduce solids entering the final clarifiers. Process Monitor **Liam Walsh** and Operator **Jerome Harris** were in the field prepping the Final Clarifier distribution area for the Mechanics to work. They also installed a portable flood light.

Although they were unable to fix the gate mechanism instantly due to the magnitude of repair and availability of parts, they were able to manipulate the gate with tools to the closed position quickly. Doing so under these adverse conditions instantly stopped the hemorrhage of solids into the chlorine contact tank and eventually to the Providence River.

NBC's current RIPDES limit for TSS is 50 mg/l. The lab sample result for the 24-hour period that the mechanical failure occurred was 36 mg/l. FP was 14 parts away from a RIPDES violation. If this situation was not resolved quickly by FP staff, another hour of this being unresolved would have surely resulted in several RIPDES violations. These gentlemen all made excellent contributions in honor of protecting the permit! A huge shoutout to **Norman Rodolewicz** and **Mark Taylor** for answering their phones late on a Saturday night and making the commitment to come in and save the bay, I mean day!



Final Clarifier #8

— Submitted by Nathan Boiros

NBC Employees Receive Flagger Certification

Throughout March and April, 45 NBC employees received Flagger Certification/Work Zone Safety Training. This important mixture of classroom and hands-on training applies to NBC employees that need to setup temporary work zones and flagger operations on secondary roadways as part of their routine job tasks. Training is delivered in accordance with the U.S. DOT's Manual on Uniform Traffic Control Devices. Full training with hands-on exercises is required every four years along with a refresher course every 2 years.



Upon completion of the training, employees receive formal flagger certification through the American Traffic Safety Services Association (ATSSA). Employees will automatically be assigned a Flagging Safety refresher course on Bay Academy in two years.

This year's training was funded by the RI Local Technical Assistance Program (RI LTAP). Administered by the RI DOT, RI LTAP's mission is to foster a safe, efficient, and environmentally sound surface transportation system in RI by improving the skills and increasing the knowledge of the transportation workforce and decision makers through quality training, technical assistance and information sharing.



— Submitted by Dave Aucoin



Big thanks to all the NBC staff who helped to make our participation in RI Clean Water Week a resounding success!

Seventy people came for tours of Field's Point and the WQSB on Saturday, April 29 and everyone was impressed by the facilities, the equipment, and the awesome work NBC staff does every day to protect and enhance the environment and public health.



Tyler Bissonette and Amanda Kezirian showing guests what the Environmental Monitoring Department is all about.

We're so grateful to Paul Desrosiers, Eric Bogosian, CJ Spellman, Nathan Dean, Daryll Sirleaf, Jeff Tortorella, Tyler Bissonette, Amanda Kezirian, Cindy McQueen, Nora Lough, Walter Palm, Kerry Britt, Mike Smith, Juan Andujar, and Ryan Porter for being fantastic ambassadors for the NBC!

Also: shout outs to the staff at Field's Point for making the facility look beautiful and to all the NBC staff who brought friends and family out for a tour.

Photo to the right: Eric Bogosian with guests viewing the Primary Clarifiers.



Photo to the left: Mike Smith with the Vacall truck for "Touch-a-Truck"

Star Wars Night with the P-Bruins

FP Operations Supervisor **Jason Trenholm** and family attended the P-Bruins annual Star Wars night in April and had a blast! The P-Bruins always give NBC great seats, great pricing with awesome fan gear. Stay tuned for next years tickets some-time in the early fall!



Another Successful Shellfish Transplant in Greenwich Cove

The NBC is proud to announce another successful shellfish transplant on Tuesday, May 2nd in Greenwich Cove. There were 59 fisherman that partipated with a total of 1,160 bags collected and transplanted, totaling 58,000 lbs of shellfish.



April Employee Promotions & Changes

Wishing the following NBC employee success in their new positions...

Gina Cofone promoted to Permits Coordinator
Kerri Houghton to Control Systems Associate
Marcos Quinones promoted to Control Systems Administrator
Janet Luu promoted to Environmental Chemist
Jospeh Malouin promoted to Mechanic I

Earth Day Clean-ups Have Begun!

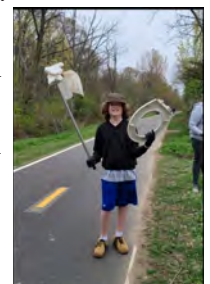
As mentioned in the April Pipeline, the NBC awarded fifteen organizations with grants for their 2023 Earth Day Clean-ups. Grants were presented to these organizations at the Environmental Merit Award breakfast on April 19th to help these organizations improve our local communities. Hundreds of volunteers from these organizations will gather to remove thousands of pounds of tires and debris from the beds and banks of the rivers, ponds and shorelines, as well as creating restoration and/or beautification projects for RI.

The Squantum Association, RI Clean Water Association, and Blackstone River Watershed Council/Friends of the Blackstone have completed their projects so far.

The Squantum Association cleaned up areas a long stretch of the Providence River shoreline in East Providence, from Boyden Heights, past Windsor Cove and north along the East Bay Bike Path to Kettle Point on April 22nd. They collected an estimated 800 lbs of debris, enough to fill a large dumpster.



The RICWA had 50 volunteers gather on April 22nd at the Squantum Point shoreline in East Providence. Volunteers found bottles, cans, typical trash items and even a toilet seat! An estimated 500 lbs of debris were removed.



were removed from that area.

Blackstone River watershed Council/Friends of the Blackstone completed their clean up off Canal Street in North Smithfield. An estimated 1 1/2 tons of trash




NBC Pipeline

June 2023

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Calendar of Events *for June*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1	2	3 Full Moon
4	5	6	7	8	9 Payday	10
11	12	13	14 Poster Contest Gallery Night 5:30 PM 	15	16 Payday	17
18	19 Juneteenth	20	21 Blood Drive 9 AM - 1 PM COB First Day of Summer	22	23 Payday	24
25	26	27 Board of Commissioners Meeting 11 AM	28	29	30	

Wellness Incentive Credits

If you have not already taken advantage of the \$500 offered to you through NBC's wellness incentives, click the link below for a list of programs that you may still have time to complete. All wellness appointments must be complete by June 30, 2023.



Click Here: [Wellness Incentive Credits](#)

News Briefs...

NBC Watershed Explorers Conference a Huge Success After a Three-Year Hiatus

The NBC Watershed Explorers program was back in full force for the 2022/2023 school year. Environmental Education Coordinator **Cynthia Morissette** worked with 12 schools totaling over 800 students, taking the program back to pre-pandemic numbers.

On Thursday, May 19th the NBC Watershed Explorers gathered with their teachers and chaperones at Goddard Park in Warwick for the 18th annual NBC Watershed Explorers Conference to conclude the year-long environmental education program for elementary school students in the NBC service area. The program encourages students and teachers to become stewards of the environment focusing on their local watershed and other surrounding water bodies. It also helps students understand the connection between the health of their local watersheds and Narragansett Bay, encouraging students to help keep these precious resources healthy for future generations.



Students from Sarah Dyer Barnes Elementary in Johnston, Pleasant View Elementary in Smithfield, Ashton Elementary in Cumberland, Kent Heights Elementary and Orlo Avenue Elementary in East Providence, Agnes Little Elementary and St. Cecilia's in Pawtucket, Paul Cuffee, Community Preparatory, and the Croft School in Providence, Orchard Farms Elementary in Cranston and Saylesville Elementary in Lincoln participated in the NBC Watershed Explorers Program this year.

The conference kicked-off with student presentations. A group of students from each school were chosen to present their macroinvertebrate posters, including interesting facts and their song, rap or poem. Following presentations students participated in educational activities presented by NBC staff, RI Audubon Society, Save the Bay, Roger Williams Park Zoo, Mass Audubon, Norman Bird Sanctuary, Resource Recovery, Woonasquatucket River Watershed Council, and Mystic Aquarium.

Many thanks to all the NBC Staff who volunteered their time. Your efforts were absolutely critical to the day's enormous success!



NBC's Eliza Moore working with students at the Macro Activity.

Welcome...

Meet Abigail Rao!



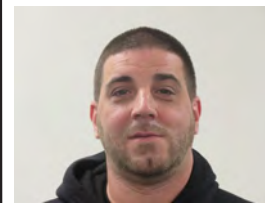
Abby started on May 21st as a Customer Care Representative. She is from Lincoln and a graduate of JWU.

Meet Maxwell Duncan!



Max started on May 21st as a FP Operator I. Max is from the Providence area and worked previously as a Machinist, he has two children and loves sports.

Meet Clifford DaRosa!



Cliff started on May 21st as a Utility Machine Operator for FP. Cliff is from the Providence area. He has a daughter and a pug named Emma.

Meet Dahlin Wiitala!



Dahlin will start as a Customer Care Representative on June 4th. She loves arts and crafts, camping, cooking and writing.

Meet Michael Christofaro!



Michael will start on June 4th as a Customer Care Representative. Michael loves photography and traveling to his favorite place, Venice Beach, California.

Safety Corner...

Working Safely in the Heat

Summer temperatures have arrived! Every year, dozens of workers die and thousands more become ill while working in extreme heat or humid conditions. In 2021, heat was the second-leading cause of weather-related fatalities in the United States.



All NBC employees are encouraged to take time to become reacclimated to the warmer temperatures. Heat related illnesses such as heat exhaustion and heat stroke are directly related to such risk factors as high temperature and humidity, direct sun exposure, physical exertion, medications and

not drinking enough fluids.

In an ongoing effort to maintain a safe workplace, all NBC employees are encouraged to adhere to the following practices, as promoted during OSHA's annual Heat Illness Prevention Campaign:

- Drink plenty of water and seek shade when possible.
- Allow yourself to gradually increase workloads and take more frequent breaks as you begin to build a tolerance for working in the heat.
- Plan for emergencies and train yourself and fellow employees on prevention.
- Monitor yourself and fellow employees for signs of illness.

Employees are encouraged to view the following OSHA video that reinforces the importance of working safely in the heat:

Remembering Tim: A Life Lost to Heat Illness at Work

To learn more about the signs and symptoms of different types of heat illnesses, including first aid measures for each, employees are encouraged to download the OSHA-NIOSH Heat Safety Tool smartphone app [HERE](#).

— Submitted by Dave Aucoin

2023 Hurricane Season Forecast

The National Oceanic and Atmospheric Administration (NOAA) has released its forecast for the 2023 Hurricane Season, which runs from June 1st through November 30th each year.

Forecasters predict a near-normal hurricane season with an estimated total of 12-17 named storms, 1-4 of which are predicated to develop into major hurricanes (Category 3, 4 or 5.) Although this season is not expected to be as severe as the record-breaking series of storms that slammed the U.S. in 2020, NBC employees and their families are still encouraged to begin planning now for potential storm impacts. Click [HERE](#) for a list of helpful hurricane preparedness resources.

Hurricane Categories Defined:

SAFFIR-SIMPSON HURRICANE WIND SCALE		
CATEGORY 1	74-95 MPH	SOME DAMAGE
CATEGORY 2	96-110 MPH	EXTENSIVE DAMAGE
CATEGORY 3	111-129 MPH	DEVASTATING DAMAGE
CATEGORY 4	130-156 MPH	CATASTROPHIC DAMAGE
CATEGORY 5	157+ MPH	CATASTROPHIC DAMAGE

Key Terms to Remember:

- Tropical Storm Watch – Tropical storm conditions are possible within 36 hours
- Tropical Storm Warning – Tropical storm conditions are expected within 24 hours or less
- Hurricane Watch – Hurricane conditions are expected within 36 hours
- Hurricane Warning – Hurricane conditions are expected with 24 hours or less

Employees are encouraged to visit the [National Weather Service](#) webpage for tips on planning and recovering from hurricanes. Downloading an advanced emergency notification app for smart devices, like CodeRed, is also encouraged. To view hurricane evacuation maps for RI's coastal towns, click [HERE](#).

— Submitted by Dave Aucoin



To **Bucklin Point** on receiving the 2023 Platinum Award from the RI Clean Water Association (RICWA).

The RICWA Platinum Award was awarded to BP for being in perfect compliance for three consecutive years. The facility has about 250-300 opportunities to violate permit requirements every month. Exceedance of just one parameter takes you out of the running from receiving this award.

BP received the award on May 12th during the RICWA Awards Banquet at the Cranston Country Club.



From left to right: Cliff Kobler, Mike Taylor, Marc Parisseault, Meg Goulet, Erika Loreda, Joe Garganese, & Mark Healy. Photo Credit: Mike Spring.

Congratulations to NBC's Bucklin Point!

To **NBC** for receiving the Environmental Business Council of New England's Corporate Leadership Award for NBC's Net-Zero Renewable Energy Program.

The award is presented to a public or private corporation in recognition of their outstanding corporate leadership and contribution to the quality of the environment in New England. NBC is committed to obtaining all of its power from sustainable sources and has offset its energy needs by 80%, with a goal of reaching 100% by 2025. NBC has invested millions in renewable energy including, wind turbines, solar arrays, anaerobic digester biogas project, and electric vehicles.



Investing in these projects has helped NBC be able to stabilize costs for rate payers and stabilize NBC's own electric costs as well as generating revenue from the sale of renewable energy credits.

Sustainability Coordinator **Kerri Houghton**, now in a new position as Control Systems Associate interviewed with EBC on NBC's net-zero journey which will be available to view after the June 8th award ceremony.

Congratulations NBC and all the staff involved in making all of NBC's renewable energy efforts possible! Thank you Kerri for representing NBC and the fantastic interview!

Visit the [EBC website](#) after June 8th to watch the interview.

The Quality Crib

Shout out to some unsung heroes, Field's Point Inventory Clerks **Dan Barlow** and **Joe Devitt**.

Nora Lough recently had to borrow a generator and was amazed on the clean, organized, and efficient tool crib. The system of color coding, ordering by supply number, and barcoding was impressive. The NBC interdepartmental collaboration and cooperation which makes NBC unique is apparent in not only possessing the tools but also the talent.



— Submitted by Nora Lough

NBC Blood Drive June 21st



When: Wednesday, June 21st
9 AM - 1 PM

Where: COB Main Conference Room

To make an appointment scan the QR code, sponsor code 0665.





NBC Pipeline

July 2023

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Calendar of Events *for July*

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
16	17	18	19	20	21	22
National Ice Cream Day					Payday	
23	24	25	26	27	28	29
				National Intern Day		
30	31					

News Briefs...

NBC Receives PBN Best Places to Work Award

The NBC was selected as one of the Best Places to Work in RI for 2023 by the Providence Business News for the thirteenth consecutive year! Awards are based on HR policies and employee surveys, NBC was one of twelve companies chosen in the large company category. Sixty-nine companies were honored at the Crowne Plaza on June 7th. Thank you all for completing surveys and making this award possible!



From left to right: Maryann Sourivong, Jahna Burke, Amy Chabot, CJ Spellman, Gail Degan, Nick DaSilva & Miguel Paolino. Photo Credit: PBN

RICWA 2023 Golf Outing

On June 19th, RICWA held its 19th annual Golf Outing. The outing helps RICWA provide funding for educational opportunities for both wastewater operations professionals and college bound high school seniors as well as providing quality professional training for wastewater professionals. NBC's

Kathryn Kelly, Greg Waugh, Robert Capron, Brian McGinn, Dave Bown, Paul Desrosiers, Rich Bernier, Tony Dalmazzi and Gerry Lagesse participated. NBC's **Kim Sandbach** and **Fern Johnson** volunteered at the event.



Last two on the right: Tony Dalmazzi & Rich Bernier Photo Credit: Mike Spring

Welcome...

Meet Logan Cruz!



Logan Started on June 18th as an IM Operator II. He is from Scituate, RI.

Meet Charles Moreau!



Goes by Chuck. Started on June 18th as NBC's Sustainability Coordinator. Chuck is married, has two sons and a dog named Luna. He enjoys quahogging in his free time.

Meet Robert Webb, Jr!



Robert will start on July 2nd as an Operator I for BP. Robert previously worked as a machine operator. He calls North Providence his hometown with his three dogs.

Meet Diana Gomez!



Diana will start on July 2nd as an Accounting Assistant. Diana previously worked as a bookkeeper. She has twin girls and a dog named Mia. She enjoys cooking and traveling to tropical vacations.

Bay Academy Online Safety Training Program

Since its launch in April of this year, the new Online Safety Training Program offered through Bay



Academy has been a success. Managers and employees should be commended for allocating time during their work schedules to login and complete required safety trainings. As the Safety Compliance function continues to expand, other online safety training courses will be assigned as needed. As a reminder, training plans are designed to meet the unique needs of each employee's specific role and job environment. So, a couple of learning plans will be applicable to all employees, while some roles will receive additional required training for their environment.

Bay Academy Q&A:

Q: How do I access Bay Academy?

A: Click on the 'Bay Academy' link under the 'Applications' tab on the SharePoint homepage



Q: How do I login to my Bay Academy account?

A: For returning users, enter your username and password. For new users, click on the 'Forgot your password' link and enter your username in the next box that appears. DO NOT enter your email address. Your Bay Academy username is the **same** as your NBC username. You will receive a system-generated email containing a link to set your own password.

Q: I get so many emails every day. What does an email from Bay Academy look like?

A: The subject line and sender address are shown below. Do not report these emails as spam!

Bay Academy Course Enrolled

Learning System Administrator (Do not reply) <noreply@sumtotalsystems.com>
To: Aucoin, David

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Q: As a manager, how can I make sure my employees are completing their required safety trainings?

A: NBC's HR Training Coordinator, Crystal Coppie can generate a status report for your section.

Q: How do I get more information on Bay Academy's new Online Safety Training Program?

A: See the All Users email from Pete Yidiaris sent December 2020.

For questions regarding assigned courses, please contact David Aucoin by email or at extension 418
For questions related to Bay Academy, please contact Crystal Coppie by email or at extension 212.

—Submitted by Dave Aucoin



Narragansett Bay Commission

Your blood drive had
17 presenting donors

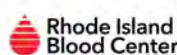
Resulting in **14** donations

Helping to save up to **42** lives!

Next Blood Drive:

Monday, August 21, 2023
9:00am – 1:00pm

Scan QR code to make appointment.
Use Sponsor Code **0665**



800.283.8385 • ribc.org #ribloodcenter



Found an Injured or Orphaned Wild Animal? What Can You Do?

Summer is upon us! You know what that means... baby animals are all around! Birds, rabbits, and squirrels, oh my! Don't forget foxes, opossums, groundhogs, raccoons, turtles, snakes, skunks, deer, ect. The list is long... you get the idea. But what are you supposed to do if you *actually find an orphaned or injured animal?*

Contact the Wildlife Clinic of Rhode Island: [401-294-6363](tel:401-294-6363)

The folks on the hotline will help you assess the problem in real time over the phone. Some situations require no intervention, while others do.

"The Wildlife Clinic of Rhode Island and Wildlife Rehabilitators Association of Rhode Island (WRARI) have been providing direct, hands-on medical and rehabilitative care to ALL species of injured or orphaned wildlife in the state since 1993. Our organization assists more than 6000 wild patients annually, with the goal of releasing them back into the environment."

For Rabies Vector Species:

"Skunks, foxes, woodchucks, raccoons, and bats are considered Rabies Vector Species (RVS) in Rhode Island. If you come across an individual of any of these species that you think may be in need of assistance, **please do not touch them with bare hands**. Any bare-handed contact may be considered an "exposure" by the RI Department of Health and the animal would be required by law to be euthanized and submitted for rabies testing. Proper handling protocols must be adhered to. **BEFORE you handle**, please contact us for instructions at 401-294-6363 or contact the RI DEM at 401-222-3070"

For more info:

<https://www.rwildliferehab.org/>

Donations to the clinic are always welcome! Check out their Wishlist!



**WILDLIFE
CLINIC**
of
RHODE
ISLAND



— Submitted by Bethany Lewis

Welcome Summer 2023 Interns

You may see a lot of new faces this summer, NBC currently has 14 interns working in various departments.

On June 28th interns toured the FP Wastewater Treatment Facility to get a glimpse of what NBC does followed by a welcome lunch.

These interns are a huge help to NBC over the summer months and it's a great experience for them as students, navigating different career fields, assisting them for the future.



From left to right: Kiley Marandola, Jessica Galego, Justin Galego, Cole Cirillo, Ryan Snell, Olivia Cimerol, Erica Tedesco, Jacob Golenia, Raissa Luu & Maxwell Martin.

Plan Ahead: Allens Avenue Detour Starting July 24th - August 6th



Phase 1 Construction will begin on the Fox Point Hurricane Barrier Repair Project July 24th 2023 through August 6th 2023. Traffic will reopen to the normal traffic pattern on Monday, August 7th.

Phase 1 will consist of the removal and replacement of the sewer gate vault roof/demolition and removal of the existing gate operators. **This will require a two-week detour on Allens Avenue, with northbound traffic reduced to one lane. Southbound traffic will be detoured to Eddy Street then to Blackstone Street and back to Allens Avenue.**



Phase 2 will consist of an installation of new gate operators and controls, the start date is TBD. This phase will not require any traffic detours.

Join the Movement with Plastic-free July

Plastic Free July is a global movement that helps millions of people be part of the solution to plastic pollution. After 11 years Plastic Free July has reduced global demand by 2.3% of all bottled water, 3.1% of all fruit and vegetable packaging, 4.0% of all plastic straws.



What plastic item would you be willing to go without forever? Visit their [website](#) and take on the challenge!

June Employee Promotions & Changes

Wishing the following NBC employees success in their new positions...

Robert Capron was promoted to Process Monitor.

FP Operations 2nd shift had a bittersweet farewell for **Brian McGinn** on his last day as Process Monitor on June 20th. Brian started at NBC in November 2019 as an Operator I. He has quickly progressed, accomplishing goals he set by obtaining his Wastewater Grade I and II licenses while being promoted to a Process Monitor all within his first year at NBC. Brian has been promoted to Control Systems Associate at BP. Brian's knowledge, leadership, and work ethic will be sorely missed by his Operations co-workers, but we are all happy for him and wish him the best of luck in his new position. Congratulations Brian!



From left to right: Jaiden Alvarado, John Cavanagh, Sean O'Keefe, Stiles Johnson, Brian McGinn, Liam Walsh & Robert Capron.

—Submitted by Mike Starnino

Strawberry Shortcake Skillet

Ingredients:

3 cups all-purpose flour
½ cup plus 3 tablespoons sugar
1 tablespoon baking powder
1 teaspoon salt
1 cup cold buttermilk
1 large egg yolk
1 teaspoon vanilla extract
12 tablespoons cold unsalted butter, cubed
4 cups quartered strawberries, plus ½ cup sliced strawberries
1 teaspoon lemon zest
Strawberry whipped cream

Directions:

Preheat the oven to 400 degrees F. Lightly grease a 10-inch cast iron skillet; line the bottom with a round of parchment paper.



Whisk flour, 1/2 cup sugar, baking powder, and salt in a large bowl. In another bowl, whisk together buttermilk, egg yolk and vanilla.

Using your fingers or pastry cutter, press butter cubes into flour mixture until pea-size pieces form. Make a well in center of flour mixture. Pour in buttermilk mixture. Stir and fold batter until just combined and a shaggy dough starts to form.

Transfer the dough to the prepared skillet; press evenly into pan. Gently press sliced strawberries into dough. Bake until golden brown and a toothpick inserted into center comes out clean, 25 to 30 minutes. Let cool for 10 minutes.

To prepare the topping, stir together the quartered strawberries, 3 tbsp sugar, and lemon zest in a medium mixing bowl to macerate. Spoon the strawberries and juices over the shortcake. Top with Strawberry Whipped Cream.

Strawberry Whipped Cream: Blend ¾ cup freeze dried strawberries into a fine powder in a food processor. Combine 1 cups whipping cream, 1 tbsp sugar, ¼ tsp vanilla and strawberry powder in a chilled mixing bowl. Beat with an electric mixer at medium speed until soft peaks form, 2 to 3 minutes.

Serves 12.

- Allrecipes Summer 2023 Issue



NBC Pipeline

August 2023

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 August*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		1 Full Moon	2	3	4 Payday	5
6	7	8	9	10	11	12
13	14  OBSERVED	15	16	17	18 Payday	19
20	21 Blood Drive 9 AM - 1 PM COB	22	23	24	25	26
27	28	29	30 Full Moon	31		

NBC Blood Drive



**When: Monday, August 21st
9 AM - 1 PM
Where: COB Main Conference Room**

To make an appointment scan the QR code, sponsor code 0665.



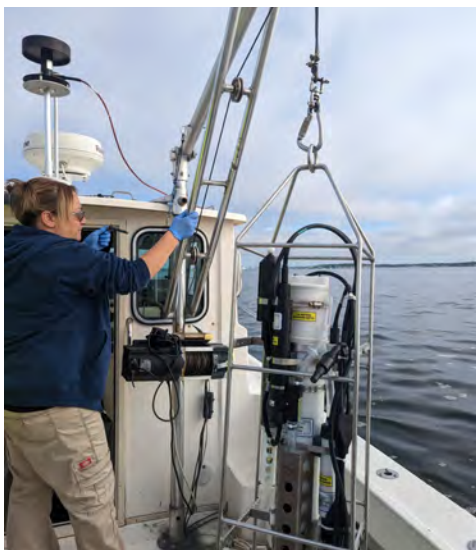
News Briefs...

Welcome, Data Stream!

Environmental Monitoring is excited to announce its new monitoring vessel, The Data Stream. The Data Stream is a brand new 2023 Parker 23290 SL: Sport cabin boat. The Data Stream is equipped with state-of-the-art electronics, including the latest Garmin GPS with Radar overlay capability, a remote-control spotlight, and salt and freshwater wash down. Data Stream's Yamaha engine is a 300hp electronic shift engine which is an upgrade from the 250 HP Mercury on the Monitor.



The Data Stream will pick up where the Monitor left off. EM routinely collects samples and data from up to 24 locations in the Providence and Seekonk Rivers, provide important understanding of the complex environment of the Upper Narragansett Bay. TAC Scientists review the information collected to gain an important understanding of the complex environment of the Upper Narragansett Bay. The data gathered is a tool in recognizing water quality changes that may occur before and after major NBC projects and initiatives designed to improve discharges from NBC facilities. Below is a summary of the monitoring activities conducted, however, for a more in depth look at these activities, [visit http://snapshot.narrabay.com/](http://snapshot.narrabay.com/):



Fixed Site Monitoring – NBC maintains and monitors two fixed site water quality stations located at Phillipsdale Landing and Bullocks Reach, which have been established in proximity to the Field's Point and Bucklin Point wastewater treatment plant outfalls respectively. These stations provide real time monitoring measurements for depth, temperature, salinity, pH, dissolved oxygen, turbidity, and fluorescence.

Water Quality Profiles – Water quality profiles are collected twice per month at 6 stations through the Upper Bay using a Seabird Electronics profiler measuring depth, temperature, salinity, dissolved oxygen, density, and photosynthetically active radiation.

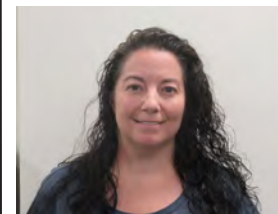
Welcome...

Meet Gabriel Berroa!



Goes by Gabe, started on July 16th as a FP Operator I. Gabe is from Pawtucket and previously worked for the Military.

Meet Melissa Bocanfusso!



Melissa is NBC's new Retirement Plan Administrator as of July 16th. She's from Charlestown, RI and has 1 son.

Meet Maria Lepore!



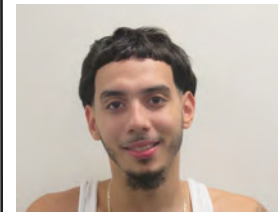
Maria started on July 16th as NBC's Customer Care Rep./Fiscal Clerk. She loves old black and white movies and her hobbies include making wreaths and greeting cards.

Meet Aaron Amaral!



Aaron started on July 31st as a Pre-treatment Inspector I. He recently moved to Smithfield with his fiancée. He has four cats named Swoopy, Mimiky, Gorgan and Junko.

Meet Christopher Bourdier!



Chris started as a BP Operator I on July 30th. He's from East Providence and previously worked for UPS. Chris enjoys playing basketball.

Welcome, Data Stream Continued...

Bay Pathogen Monitoring – EM collects bi-weekly bacteria samples at twenty stations throughout the Upper Bay. All the bacteria samples are analyzed for fecal coliform and one quarter are selected to be analyzed for enterococcus. Evaluation of these parameters by NBC has helped to determine the effectiveness of the NBC CSO Abatement Project.



Nutrient Monitoring - EM samples the receiving water for various nutrient parameters twice a month from six stations throughout the Upper Bay. Analyzed parameters include nitrite, nitrate ammonia, total dissolved nitrogen, orthophosphate, and silicate. This monitoring has demonstrated that NBC contribution of nutrients is minor when compared to loadings from other sources.

Benthic Video Monitoring – EM attempts to conduct video surveys (weather permitting) of benthic conditions of the Providence River. The NBC boat tows an underwater camera mounted on a specialized sled collecting video which is later viewed by NBC scientists who document observations and organism captured by the video.



Surface Mapping – While the monitoring vessel is under, the location of the boat is recorded while water is pumped from the surface of the Bay through a flow meter to a water quality sonde which measures temperature, salinity, dissolved oxygen and chlorophyll data.

—Submitted by Nathan Dean

Casual Day Raffle

The Casual Day Committee had such great response with their last call for ideas, they're doing it again!



Those who are loyal contributors to the Casual Day Charitable Giving Fund, Casual Day Committee members want to ensure that the organizations you care about benefit from the Fund. Especially in our current economic environment, there are many excellent charities that could use a little extra help. So, please: let them know what's near and dear to your heart.

Here's what to do: Contact a member of the Casual Day Charitable Fund Committee with your suggestion(s) by Friday, August 4th. Members include: Leah Foster, Bethany Lewis, Eliza Moore, Ashley Petteruto, Patricia Pinilla, Renee Rinaldi-Patterson and Jamie Samons. **Four worthy organizations will be chosen at random to receive a \$500 donation from the Fund.**

Just a reminder: the organization must be a 501(c)(3) and not political or religious in nature.

Don't have an idea for a charity right now? No problem: the Committee welcomes suggestions on a rolling basis.

Congratulations!

NBC received the GFOA Excellence Award in financial reporting for FY 2022 audit.



This award is the highest form of recognition in the area of governmental accounting and financial reporting and represents significant accomplishment. It encourages and assists state and local government agencies to go beyond the minimum requirements of generally accepted accounting principles to prepare annual comprehensive financial reports that evidence the spirit of transparency and full disclosure and then to recognize individual governments that succeed in achieving that goal.

Congratulations to NBC's accounting team for all their efforts!

FP Updates on Heavy Rainfall in the Month of July

Rhode Island was the victim of some major wet weather events in the month of July. Heavy rains caused serious flooding in many areas of the state during the week of the 4th of July as well as July 16th.

On Sunday July 16th Field's Point received approximately 4 inches of rain in a short amount of time which resulted in filling the tunnel and going into a Wet Weather event. Flows from the Main Pump Station reached up to 173MGD. FP staff worked together and handled the high flows and any issues that came their way.

The very next day FP had an unexpected plantwide power outage at 9:10 AM while staff were on break due to a mysterious power surge. FP staff immediately jumped into action from a first day Operator to Plant Manager, all hands are on deck when these issues arise.

When having experienced staff and people who truly care about the plant, these issues don't seem as bad when they occur. It's impressive to watch everyone jump into action with a plan to get the job done!

Big **THANK YOU** to all involved!!

—Submitted by Eric Bogosian

Field's Point Beautification Project

Operator Al Montijo has been working hard to complete this overgrown space during the hot uncomfortable temperatures. Not only did he do an amazing job but he added creativity, and made the space a little more beautiful.



In the small space of land in between the FP Administration Building and the Pretreatment Building there were a series of dying bushes surrounded by unsightly vegetation that would constantly need upkeep.

Thank you, Al, for changing what was once an eye sore into a clear pristine space. In addition, a picnic table was added to the area where employees could enjoy a lunch or a break.

— Submitted by Jason Trenholm

Save the Date: Annual NBC Golf Tournament, October 5th

The NBC Golf Tournament is scheduled for...

Thursday, October 5th 2023
Swansea Country Club.
Start time: 10:00 AM



The format will be the same as prior years, teams of four with everyone starting at the same time but at a different hole. Participants will be playing a "scramble" which means you always hit from the best shot of the four players. There will also be a closest to the pin and longest drive award.

This year's event will include lunch; two hot dogs, chips, and soda. The cost will be \$72.00.

Payment and team roster must be submitted to Eric Bogosian by Friday, September 22nd. If payment is not received on time, your team will not be scheduled to play, as we are responsible for no-shows.

As usual, please check with your supervisor on scheduling vacation or personal time for this.

Contact **Eric at x213** if you have any questions.

Arnold Mills Parade

The weather didn't stop IM Inspector **Anthony Ciccirelli** for continuing his Arnold Mills Parade tradition. Anthony decked out his jeep for the event that has been a Cumberland 4th of July tradition since 1927.





NBC Pipeline

September 2023

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Calendar of Events *for September*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1	2
					Payday	
3	4	5	6	7	8	9
						
10	11	12	13	14	15	16
	Patriot Day				Payday	
17	18	19	20	21	22	23
						
24	25	26	27	28	29	30
		BOC Meeting Bucklin Point 11 AM			Full Moon	
					Payday	

News Briefs...

Wind Turbine Blade Repair Finishes Ahead of Schedule

Last month, you may have observed what appeared to be tiny specs on the Field's Point turbine blades. These "specs" were actually technicians suspended in a basket working on the turbine blades. On July 25th work began to repair the blades on all three Field's Point wind turbines. The blades' leading edges were in significant disrepair due to years of wear and pitting caused by rain, snow, ice, and particulate dust in the air. Blade tip speed can reach a maximum of 166 mph and at that speed even rain droplets will eventually cause pitting and wear on the blades, reducing turbine efficiency and affecting power generation.



First, the existing leading-edge material had to be sanded off. Any blade damage, such as cracks, erosion, chips, etc. were repaired using fiberglass/resin, and then the repaired area was gel coated. The last step in the process was to install 8 meters of a proprietary material called Pro Blade Ultra (PBU) over the outermost edge of each blade. PBU is a tough film cut into one-meter sections that is wrapped over the leading edge of the blade.

The work was performed by a three-person team sent by LM Wind Power, the original manufacturer of NBC's turbine blades. Support work to lock-out tag-out (LOTO) the turbines and lock each blade being worked on at the 06:00 o'clock position was provided by Green Development, LLC.



The new proprietary PBU material carries an eight-year warranty, a huge improvement over the prior material which carried just a one-year warranty. The manufacturer of the PBU leading edge material also claims its material can improve Annual Energy Production (AEP) by up to 1.4% compared to the existing Leading-Edge Protection (LEP) solutions, due to its material having less drag.

Operations staff were instrumental in assisting with the project, helping to identify platform stabilization spotter locations for each turbine, and making calls to the Goldwind Remote Operation Center (ROC) to deactivate/reactivate each turbine when necessary. Despite the hot, humid and sometimes windy conditions, the team finished the project on August 4th, about one week ahead of schedule, working very long days and even on the weekend.

-Submitted by the Engineering Team

Welcome...

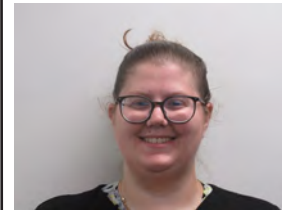
Meet Lauren Malouin!



Lauren started as a Lab Technician on August 13th. Lauren has her Masters in Molecu-

lar Cell Biology and graduated with her Masters Degree at age 21! She enjoys reading and watching her favorite show, Game of Thrones.

Meet Sarah Dalmazzi!



Sarah started as NBC's Purchasing Support Specialist on August 13th. She lives in Hope,

RI with her two children. Sarah previously worked in Healthcare Management for the last 10 years.

Budgeting Basics

Kudos to these three ladies to the right for putting together a very informative workshop for staff dealing with NBC's budget. Michelle McCabe, Gail Degnan and Christine Severino went through all the ins and outs of running account analyses, budget vs actual reports, entering budget transfers, OCP reallocations and changes to capital projects throughout the fiscal year.



Great job and thank you for all the Budgeting help!

Congratulations...

To Process Monitor **Jaiden Alvarado** on the birth of his beautiful daughter, Nyla Zo'e Alvarado. Nyla was born on August 1st, weighing 7 lbs 12 oz and measuring 20.5 inches long. Mom and baby are healthy and everyone is doing well!



The sky is the limit for Jaiden. Jaiden has been with NBC about 14 months now, starting just a few weeks out of graduating from high school. He was part of the NBC high school recruitment process HR developed in 2022 and NBC is so proud of his success. He started as an Operator I, worked his way up to Operator II and is now currently a Process Monitor all within this last year, awesome job Jaiden!

To Lab Sample Compliance Coordinator **Joseph Guerreiro** on his beautiful daughter Ivy. Ivy came into this world on August 24th at 5:58 PM, weighing 5 lbs 11oz. Everyone is happy, healthy and doing well!



Reminder: Annual NBC Golf Tournament, October 5th

The NBC Golf Tournament is scheduled for...

Thursday, October 5th 2023
Swansea Country Club.
Start time: 10:00 AM



The format will be the same as prior years, teams of four with everyone starting at the same time but at a different hole. Participants will be playing a “scramble” which means you always hit from the best shot of the four players. There will also be a closest to the pin and longest drive award.

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As usual, please check with your supervisor on scheduling vacation or personal time for this.

Contact **Eric at x213** if you have any questions.

NBC Watershed Explorers Program Hosts its First Summer Camp

Big shout out to NBC's Environmental Education Coordinator **Cynthia Morissette** for a successful first year hosting a week of summer camp. Great job!

Students from the year-long NBC Watershed Explorers Program were given the opportunity to write an essay to be entered in for a chance to attend a free week of camp at NBC and five students were chosen.

These five lucky students spent a fun filled week learning about NBC's wastewater treatment process and visiting NBC's state-of-the-art Water Quality Science Building, enjoyed a field trip to Save the Bay for a Bay Experience and a trip to Frosty Hollow Pond in Exeter to search for critters and many other fun activities and learning experiences in-between.

NBC looks forward to hosting another group of students in Summer 2024!



FP Mechanics Replace Motor at Ernest Street Pump

On August 2nd and 3rd, Fields Point Maintenance Mechanics removed and replaced the 300 hp motor for the #1 Goulds Pump at the Ernest Street Pump Station. This motor weighs more than 5000 lbs. and is located four levels underground. This project included removal of the faulty motor, lowering, and installing the new motor as well as laser shaft alignment with the pump shaft. The work was completed in a safe and expedient manner by our most senior and experienced mechanics, **Norman Rodolewicz, John Schupp, Norman Ellinwood and Troy Zillich**. These four men are all Grade 2 Maintenance Mechanics and are the backbone of the Fields Point Maintenance Department.



Thank you all for another job well done!

— Submitted by Ron Goodinson

Have You Visited NBC's Snapshot Website?

August 8th brought some crazy weather to the Providence area. NBC's Quality Assurance Coordinator Maryann Sourivong and intern Olivia Cimerol were out on NBC's new boat, the Data Stream to access and swap out the sonde equipment as the torrential rains hit. The sonde equipment has live data readouts to collect water quality data in the Upper Bay.



NBC records and shares the sonde equipment data on the Snapshot of the Upper Bay Website, check it out!

August Employee Promotions, Transfers & Retirements

Wishing the following NBC employee success in their new positions and a happy, healthy retirement...

Jim Kelly was promoted to Environmental Science Technical Advisor

CJ Spellman was promoted to Principal Environmental Engineer

Kerri Houghton was promoted to Assistant Control Systems Administrator

Jason Trenholm was promoted to Maintenance Manager

Bernard Harwood was transferred to Inventory Control Clerk

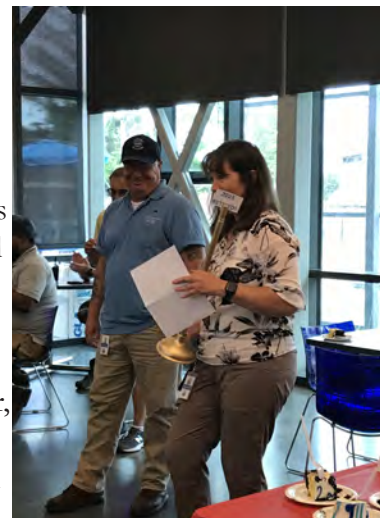
Mariam Larios was transferred to Customer Care Fiscal Clerk

Ron Goodinson retired on August 18th

Ron Celebrates Over 35 Years with NBC and Looks Forward to Retirement

The NBC celebrated **Ron Goodinson's** retirement on Thursday, August 17th in the Field's Point lunch room with some of his closest co-workers and friends. Ron worked for NBC for 35 years and 9 months to be exact! O & M Director, Meg Goulet presented Ron with his very own golden plunger while staff enjoyed lunch and cake to celebrate his many years at NBC.

Ron looks forward to spending some quality time with family and his grandkids, and still plans to continue umpiring for local softball and baseball teams in his free time.



Wishing you a happy, healthy, relaxing retirement!



NBC Pipeline

October 2023

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Calendar of Events *for October*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	
1 National Pumpkin Spice Day	2	3	4	5 Flu Shot Clinic 7:30 - 11:30 AM NBC Golf Tournament	6	7	
8	9	10	11	12	13 Payday	14	
15	16 Columbus Day OBSERVED	17	18	19	20	21	
22	23	24	25	26	27	28	
		SPIRIT WEEK October 23 - 27			26 Pumpkin Decorating Contest	27 Payday	28 Full Moon
29	30	31 BOC Meeting COB 11 AM Halloween					



News Briefs...

NBC Hosts First Board Meeting in the New Bucklin Point Operations Building

On Tuesday, September 26th NBC hosted the September Board of Commissioners meeting in the new conference room at Bucklin Point and celebrated the completion of the new Bucklin Point Wastewater Treatment Facility Operations Building.



Photo Credit: Peter Goldberg

With the completion of the new building, NBC will now be able to host Board of Commissioners meetings at either NBC location. In honor of this special event, Mayor Grebien of Pawtucket, Mayor DaSilva of East Providence and Lincoln Town Administrator Gould joined NBC staff and Commissioners for the ribbon cutting ceremony of the new conference room.



Photo Credit: Peter Goldberg

The modern building will help the facility meet the current and future challenges of keeping our rivers clean. It is fully equipped with a beautiful foyer, breakroom and locker rooms for all shifts, offices for staff, and a conference room with a magnificent panoramic view of the wastewater treatment facility along the Seekonk River.



Photo Credit: Peter Goldberg

Welcome...

Meet Shaun Collum!

Shaun will start on October 8th as an Operations Supervisor at Bucklin Point. Shaun is from



North Kingstown and previously worked at the South Kingstown Regional Wastewater Treatment Facility. He is married with 2 children and enjoys bowling in his free time.

Meet Heather Tejado Fiallo!

Heather (Heather) will start on October 8th as NBC's Control Systems Associate. Heather



has a degree in Computer Science and Spanish and she is the first in her family to graduate from college; congratulations Heather! Heather is a foodie and enjoys traveling, drawing, going to the gym, and braiding in her free time.

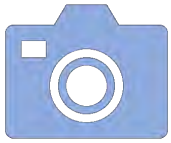
Meet Diego Gutierrez!

Diego will start on October 8th as a FP Operator I. Diego is from Columbia and was previously a



truck driver for over 15 years before starting at NBC. Diego has two daughters and a dog.

Photos Wanted!



It's that time of year again... The NBC Budget Team wants to feature your photos in the upcoming FY 2025 Budget! We are looking for photos taken by NBC staff of the happenings on NBC campuses, staff in the field, and of course, Narragansett Bay!

Please be sure to include dates, locations, descriptions, and/or names with each photo. All photos can be sent to Budget_Inquiries@narrabay.com for a chance to be featured in the FY 2025 Budget. Thank you so much to everyone who submitted photos last year. We look forward to seeing your submissions!

- Submitted by Budget Team

NBC Flu Clinic, October 5th

The NBC Flu Clinic is scheduled for **Thursday, October 5, 2023 from 7:30 AM to 11:30 AM in the COB Main Conference Room**. If you haven't already done so and are interested, please register, as walk-ins will be limited.



New to the Wellness Incentive program this year is the Flu Vaccine. Eligible Employees may receive a \$100.00 wellness incentive.

To sign up visit: [The Wellness Company](#)
Login ID: narrabay

September Employee Promotions

Wishing the following NBC employees success in their new positions...

Robert Capron promoted to FP Operations Supervisor

David Miller promoted to FP Process Monitor

Elizabeth Kohr promoted to Quality Assurance Specialist

Arlene (Dee) Natale promoted to Financial Analyst

P-Bruins Kick-off the Season!

It's that time of year again! The P-Bruins will be working with NBC again to give us special group offers and great lower-level seats on upcoming games throughout the year. Their first group offer will be for Friday, October 13th vs the Hartford Wolfpack on Opening Night! For anyone that can't make this game, when you access the link, they are also offering discounted tickets for games on October 20th and 21st.



Game & Details:

Friday, October 13th at 7:05 vs. Hartford

- \$25 for 100 Level Seating
- One (1) Providence Bruins Hat
- Rally Towel Giveaway for first 2000 fans!

Tickets can be purchased for this game at: <http://www.ProvidenceBruins.com/GroupTickets>

*New for this season, fans will have the capability to select specific seats now, instead of being given best available! The seating will be in Section 111-119 where the P-Bruins shoot twice while supplies last. There is also no need for a Promo Code anymore, they have a new tracking system.

Mark Your Calendars!
Open Enrollment Starts
November 6th



NBC Spirit Week: October 23rd - 27th

Spirit Week Details:



- Monday 10/23 - NBC Blue Day
- Tuesday 10/24 - Crazy Sock Day
- Wednesday 10/25 - Battle of the Decades:
80's vs. 90's
- Thursday 10/26 - Costume Day
(Prize for Best Costume)
- Friday 10/27 - Jersey Day

O&M Garage Update

NBC's Inventory Control Clerks **Dan Barlow** and **Joe Devitt** are at it again. The O&M Tool Crib and Garage received some re-painting and cleaning up, the place looks fantastic.

Thanks, Joe and Dan!

— Submitted by *Andrea DiCicco*

It's Electric!

Field's Point welcomed a new electric GEM vehicle in September. This new vehicle will be used in the place of the Utility Operator to use throughout the plant for landscaping, painting projects and small tasks.



Pictured: Steve Cote and Jack Fascitelli

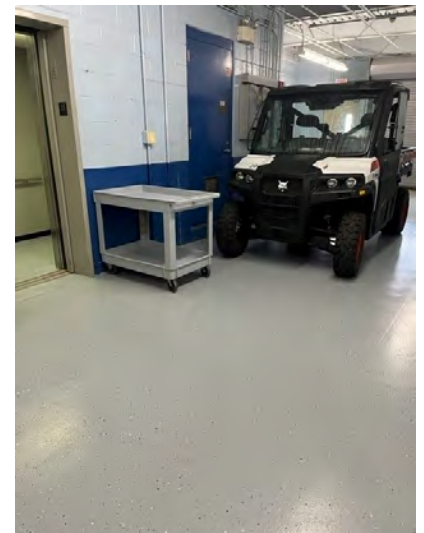
— Submitted by *Nathan Boiros*

Casual Day Update



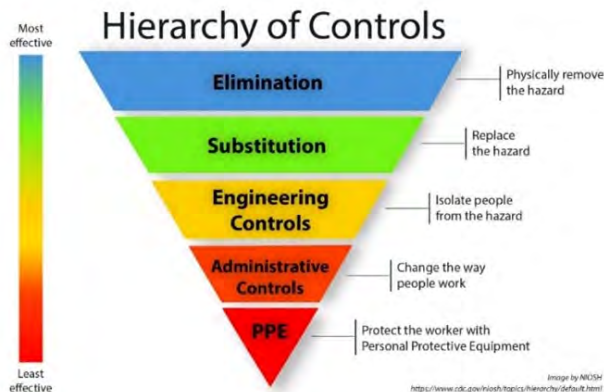
The NBC Casual Day Fund will be contributing to the Gloria Gemma Breast Cancer Research Foundation this month in honor of Breast Cancer Awareness Month.

If you are a Fund participant and would like to request a donation to a qualifying charity, please contact a member of the Casual Day Fund Giving Committee: **Leah Foster, Eliza Moore, Ashley Petteruto, Patricia Pinilla, Renee Rinaldi-Patterson, or Jamie Samons.** Qualifying charities must be a recognized 501 (c)(3) and cannot be political or religious in nature. If you are not currently contributing to the Fund, contact payroll and join the effort!



October is National Protect Your Hearing Month

The National Safety Council annually designates the month of October as “National Protect Your Hearing Month.” Sponsored by the National Institute for Occupational Safety and Health (NIOSH), the goal of this month’s theme is to promote awareness about workplace noise and occupational hearing loss.



Every year, tens of millions of employees are exposed to hazardous noise levels in the workplace, and thousands suffer from preventable hearing loss. Although occupational hearing loss is one of the most common work-related illnesses, it’s important to remember that it is preventable. Controlling employee exposure to hazardous noise levels in the workplace is critical and can be achieved by implementing long-standing “Hierarchy of Controls” as pictured below.

Noise-induced hearing loss limits an employee’s ability to hear high frequency sounds and understand speech, which seriously impairs the ability to communicate at work. This type of hearing loss is permanent, but once again, preventable. NBC’s Hearing Conservation Program strives to prevent occupational hearing loss, preserve and protect remaining hearing, and equip applicable employees with the knowledge and hearing protection devices necessary to safeguard themselves against harmful noise levels. Employees in NBC’s Hearing Conservation Program also receive required hearing tests, or ‘audiograms’ every year to ensure that workplace noise controls are adequate and utilized hearing protection is sufficient. All NBC employees are encouraged to click [HERE](#) to view a short educational video on common hearing loss myths.

Remember to protect your hearing at home, as well. Here are some tips for employees:

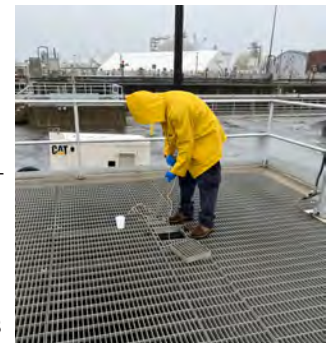
- Turn the volume down on your devices,
- Take breaks from noise,
- Get regular hearing tests from your physician,
- Wear protective hearing gear in noisy environments,
- Allow your ears time to recover after being exposed to loud sounds,
- Download one of many phone apps that record decibel levels

— Submitted by Dave Aucoin

Record Rainfall Impacts NBC Facilities

Shout out to all the **Field’s Point** and **Bucklin Point** staff for the outstanding job managing the NBC treatment facilities during the major rainfall the area had over the last few months.

The Providence area and most of the surrounding cities and towns saw over 16 inches of rain over the last three months, which is well above average. Staff worked around the clock during these events monitoring flows to the plant and tunnel, collecting the necessary samples that are needed to process changes and making sure the Ernest Street Pump Station does not go past 107ft and damage equipment.



FP Operator Cliff Darosa collecting a sample



Great job everyone and as Supervisor Mike Starnino says, “there is always light at the end of a full tunnel”!

Photo Credits: Mike Starnino



NBC Pipeline

November 2023

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 November*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
5	6	7	8	9	10	11
Daylight Saving Time Ends	Open Enrollment Assistance COB - RM 104 9 AM - 12 PM	Election Day	Benefits Fair COB 9 AM - 12 PM Full Moon		Veterans Day OBSERVED Payday	
12	13	14	15	16	17	18
			Know your Numbers COB 9 AM - 1 PM			
19	20	21	22	23	24	25
				Thanksgiving Day	Payday	
26	27	28	29	30		



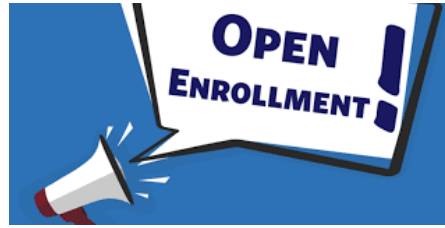
Mark your Calendar:
Open Enrollment will take place
November 6th - 19th

News Briefs...

NBC Open Enrollment & Benefits Fair Details

On-line open enrollment will take place from **November 6th - 19th.**

Online enrollment must be completed by all employees even if you are not making changes.



- The first 5 Employees that complete their online enrollment will receive an NBC Bluetooth Cooler
- The next 20 Employees will have a chance to spin our prize wheel
- The next 100 Employees will receive an NBC goodie bag.

If you've had changes during the year, make sure you:

Update Beneficiary Information

Update Vehicle Information

Update Contacts or Address Information

Online enrollment must be completed November 19th
All completed Forms must be to HR by November 24th
Changes are effective in the paycheck dated 1/5/2024

NBC will be hosting a Benefits Fair on **Wednesday, November 8th** in the **COB Main Conference room from 9 AM - 12 PM.**

Representatives from the following companies will be present to assist you with enrollment and answer questions:

- Blue Cross Blue Shield of RI
- Delta Dental of RI
- CollegeBoundfund - Jennifer McElroy
- Colonial Life Insurance - Gordy Jones
- Employees Retirement System of RI
- TIAA-Cref
- SRP Financial Services
- NBC's HR Department for VSP, Reliance Life Insurance, and TASC (medical and dependent care FSA)

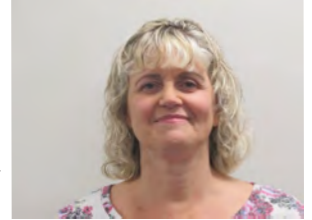


Stop by any time during the scheduled event to gather some useful information, enter a raffle, and pick up an NBC souvenir!

Welcome...

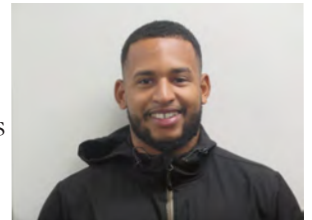
Meet Victoria Cohen!

Victoria is NBC's new Senior Accountant. She is from Attleboro, MA where she resides with her cat Smokey. She enjoys knitting and reading during her free time.



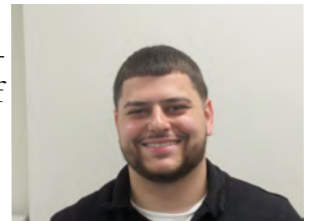
Meet Rubens Tondreau!

Rubens started in October as a Field's Point Operator I. Rubens is from Walpole, MA and previously worked as a Supply Associate. His hobbies include working out, hiking and eating good food!



Meet Jacob Pagnozzi!

Goes by Jake, is a new Financial Analyst at NBC as of October 8th. Jake is from Cranston, RI.



Meet Meghan Healy!

Meghan is NBC's new Pretreatment Inspector I. Meghan has interned with NBC in the past and just graduated from Stonehill College in May. Congratulations!



Welcome Continued...

Meet David Thistle!

Dave is the new Assistant E & I Technician at BP. Dave is excited to be here! He is from Providence and enjoys Martial Arts in his free time.



Meet John Scotton!

John started as NBC's new Treasury and Debt Manager. He is originally from North Carolina. John previously worked for Duke University before coming to NBC. John enjoys hiking in his free time.



Save the Date: Holiday Employee Appreciation Events Announced

Tuesday, December 12th: Field's Point, all shifts

Thursday, December 14th: COB, IM, EM, TAC, Lab, Pretreatment
Location: Field's Point Lunchroom

Thursday, December 14th: Bucklin Point, all shifts



Casual Day Fund raffle, giving drive, games, fun and more details to come!

Stay tuned...

Congratulations...

To Assistant IM Manager, **Christopher Dracoules** on the birth of his second daughter, Rosalie Quinn Dracoules. Rosalie was born on Wednesday, October 18th at 10:27 AM, weighing 7lb 11.5oz and 20 inches. Congratulations to the Dracoules family on your beautiful new addition!



To Sr. Human Resource Representative, **Crys-tine Marandola** on her wedding to her now husband Louie on Sunday, October 1st.



Use or Lose



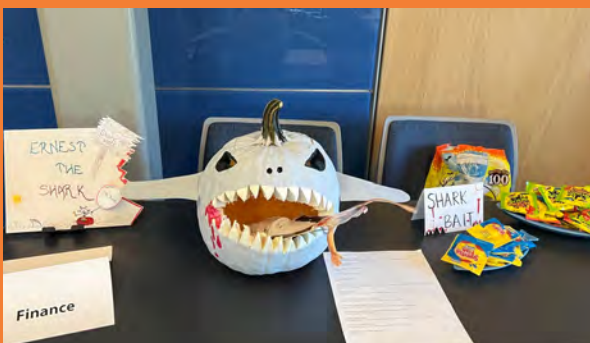
The deadline for utilizing "Use or Lose" vacation and personal time is December 30th, 2023. Please be sure to review your accruals on SharePoint and plan accordingly. Scheduling and approval for the use of all vacation and personal time must be coordinated and approved by your supervisor

Phase 2 Begins on the Fox Point Hurricane Barrier Repair Project

The second phase of construction will begin Monday, November 13th and should conclude by early December. During this phase of construction, Allens Avenue will remain open to both north and south-bound traffic but will be reduced to one lane in each direction around the work zone at the Allens Avenue Hurricane Barrier Street Gate.



Annual NBC Pumpkin Decorating Contest



NBC Spirit Week FUN

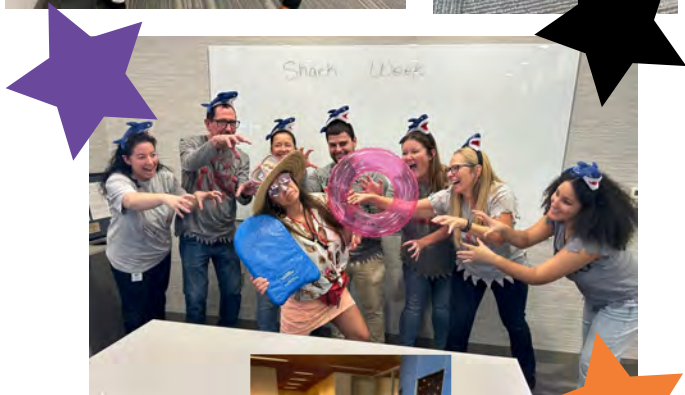


NBC's annual Pumpkin Decorating Contest was a huge success! There was some tough competition this year, with no theme in place staff really showed off their creativity, hardwork, and dedication to this annual event. Especially our 1st place winners, EMDA. It took them about 3 days to cover that pumpkin in about 9 bags of candy corn! (See previous page)

Spirit week was a blast as well!

Congratulations to Creative Administrative Assistant, **Anne Marie Higgins** on winning the Costume Contest. Anne Marie dressed as Madame Leota from Disney's A Haunted Mansion.

Thank you to everyone who participated!



Know Your Numbers

The Know Your Numbers health screen event will take place on November 15th from 9:00 AM to 1:00 PM in the COB Main Conference Room.

Space is limited and there are only a few spots left. If you haven't registered and would like to participate, sign up today!



The screening service includes:

Cholesterol, Blood Pressure, Glucose (blood sugar) level, and Sun Safety Screening (dermaview).

In addition, eligible employees may receive a Wellness incentive award of \$100 for the Annual Know Your Numbers Screening wellness incentive and \$100 for the Preventive Screening wellness incentive if the results obtained at the screening event meet the guidelines of NBC's Wellness Incentive Program.

For questions contact Jessica Toporoski at ext. 370.

Buy Nothing Day Coat Exchange

NBC will be participating in the Buy Nothing Day Coat Exchange again this year.

To donate, place new or gently-used coats, hats, gloves, mittens, sweaters, or sweatshirts in the marked bins at each NBC location between **now and November 21st.**

All sizes of kid and adult items are greatly appreciated!



For more information you can visit their website at <https://www.ricoatexchange.org/>

November P-Bruins Offer

The P-Bruins are offering NBC staff some great ticket deals with some exciting giveaways this month!



On Friday, November 17th, the P-Bruins be giving away a commemorative ticket celebrating the 25th anniversary of their 1999 Calder Cup team to the first 2,000 fans! On Saturday, the 18th, they'll be giving away t-shirts also celebrating the Calder Cup team for the first 2,000 fans!

Game Details:

- Friday, November 17th at 7:05pm vs Wilkes Barre/Scranton Penguins
- Saturday, November 18th at 7:05pm vs Wilkes Barre/Scranton Penguins

Ticket Details:

- \$25 for 100 Level Seating
- One (1) Providence Bruins Logo Hat

Tickets can be purchased for this game at: [http://www.ProvidenceBruins.com/Group Tickets](http://www.ProvidenceBruins.com/GroupTickets)

Anthony Ciccarelli's Grandson Visits FP

Five year old Isaac came for a visit to FP on Friday, October 16th, he loved checking out the big trucks and wearing Grampy's hard hat!



Trash Talkin

EVERYBODY KNOWS that aluminum, glass, and plastic are all recyclable. But did you know each material can be recycled a specific number of times?



Aluminum can be recycled an unlimited number of times and 65% of all aluminum cans are recycled. 80,000,000,000 cans are produced each year. (Source: Earth Warrior Lifestyle)

Glass is second and is 100% recyclable. Glass can be endlessly recycled yet only 33% of glass bottles are recycled each year. (source: Glass Manufacturers Industry Council GMIC). Coca Cola first used glass bottles which were used approximately 15 times each before being discarded.

Lastly, single use plastic bottles are designed for one-time use only. (source Healthline) Bottled water has been sold since the 1850s. FACT estimates show that approximately 1.3 BILLION bottles are used each day which equates to 1 million bottles used per minute. (source: AQUASANA)

PLEASE, let's all do our part and be more diligent with our recycling. Look for the recycling bins around the office and use a reusable waterbottle whenever possible.

- Submitted by Charles Moreau

Successful Annual Confined Space Training

Annual confined space field training at Field's Point on September 26th was a huge success.

From scheduling assistance and equipment setup, to encouraging employee attendance and participation, efforts helped provide another well-received training session for Field's Point employees, both seasoned and new.

Of the 42 employees that were scheduled for this required training, 38 were in attendance for an attendance rate of 91%.



FP Maintenance Manager Jason Trenholm and Safety Compliance Coordinator David Aucoin.

Congratulations FP Employee of the Year & Team of the Year!

Congratulations to Field's Point Employee of the Year, **Broc Hector** and Field's Point Team of the Year, **Dan Barlow** and **Joe Devitt!**

Broc, FP Operator/Heavy Equipment Operator, is always a pleasure to work with. He goes above and beyond and is always there when you need him. He has a positive attitude, he is self-motivated, neat, and true to himself. Safety is always a priority to Broc and he actually has his own "Broc things" assigned to him that always get done!



Dan Barlow and Joe Devitt, both Inventory Control Clerks here at NBC have completely transformed the inventory area. They went through lots of improvements including organizing, cleaning, and painting the space. They have gone above and beyond their duties and created better working conditions not only for themselves but for the rest of their peers at NBC. They have truly set an example of "teamwork"!



Thank you to the Awards Committee; Nik Carroccio, Pam Ciolfi, David Fraioli, Sean O'Keef and Jason Trenholm for the year-long planning and review of candidates as well as putting the award ceremony together. Also, shout out to all the staff that submitted nominations, all nominations were outstanding candidates!

Congratulations Broc, Dan and Joe!

RIasing Sludge Takes Home Third Place Overall in the Operations Challenge at WEFTEC

The Rhode Island Clean Water Association's (RICWA) Wastewater Operator Challenge Team, RIasing Sludge competed in WEFTEC 2023 in Chicago last month. WEFTEC is the largest annual water quality exhibition in the world, with operations teams flying in from all over the world.

NBC's newest team member, Bucklin Point Operations Supervisor, **Shaun Colium** is a member of RIasing Sludge and attended the event. Out of 56 teams that competed across three divisions, RIasing Sludge placed 1st in the Process Event, 3rd in the Laboratory Event, and 3rd place overall in the Division II bracket, making the team eligible for Division I in 2024.

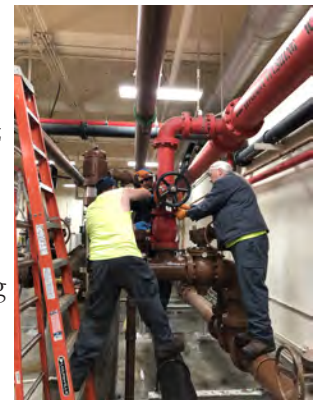


NBC Biologist II, **Nora Lough** also participated at the conference as a Laboratory Judge for the competition.

THANK YOU, Shaun and Nora for being outstanding ambassadors for the NBC and Congratulations Shaun and the rest of RIasing Sludge team, NBC can't wait to cheer you on in the 2024 competition!

BP Maintenance Updates

Maintenance staff at BP have been busy with repairs. **Mike Arlan, Mike D'Arezzo, Guy Beaudette** and **Jesse Gomez** installed a 6" knife gate in the Primary Sludge Pumping Station basement for flushing water, which required shutting down the building for some time to replace the valve. A cracked hypo line needed repair as well and was able to be replaced by **Tim Henshaw** and **Jesse Gomez** in good time before all the rain received in the beginning of October. Great work by all!



— Submitted by Mark Healy

Sprains and Strains Injury Prevention

Sprains and strains continue to be a common type of work-related injury throughout the U.S. A sprain is a stretch or tear in a ligament. Ligaments are bands of fibrous tissue that connect bones to bones or joints. A strain is also a stretch or tear, but it happens in a muscle or tendon. Tendons link muscles to the bones. From 2021 – 2023, NBC has experienced a total of 41 injuries related to sprains and strains. Back injuries continue to be the most prevalent type of strain experienced by employees throughout the country, as well as at NBC. According to the Bureau of Labor Statistics (BLS), more than one million U.S. workers suffer back injuries each year.

In an ongoing effort to promote injury prevention at NBC, TAC staff recently coordinated in-person Healthy Back/Ergonomics training for all Operations and Maintenance (O&M) employees. This mandatory training was conducted by Beacon Mutual Insurance in late September and early October. Classes were held at Field's Point and Bucklin Point to accommodate all O&M employees. This type of targeted training is important because employees within the O&M Division commonly perform tasks that involve bending, twisting, lifting and transporting heavy objects or material.



Listed below are some of the injury prevention techniques that were provided to O&M employees, but also apply to all NBC employees, while at work and at home:

- Stretch before performing any heavy lifting or moving of material,
- Avoid lifting an object that exceeds your own personal strength, usually > 50 lbs. for the average person,
- Always carry and transport objects close to your body,
- Avoid twisting. Turn your whole body as one unit,
- Lift with the power of your legs, not your back, and
- Lift or transport heavy loads by pushing the load, as opposed to pulling.

The following online Bay Academy resources are available to all NBC employees:

- Sprains and Strains
- Back Safety & Injury Prevention 2.0
- Ergonomics in the Workplace 2.0

—Submitted by Dave Aucoin

CSO Phase III Tunnel Update...

Another CSO Phase III milestone occurred on October 25th, the breakthrough of the micro tunnel! The TBM dug a 96" diameter micro tunnel in rock approximately 1,000 feet long which connects to the drop shaft to the main CSO tunnel. The route of the micro TBM crossed beneath the Seekonk River breaking through exactly where it was predicted to. Check out the live breakthrough video on all NBC TV screens and NBC Instagram.



Stay tuned for more tunnel updates!

— Submitted by Greg Waugh



NBC Pipeline

December 2023

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 Hanukkah Begins	8 Payday	9
10	11	12 FP Employee Appreciation (ALL SHIFTS) BOC Meeting 11 AM COB	13	14 BP (ALL SHIFTS), COB, IM, LAB, TAC, EM & PT Employee Appreciation	15 Hanukkah Ends	16
17	18	19	20	21 Winter Solstice	22 Payday	23
24 Christmas Eve	25 Christmas Day HOLIDAY	26 Kwanzaa Begins Full Moon	27	28	29	30 Last day to use Use-or-Lose vacation or personal time
31 New Year's Eve	<div style="border: 2px solid #00AEEF; padding: 10px; text-align: center;"> <p>Mark your Calendars: Brown Bag Lunch Series Briefly discuss topics of public and scientific interests, such as microplastics, PFAS, hypoxia, green energy, food waste, etc..</p> <p>Location: Online, link will be provided Time: 12:00-12:30 PM Date: 1/8, 2/5, 3/4, 4/1, 5/6, & 6/3 Facilitator: Nicole Skyleson</p> </div>					

News Briefs...

Mark your Calendars for Upcoming Holiday Employee Appreciation Events



NBC Holiday Employee Appreciation Events

Field's Point: Tuesday, December 12th (All Shifts)

Bucklin Point: Thursday, December 14th (All Shifts)

COB, IM, LAB, EM, TAC, PT: Thursday, December 14th
12 PM - 2 PM in the Field's Point Lunch Room

NBC Participates in Junior Achievement with the Help of Many NBC Volunteers

On November 14th - 16th NBC had the opportunity to participate in the Junior Achievement Career Exploration Fair at the RI Convention Center helping to inspire 8th graders from all over RI take their first step into exploring different career paths.



A big shout out to **Nora Lough, John Zuba, Cas Bennett, Marc Pariseault, Kerry Britt, Kelsie Bryer, CJ Spellman, Bob Baglini, Shaun Collum, Jamie Samons and Talia Cheshier** for your

time and efforts helping to inspire almost 5,000 students in three days on different career paths within the wastewater industry!

NBC plans to participate again next year, stay tuned for a future email if you'd like to volunteer.

Welcome...

Meet Renee Landi!

Renee joined NBC as a Customer Care Representative on November 5th. She is from Pawtucket, RI and loves bowling and watching her favorite TV show Friends.



Meet Michele Donatelli!

Michele joined NBC as a Customer Care Representative on November 5th. She resides in Saunderstown with her three kids and Chihuahua. Michele loves yoga, reading and catching up on Bravo's RHONJ and RHONY.



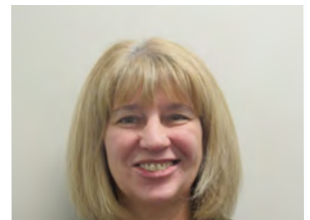
Meet Carlos Carvalho!

Carlos started as a Field's Point Operator I on November 27th.



Meet Olga Yankov!

Olga will start on December 3rd as a Laboratory Supervisor. Olga is from Russia and has background in Chemical Engineering. She has two sons and a cat named Smokey.



Winter Donation Drive to the Boys & Girls Club of Pawtucket

The NBC will be collecting toys, clothing, winter necessities and other wishlist items for the Boys & Girls Club of Pawtucket (BGCP) again this year.

The BGCP helps and assist thousands of children through BGCP programs in academics, sports, the arts as well as providing basic needs like warm clothes and free meals. Due to inflation and other challenges families are facing the BGCP could really use the extra help this year.



Although the Winter Drive is focused on warm clothes, the Club has a wishlist of other items to support their programs:

- NEW art supplies (glue, paint, brushes, paper, markers, crayons, colored pencils, etc.)
- NEW school supplies (notebooks, binders, loose-leaf paper, folders, pencils, pens, backpacks, etc.)
- Playing cards
- Legos
- Wooden or plastic blocks
- Beads/jewelry making kits
- NEW underwear & socks for boys & girls sizes 6-12
- NEW sweatpants for boys & girls sizes 6-12
- Tickets to sporting events or cultural experiences

If you'd like to make a donation, place it in one of the donation bins (FP, BP, WQSB, COB) by Tuesday, December 15.

December Casual Day Fund Raffle

NBC will host its annual Casual Day Fund Raffle in December. If you currently contribute to the Casual Day Fund, you will automatically be entered into the raffle. If your name is chosen, the Casual Day Fund will make a \$500 donation to the 501(c)(3) charity of your choice.

Qualifying charities must be a recognized 501 (c)(3) and cannot be political or religious in nature. If you are not currently contributing to the Fund, contact payroll and join the effort!



No Job too Big for the NBC Maintenance Team

Maintenance staff completed a very challenging in-house job that NBC originally thought would need to be repaired by a contractor but mechanics John Schupp, Troy Zillich, Jay Malouin, and Mark Taylor, lead by supervisors David Fraioli and Nigel Yattaw insisted they could get this done with no questions asked.

The job consisted of repairing a damaged heating unit high overhead in the fine screenings building. After a lot of strength, hard work, and determination the job was completed within a week.



Pictured left to right: Troy Zillich, Jay Malouin & Mark Taylor.

Great job and thank you for all your effort!

*— Submitted by Jason Trenholm
& David Fraioli*

Lights, Camera, Action!

Here's a behind the scenes peek at the next installment of CSO videos. This video features NBC Chairman **Vincent Mesolella** and CSO Program Manager/Assistant Director of Construction & Engineering **Kathryn Kelly** and will take a deeper dive into the operation of the Tunnel Boring Machine (TBM). The video will launch in January on the RestoredWatersRI.com website and NBC's YouTube channel.

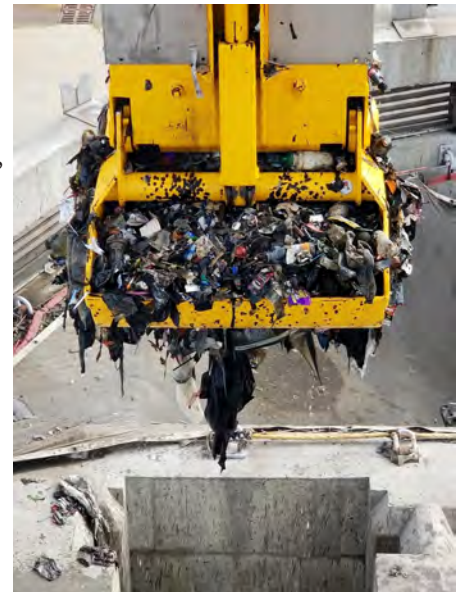


Routine Maintenance for CSO Phase I Tunnel

Pictured below is the aftermath of a successful tunnel mucking that took place on November 7th. Debris from the tunnel is removed monthly to ensure space is available for any upcoming rain event and to prevent any odor issues.

A significant amount of trash; plastic bottles, empty food containers, plastic bags/garbage bags, sticks, stones and leaves are removed monthly during FP's scheduled Tunnel Mucking.

Over 15 billion gallons of combined sewage has been prevented from entering the Bay thanks to the CSO Phase I Tunnel.



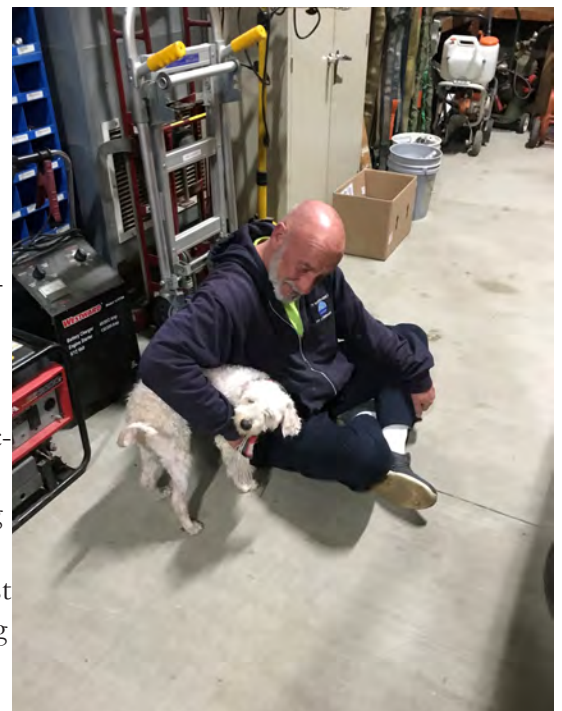
A Happy Ending for Benji, the Lost Dog Found at IM

Benji is going back home. As of Thursday November 30th, Benji's owners were submitting the necessary paperwork to the Providence Animal Control Facility to bring him home.

Benji was found Monday, November 27th sitting in front of the dumpster outside of the IM garage when **Chris Moran, Brian Blais** and **Tony DiIorio** arrived at 6 AM. Chris was able to safely lure him into the garage, fed him a sandwich and gave him some water; Benji warmed right up to Chris. Meanwhile, IM staff checked with the Barking Lot and Providence Animal Control to see if anyone may have been looking for him, but had no luck.

Animal Control picked Benji up within a couple hours and would start the process in hopefully find his owners and luckily they were successful.

THANK YOU **Chris Moran** for showing Benji lots of love and compassion during his short stay with NBC and thank you to the rest of the IM team for jumping into action trying to find Benji's owners.



Chris Moran & Benji.

Avoiding Slips, Trips and Falls

As temperatures drop and snow and ice accumulation is imminent, all NBC employees are reminded of the importance of remaining vigilant while walking around NBC property, as well as at home.

According to the U.S. Department of Labor, slips, trips and falls account for the majority of workplace accidents and are one of the leading causes of accidental deaths, second only to motor vehicle accidents. Since 2021, slips, trips and falls have been the leading cause of injury throughout NBC, accounting for 26% of all injuries. These types of injuries typically result in days away from work, cost an average of \$49,000 per incident (national average), and can have a negative impact on employee production and morale. Slips, trips and falls are preventable!

All slips, trips and falls are caused by three main issues: human factors, wet surfaces, and housekeeping issues.

Here are some useful tips all employees can apply throughout the workplace and at home:

- Parking Lots & Building Entrances – Look down when exiting a vehicle. There may be ice in the parking lot. Watch for uneven surfaces and slippery floors caused by wet shoes. Walk slowly up and down stairways.
- Breakrooms – Watch for drips from sinks, melted ice on floors, leaking trash cans and spilled coffee or drinks.
- Walkways – Beware of wet floors that have recently been cleaned, drips from pipes or downspouts on buildings, uneven flooring/unexpected steps, and misplaced pieces of equipment.
- Throughout NBC Facilities – Look for leaks or drips around machinery, spills from drums or containers, uncovered cords, hoses and wires, unsafe ladders, poor lighting, and stairways that may need a non-slip finish. Remember to always wear the appropriate footwear for your work environment!

A slippery or obstructed walking surface should always be considered a hazardous area. Remember to always report any unsafe work conditions immediately to your supervisor.

— Submitted by Dave Aucoin

Skip the Plastic Bag and Water Bottle, Choose Reusable

Plastic water bottles, much like the ubiquitous plastic bag, may seem useful in everyday life, but the environmental impact they produce is unsustainable. The large amount of plastic water bottles we send to landfills and oceans has become a burden on our environment. Below are some interesting, yet scary facts on the amounts produced and the destruction its causing. Do your part and skip the plastic bag and water bottle.



- 480 billion plastic bottles were sold in 2016
- The average plastic bag is only used for 12 minutes, but can take hundreds of years to decompose
- There are over 150 million tons of plastic waste in the ocean
- It takes 500 to 750 years for plastic to decompose
- Estimates say that we produce 1 to 5 trillion plastic bags annually
- The damage caused by plastics to marine ecosystems costs \$13 billion annually
- By 2025 plastics in our oceans will grow to 250 million tons
- Coca Cola is the largest producer of plastic bottle pollution in the world

(WMGT-world.com Nov 7, 2023/*National Geographic*, *Laura Parker June 7, 2019*)

— Submitted by Chuck Moreau

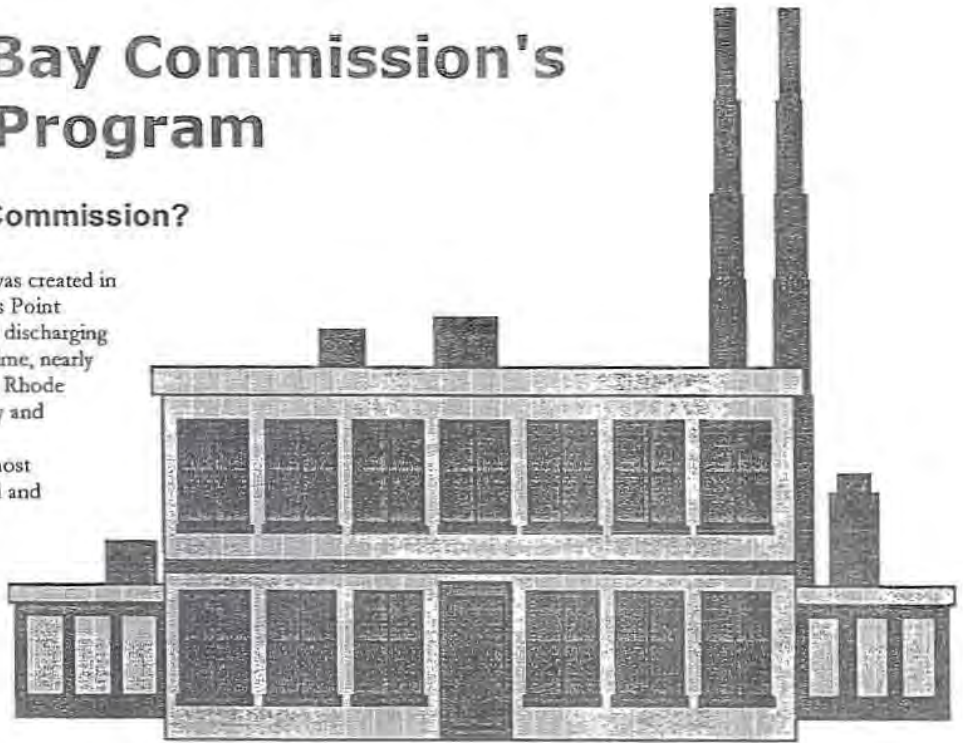
EDUCATIONAL DOCUMENTS

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.

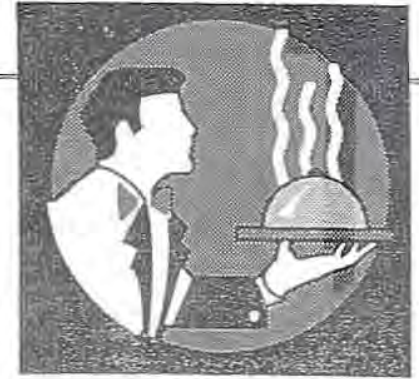
What if I need technical assistance?

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@nartabay.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

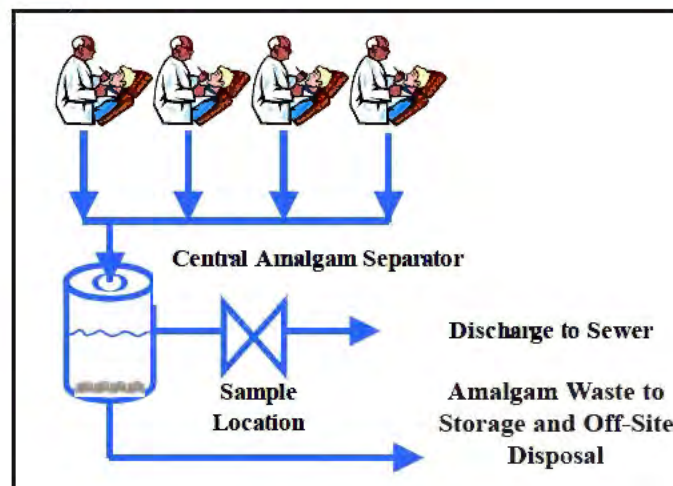
the Management of Waste Dental Amalgam

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!



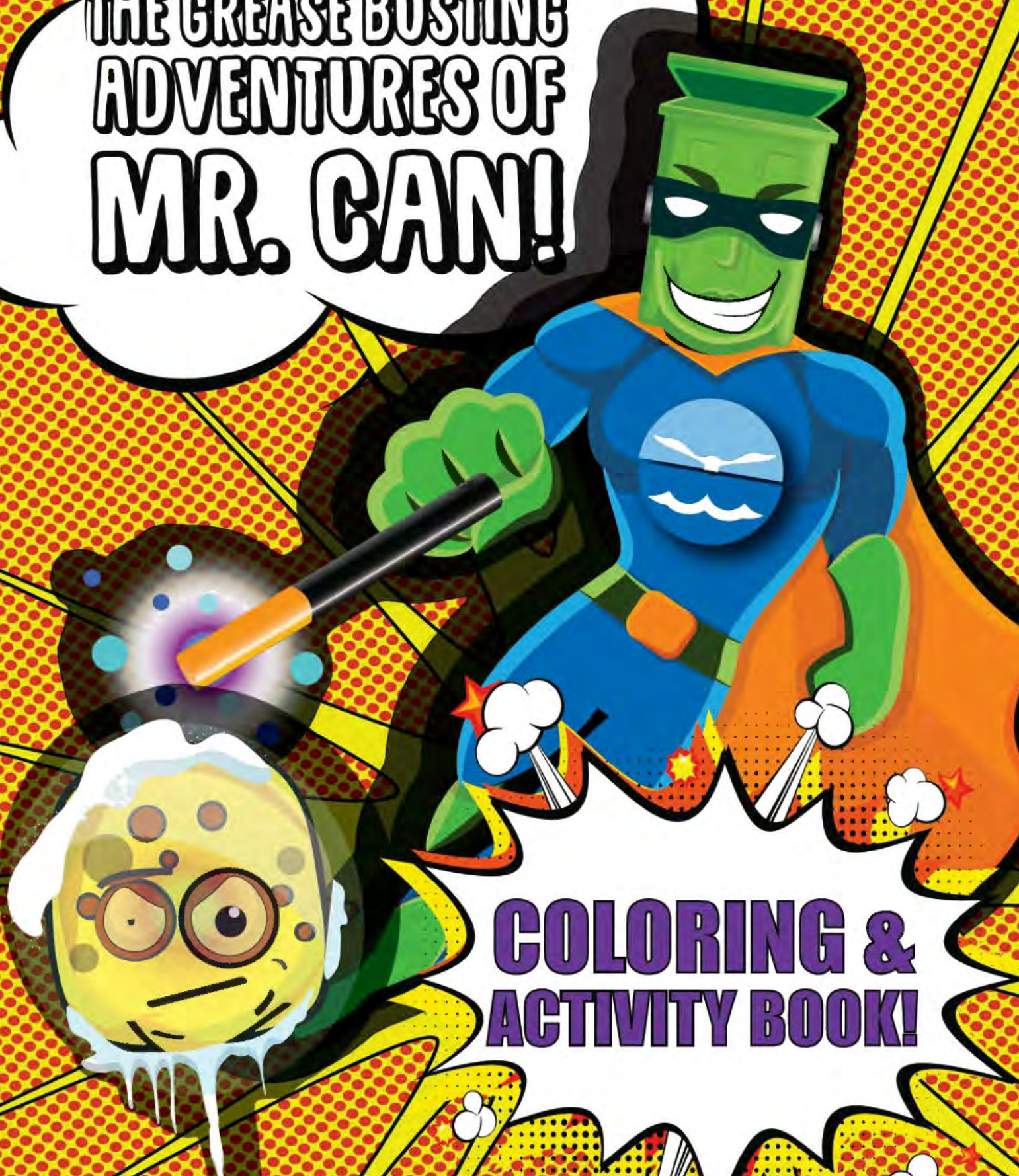
Narragansett Bay Commission

One Service Road, Providence, RI 02905

www.narrabay.com



**THE GREASE BUSTING
ADVENTURES OF
MR. CAN!**

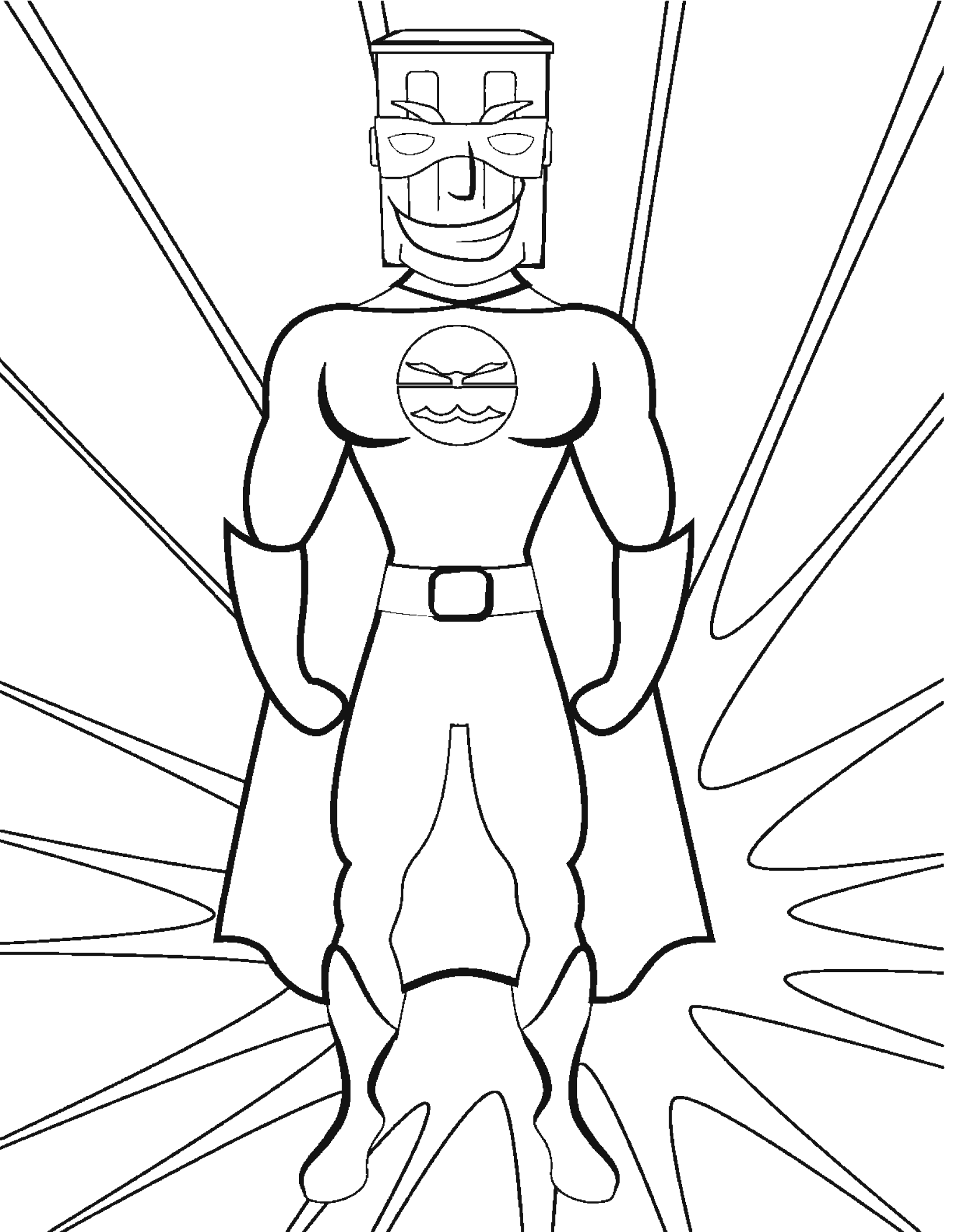


**COLORING &
ACTIVITY BOOK!**

**COOL IT
& CAN IT!**



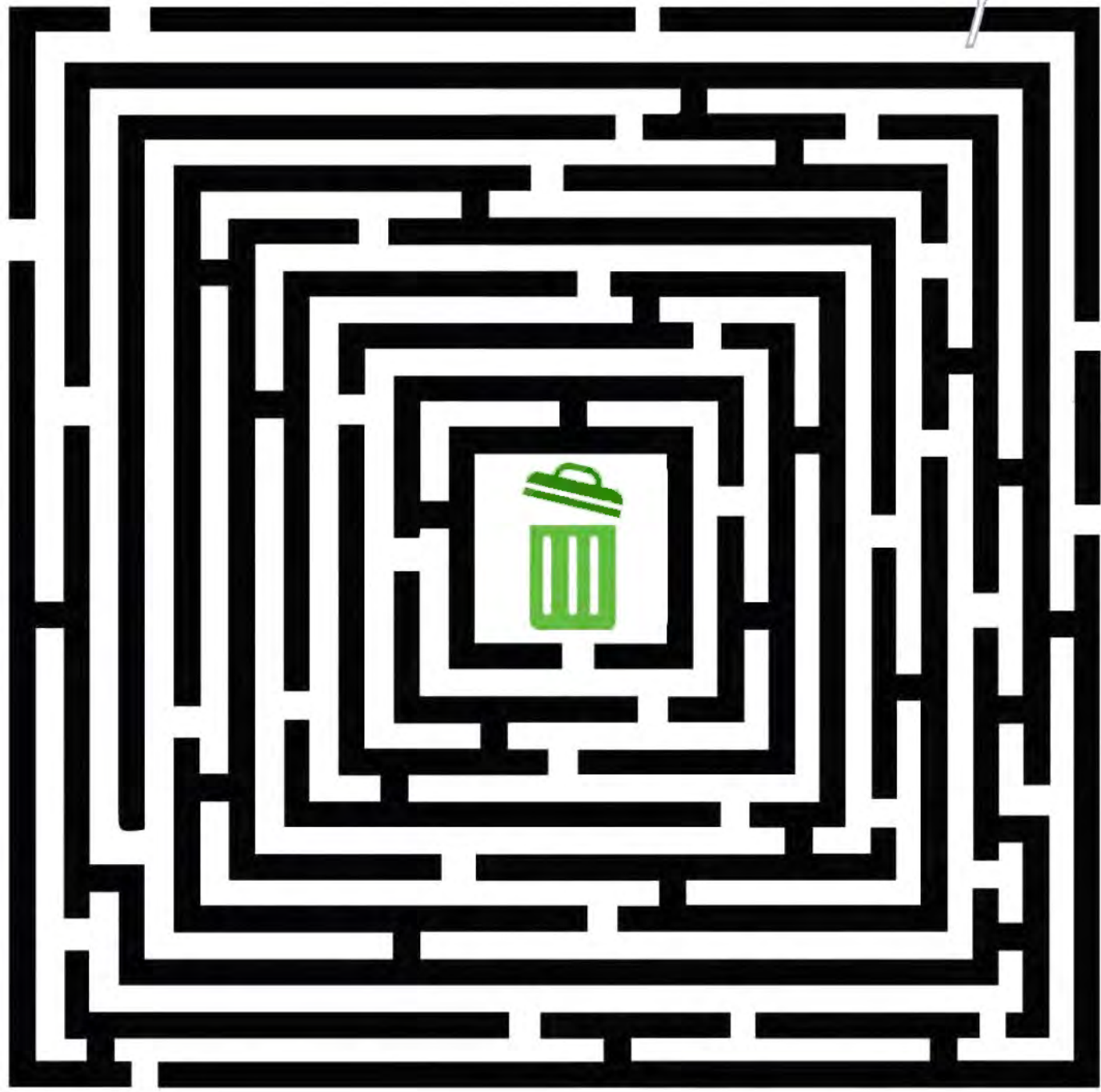
**Pledge to COOL IT & CAN IT and
help Mr. Can share the message
of proper grease disposal!**



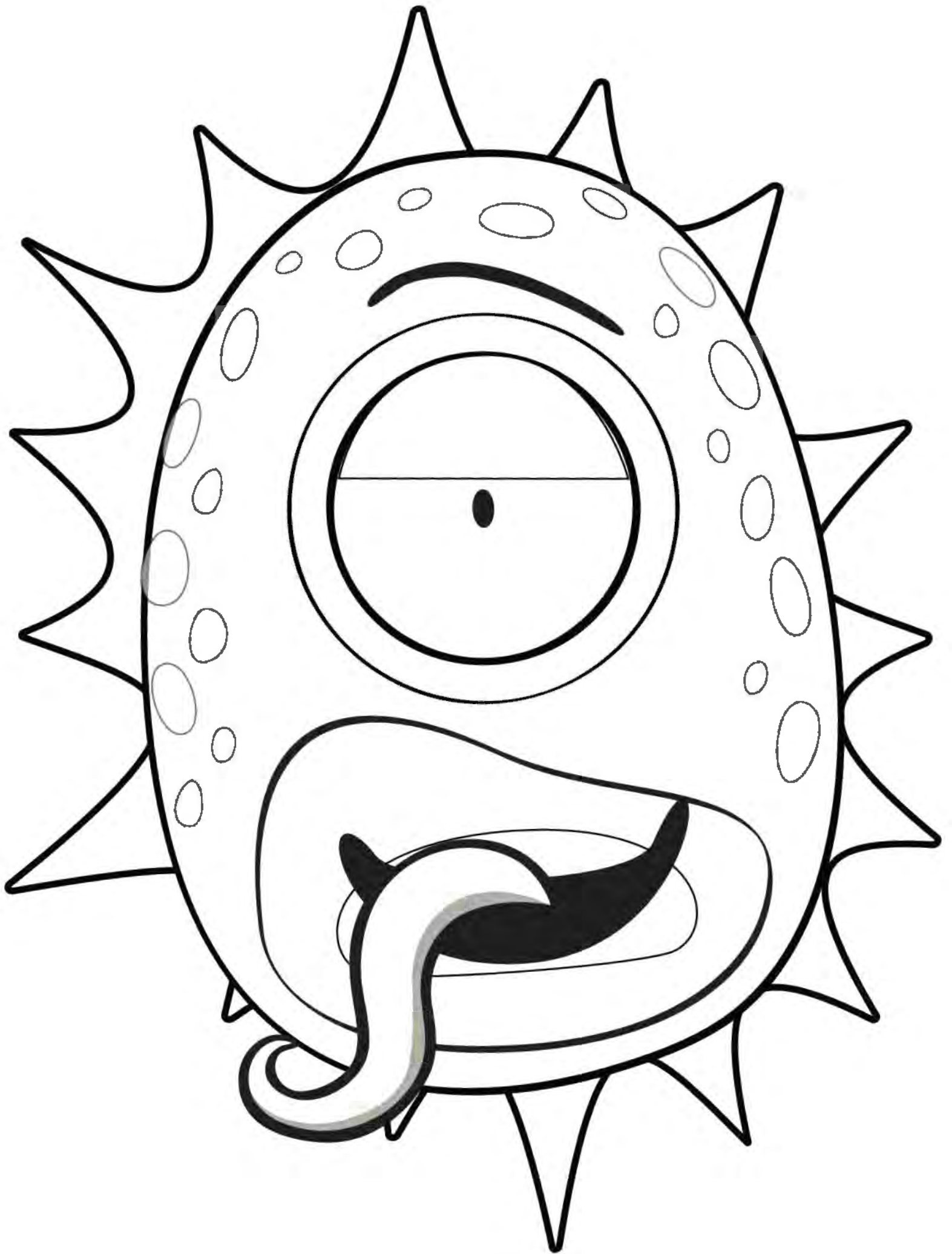
GUIDE THE GREASE!



Get this cooled off grease beast to the trash can in the center!



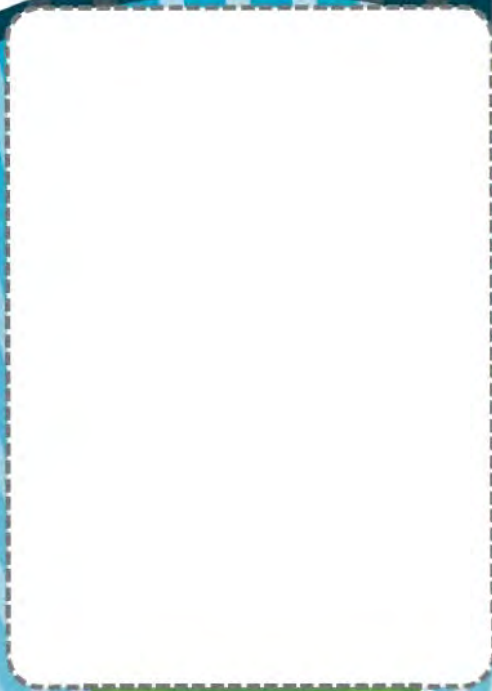






SUPER HERO FACE SWAP!

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!







WASTEWATER TREATMENT
FACILITY IMAGE 1

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 2





ZAP!!



LARD
VEGETABLE OIL

DRIPPINGS
GREASE

MR. CAN
NBC

WATER
COOL IT

CAN IT
NARRAGANSETT BAY

LGNMXIARCANITTSNAAT
LRKBGNVEGETABLEOILA
LEDECBLIWIWATEROETS I
AACOOLITVDRIPPIN GSM
RSTIVNADSNXMRCA NP H
DET NARRAGANSETT BAY





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.

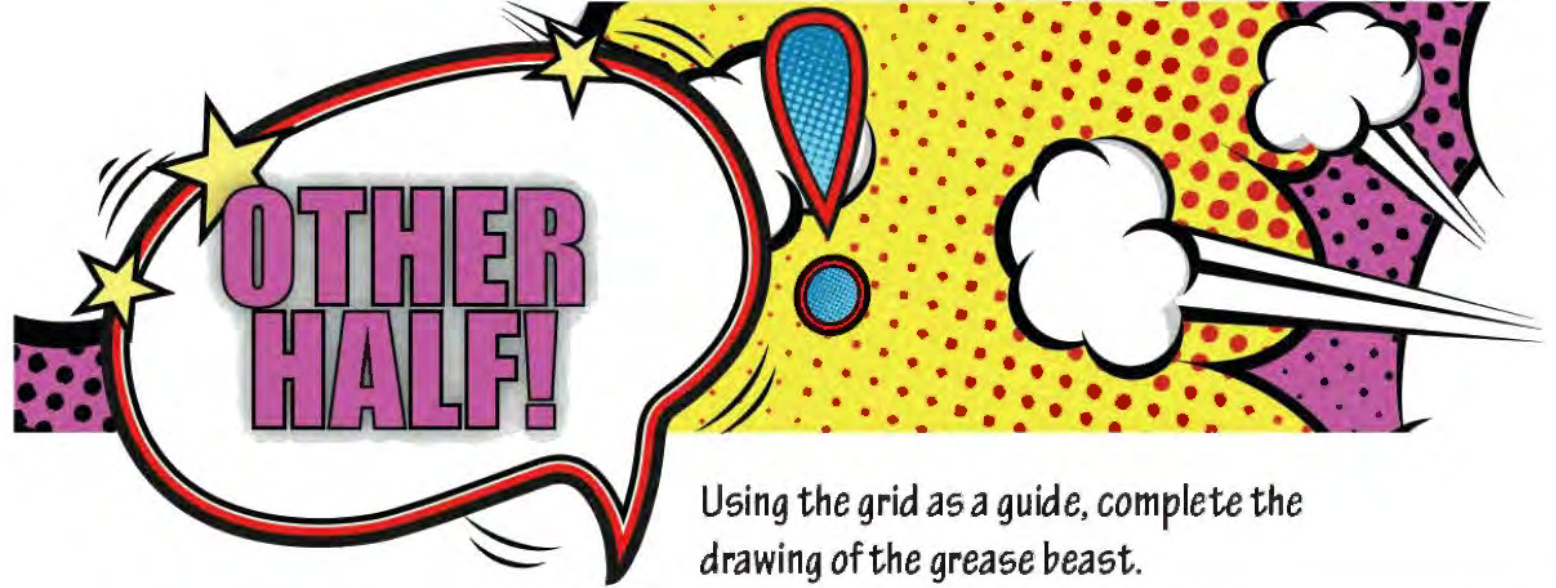


STEP 3

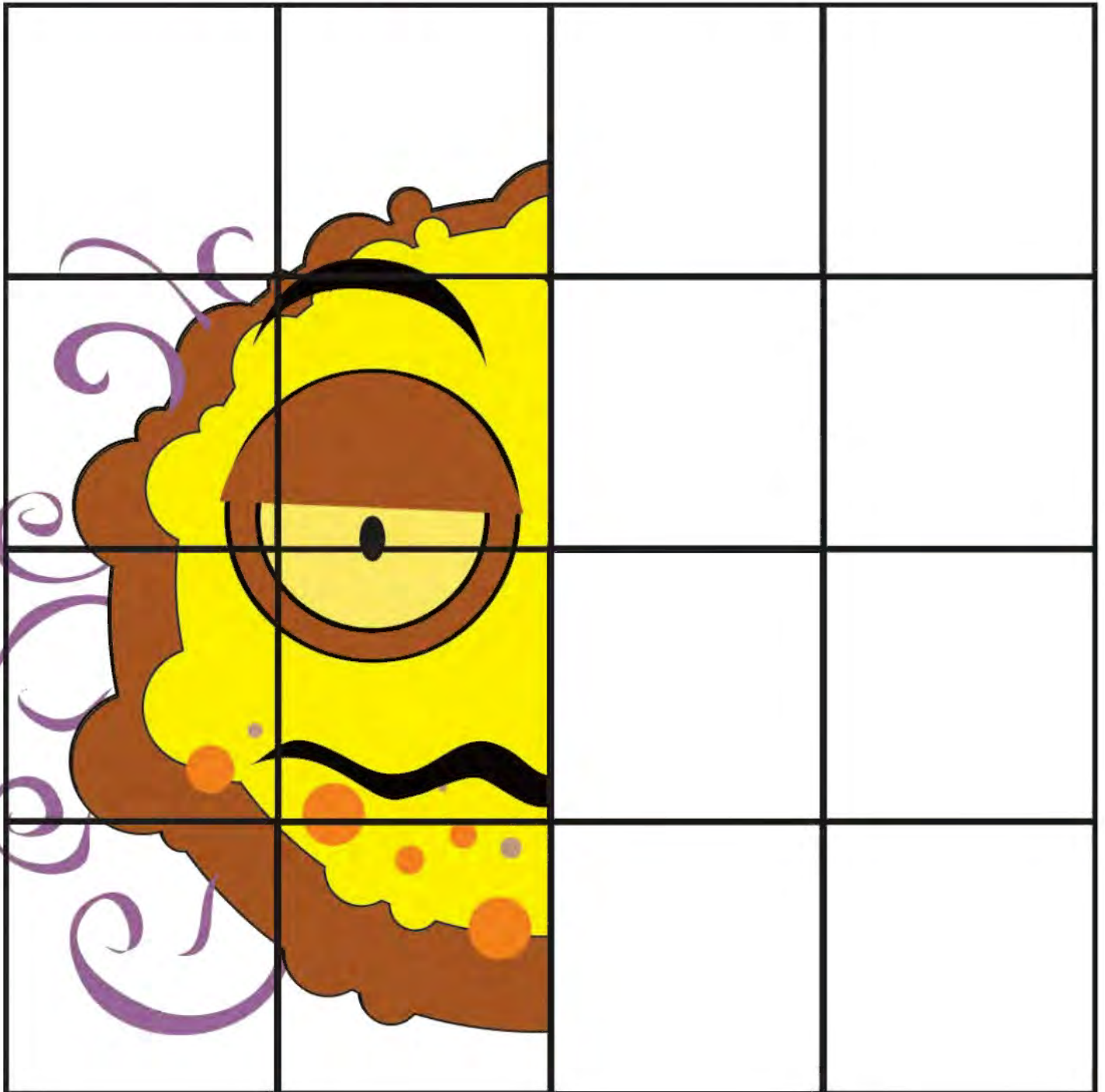
Use a heavier pencil to add more detail and shadow. Go over the drawing in black ink pen or marker, then color your super hero in bright, comic-book colors!

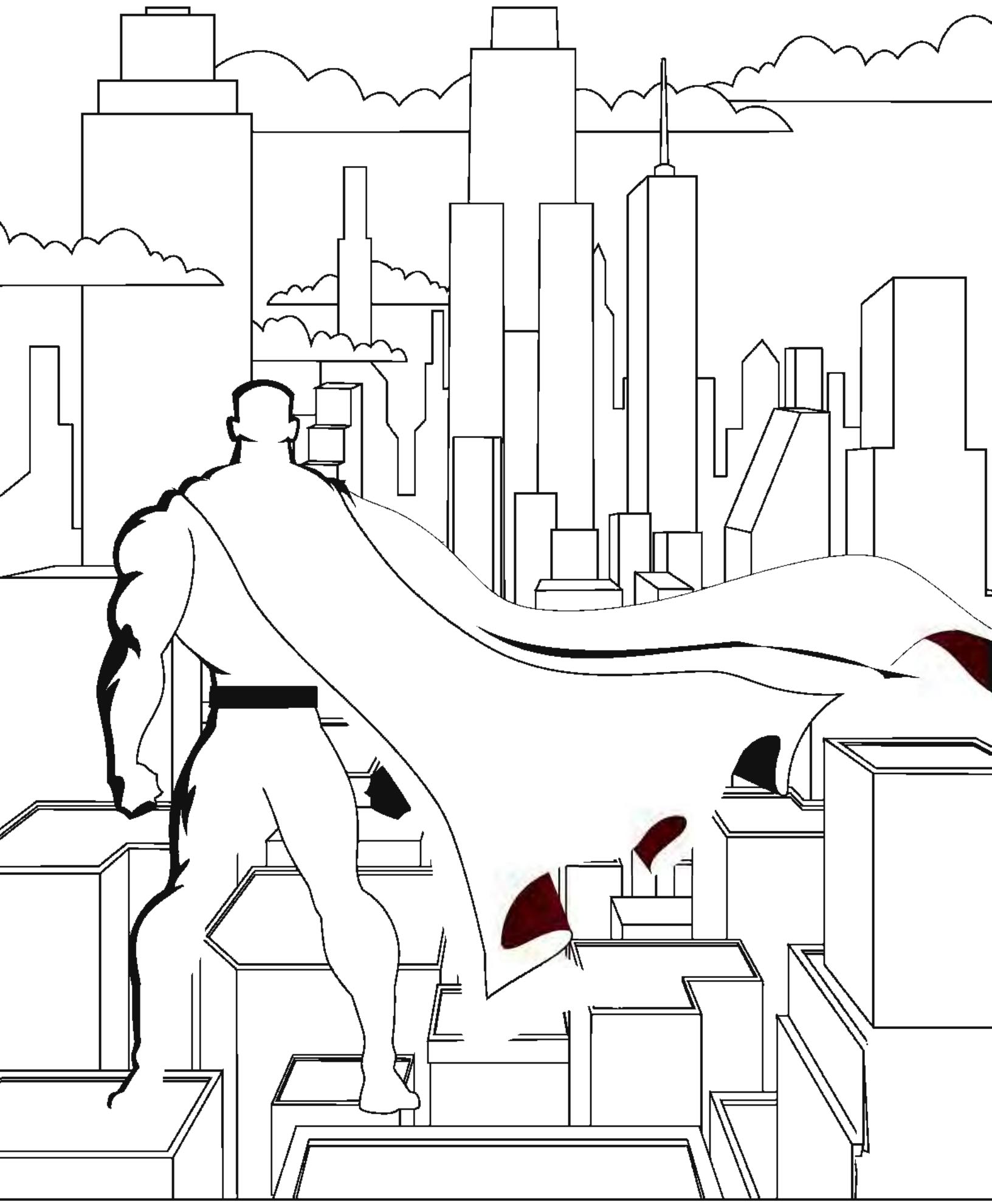


Comic style is about exaggerated elements and simple features. Once you've mastered your super hero, try drawing a whole comic strip!



Using the grid as a guide, complete the drawing of the grease beast.

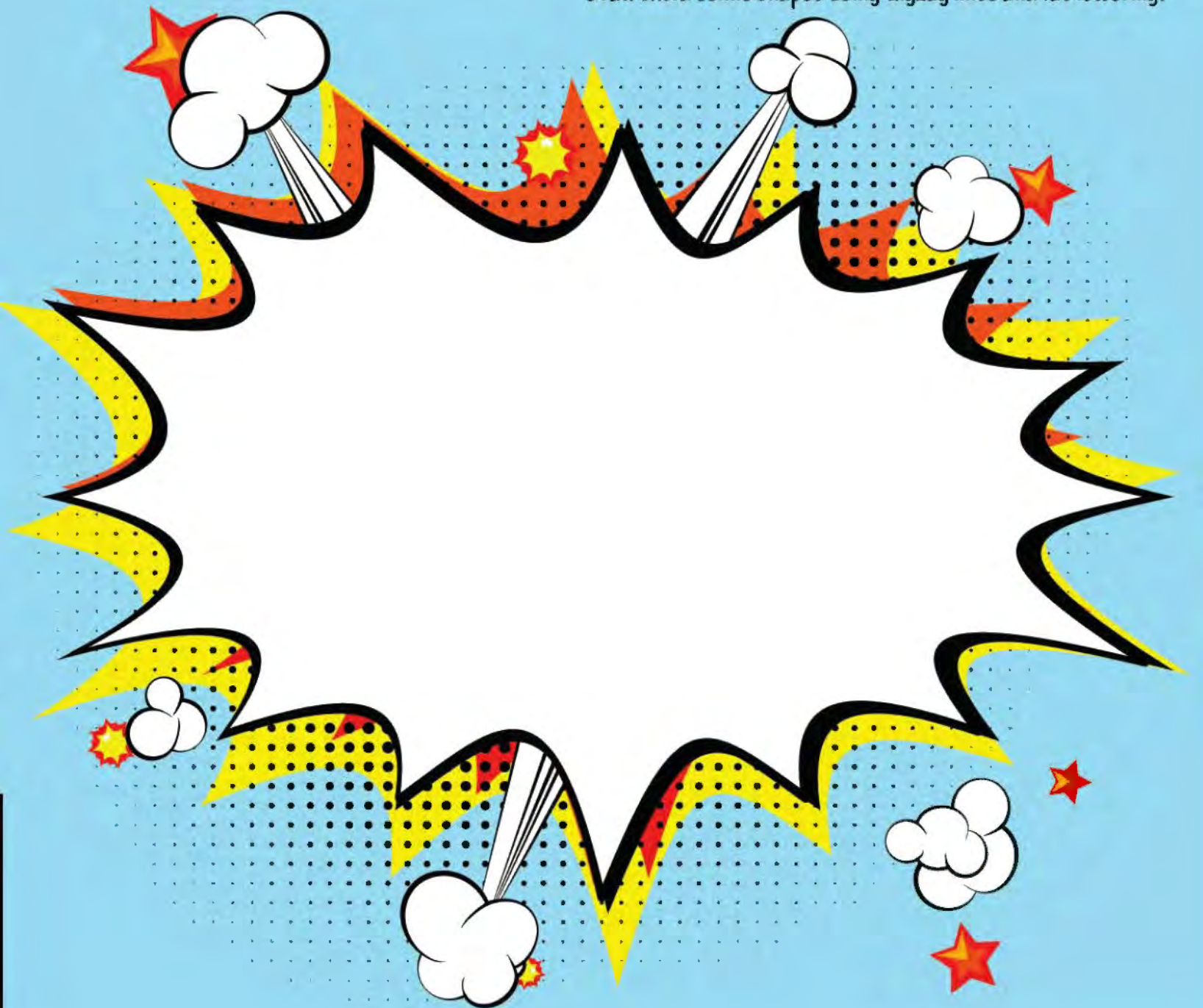






COMIC STRIP ADVENTURE!

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**

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:

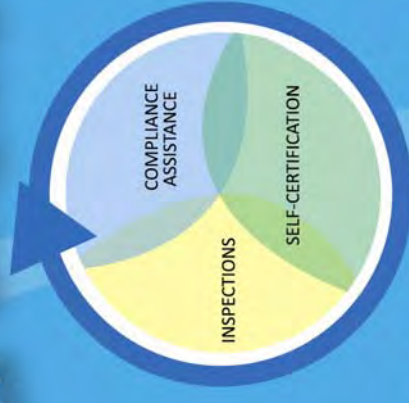
- On-site Technical Assistance
- Workshops
- Development and use of FOG Best Management Practices (BMPs)
- FOG management "Self-Evaluations"
- Compliance Inspections
- FOG data collection and analysis



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.

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.

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.



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
Corporate Headquarters:
1 Service Road, Providence, RI 02905
Phone (401) 461-8848
Fax (401) 461-6540

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



NARRAGANSETT BAY COMMISSION

LINCOLN SEPTAGE RECEIVING FACILITY

Septage Acceptance Policy Summary



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*



RestoredWaters RI

A Narragansett Bay Commission Project



Controlled Blasting Information

RestoredWaters RI – formally known as the Narragansett Bay Commission's Combined Sewer Overflow (CSO) Project – is Rhode Island's largest and most important clean water project and will improve the health of the Seekonk River and Upper Narragansett Bay. The centerpiece, which marks the third and final phase of the RestoredWaters RI project, is a deep-rock tunnel that will capture and store storm-related sewage overflows. This tunnel, called the Pawtucket Tunnel, will be 2.2 miles long and 125-150 feet below ground.

A Tunnel Boring Machine (TBM) will horizontally excavate the tunnel by slowly grinding its way through deep bedrock, but in order to get the TBM below ground and to create the vertical shafts that bring the sewage overflows to the tunnel, the construction team will first need to remove the bedrock by blasting at a few specific locations along the tunnel route.

What is blasting?

Blasting is performed to fracture rock so it can be excavated for construction. The contractor drills holes in the underground rock; each hole is loaded with a carefully-calculated amount of explosives, which are then detonated. A typical blast will last approximately 3-5 seconds. Typically, there is no more than one blast per day at each location.

Neighbors may hear a warning horn just prior to the blast, a muffled blast noise, and may feel a slight vibration. The area will be monitored with seismographs to measure levels.

How can I find out when a blast will occur?

You can opt in to email notifications at RestoredWatersRI.com.

Will I feel the blast?

Most of the energy from a blast is used to break rock, but some energy will travel from the blast site in the form of groundwaves and airwaves. These can cause your house to mildly vibrate or shake. Humans and animals are very sensitive to all vibrations and it is possible that you will feel or hear your house shake from the blasting, even at very low levels. All the blasts related to the RestoredWaters RI project are designed far below levels known to cause property damage, but we encourage any interested homeowner within 500 feet of the blasting sites to consider allowing the project team to perform a preconstruction survey of their property.

Why do some blasts feel stronger than others?

How a blast feels depends on groundwaves or airwaves that reach your house. These are influenced by the type of blast, the distance from the blast, the amount of explosives, whether you are inside or outside your house, and even the weather.

Your pets may also sense blast vibrations. Pets, like humans, are sometimes startled by the sound of a blast or warning signals.

Blasting for RestoredWaters RI:

- Blasts can only occur between 7 AM and 5 PM
- Typically, no more than 1 blast/day
- Ground vibration limits set at 2.0 in/sec and air vibrations limits at 133 dBL
- Each blast monitored at 4 locations

Who sets the guidelines for safe and effective blasting?

In the United States, safe vibration standards are based on scientific studies conducted by the U.S. Bureau of Mines (USBM). In addition, the contractor for RestoredWaters RI follows guidelines established by the International Society of Explosive Engineers (ISEE) for monitoring vibrations and air overpressure.

Do you want to dig deeper into blasting?

Visit RestoredWatersRI.com/blasting

ATTACHMENT VOLUME I

SECTION 2

***TYPICAL NBC WASTEWATER
DISCHARGE PERMITS***

***TYPICAL METALFINISHER
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: P1112-250-0628

Company Name: **IRA GREEN, INC.**

Facility Address: 177 Georgia Avenue, Providence, RI 02905

Mailing Address: 177 Georgia Avenue, Providence, RI 02905

Facility President: Mr. Douglas Anderson

Facility Authorized Agents: Mr. Douglas Anderson, Mr. Shaun McDermott

User Classification: Metal Finishing Operations

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. Douglas Anderson and Ira Green, 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 20 pages with conditions A - V.

**This permit becomes effective upon receipt
and expires on June 30, 2028.**

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

July 20, 2023
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 19, 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 10,000 gallons but less than 50,000 gallons. Decreasing or increasing the average daily water usage may affect 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 all waste streams have the potential to be contaminated with cyanide due to the configuration of the electroplating operation. Therefore, the EPA Total Cyanide Metal Finishing limitations will be enforced at the final discharge location, upflow baffle in the final pH neutralization tank, Sample Location #1. The NBC effluent discharge limitations for Total Cyanide are more stringent than the EPA Total Cyanide limitations at the final effluent. Therefore, the NBC Total Cyanide limitations will be enforced at the final discharge location. In addition, the permittee has a batch cyanide destruct tank. All wastewater discharging to the tank has the potential to be contaminated with cyanide. The EPA Total Cyanide Metal Finishing limitations will be enforced at this 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 Wastewater;
 - b. Treated Stoning Wastewater;
 - c. Treated Ultrasonic Solutions;
 - d. Treated Electrocleaner Solutions;
 - e. Treated Soap Sink Solutions;
 - f. Treated Ultrafilter Permeate;
 - g. Treated Acid Solutions;
 - h. Treated Brite Dip Solutions;
 - i. Treated Dragout Solutions;
 - j. Treated Floor Spills;
 - k. Treated Cyanide Bearing Rinsewater;
 - l. Treated Imitation Rhodium Plating Solutions;
 - m. Treated Cyanide Bearing Dragout Solutions.
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 and 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 19, attached hereto and incorporated herein.
3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. 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 five (5) sample locations must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Upflow baffle in the Final pH Neutralization Tank, collecting all process discharges specified in Section B(1)(a through m) of this permit.

Sample Location #2 - Acid/Alkali Batch Treatment Tank, collecting all process discharges specified in Section B(1)(h through j) of this permit.

Sample Location #3 - Cyanide Destruct Batch Treatment Tank, collecting all process discharges specified in Section B(1)(k through m) of this permit.

Sample Location #4 - Tub/Vibe Batch Treatment Tank, collecting all process discharges specified in Section B(1)(b) of this permit.

Sample Location #5 Soap Batch Treatment Tank, collecting all process discharges specified in Section B(1)(c through g) 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. The discharge through Sample Locations #2, #3, #4, and #5 must be in compliance with the concentrated discharge formula referenced in Section 1.2(X) of the Rules and Regulations. The discharge through Sample Location #3 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 approved by the NBC. 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 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. 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 at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the upflow baffle in the final pH neutralization 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:

Cadmium (Total)	Lead (Total)	Silver (Total)
Chromium (Total)	Nickel (Total)	Zinc (Total)
Copper (Total)		

- b. On the same four (4) days that the composite samples listed in Section E(2)(a) above are being collected, the permittee shall collect a minimum of four (4) grab samples at equidistant time intervals over each entire operating day from the upflow baffle in the final pH neutralization tank, Sample Location #1. 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. Each of the four (4) daily composite samples consisting of the four (4) preserved grab samples must be refrigerated until analysis and must be analyzed separately within fourteen (14) days of collection for **Total Cyanide**. Each daily composite sample must be in compliance with the NBC Total Cyanide Standard of 0.58 ppm.

- c. On the same four (4) days that the composite samples listed in Section E(2)(a) above are being collected, the permittee shall collect a minimum of four (4) grab samples at equidistant time intervals over each entire operating day from the cyanide destruct batch treatment tank, the combined point of discharge of the cyanide bearing rinsewaters, 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. Each 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; 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. Each of the four (4) daily composite samples, consisting of the four (4) preserved grab samples must be refrigerated until analysis and must be analyzed separately within fourteen (14) days of collection for **Total Cyanide**. Each daily composite sample must be in compliance with the EPA Metal Finishing Total Cyanide Standards referenced in Section A(5) of this permit.
- d. On the same four days that the composite samples listed in Section E(2)(a) are being collected the permittee shall collect four (4) grab samples from the upflow baffle in the final pH neutralization tank, Sample Location #1 at equidistant time periods over the 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.

- e. The analytical results are to be received by the NBC by August 30, 2023. 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, 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 upflow baffle in the final pH neutralization tank, 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)	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)	Nickel (Total)
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- b. On the same day that the composite samples listed in Section E(3)(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 upflow baffle in the final pH neutralization 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**.

- c. Composite samples collected during the months of January, March, May, July, September, November, are to be collected while the acid/alkali batch treatment tank is being discharged. In addition, on the days that these composite samples are collected, a grab sample must be collected from the acid/alkali batch treatment tank, Sample Location #2, after treatment and just before discharge of this tank. This grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Copper (Total)	Lead (Total)	Zinc (Total)
	Nickel (Total)	

- d. Composite samples collected during the months of February, April, June, August, October, and December are to be collected while the cyanide destruct batch treatment tank, Sample Location #3, is being discharged. In addition, on the days that these composite samples are collected, two grab samples must be collected from the cyanide destruct batch treatment tank after treatment has been provided and just before discharge of this tank. The first grab sample must be preserved immediately upon 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 must then be retested for chlorine residual, and if it is present, the addition of ascorbic acid must 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. The preserved grab sample must be refrigerated until analysis and must be analyzed within fourteen (14) days from sample 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. The second grab sample must be collected, preserved, and analyzed according to EPA protocols for Copper (Total).

- e. Composite samples collected during the months of January, March, May, July, September, and November are to be collected while the tub/vibe batch treatment tank is being discharged. In addition, on the days that these composite samples are collected, a grab sample must be collected from the tub/vibe batch treatment tank, Sample Location #4, after treatment and just before discharge of this tank. This grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Copper (Total)	Lead (Total)	Zinc (Total)
	Nickel (Total)	

- f. Composite samples collected during the months of February, April, June, August, October, and December are to be collected while the soap batch treatment tank is being discharged. In addition, on the days that these composite samples are collected, a grab sample must be collected from the soap batch treatment tank, Sample Location #5, after treatment and just before discharge of this tank. This grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Copper (Total)	Lead (Total)	Zinc (Total)
	Nickel (Total)	

If the batch treatment tanks specified in Sections E(3)(c,d,e,and f) are not discharged during the required sampling month, the permittee must notify the NBC in writing and sample during the next discharge of the tank. The discharge from each of these tanks must be in compliance with the NBC concentrated discharge formula, referenced in Section 1.2(V) of the NBC Rules and Regulations.

Table 2 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 to 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 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, 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.

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. Fees:

The permittee agrees to pay all sewer user fees, including application 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. Ira Green, Inc. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Ira Green, 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 Ira Green, 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 Ira Green, Inc. 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 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.

P. 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.

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 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 Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) 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 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.

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:MM:rcf

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
Field's Point District

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)
Arsenic (Total)	0.02*
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.58**
Lead (Total)	0.60
Mercury (Total)	0.005
Nickel (Total)	1.62
Silver (Total)	0.43
Zinc (Total)	2.61
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User	Parameter(s)	Limitation
Category/Categories		(lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 32, 34, and 36	BOD ₅ and TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

Industrial User	Parameter(s)	Limitation
Category/Categories		(lbs/day)
32	Total Nitrogen	300***
32	Ammonia	300***

* The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L

** The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.

*** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

Table 2

Ira Green, Inc.
Sampling Requirements

Month	Sample Location #1 Upflow Baffle in the Final pH Neutralization Tank		Sample Location #2 Acid/Alkali Batch Treatment Tank		Sample Location #3 Cyanide Destruct Batch Treatment Tank		Sample Location #4 Tub/Vibe Batch Treatment Tank Sample Location #5 Soap Batch Treatment Tank		
	Composite Sample	Parameters	Grab Sample*	Parameters	Grab Sample*	Parameters	Grab Sample*	Sample Location	Parameters
January	X	Cu, Ni, CN	X	Cu, Pb, Ni, Zn			X	#4	Cu, Pb, Ni, Zn
February	X	Cu, Ni, CN			X	Cu, EPA-CN	X	#5	Cu, Pb, Ni, Zn
March	X	Cu, Ni, CN	X	Cu, Pb, Ni, Zn			X	#4	Cu, Pb, Ni, Zn
April	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN			X	Cu, EPA-CN	X	#5	Cu, Pb, Ni, Zn
May	X	Cu, Ni, CN	X	Cu, Pb, Ni, Zn			X	#4	Cu, Pb, Ni, Zn
June	X	Cu, Ni, CN			X	Cu, EPA-CN	X	#5	Cu, Pb, Ni, Zn
July	X	Cu, Ni, CN	X	Cu, Pb, Ni, Zn			X	#4	Cu, Pb, Ni, Zn
August	X	Cu, Ni, CN			X	Cu, EPA-CN	X	#5	Cu, Pb, Ni, Zn
September	X	Cu, Ni, CN	X	Cu, Pb, Ni, Zn			X	#4	Cu, Pb, Ni, Zn
October	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN			X	Cu, EPA-CN	X	#5	Cu, Pb, Ni, Zn
November	X	Cu, Ni, CN	X	Cu, Pb, Ni, Zn			X	#4	Cu, Pb, Ni, Zn
December	X	Cu, Ni, CN			X	Cu, EPA-CN	X	#5	Cu, Pb, Ni, Zn

Legend

Cd - Cadmium Pb - Lead
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 and tank is to be discharged while composite sample is being collected.

CERTIFICATE TO DISCHARGE

the following types of process water:

TREATED METAL FINISHING WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Ira Green, Inc.

177 Georgia Avenue

Providence, RI 02905

PERMIT NUMBER: P1112-250-0628

PERMIT EXPIRATION DATE: 06-30-2028

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.

July 20, 2023

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL PHARMACEUTICAL
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B1404-021-0426

Company Name: **TEDOR PHARMA, INC.**

Facility Address: 400 Highland Corporate Drive, Cumberland, RI 02864

Mailing Address: 400 Highland Corporate Drive, Cumberland, RI 02864

Facility President: Mr. Doug Drysdale

Facility Authorized Agents: Robert F. Ferrari, P.E., Mr. Timothy Sherman, Mr. Michael Alpert

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 Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Doug Drysdale and Tedor Pharma, 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 22 pages with conditions A - V.

**This permit becomes effective on June 1, 2021
and expires on April 30, 2026.**

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

May 25, 2021
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, 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 conducts pharmaceutical manufacturing operations and discharges wastewater with high concentrations of conventional pollutants. The permittee must comply with the Biochemical Oxygen Demand and Total Suspended Solids limitations for Category 14 specified in Table 1 on page 16, attached hereto and incorporated herein.
4. 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.
5. 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 mg/L and the monthly average of 8.2 mg/L for acetone, 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 mg/L and the monthly average limit of 0.7 mg/L for methylene chloride. Table 2 summarizes these Pretreatment Standards. 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's 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's facilities:
 - a. Treated Washwater from Pharmaceutical Manufacturing Equipment;
 - b. Wastewater from Pharmaceutical Research Operations;
 - c. Glass Washing Wastewater;
 - d. Laboratory Equipment, Floor, and Wall Washwater.

2. The permittee may discharge laboratory chemicals/solutions and washings from laboratory glassware, as identified in Section B(1)(b and c) above, provided that:
 - a. The chemicals/solutions are discharged on an as generated basis;
 - b. The discharge criteria listed in Table 1 are met at the source without dilution;
 - c. The chemical solutions are not and do not contain Toxic Pollutants (reference Table 4) in concentrations that would violate the NBC discharge limitations specified in Table 1 of this Permit;
 - d. The chemicals/solutions are not and do not contain mutagens, teratogens and/or carcinogens.

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. Prohibited discharges include, but are not limited to, the following:
 - a. Product Solutions;
 - b. Raw Materials;
 - c. Off-Specification Product;
 - d. Cyanide Solutions;
 - 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 and Lubricating Oils.

2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) and Section B(2) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 16 and in Table 2 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 approved by the NBC. 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.
5. Non-sanitary discharges other than those specified in Section B of this permit are prohibited unless specifically approved by the NBC in writing.
6. Discharging of chemicals or solutions containing materials listed in the attached List of Toxic Pollutants (Table 4) is strictly prohibited if said discharge would result in violation of NBC limitations in Table 1.
7. The permittee is prohibited from discharging the following materials, solutions, and/or process wastewater streams to the NBC facilities:
 - a. Isolation waste may not be discharged to the sewer;
 - b. Human body parts and tissues may not be discharged to the sewer system;
 - c. Discarded cultures and stocks of infectious agents and associated biologicals may not be discharged to the sewer.

Refer to Table 5 and Appendix I for isolation and oncological waste definitions.

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 Wastewater Storage Tank T-101, collecting all process discharges specified in Section B(1)(a) 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, Table 1, Table 2, and with the EPA Pharmaceutical Manufacturing Standards referenced in Section A(5) of this permit.

2. The permittee shall operate and maintain a pretreatment system in conformance with plans approved by NBC. 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 pH of the effluent discharge and record it continuously. The permittee shall report the results monthly in a summary report giving the maximum, minimum, average pH readings, and volume of each batch discharge (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. During the months of January, April, July, and October, until the expiration date of this permit, the permittee shall conduct sampling of one batch discharge from the sample port on the discharge line of Wastewater Storage Tank T-101, Sample Location #1, after treatment and just prior to discharge. The permittee shall collect seven grab samples from the same batch discharge. The grab samples must be analyzed separately.
 - a. The first 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

- b. The second 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. The third grab sample consisting of at least 1000ml (1L) 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. The fourth grab sample consisting of at least 1000ml (1L) is to be collected for analysis in a 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. The fifth grab sample is to be collected in a glass bottle. 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. The sixth grab sample is to be collected, preserved, and analyzed according to EPA protocols for the following parameters:

Biochemical Oxygen Demand (BOD)
Total Suspended Solids (TSS)

- g. The seventh grab sample is to be collected, preserved, and analyzed according to EPA protocols for the following parameters:

Cadmium (Total) Copper (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.

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 the sampling day and at the end of the sampling day. These results 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 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 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. Completed manifest forms for hazardous materials;
 - b. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred;
 - c. The amount of chemicals added to provide pretreatment of batch discharges;
 - d. pH readings taken during the course of providing batch treatment of any process wastewater and the amount of sludge generated, where applicable;
 - e. 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 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. Chemical feed pump failure;
- d. 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. Fees:

The permittee agrees to pay all sewer user fees, including application 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. Tedor Pharma, Inc. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Tedor Pharma, 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 Tedor Pharma, 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 Tedor Pharma, Inc. 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 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.

P. 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.

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 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 Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) 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 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.

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.

KMB: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
- Mass-Based Limits Worksheet

Table 1

NBC Effluent Discharge Limitations
Bucklin Point District

All parameters in mg/l unless otherwise specified

Parameter	Limitation (Max)
Arsenic(Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 34, and 36	BOD ₅ and TSS	10
32	BOD	570
32	TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300**
32	Ammonia	300**

* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

Table 2

Tedor Pharma, Inc.

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

Tedor Pharma, Inc.
Sampling Requirements

Sample Location #1		
Sample Port on the Discharge Line of Wastewater Storage Tank, T-101		
Month	Grab Sample*	Parameters
January	X	Cd, Cu, Zn, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Acetone, Methylene Chloride, VOC, EXT, BOD, TSS, O&G
February		
March		
April	X	Cd, Cu, Zn, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Acetone, Methylene Chloride, VOC, EXT, BOD, TSS, O&G
May		
June		
July	X	Cd, Cu, Zn, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Acetone, Methylene Chloride, VOC, EXT, BOD, TSS, O&G
August		
September		
October	X	Cd, Cu, Zn, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Acetone, Methylene Chloride, VOC, EXT, BOD, TSS, O&G
November		
December		

Legend

Cd – Cadmium Pb - Lead BOD - Biochemical Oxygen Demand
Cr – Chromium Ni - Nickel TSS - Total Suspended Solids
Cu – Copper Ag - Silver TTO - Total Toxic Organic Compounds
CN – Cyanide Zn - Zinc VOC - Volatile Organic Compounds Portion of TTO List
EXT - Extractable Portion of TTO List
O&G - Total Oil and Grease (fats, oils, and grease)

*These grab samples are to be collected after treatment and just prior to discharge.

Table 4

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)

Table 5

Definitions

1. **Biologicals** mean preparations made from living organisms and their products, including vaccines, cultures, etc., intended for used in diagnosing, immunizing or treating humans or animals or in research pertaining thereto.
2. **Blood Products** means any product derived from human blood, including but not limited to blood plasma, platelets, red or white blood corpuscles, and other derived licensed products, such as interferon, etc.
3. **Body Fluids** means liquid emanating or derived from humans and limited to blood; cerebrospinal, synovial, pleural, peritoneal and pericardial fluids; dialysate and amniotic fluids; and semen and vaginal secretions but excluding feces, urine, nasal secretions, sputum, sweat, tears, vomitus, saliva, and breast milk, unless any such excluded substance contains visible blood or is isolation waste.
4. **Contaminated Animal Carcasses, Body Parts and Bedding** - Body parts and bedding of animals that were exposed to infectious agents in research.
5. **Contaminated Sharps** - Discarded sharps (i.e. hypodermic needles, syringes, pasture pipettes, broken glass, scalpel blades, etc.) that may have come into contact with infectious agents.
6. **Contaminated Wastes from Surgical and Autopsy Procedures** - All soiled dressing, sponges, drapes, lavage tubes, surgical gloves, drainage sets, etc., that have come in contact with patient tissues, blood, body fluids, secretions, and excretions.
7. **Dialysis Unit Wastes** - Wastes that have come in contact with the blood of patients undergoing hemodialysis. Types of waste include contaminated disposal equipment and supplies such as tubing, filters, sheets, towels, gloves, etc.
8. **Discarded Cultures and Stocks of Infectious Agents and Associated Biologicals** - Cultures of specimens from medical/clinical and pathological laboratories, cultures and stocks of infectious agents, wastes from production of biologicals, discarded live and attenuated vaccines.
9. **Infectious Agent** - Any organism, such as a virus or a bacteria, that is capable of being communicated by invasion and multiplication in body tissues and capable of causing disease or adverse health impacts in humans.
10. **Isolation Wastes** - Biological waste and discarded materials contaminated with blood, excretion, exudates, or secretions from humans who are isolated to protect others from certain highly communicable diseases, or isolated animals known to be infected with highly communicable diseases. A list of these diseases may be found in Appendix I.
11. **Medical Waste** means any solid waste which is generated in the diagnosis, treatment, (i.e. provision of medical services), or immunization of human beings or animals, in research pertaining thereto, or in the production or testing of biologicals.
12. **Oncological Waste** - Wastes discarded from the preparation and/or administration of those classes of drugs used in chemotherapy, i.e. antineoplastic and cytotoxic agents.
13. **Pathological Wastes** - Tissues and body parts, including body fluids removed during surgery and/or autopsy.
14. **Regulated Medical Waste** - A special category of solid waste that includes specific types of medical waste that includes solid, semisolid, or liquid materials, but does not include domestic sewage materials. This waste is subject to the handling and tracking requirements of RI DEM. Categories of regulated medical waste are defined below as blood products, body fluids, contaminated sharps, discarded cultures and stocks of infectious agents and associated biologicals, isolation wastes, pathological waste and oncological waste.

Appendix I

List of Diseases Associated with Isolation Wastes

- A. Biological waste and discarded materials contaminated with blood, excretion, exudates or secretions from humans who are isolated to protect others from certain highly communicable diseases.

The following viral diseases are included in the list of "highly communicable diseases" associated with the class of Isolation Wastes. Unless otherwise noted, these diseases have been taken from Classification 4 of the Center for Disease Control's (CDC) 1974 document "Classification of Etiologic Agents on the Basis of Hazard".

<u>Infectious Agent</u>	<u>Disease</u>
* Variola minor	Alastrim
* Variola major	Small Pox
* Whitepox	
* Monkey Pox	Human Monkeypox
** Crimean (congo) hemorrhagic fever virus	Crimean hemorrhagic fever
** Junin virus	Argentine hemorrhagic fever
** Machupo virus	Bolivian hemorrhagic fever
Herpesvirus simiae (Monkey B)	Oncogenic in primates
Lassa virus	Lassa fever
Marburg virus	Marburg virus disease
Russian spring-summer Encephalitis virus	Russian spring-summer Encephalitis
Kyasanur forest disease virus	Kyasanur forest disease
Omsk hemorrhagic fever virus	Omsk hemorrhagic fever
Central European encephalitis	Central European encephalitis
* Venezuelan equine encephalitis virus	Venezuelan equine encephalitis
* Yellow fever virus	Yellow fever
*** Ebola virus	Ebola virus disease
*** Absettarov virus	Tick-borne encephalitis
*** Hanzalova virus	Tick-borne encephalitis
*** Hyper virus	Tick-borne encephalitis
*** Kumlinge virus	Tick-borne encephalitis
* When used for transmission or animal inoculation experiments.	
** CDC has noted that the above listed viruses in the hemorrhagic fever group and other viruses in this group, that are not yet identified, are also classified as Class 4.	
*** CDC/NIH have included these diseases in Class 4 of their 1988 document "Biosafety in Microbiological and Biomedical laboratories". This document is an update of the 1974 publication.	

B. Isolated animals known to be infected with highly communicable diseases.

The following diseases are included in the list of "highly communicable diseases" associated with animals. Unless otherwise noted by an asterisk, these diseases are part of the National Notifiable Disease Surveillances System List:

- Anthrax
- Botulism
- Brucellosis
- Eastern Equine Encephalitis
- Leptospirosis
- Lyme Disease
- Plague
- Psittacosis (Chlamyudiosis)
- Rabies
- Salmonellosis
- Trichinosis
- Tuberculosis
- Tularemia
- * Cat-Scratch Fever Disease
- * Ebola Virus
- * Ehrlichia Canis
- ** Encephalomyocarditis
- * Monkey B-Virus
- * Monkey Marburg Virus
- * Poxvirus
- * "Q" fever
- * Rocky Mountain Spotted Fever
- * Vesicular Stomatitis

CERTIFICATE TO DISCHARGE

the following types of process water:

PHARMACEUTICAL RESEARCH AND MANUFACTURING WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Tedor Pharma, Inc.

400 Highland Corporate Drive

Cumberland, RI 02864

PERMIT NUMBER: B1404-021-0426

PERMIT EXPIRATION DATE: 04/30/2026

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.

May 25, 2021
Initial Date of Issuance

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager

***TYPICAL METAL FORMER
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B1506-018-0428

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. Anthony Ledru

Facility Authorized Agents: Mr. Christopher Lepore, Ms. Michelle Park, Mr. Steven Saulen,
Mr. Robert Alley

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 Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Anthony Ledru 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 21 pages with conditions A - W.

**This permit becomes effective on May 1, 2023
and expires on April 30, 2028.**

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

April 25, 2023
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 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 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 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. 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 Rinsewaters;
 - f. Ultrasonic Cleaner Solutions;
 - 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. Concentrated 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 and 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 approved by the NBC. 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 - 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)(k) 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 install, operate, and maintain a pretreatment system in conformance with plans approved by the NBC. 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 illustrated in the plans that have been received by the NBC. 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 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 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 collected, 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 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 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. Fees:

The permittee agrees to pay all sewer user fees, including application 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 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.

CLV:NJD:rcf

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 Toxic Organic Compounds

Table 1

NBC Effluent Discharge Limitations
Bucklin Point District

All parameters in mg/l unless otherwise specified

Parameter	Limitation (Max)
Arsenic (Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 34, and 36	BOD ₅ and TSS	10
32	BOD	570
32	TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300**
32	Ammonia	300**

* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

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)*	0.10	0.10
Copper (Total)*	1.05	1.04
Cyanide (Total)*	0.43	0.43
Silver (Total)*	0.35	0.35

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 40 CFR §471.45. See Attachment A of this permit for more details.

*The US EPA Discharge Limitations are more stringent than NBC Effluent Discharge Limitations listed in Table 1. 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 days average)

Categorical discharge limitation in mg/L

$$C = M_{cwf} / F_t$$

F_t = average monthly flow through this combined treatment facility

Table 3

Tiffany and Company
Sampling Requirements

	Sample Location #1		Sample Location #2	
	Sample Port on the Discharge Line of the Final pH Adjustment Tank		Sample Port on the Discharge Line of the Oil/Water Separator in the Mechanical Room	
Month	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	Total Oil and Grease (fats, oils, and grease)
November				
December	X	Cu, Ag		

Legend

Cd - Cadmium
Cr - Chromium
Cu - Copper
CN - Cyanide
Pb - Lead
Ni - Nickel
Ag - Silver
Zn - Zinc

O&G - Total Oil and Grease (fats, oils, and grease)

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 Shot Casing 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

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	0.0121	0.050
Silver	0.171	0.071

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)

Conversion to mg/l ($C_{mg/l}$)

$$C_{mg/l} = M_{cwf} / F$$

F = Average monthly flow through this 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: B1506-018-0428

PERMIT EXPIRATION DATE: 04/30/2028

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 25, 2023

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL LANDFILL OPERATIONS
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: P3112-001-1024

Company Name: **RHODE ISLAND RESOURCE RECOVERY CORPORATION**

Facility Address: 65 Shun Pike, Johnston, RI 02919

Mailing Address: 65 Shun Pike, Johnston, RI 02919

Facility Executive Director: Mr. Joseph Reposa

Facility Authorized Agents: Mr. Joseph Brennan, 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. Joseph Reposa**, 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 16 pages with conditions A - T and Attachment 1.

**This permit becomes effective on June 1, 2021
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

May 12, 2021
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.
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.

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 and 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 15, attached hereto and incorporated herein.
6. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. 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 of this permit.

2. The permittee shall operate and maintain pretreatment systems in conformance with plans approved by the NBC. 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 discharge limitations for nitrogen compounds specified in Table 1 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.

- 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:

- 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 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)
Total Nitrogen

Other Parameters:

Cyanide
Total Oil & Grease (fats, oils, and grease)
Total Toxic Organics (TTO)
Biochemical Oxygen Demand (BOD)
Total Suspended Solids (TSS)

The sampling protocols for the parameters listed above are detailed in Attachment 1 of this permit.

Table 2 attached hereto summarizes the sampling requirements for this facility.

3. The discharge meter measuring flows from the SBR pretreatment system is to be read at the start of the sampling day and at the end of the sampling day. These results 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 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 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 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. All results from samples analyzed in the in-house laboratory. The samples must be retained on site for a period of seven days;
 - b. Amount of chemicals used on a monthly basis to provide pretreatment;

- c. Amount of sludge generated on a monthly basis;
 - d. Completed manifest forms for hazardous materials;
 - e. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration and other maintenance requests specified by inspectors of the NBC;
 - f. 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, 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;
- 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. Fees:

The permittee agrees to pay all sewer user fees, including application 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.

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

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)
Arsenic(Total)	0.02*
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.58**
Lead (Total)	0.60
Mercury (Total)	0.005
Nickel (Total)	1.62
Silver (Total)	0.43
Zinc (Total)	2.61
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 32, 34, and 36	BOD ₅ and TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300***
32	Ammonia	300***

* The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L

** The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.

*** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

Table 2
Rhode Island Resource Recovery Corporation
Sampling Requirements

Sample Location #1		
Sample Port on the Discharge Line of the Final Equalization Tank		
Monthly		
Month	Composite Sample	Parameters
January	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
February	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
March	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
April	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
May	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
June	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
July	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
August	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
September	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
October	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
November	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN
December	X	As, Cd, Cr, Cu, Pb, Hg, Ni, Ag, Zn, CN, O&G, TTO, BOD, TSS, Ammonia, TN

Legend

As - Arsenic	Pb - Lead	O&G - Total Oil & Grease (fats, oils & grease)	*Cyanide and Total Oil & Grease samples are to be collected as four grab samples over the course of the day.
Cd - Cadmium	Hg - Mercury	BOD - Biochemical Oxygen Demand	
Cr - Chromium	Ni - Nickel	TSS - Total Suspended Solids	
Cu - Copper	Ag - Silver (Total)	TTO - Total Toxic Organics	
CN - Cyanide	Zn - Zinc (Total)	TN - Total Nitrogen	

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 - 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: P3112-001-1024

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.

May 12, 2021

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL AEROGEL MANUFACTURING
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B3206-002-0426

Company Name: **ASPEN AEROGELS RHODE ISLAND, LLC**

Facility Address: 3 Dexter Road, East Providence, RI 02914

Mailing Address: 3 Dexter Road, East Providence, RI 02914

Facility President: Mr. Donald R. Young

Facility Authorized Agents: Mr. Matthew Milliken, Ms. Thalia Valkanos

User Classification: Aerogel Manufacturing with High Conventional Pollutant Loads

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. Donald R. Young and Aspen Aerogels Rhode Island, 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 21 pages with conditions A - V.

**This permit becomes effective upon receipt
and expires on April 30, 2026.**

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 25, 2022
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 20, 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 conducts aerogel manufacturing operations and discharges wastewater with high concentrations of conventional pollutants. The permittee must comply with the Ammonia, Biochemical Oxygen Demand, Total Nitrogen, and Total Suspended Solids limitations for Category 32 specified in Table 1 on page 19, attached hereto and incorporated herein. The Ammonia and Total Nitrogen limits will be enforced from May 1st through October 31st. These limits are in pounds per day and apply to the entire facility.
4. 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.
5. The permittee agrees that the discharge per calendar day of aerogel manufacturing wastewater is greater than or equal to 50,000 gallons. Decreasing or increasing the daily water usage may affect the monitoring frequency specified in this permit. The permittee must notify the NBC of any deviations from the aforementioned flow range so that required permit modifications may be made.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:

- a. Treated Scrubber Blowdown;
 - b. Extractor Wash Water;
 - c. Coating Line Equipment Wash Water;
 - d. Water Jet Machine Wastewater;
 - e. Cooling Tower Purge;
 - f. Plunger CO₂ Pump Water;
 - g. Air Compressor Condensate;
 - h. AFTF Catalyst Process Wastewater.
2. The permittee may batch discharge the entire contents of the cooling towers, boilers, and chillers after receiving approval from the NBC. In order to receive approval, the permittee must sample the contents in accordance with Sections E(6, 7, and 8) of this permit.
 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. Prohibited discharges include, but are not limited to, the following:
 - a. Raw Materials;
 - b. Off Specification Materials;
 - c. Sol Prep Solutions;
 - d. Casting Solutions;
 - e. Aging Fluid;
 - f. Solids greater than 1/2 inch in diameter;
 - g. Acidic Solutions with a pH less than 5.0 standard units;
 - h. Caustic Solutions with a pH greater than 11.0 standard units;
 - i. Degreasing Solutions;
 - j. Solvents;
 - k. Sludges;
 - l. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from batch discharging the entire contents of the cooling towers, boilers, and chillers without first receiving approval prior to discharge. In order to receive approval, the contents of the cooling towers, boilers, and chillers must be sampled in accordance with Section E(6 through 8) 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 20, attached hereto and incorporated herein.

4. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. 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 ten (10) sample locations must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - pH Adjustment Tank, collecting all process discharges specified in Section B(1)(a) of this permit.

Sample Location #2 - Sample port downstream of Clean In Place Tank and AFTF Catalyst Process discharge line, collecting all process discharges specified in Section B(1)(b and h) of this permit.

Sample Location #3 - Sample port on the discharge line of the Coating Line Wastewater Sump Tank and Water Jet Machine #2, collecting all process discharges specified in Section B(1)(c and d) of this permit.

Sample Location #4 - Sample port on the Buildings 1 and 2 Cooling Towers discharge line, collecting all process discharges specified in Sections B(1) (e and f) and B(2) of this permit.

Sample Location #5 - Sample port on the Building 3 Cooling Tower discharge line, collecting all process discharges specified in Section B(1) (e and f) and B(2) of this permit.

Sample Location #6 - Sample port on the Buildings 1 and 2 Boiler discharge line, collecting all process discharges specified in Section B(2) of this permit.

Sample Location #7 - Sample port on the Building 3 Boiler discharge line, collecting all process discharges specified in Section B(2) of this permit.

Sample Location #8 - Sample port on the Buildings 1 and 2 Chiller discharge line, collecting all process discharges specified in Section B(2) of this permit.

Sample Location #9 - Sample port on the Building 3 Chiller discharge line, collecting all process discharges specified in Section B(2) of this permit.

Sample Location #10 - Sample port on the discharge line of water jet machine #1, collecting all process discharges specified in Section B(1)(d) 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, #5, #6, #7, #8, #9, and #10 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee must ensure that all floor drains are equipped with screens, filters, or some other solids retention device to ensure that solids larger than 1/2 inch are not discharged to the sewer system.
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 pH of the effluent discharge through Sample Location #1 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 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 pH Adjustment Tank, Sample Location #1. The composite sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameter:

Biochemical Oxygen Demand (BOD)

During the months of June, August, and October, a portion of the composite sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Ammonia
Total Nitrogen

- b. On the same day that the composite sample listed in Section E(2)(a) above is being collected, the permittee shall collect four (4) grab samples from the pH Adjustment Tank, Sample Location #1, at equidistant time periods the operating days (i.e., one (1) sample every two (2) hours over the 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.

- c. On the same day that the composite sample listed in Section E(2)(a) above is being collected, the permittee shall collect a composite sample consisting of a minimum of twelve (12) equal volume grab samples collected at least every half hour over the course of the operating day or collected continuously with a composite sampler. The samples are to be collected from the pH Adjustment Tank, Sample Location #1. A minimum of 1,000 ml (1L) must be collected for analysis in a glass amber bottle with a Teflon lined cap. Each grab sample must be preserved immediately upon sample collection according to EPA regulations 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 sample containers; the samples must be refrigerated to a temperature of 0 - 4°C during sample collection; and they 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., 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 should 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. 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/Neutral fraction** of the Total Toxic Organics (TTO) list enclosed.

3. During the months of February, April, June, August, October and December until the expiration date of this permit, the permittee shall conduct sampling from the sample port downstream of the Clean In Place Tank and AFTF Catalyst Process discharge line, Sample Location #2, while a batch discharge is occurring, three grab samples must be collected as follows:

- a. A grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand (BOD)
Total Suspended Solids

During the months of June, August, and October, a portion of the composite sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Ammonia
Total Nitrogen

- b. A 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.
 - c. A grab sample consisting of a minimum of 1,000 ml (1L) must be collected for analysis in a 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, then 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 should 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 and refrigerated at a temperature of 0 - 4°C, 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/Neutral fraction** of the Total Toxic Organics (TTO) list enclosed.
4. During the months of February, June, and October, until the expiration date of this permit, the permittee shall conduct sampling from the sample port on the discharge line of the Coating Line Wastewater Sump Tank and Water Jet Machine #2, Sample Location #3, while batch discharge is occurring. Three (3) grab samples must be collected as follows:
 - a. A grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand (BOD)
Total Suspended Solids

- b. A 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.
 - c. A grab sample consisting of a minimum of 1,000 ml (1L) must be collected for analysis in a 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, then 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 should 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 and refrigerated at a temperature of 0 - 4°C, 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/Neutral fraction** of the Total Toxic Organics (TTO) list enclosed.
5. During the months of April, August, and October, until the expiration date of this permit, the permittee shall collect a grab sample from the sample port on the discharge line of the water jet machine, Sample Location #10. The grab sample is to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand (BOD)
Total Suspended Solids

Table 2 attached hereto summarizes the sampling requirements for this facility.

- 6. Prior to obtaining approval to discharge the contents of any cooling tower, a grab sample of the cooling tower 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)	

Analytical results must be submitted to the NBC along 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 discharge the contents of the cooling tower once approval is received from the NBC.

7. Prior to obtaining approval to discharge the contents of any boiler, a grab sample of the boiler 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)	

Analytical results must be submitted to the NBC along with a properly completed Self-Monitoring Compliance Report and chain of custody documentation requesting permission to discharge the contents of the boiler. The permittee may only discharge the contents of the boiler once approval is received from the NBC.

8. Prior to obtaining approval to discharge the contents of any 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)	

Analytical results must be submitted to the NBC along with a properly completed Self-Monitoring Compliance Report and chain of custody documentation requesting permission to discharge the contents of the chiller. The permittee may only discharge the contents of the chiller once approval is received from the NBC.

9. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.
10. 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.

11. 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 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.
12. 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. Completed manifest forms for hazardous materials;
 - c. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred;
 - d. The amount of chemicals added to provide pretreatment of batch discharges;
 - e. 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 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. Fees:

The permittee agrees to pay all sewer user fees, including application 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 limited liability company. The permittee shall ensure the limited liability company be registered with the Rhode Island Secretary of State Corporations Division. Aspen Aerogels Rhode Island, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Aspen Aerogels Rhode Island, 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 Aspen Aerogels Rhode Island, 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 Aspen Aerogels Rhode Island, 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 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.

P. 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.

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 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 Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) 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 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.

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:rcf

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

All parameters in mg/l unless otherwise specified

Parameter	Limitation (Max)
Arsenic(Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 34, and 36	BOD ₅ and TSS	10
32	BOD	570
32	TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300**
32	Ammonia	300**

* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

Table 2

Aspen Aerogels Rhode Island, LLC
Sampling Requirements

Month	Sample Location #1 pH Adjustment Tank		Sample Location #2 Sample Port Downstream of the Clean In Place Tank and AFTF Catalyst Process Discharge Line		Sample Location #3 Sample Port on the Discharge Line of the Coating Line and Water Jet Machine #2 Wastewater		Sample Location #4 Sample Port on the Discharge Line of the Water Jet Machine	
	Composite Sample	Parameters	Grab Sample	Parameters	Grab Sample	Parameters	Grab Sample	Parameters
January								
February	X	BOD, VOC, EXT	X	BOD, TSS, VOC, EXT	X	BOD, TSS, VOC, EXT		
March								
April	X	BOD, VOC, EXT	X	BOD, TSS, VOC, EXT			X	BOD, TSS
May								
June	X	BOD, VOC, EXT, TN, NH ₃	X	BOD, TSS, VOC, EXT, TN, NH ₃	X	BOD, TSS, VOC, EXT		
July								
August	X	BOD, VOC, EXT, TN, NH ₃	X	BOD, TSS, VOC, EXT, TN, NH ₃			X	BOD, TSS
September								
October	X	BOD, VOC, EXT, TN, NH ₃	X	BOD, TSS, VOC, EXT, TN, NH ₃	X	BOD, TSS, VOC, EXT		
November								
December	X	BOD, VOC, EXT	X	BOD, TSS, VOC, EXT			X	BOD, TSS

Legend

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

VOC - Volatile Organic compounds Portion of TTO List

EXT - Extractable Portion of TTO List

TN – Total Nitrogen

NH₃ – Ammonia

CERTIFICATE TO DISCHARGE

the following types of process water:

AEROGEL MANUFACTURING WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Aspen Aerogels Rhode Island, LLC

3 Dexter Road

East Providence, RI 02914

PERMIT NUMBER: B3206-002-0426

PERMIT EXPIRATION DATE: 04/30/2026

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 25, 2022

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL WHOLESALE FOOD
PROCESSING WITH HIGH
CONVENTIONAL POLLUTANT
LOADS WASTEWATER DISCHARGE
PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: P3302-022-0128

Company Name: **SEVEN STARS BAKERY, LLC**

Permitted Facility: **Royal Little Drive**

Facility Address: 170 Royal Little Drive, Providence, RI 02904

Mailing Address: 999 Main Street Unit 104, Pawtucket, RI 02860

Facility Manager: Ms. Tracy Daugherty

Facility Authorized Agent: Mr. Randy Nason

User Classification: Wholesale Food Processing Operations with High Conventional
Pollutant Loads

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), **Ms. Tracy Daugherty and Seven Stars Bakery, 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 15 pages with conditions A - T.

**This permit becomes effective upon receipt
and expires on January 31, 2028.**

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

March 14, 2023

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 conducts food processing operations and discharges wastewater with high concentrations of conventional pollutants. The permittee must comply with the Ammonia, Biochemical Oxygen Demand, Total Nitrogen, and Total Suspended Solids limitations for Category 33 specified in Table 1 on page 14, attached hereto and incorporated herein.
4. 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.
5. The permittee agrees that the discharge per calendar day of food processing wastewater is greater than or equal to 1,000 gallons, but less than 10,000 gallons. Decreasing or increasing the daily water usage may affect the monitoring frequency specified in this permit.. The permitte must notify the NBC of any deviaitons from the aforementioned flow range so that required permit modifications may be made.

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 Wash 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. Prohibited discharges include, but are not limited to, the following:
 - a. Solids greater than ½ inch in diameter;
 - b. Acidic Solutions with a pH less than 5.0 standard units;
 - c. Caustic Solutions with a pH greater than 11.00 standard units;
 - d. Degreasing Solutions;
 - e. Solvents;
 - f. Sludges;
 - g. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater 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. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. 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 one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sampling tee in the final retention tank of the outdoor grease interceptor, 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 the sample location 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 outdoor grease interceptor in conformance with the plans approved by the NBC. The interceptor 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 outdoor grease interceptor so that effluent limitations are met at all times. The permittee shall also be responsible for maintaining all records pertaining to the operation of the outdoor grease interceptor including, but not limited to, the following:
 - a. The permittee must conduct weekly inspections of the outdoor grease interceptor to determine the amount of grease collected in the unit. The grease interceptor must be maintained according to manufacturer's specifications at all times. The permittee is required to have the grease pumped out of the interceptor before such grease discharges to the NBC sewer system and must be pumped out immediately upon grease being observed in the final sampling te
 - b. The outdoor grease interceptor must be pumped out at least once each year. The NBC may require more frequent cleaning of the grease interceptor based on inspections and sampling performed by NBC personnel;
 - c. Only kitchen wastewater may be discharged into the grease interceptor. Sanitary wastes and sanitary wastewater lines may not discharge to the grease interceptor;
 - d. An outdoor grease interceptor logbook must be maintained at the permittee's facility. 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.
4. The permittee must install additional grease removal equipment that conforms with Section 1.8.8 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:

1. During the months of February and August, until the expiration date of the permit, the permittee must collect two (2) grab samples from the sampling tee in the final retention tank of the outdoor grease interceptor, Sample Location #1. The first grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand (BOD)
Total Suspended Solids (TSS)

The second grab sample is to be collected in a glass bottle, preserved and analyzed in accordance with EPA protocols for the following parameter:

Total Oil and Grease (fats, oils, and grease)

During the month of August, the permittee must collect a third grab sample. This grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Ammonia
Total Nitrogen

Table 2 attached hereto summarizes the sampling requirements for this facility.

2. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.
3. 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 must certify that the information submitted is accurate and complete to the best of their knowledge.
4. 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 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.
5. 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 must inspect and maintain the outdoor grease interceptor at least once per week and record in a logbook the time and date of the inspection (month, day, and year), 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. The thickness of the grease layer must be recorded in the logbook. The outdoor grease interceptor must be maintained according to manufacturer's specifications and pumped out accordingly. If grease is observed in the final sampling tee, the grease interceptor must be pumped out immediately;
 - b. All pump-outs are to be recorded, listing the firm that performed the pump-out, estimated gallons pumped, and the date and time when the pumping occurred;
 - c. Physical receipts for each pump-out are to be kept with the permittee's logbook. These receipts must be kept for a period of three (3) years and must be made available to NBC inspectors.
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. Facility 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. 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. Fees:

The permittee agrees to pay all sewer user fees, including application 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 be registered with the Rhode Island Secretary of State Corporations Division. Seven Stars Bakery, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Seven Stars Bakery, 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 Seven Stars Bakery, 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 Seven Stars Bakery, 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 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.

MM:NJD:lp

Attachments:

- Designation of Authorized Agent Form
- RCRA Handbook
- Logsheet for Outdoor Grease Interceptor
- Self-Monitoring Compliance Report Form
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed laboratories
- Outdoor In-Ground grease Removal Unit Logsheet

Table 1

NBC Effluent Discharge Limitations
Field's Point District

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)
Arsenic(Total)	0.02*
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.58**
Lead (Total)	0.60
Mercury (Total)	0.005
Nickel (Total)	1.62
Silver (Total)	0.43
Zinc (Total)	2.61
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 32, 34, and 36	BOD ₅ and TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300***
32	Ammonia	300***

* The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L

** The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.

*** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

Table 2

Seven Stars Bakery, LLC
Sampling Requirements

Sample Location #1		
Sampling Tee in the Final Retention Tank of the Outdoor Grease Interceptor		
Month	Grab Sample	Parameters
January		
February	X	BOD, TSS, O&G
March		
April		
May		
June		
July		
August	X	BOD, TSS, O&G, NH ₃ , TN
September		
October		
November		
December		

Legend

BOD – Biochemical Oxygen Demand

TSS – Total Suspended Solids

O&G – Total Oil and Grease (fats, oils, and grease)

NH₃ – Ammonia

TN – Total Nitrogen

CERTIFICATE TO DISCHARGE

the following types of process water:

**TREATED FOOD PREPARATION WASTEWATER AND
TREATED DISH, POT, AND EQUIPMENT WASH WATER**

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Seven Stars Bakery, LLC

170 Royal Little Drive

Providence, RI 02904

PERMIT NUMBER: P3302-022-0128

PERMIT EXPIRATION DATE: 01/31/2028

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 14, 2023
Initial Date of Issuance

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager

***TYPICAL BEVERAGE MANUFACTURING
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: P3402-014-0728

Company Name: **YACHT CLUB BOTTLING WORKS**

Facility Address: 2239 Mineral Spring Avenue, North Providence, RI 02911

Mailing Address: 2239 Mineral Spring Avenue, North Providence, RI 02911

Facility President: Mr. John Sgambato

Facility Authorized Agents: Mr. Michael Sgambato, Mr. William Sgambato, Mr. Brian Steere

User Classification: Beverage Manufacturing Operations with High Conventional Pollutant Loads and Low Flow

Categorical Standards Applicable: None

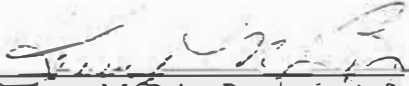
By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. John Sgambato and Yacht Club Bottling Works**, hereinafter jointly referred to as **Permittee**, 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 14 pages with conditions A - T.

**This permit becomes effective on August 1, 2023
and expires on July 31, 2028.**

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. Brit, Pretreatment Manager
Narragansett Bay Commission

July 22, 2023

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.
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 conducts beverage manufacturing operations and discharges wastewater with high concentrations of conventional pollutants. The permittee must comply with the Biochemical Oxygen Demand and Total Suspended Solids limitations for Category 34 specified in Table 1 on page 13, attached hereto and incorporated herein.
4. 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.
5. The permittee agrees that the discharge per calendar day of beverage manufacturing wastewater is less than 2,500 gallons. Decreasing or increasing the daily water usage may affect the monitoring frequency specified in this permit. The permittee must notify the NBC of any deviations from the aforementioned flow range so that required permit modifications may be made.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
 - a. Bottling Equipment Wash Water;
 - b. Sanitizer Overflow;
 - c. Floor Wash 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. Prohibited discharges include, but are not limited to, the following:
 - a. Waste and Off-Specification Product;
 - b. Concentrated Sanitizing Solutions;
 - c. Solids greater than 1/2 inch in diameter;
 - 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 and 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 13, attached hereto and incorporated herein.
3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. 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 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 downstream of the bottling operation, collecting all process discharges specified in Section B(1)(a, 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 Location # 1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee shall provide 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 the pretreatment system must be submitted to the NBC for approval before beginning construction.
3. The permittee must ensure that all floor drains are equipped with screens, filters, or some other solids retention device to ensure that solids larger than 1/2 inch are not discharged to the sewer system.
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. During the months of January and July, until the expiration date of this permit, the permittee must collect one (1) grab sample from the sample port on the discharge pipe downstream of the bottling operation, Sample Location #1. The grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand (BOD)
Total Suspended Solids (TSS)

Table 2 attached hereto summarizes the sampling requirements for this facility.

2. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.

3. 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.
4. 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 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.
5. 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:

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

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. 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. Fees:

The permittee agrees to pay all sewer user fees, including application 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. Yacht Club Bottling Works shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Yacht Club Bottling Works 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 Yacht Club Bottling Works 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 Yacht Club Bottling Works 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 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.

CLV:NPD:lp

Attachments:

- Self-Monitoring Compliance 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

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)
Arsenic (Total)	0.02*
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.58**
Lead (Total)	0.60
Mercury (Total)	0.005
Nickel (Total)	1.62
Silver (Total)	0.43
Zinc (Total)	2.61
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 - 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User	Parameter(s)	Limitation
Category/Categories		(lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 32, 34, and 36	BOD ₅ and TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***
Industrial User		Limitation
Category/Categories	Parameter(s)	(lbs/day)
32	Total Nitrogen	300***
32	Ammonia	300***

* The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L

** The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.

*** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

Table 2

Yacht Club Bottling Works
Sampling Requirements

Sample Location #1		
Sample Port on the discharge pipe downstream of the bottling operation		
Month	Grab Sample	Parameters
January	X	BOD, TSS
February		
March		
April		
May		
June		
July	X	BOD, TSS
August		
September		
October		
November		
December		

Legend

BOD - Biochemical Oxygen Demand
TSS - Total Suspended Solids

CERTIFICATE TO DISCHARGE

the following types of process water:

BEVERAGE MANUFACTURING WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Yacht Club Bottling Works

2239 Mineral Spring Avenue

North Providence, RI 02911


PERMIT NUMBER: P3402-014-0728

PERMIT EXPIRATION DATE: 7/31/2028

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.

July 22, 2023

Initial Date of Issuance



Kerry M. Britt, Pretreatment Manager

***TYPICAL BREWERY
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B3602-010-1227

Company Name: **OCEAN STATE BREWING, LLC D/B/A
PHANTOM FARMS BREWING**

Facility Address: 30 Martin Street, Cumberland, RI 02864

Mailing Address: 30 Martin Street, Suite 3C, Cumberland, RI 02864

Facility Managing Member: Mr. Jason Macari

Facility Authorized Agent: Mr. Jason Macari

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. Jason Macari and Ocean State Brewing, LLC d/b/a Phantom Farms Brewing**, 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.

**This permit becomes effective upon receipt
and expires on December 31, 2027.**

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

March 14, 2023
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.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
 - a. Brewing Tank Wash Water;
 - b. Fermenting Tank Wash Water;
 - c. Brewhouse Facility Floor Wash Water;
 - d. Glassware Wash 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. 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. Solids greater than 1/2 inch in diameter;
 - 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 and 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 14, attached hereto and incorporated herein.
 3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. 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 one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample tee in the brewhouse discharge holding tank, collecting all process discharges specified in Section B(1)(a through 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 Location #1 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 approved by the NBC. 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 conduct sampling over one (1) full normal operating day during the months of April and October, until the expiration date of this permit. A composite sample must be collected from the sample tee in the brewhouse discharge holding tank, Sample Location #1, and consist of equal volume grab samples collected from each batch discharge of the brewhouse discharge holding tank. The composite samples collected in April and October are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand
Total Suspended Solids

Table 2 attached hereto summarizes the sampling requirements for this facility.

2. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.
3. 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.

4. 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 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.
5. 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:

Date, volume, and pH of each batch discharge

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:

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

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. 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. Fees:

The permittee agrees to pay all sewer user fees, including application 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. Ocean State Brewing, LLC d/b/a Phantom Farms Brewing shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Ocean State Brewing, LLC d/b/a Phantom Farms Brewing 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 Ocean State Brewing, LLC d/b/a Phantom Farms Brewing 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 Ocean State Brewing, LLC d/b/a Phantom Farms Brewing 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.

KCG:NJD:rcf

Attachments:

- Self-Monitoring Compliance 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
Bucklin Point District

All parameters in mg/l unless otherwise specified

Parameter	Limitation (Max)
Arsenic (Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 34, and 36	BOD ₅ and TSS	10
32	BOD	570
32	TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300**
32	Ammonia	300**

* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

Table 2

**Ocean State Brewing, LLC d/b/a
Phantom Farms Brewing
Sampling Requirements**

Sample Location #1		
Sample Tee in the Brewhouse Holding Tank		
Month	Composite Sample*	Parameters
January		
February		
March		
April	X	BOD, TSS
May		
June		
July		
August		
September		
October	X	BOD, TSS
November		
December		

Legend

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

*Composite samples must consist of equal volume grab samples collected from each batch of the brewhouse holding tank over the operating day.

CERTIFICATE TO DISCHARGE

the following types of process water:

**BREWING TANK WASH WATER. FERMENTING TANK WASH WATER
BREWHOUSE FACILITY FLOOR WASH WATER, GLASSWARE WASH WATER**

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Ocean State Brewing, LLC d/b/a Phantom Farms Brewing

30 Martin Street

Cumberland, RI 02864

PERMIT NUMBER: B3602-010-1227

PERMIT EXPIRATION DATE: 12/31/2027

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 14, 2023
Initial Date of Issuance

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager

***TYPICAL AUTOMOTIVE
FLEET WASHING WASTEWATER
DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B3702-024-1028

Company Name: **CAMRAC, LLC D/B/A ENTERPRISE RENT-A-CAR**

Permitted Facility: **Broadway, Pawtucket**

Facility Address: 458 Broadway, Pawtucket, RI 02860

Mailing Address: 8 Ella Grasso Turnpike, Windsor Locks, CT 06096

Facility President: Ms. Chrissy Taylor

Facility Authorized Agent: Mr. Kevin Kolstad

User Classification: Automotive 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) **Ms. Chrissy Taylor and CAMRAC, LLC d/b/a Enterprise Rent-A-Car**, 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 14 pages with conditions A - T.

**This permit becomes effective on November 1, 2023
and expires on October 31, 2028.**

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 18, 2023
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.
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. Treated Vehicle Wash Water and Rinsewater;
 - b. Treated Wastewater from Facility Floor Washing.
2. No other process wastewater, chemicals, or solutions are 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. Oils and Greases;
 - b. Fuels and Lubricating Oils;
 - c. Solvents;
 - d. Sludges;
 - e. Solids/Grit;

- f. Antifreeze Solutions;
 - g. Degreasing Solutions;
 - h. Caustic Solutions with a pH greater than 11.0 standard units;
 - i. Acidic Solutions with a pH less than 5.0 standard units.
2. The permittee is strictly prohibited from discharging wastewater 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 may only treat and/or discharge those solutions that are specified in Section B(1) of this permit. The permittee is strictly prohibited from discharging any other solutions, chemicals or materials including all prohibited substances as defined in the Rules and Regulations without written approval from the NBC.
 4. No tanks are to be discharged to the sewer unless specifically approved by the NBC in writing.
 5. The use of portable pumps and/or flexible hose for transfer of chemicals or wastewater is specifically prohibited without written approval from the NBC.

D. Pretreatment Requirements:

1. The permittee must ensure that all vehicle wash water, rinsewater, and floor washing wastewater discharges to a solids/grit removal chamber or some other solids retention device to ensure that solids such as sand and grit are not discharged to the sewer system.
2. 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 - The effluent sampling tee in the oil and solids/grit separating tank, collecting wastestreams referenced 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 each sample location must be in compliance with the effluent limitations specified in Table 1 of this permit.

3. The permittee has installed and must operate and maintain the oil and solids/grit removal system. This oil and solids/grit removal system shall be fully operational whenever process discharges to the sewer system 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. During the months of April and October, until the expiration date of the permit, the permittee shall collect one (1) grab sample from the effluent sampling tee in the oil and solids/grit separating tank, Sample Location #1, while vehicle and floor washing operations are being conducted. 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 2 attached hereto summarizes the sampling requirements for this facility.

2. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These readings and the resultant total flow are to be submitted with the sampling results.
3. 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 must certify that the information submitted is accurate and complete to the best of their knowledge.
4. 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 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.

5. 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 oil and solids/grit removal system including, but not limited to, the following:
 - a. Date on which the separator is inspected, cleaned, and by whom;
 - b. Nature of any maintenance and corrective measures required to maintain proper performance of separator and other maintenance requests specified by inspectors of the NBC;
 - c. Completed manifests or physical receipts for waste materials removed from the facility.
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. 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, 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:

Oil and Solids/Grit Separation System 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. Fees:

The permittee agrees to pay all sewer user fees, including application 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. CAMRAC, LLC d/b/a Enterprise Rent-A-Car shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event CAMRAC, LLC d/b/a Enterprise Rent-A-Car 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 CAMRAC, LLC d/b/a Enterprise Rent-A-Car 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 CAMRAC, LLC d/b/a Enterprise Rent-A-Car 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 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.

NPD:KMB:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- List of Licensed Laboratories
- Twenty-four (24) Hour Violation Notification Fax Form

Table 1

NBC Effluent Discharge Limitations
Bucklin Point District

All parameters in mg/l unless otherwise specified

Parameter	Limitation (Max)
Arsenic (Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 34, and 36	BOD ₅ and TSS	10
32	BOD	570
32	TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300**
32	Ammonia	300**

* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

Table 2

CAMRAC, LLC d/b/a Enterprise Rent-A-Car
Sampling Requirements

Sample Location #1		
The Effluent Sampling Tee in the Oil and Solids/Grit Separating Tank		
Month	Grab Sample	Parameters
January		
February		
March		
April	X	Total Oil and Grease (fats, oils, and grease)
May		
June		
July		
August		
September		
October	X	Total Oil and Grease (fats, oils, and grease)
November		
December		

CERTIFICATE TO DISCHARGE

the following types of process water:

TREATED VEHICLE AND FLOOR WASH WATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

CAMRAC, LLC d/b/a Enterprise Rent-A-Car

458 Broadway

Pawtucket, RI 02860

PERMIT NUMBER: B3702-024-1028

PERMIT EXPIRATION DATE: 10/31/2028

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 18, 2023
Initial Date of Issuance

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager

***ANAEROBIC DIGESTOR
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: P3812-003-0927

Company Name: **RHODE ISLAND BIOENERGY, LLC**

Facility Address: 289 Scituate Avenue, Johnston, RI 02919

Mailing Address: c/o Anaergia Services, LLC 705 Palomar Airport Road,
Suite 200, Carlsbad, CA 92011

Facility Chief Executive Officer: Mr. Andrew Benedek

Facility Authorized Agents: Mr. Kevin Bell, Mr. Alex McFarlane

User Classification: Anaerobic Food Digestion 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. Andrew Benedek and Rhode Island Bioenergy, 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 - V.

**This permit becomes effective upon receipt
and expires on September 30, 2027.**

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

October 12, 2022

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.
4. The permittee shall not discharge more than 148,000 gallons per day of food waste digestate and gas scrubber wastewater. The permittee must notify the NBC within twenty-four (24) hours if the daily flow restriction is exceeded.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
 - a. Treated Food Waste Digestate;
 - b. Treated Condensate from Biogas Washing Scrubbers.
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. Solids larger than 1/2 inch in size;
 - b. Concentrated/Untreated Food Waste;

- 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 and 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 approved by the NBC. 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 one 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 from the MBR system, 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 has installed and shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. 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 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 monitor the quantity of treated wastewater discharged to the NBC sewer system and record the total daily flow from the turbine water meter. The permittee shall report the daily flow in a summary report which must be received by the NBC within thirty (30) days from the end of the month in which the flow was recorded. The turbine meter must be inspected at a minimum of one (1) time per year and calibrated as needed.
3. 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 from the sample port on the discharge line from the MBR system, Sample Location #1. The monthly samples must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Nitrogen Parameters:*

Ammonia (Total)
Total Nitrogen*

Other Parameters:

Biochemical Oxygen Demand (BOD₅)
Total Suspended Solids (TSS)
Total Oil & Grease (fats, oils, and grease)

*The limitations for ammonia and nitrogen are seasonal and will be enforced from May 1st through October 31st. The Total Nitrogen result must be provided in total concentration (mg/L) and total loading (pounds).

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 the sampling day and at the end of the sampling day. These results 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 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. 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. Turbine meter inspections, maintenance, and calculations.
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, 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;
- f. Turbine meter 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. Fees:

The permittee agrees to pay all sewer user fees, including application 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 limited liability company. The permittee shall ensure the limited liability company be registered with the Rhode Island Secretary of State Corporations Division. Rhode Island Bioenergy, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Rhode Island Bioenergy, 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 Rhode Island Bioenergy, 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 Rhode Island Bioenergy, 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 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.

P. 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.

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 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 Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) 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 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.

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:KMB:sm

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

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)
Arsenic (Total)	0.02*
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.58**
Lead (Total)	0.60
Mercury (Total)	0.005
Nickel (Total)	1.62
Silver (Total)	0.43
Zinc (Total)	2.61
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User	Parameter(s)	Limitation
Category/Categories		(lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 32, 34, and 36	BOD ₅ and TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***
Industrial User		Limitation
Category/Categories	Parameter(s)	(lbs/day)
32	Total Nitrogen	300***
32	Ammonia	300***

- * The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L
- ** The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.
- *** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

Table 2

Rhode Island Bioenergy, LLC
Sampling Requirements

Sample Location #1		
Sample Port on the Discharge Line from the MBR System		
Month	Composite Sample	Parameters
January	X	BOD, TSS, O&G, NH ₃ , TN
February	X	BOD, TSS, O&G, NH ₃ , TN
March	X	BOD, TSS, O&G, NH ₃ , TN
April	X	BOD, TSS, O&G, NH ₃ , TN
May	X	BOD, TSS, O&G, NH ₃ , TN
June	X	BOD, TSS, O&G, NH ₃ , TN
July	X	BOD, TSS, O&G, NH ₃ , TN
August	X	BOD, TSS, O&G, NH ₃ , TN
September	X	BOD, TSS, O&G, NH ₃ , TN
October	X	BOD, TSS, O&G, NH ₃ , TN
November	X	BOD, TSS, O&G, NH ₃ , TN
December	X	BOD, TSS, O&G, NH ₃ , TN

Legend

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

O&G - Total Oil and Grease (fats, oils, and grease)

NH₃ - Ammonia

TN - Total Nitrogen

CERTIFICATE TO DISCHARGE

the following types of process water:

TREATED DIGESTATE AND GAS SCRUBBING CONDENSATE

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Rhode Island Bioenergy, LLC

289 Scituate Avenue

Johnston, RI 02919


PERMIT NUMBER: P3812-003-0927

PERMIT EXPIRATION DATE: 09/30/2027

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 12, 2022

Initial Date of Issuance



Kerry M. Britt, Pretreatment Manager

***TYPICAL GROUNDWATER
REMEDICATION WASTEWATER
DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B4012-038-0328
Company Name: **BARLETTA HEAVY DIVISION**
Permitted Facility: **Central Avenue**
Facility Address: 5 Central Avenue, Pawtucket, RI 02860
Mailing Address: 40 Shawmut Road, Canton, MA 02021
Facility President: Mr. Vincent F. Barletta
Facility Authorized Agents: Mr. Dan McGathey, Mr. Ryan Ferguson
User Classification: Groundwater Discharges
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. Vincent F. Barletta and Barletta Heavy Division**, 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 - U.

**This permit becomes effective upon receipt
and expires on March 31, 2028.**

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/ Kerri M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

June 8, 2023
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 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 72,000 gallons per day. The permittee agrees not to exceed the specified maximum daily flow restrictions and must notify the NBC in advance of any exceedances of the aforementioned flow rates.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
 - a. Treated Groundwater;
 - b. Treated Mining Operation Wastewater;
 - c. Treated Equipment Wash 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. Prohibited discharges include, but are not limited to, the following:
 - a. Acidic Solutions with a pH less than 5.0 standard units;

- b. Caustic Solutions with a pH greater than 11.0 standard units;
 - c. Degreasing Solutions;
 - d. Solvents;
 - e. Sludges;
 - f. Fuel and 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 approved by the NBC. 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 one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - The effluent sample port downstream of the groundwater settling and storage tank, collecting all process discharges specified in Section B(1)(a, 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 Location #1 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 approved by the NBC. 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. 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 at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the effluent sampling port downstream of the groundwater settling and storage 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:

Arsenic (Total)	Copper (Total)	Silver (Total)
Cadmium (Total)	Lead (Total)	Zinc (Total)
Chromium (Total)	Nickel (Total)	Total Suspended Solids

- b. On the same four (4) days that the composite samples listed in Section E(2)(a) above are being collected, the permittee shall collect a minimum of four (4) grab samples at equidistant time intervals over each entire operating day from the effluent sampling port downstream of the groundwater settling and storage tank, Sample Location #1. 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. Each of the four (4) daily composite samples consisting of the four (4) preserved grab samples must be refrigerated until analysis and must be analyzed separately within fourteen (14) days of collection for **Total Cyanide**. Each daily composite sample must be in compliance with the NBC Total Cyanide Standard of 0.40 ppm.

- c. On the same four (4) days that the composite samples listed in Section E(2)(a) above are being collected, four (4) grab samples are to be collected from the effluent sampling port downstream of the groundwater settling and storage tank, Sample Location #1 at equidistant time periods over each 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.
- d. On the same days that the composite samples listed in Section E(2)(a) are collected, the permittee shall collect four (4) separate grab samples in glass bottles at equally spaced time intervals over the course of the entire operating day from the effluent sampling port downstream of the groundwater settling and storage tank, Sample Location #1. The grab samples are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameter:

Total Oil and Grease (fats, oils, and grease)

The mathematical average of the analytical results of the four (4) grab samples will be used to determine compliance with the NBC Total Oil and Grease (fats, oils, and grease) effluent discharge limitation of 125.00 mg/l.

This sampling procedure must be repeated daily over four (4) consecutive operating days during the first full normal week of operations.

- e. The analytical results are to be received by the NBC within thirty (30) days after the end of the month in which the samples are collected. 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).

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 effluent sample port downstream of the groundwater settling and storage tank, Sample Location #1. The composite samples are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Arsenic (Total)	Copper (Total)	Silver (Total)
Cadmium (Total)	Lead (Total)	Zinc (Total)
Chromium (Total)	Nickel (Total)	Total Suspended Solids

b. On the same day that the composite samples listed in Section E(3)(a) are collected, the permittee shall collect four (4) separate grab samples in glass bottles at equally spaced time intervals over the course of the entire operating day from the effluent sampling port downstream of the groundwater settling and storage tank, Sample Location #1. The grab samples are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameter:

Total Oil and Grease (fats, oils, and grease)

The mathematical average of the analytical results of the four (4) grab samples will be used to determine compliance with the NBC Total Oil and Grease (fats, oils, and grease) effluent discharge limitation of 125.00 mg/l.

c. On the same day that the composite sample listed in Section E(3)(a) above is being collected, four (4) grab samples are to be collected at equidistant time periods over an operating days (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 be preserved immediately upon sample collection in accordance with EPA regulations. 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 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.

Table 2 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 the sampling day and at the end of the sampling day. These results 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 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 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. Maintenance performed on the pretreatment system, including weir tank pumpout 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:

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

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. 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. Fees:

The permittee agrees to pay all sewer user fees, including application 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. Barletta Heavy Division shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Barletta Heavy Division 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 Barletta Heavy Division 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 Barletta Heavy Division 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.

KG:KMB:sm

Attachments:

- Self-Monitoring Compliance 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
- Spill and Slug Prevention Control Plan

Table 1

NBC Effluent Discharge Limitations
Bucklin Point District

All parameters in mg/l unless otherwise specified

Parameter	Limitation (Max)
Arsenic(Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 34, and 36	BOD ₅ and TSS	10
32	BOD	570
32	TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300**
32	Ammonia	300**

* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

Table 2

Barletta Heavy Division
Sampling Requirements

Sample Location #1		
The Effluent Sample Port Downstream of the Groundwater Settling and Storage Tank		
Month	Composite Sample	Parameters
January	X	As, Cd, Cr, Cu, Pb, Ni, Ag, Zn, VOC, TSS, O&G
February	X	As, Cd, Cr, Cu, Pb, Ni, Ag, Zn, VOC, TSS, O&G
March	X	As, Cd, Cr, Cu, Pb, Ni, Ag, Zn, VOC, TSS, O&G
April	X	As, Cd, Cr, Cu, Pb, Ni, Ag, Zn, VOC, TSS, O&G
May	X	As, Cd, Cr, Cu, Pb, Ni, Ag, Zn, VOC, TSS, O&G
June	X	As, Cd, Cr, Cu, Pb, Ni, Ag, Zn, VOC, TSS, O&G
July	X	As, Cd, Cr, Cu, Pb, Ni, Ag, Zn, VOC, TSS, O&G
August	X	As, Cd, Cr, Cu, Pb, Ni, Ag, Zn, VOC, TSS, O&G
September	X	As, Cd, Cr, Cu, Pb, Ni, Ag, Zn, VOC, TSS, O&G
October	X	As, Cd, Cr, Cu, Pb, Ni, Ag, Zn, VOC, TSS, O&G
November	X	As, Cd, Cr, Cu, Pb, Ni, Ag, Zn, VOC, TSS, O&G
December	X	As, Cd, Cr, Cu, Pb, Ni, Ag, Zn, VOC, TSS, O&G

Legend

As – Arsenic

Cd - Cadmium

Cr - Chromium

Cu - Copper

Pb - Lead

Ni - Nickel

Ag - Silver

Zn – Zinc

TSS - Total Suspended Solids

O&G - Total Oil and Grease (fats, oils, and grease)

VOC - Volatile Organic compounds Portion of TTO List

CERTIFICATE TO DISCHARGE

the following types of process water:

**TREATED GROUNDWATER, MINING OPERATION WASTEWATER,
AND EQUIPMENT WASHING WASTEWATER**

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Barletta Heavy Division

5 Central Avenue

Pawtucket, RI 02860

PERMIT NUMBER: B4012-038-0328

PERMIT EXPIRATION DATE: 03/31/2028

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.

June 8, 2023

Initial Date of Issuance

/s/ Kerri M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL ZERO PROCESS
WASTEWATER-SANITARY
DISCHARGE PERMIT***



ZERO PROCESS WASTEWATER - SANITARY DISCHARGE PERMIT

Permit Number: P4100-111-0528
Company Name: **ANNEX PLATING**
Facility Address: 9 Warren Avenue, North Providence, RI 02911
Mailing Address: 9 Warren Avenue, North Providence, RI 02911
Facility President: Mr. Barry Fishback
Facility Authorized Agent: Mr. Barry Fishback
User Classification: Zero Discharge Electroplating Operations
Categorical Standards Applicable: None

In accordance with R.I.G.L. §46-25-1 et. seq. and The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), the Narragansett Bay Commission hereby grants a Zero Process Wastewater-Sanitary Discharge Permit to **Mr. Barry Fishback and Annex Plating**, hereinafter jointly referred to as **Permittee**. This permit authorizes the permittee to discharge only sanitary wastewater into the NBC facilities in accordance with the terms and conditions of this permit. The discharge of any process wastewater streams to the NBC sewer system shall constitute a violation of the permit. This permit consists of 13 pages with conditions A - T and Attachment A.

**This permit becomes effective June 1, 2023
and expires on May 31, 2028.**

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

May 17, 2023
Date

Mr. Barry Fishback and Annex Plating hereby consents to this Zero Process Wastewater-Sanitary Discharge Permit. In so consenting, appropriate officers of **Annex Plating** have personally read and understood each of the numbered provisions in this Zero Discharge Permit. This permit allows **Annex Plating** 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 Rules and Regulations and the conditions and procedures contained in this permit.

Company Authorized Agent(s) _____ **Company Seal**

Title _____

Signature _____

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 approved by the NBC. This pretreatment system shall be used specifically for the use of recycling wastewater or eliminating discharges from the following operations:
 - a. Electroplating Operations;
 - b. Cleaning Operations.
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 approved by the NBC 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 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 recycle system, 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 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.

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. Prohibited discharges include, but are not limited to, the following:
 - a. Electroplating Wastewaters;
 - 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.

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. Fees:

The permittee agrees to pay all sewer user fees, including application 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. Annex Plating shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Annex Plating 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 Annex Plating 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 Annex Plating 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.

KCG:NPD:rcf

Attachments:

- Designation of Authorized Agent Form
- RCRA Handbook
- List of Toxic Organic Compounds
- Monthly Zero Process Wastewater Discharge Certification

Table 1

NBC Effluent Discharge Limitations
Field's Point District

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)
Arsenic (Total)	0.02*
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.58**
Lead (Total)	0.60
Mercury (Total)	0.005
Nickel (Total)	1.62
Silver (Total)	0.43
Zinc (Total)	2.61
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 32, 34, and 36	BOD ₅ and TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300***
32	Ammonia	300***

* The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L

** The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.

*** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

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: B8000-154-0528
Company Name: **ABM ENTERPRISE**
Company President: Mr. Kirk J. Mangum
Facility Address: 38 East Street 1st Floor, West Warwick, RI 02893
Mailing Address: 38 East Street 1st Floor, West Warwick, RI 02893
DEM License Number: RI-958

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. Kirk J. Mangum and ABM Enterprise**, 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, 2023
and expires on May 31, 2028.**

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 1.14.4 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. Fees: The permittee agrees to pay an application fee and all other 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.

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 B8000-154-0528

Attachment A

ABM Enterprise

(COMPANY NAME)

PERMITTED VEHICLES:

VEHICLE TYPE	REGISTRATION NUMBER	TRUCK VIN NUMBER	CAPACITY (GALLONS)
TRUCK	1B271	3C7WRNDL6LG289280	926
TRUCK	82780	1FT8W4DPXHEF4140	520

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: B8500-948-0928

Company Name: **LUNA'S CAFÉ, LLC D/B/A THE RHODY HEN CAFÉ**

Facility Address: 350 Prospect Street, Pawtucket, RI 02860

Mailing Address: P.O. Box 3376, Pawtucket, RI 02861

Facility Owners: Mr. Antonio Barrera Hernandez, Ms. Tiffany Barrera

Facility Authorized Agents: Mr. Antonio Barrera Hernandez, Ms. Tiffany Barrera

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. Antonio Barrera Hernandez, Ms. Tiffany Barrera and Luna's Café, LLC d/b/a The Rhody Hen Café**, 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 12 pages with conditions A - T.

**This permit becomes effective on October 1, 2023
and expires on September 30, 2028.**

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

September 19, 2023
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 12, 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 waste, solutions, or process wastewater streams to the NBC facilities:
 - a. Treated Food Preparation Wastewater;
 - b. Treated Dish, Pot, and Equipment Wash 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. 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 and 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. 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 1.8.8 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 24-hr 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. 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. Fees:

The permittee agrees to pay all sewer user fees, including application 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. Luna's Café, LLC d/b/a The Rhody Hen Café shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Luna's Café, LLC d/b/a The Rhody Hen Café 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 Luna's Café, LLC d/b/a The Rhody Hen Café 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 Luna's Café, LLC d/b/a The Rhody Hen Café 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.

JU:NPD:rcf

Attachments:

Designation of Authorized Agent Form
RCRA Handbook
Automatic Grease Removal Unit Logsheet

Table 1

NBC Effluent Discharge Limitations
Bucklin Point District

All parameters in mg/l unless otherwise specified

Parameter	Limitation (Max)
Arsenic (Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 34, and 36	BOD ₅ and TSS	10
32	BOD	570
32	TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300**
32	Ammonia	300**

* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

CERTIFICATE TO DISCHARGE

the following types of process water:

**TREATED FOOD PREPARATION WASTEWATER AND
TREATED DISH, POT, AND EQUIPMENT WASH WATER**

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Luna's Café, LLC d/b/a The Rhody Hen Café

350 Prospect Street

Pawtucket, RI 02860

PERMIT NUMBER: B8500-948-0928

PERMIT EXPIRATION DATE: 09/30/2028

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.

September 19, 2023
Initial Date of Issuance

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager

***TYPICAL DENTIST
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: P9400-460-0228

Company Name: **ADVANCED DENTAL CARE**

Facility Address: 433 Lloyd Avenue, Providence, RI 02906

Mailing Address: 433 Lloyd Avenue, Providence, RI 02906

Facility President: Dr. Armand Mahmoudi

Facility Authorized Agent: Dr. Armand Mahmoudi

User Classification: Dental Operations

Categorical Standards Applicable: 40 CFR §441.40, 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), **Dr. Armand Mahmoudi and Advanced Dental Care**, 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 and Attachment A.

**This permit becomes effective upon receipt
and expires on February 29, 2028.**

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

March 31, 2023
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.
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 §441.40, Pretreatment Standards for New 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 13, 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 medical waste 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 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 §441.40, Pretreatment Standards for New Sources and 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 approved by the NBC. 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 F(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 of 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 all 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 January to December. 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. 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.

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 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.

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. Fees:

The permittee agrees to pay all sewer user fees, including application 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. Advanced Dental Care shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Advanced Dental Care 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 Advanced Dental Care 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 Advanced Dental Care 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 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.

THC:NJD:rcf

Attachments:

Designation of Authorized Agent Form
RCRA Handbook

Table 1

NBC Effluent Discharge Limitations
Field's Point District

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)
Arsenic (Total)	0.02*
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.58**
Lead (Total)	0.60
Mercury (Total)	0.005
Nickel (Total)	1.62
Silver (Total)	0.43
Zinc (Total)	2.61
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User	Parameter(s)	Limitation
Category/Categories		(lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 32, 34, and 36	BOD ₅ and TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

Industrial User	Parameter(s)	Limitation
Category/Categories		(lbs/day)
32	Total Nitrogen	300***
32	Ammonia	300***

* The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L

** The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.

*** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

Attachment A

Best Management Practice Certification

For the previous 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 WASTEWATER CONTAINING AMALGAM AND DENTAL PROCESS WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Advanced Dental Care

433 Lloyd Avenue

Providence, RI 02906

PERMIT NUMBER: P9400-460-0228

PERMIT EXPIRATION DATE: 02/29/2028

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, 2023
Initial Date of Issuance

/s/ Kerry M. Britt
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 (NBC) Rules and Regulations for Use of the Wastewater Facilities (Section 1.8.9) 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

3. List each room or area inside or outside of your facility in which chemicals, solvents, liquids, fuel or lubricating oils, hazardous waste, etc. may be used or stored and indicate if spill control facilities are in place to prevent a spill from reaching the sewer system.

Room/Area	Spill Control Facilities in Place Yes/No

Attachment A must be completed for each area listed above with the exception of boiler facilities.

4. Attach a sketch of your entire facility showing each area/room listed above. This sketch must show the location of all floor drains, open sewer connections, berms, etc. in relation to the rooms listed above. Be sure to include outside yard drains located near loading docks or storage areas. For multilevel facilities a sketch must be provided for each level of the facility.

Section B: Spill Control Training, Equipment and Routine Inspections

1. The NBC recommends all employees working in areas specified in Section A(3) be thoroughly trained annually in spill control procedures for their respective work areas. List all spill control training that has been conducted at your facility and indicate the frequency of training:

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 1.7.2(A)(5) of the Narragansett Bay Commission (NBC) Rules and Regulations for Use of the 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, including 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

*- Polynuclear Aromatic Hydrocarbons

Pesticides

EPA Method 625

aldrin
alpha - BHC
beta - BHC
gamma - BHC
delta - BHC
chlordan
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)

***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 _____

Part IV – Spill, Slug, and Solvent Discharge Control

- (a) Does the facility have a Spill & Slug Prevention Control Plan (SSPCP)? __Yes __No __N/A
- (b) Has a SSPCP been approved? __Yes __No __N/A
- (c) Are spill control measures physically in place as stated in SSPCP? __Yes __No __N/A

If no, Explain _____

* Check for open drains or other direct sewer access points.

- (d) Does the facility have a Toxic Organic/Solvent Management Plan (TO/SMP)? __Yes __No __N/A
 - (e) Has TO/SMP been submitted? __Yes __No __N/A
 - (f) Has TO/SMP been approved? __Yes __No __N/A
 - (g) Is the existing TO/SMP accurate and sufficient? __Yes __No __N/A
- If no, Explain _____

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

Location	Process Operation Monitored	Readings	Units
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Part VI – Comments/Requirements:

Engineers Comments: _____

What will be required of the firm? _____

If this is an industrial vacation shutdown inspection, please provide a copy of the NBC notice detailing the proper disposal methods that should be used during the annual facility vacation shutdown.

Is the facility shutting down for vacation? __Yes __No __N/A
 If yes, provide dates _____

***NBC BREWERY-DISTILLERY
INSPECTION CHECKLIST***

NARRAGANSETT BAY COMMISSION

Brewery/Distillery Inspection Checklist
For Industrial Users

Company Name: _____ Technician/Engineer: _____
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 made 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 _____

Part IV – Spill, Slug, and Solvent Discharge Control

- (a) Does the facility have a Spill & Slug Prevention Control Plan (SSPCP)? Yes No N/A
(b) Has a SSPCP been approved? Yes No N/A
(c) Are spill control measures physically in place as stated in SSPCP? Yes No N/A

If no, Explain _____

* Check for open drains or other direct sewer access points.

Part V – Sampling and Process Flow Measurement:

(a) Water Meter Location	Process Operations Monitored	Readings	Units
_____	_____	_____	_____
_____	_____	_____	_____

- (b) Is sampling being conducted in accordance with the Wastewater Discharge Permit? Yes No

If no, Explain _____

Part VI – Brewery/Distillery Prohibited Waste Disposal

- (a) How are spent mash, grains, and/or yeast collected and disposed? _____

- (b) How are tank heels/bottoms collected and disposed? _____

- (c) How would/is off specification product (bad batch of beer for example) be collected and disposed? _____

Part VII – Comments/Requirements:

Engineers Comments: _____

What will be required of the firm? _____

If this is an industrial vacation shutdown inspection, please provide a copy of the NBC notice detailing the proper disposal methods that should be used during the annual facility vacation shutdown. Is the facility shutting down for vacation? Yes No N/A
If yes, provide dates _____

***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):_____	Other (Specify):_____	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

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)	Parameter	Limitation (Max)
Arsenic(Total)	0.02**	Zinc (Total)	2.61
Cadmium (Total)	0.11	Total Toxic Organics (TTO)	2.13
Chromium (Total)	2.77	Biochemical Oxygen Demand (BOD ₅)	300
Copper (Total)	1.20	Total Suspended Solids (TSS)	300
Cyanide (Total)	0.58*	Total Oil and Grease (fats, oils and grease)	125
Lead (Total)	0.60	Total Nitrogen	115***
Mercury (Total)	0.005	Ammonia	50***
Nickel (Total)	1.62	pH range (at all times)	5.0 – 11.0 s.u.
Silver (Total)	0.43		

Mass Based Limitations (These limitations supersede those listed above for the specified categories)

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)	Converted Limitation (mg/L)
14	BOD ₅ and TSS	5	600
23 and 29	BOD ₅ and TSS	20	2400
25, 28, 34, and 36	BOD ₅ and TSS	10	1200
33	BOD ₅ and TSS	75	9000
33	Total Nitrogen	10***	1200
33	Ammonia	2***	240

* This limitation only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l.

** This limitation applies to all Industrial Users except the landfill which must meet 0.4 mg/l.

*** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st,



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):_____	Other (Specify):_____	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

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)	Parameter	Limitation (Max)
Arsenic(Total)	0.03	Zinc (Total)	1.67
Cadmium (Total)	0.11	Total Toxic Organics (TTO)	2.13
Chromium (Total)	2.77	Biochemical Oxygen Demand (BOD ₅)	300
Copper (Total)	1.20	Total Suspended Solids (TSS)	300
Cyanide (Total)	0.50*	Total Oil and Grease (fats, oils and grease)	125
Lead (Total)	0.69	Total Nitrogen	115**
Mercury (Total)	0.06	Ammonia	50**
Nickel (Total)	1.62*	pH range (at all times)	5.0 – 11.0 s.u.
Silver (Total)	0.40		

The following limitations supersede those listed above for the specified categories.

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)	Converted Limitation (mg/L)
14	BOD ₅ and TSS	5	600
23 and 29	BOD ₅ and TSS	20	2400
25, 28, 34, and 36	BOD ₅ and TSS	10	1200
32	BOD	570	68,400
32	TSS	10	1200
33	BOD ₅ and TSS	75	9,000
33	Total Nitrogen	10**	1200
33	Ammonia	2**	240

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300**
32	Ammonia	300**

* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st,



TWENTY-FOUR (24) HOUR VIOLATION NOTIFICATION FAX FORM

Fax To: Narragansett Bay Commission – Pretreatment Section
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):

Sampling Date of Violation	Parameter	Concentration

I certify that I have just become aware of the above-referenced violation(s) within the past 24 hours and will immediately resample this waste stream for the parameter(s) exceeding the NBC discharge limitation(s). I certify under the 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 is 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

**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									
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22									
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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

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***



June 13, 2023

Joseph B. Haberek, P.E.
Administrator of Surface Water Protection
R. I. Department of Environmental Management
Office of Water Resources – RIPDES Permitting Program
235 Promenade Street
Providence, RI 02908-5767

RE: Notification of Substantial Change

Dear Mr. Haberekr:

In accordance with Part I.C.5.i of the RIPDES Permit for the Bucklin Point Wastewater Treatment Facility (RI0100072) and the Consent Order which was signed on July 19, 2018, the Narragansett Bay Commission (NBC) is notifying the DEM of the following substantial change in industrial discharge:

Company

Barletta Heavy Division

Substantial Change

This company has been contracted for the construction of two final clarifiers at the Bucklin Point Wastewater Treatment plant. The construction requires the site to be dewatered. The company is proposing to discharge 70,000 to 150,000 gallons per day of ground water to the headworks of the plant.

Pretreatment staff have determined the additional flow from this project will not adversely impact the treatment facility.

If you have any questions, please contact me at 401.461.8848 ext. 472.

Sincerely,

Kerry M. Britt
Pretreatment Manager

Cc: Walter Palm

NOTICE OF VIOLATION
FAILURE TO MEET STANDARDS (USER SAMPLE)



December 15, 2023

Mr. Alan Costantino
Venda Ravioli - Royal Little Drive
265 Atwells Avenue
Providence, RI 02903

Dear Mr. Costantino

The sample results for October which were received by this office on December 20, 2023 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
11/2/2023	OIL & GREASE-T	Grab	156.000	LOCAL	125.000 mg/L

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. 262.

Sincerely,

Jayna R. McCarvill
Pretreatment Inspector I

**NOTICE OF VIOLATION
FAILURE TO SUBMIT PH MONITORING REPORT**

December 01, 2023



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 2023, October 2023

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,

A handwritten signature in black ink, appearing to read "N. Daggett", is written over a faint circular stamp.

Nathan P. Daggett
Pretreatment Inspector IV

**Notice of Violation
Failure to Immediately Report Violation**

May 31, 2023



Ms. Arlenny Gutierrez
Union Supermarket & Restaurant
895 Elmwood Avenue
Providence, RI 02907

Dear Ms. Gutierrez:

The Self-Monitoring Compliance report which was received by this office on May 26, 2023 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,

A handwritten signature in black ink, appearing to read "Michael McBurney", is written over a faint, illegible typed name.

Michael McBurney
Assistant Pretreatment Manager

**NOTICE OF VIOLATION
FAILURE TO SUBMIT CERTIFICATION**



May 31, 2023

Dr. Lawrence Page
Lawrence Page, DMD, Inc.
31 Elmgrove Avenue
Providence, RI 02906

Dear Dr. Page:

In accordance with your permit issued by the Narragansett Bay Commission (NBC), it is necessary for you to submit a Certification for the month of:

April-2023

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 "Michael McBurney", is written over a faint circular stamp.

Michael McBurney
Assistant Pretreatment Manager



January 22, 2024

Ms. Vilada Khammahavong
Kow Kow
120 Ives Street
Providence, RI 02906

Certified Mail
Return Receipt Requested

91 7108 2133 3937 9775 3970

Dear Ms. Khammahavong:

It has come to my attention from the Narragansett Bay Commission (NBC) pretreatment staff that your company has failed to submit a Wastewater Discharge Permit Application and an application fee, which have been overdue since October 12, 2023. Notices of Violation have been issued and have been presumably ignored by your firm.

This default is in violation of the NBC Rules and Regulations. The NBC has the authority to fine persons violating provisions of any permit, rule, regulation, or order and may assess an administrative penalty of up to twenty-five thousand (\$25,000) dollars per day for each violation.

Please be advised that if this matter is not satisfactorily addressed within thirty (30) days, enforcement action will follow. Should you have any questions regarding the NBC requirements of your firm, you should contact Jayna McCarvill at 461-8848, ext. 490. Thank you for your anticipated cooperation.

Very truly yours,

Holly R. Ialongo, Esq.
Chief Legal Counsel

HRI:rcf

cc: Jayna McCarvill

**NOTICE OF VIOLATION
NOTICE OF PH VIOLATIONS**



March 01, 2023

Mr. Steve DiPrete
Monarch Metal Finishing Co., Inc.
189 Georgia Avenue
Providence, RI 02905

Dear Mr. DiPrete

I have reviewed the January pH Monitoring Report submitted on February 28, 2023. Based upon this report, your facility has exceeded the pH discharge limitation as follows:

LOW LIMIT VIOLATIONS

12

HIGH LIMIT VIOLATIONS

12

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,

A handwritten signature in black ink, appearing to read "N. Daggett".

Nathan P. Daggett
Principal Pretreatment Engineer

NOTICE OF VIOLATION
AVERAGE LIMIT VIOLATION

September 20, 2023



Mr. Joshua Medina
Denison Pharmaceuticals, LLC
One Powder Hill Road
Lincoln, RI 02865

Dear Mr. Medina:

The results of sampling conducted at your firm for the month of May-2023 show that you are in violation of average discharge limitations for the following:

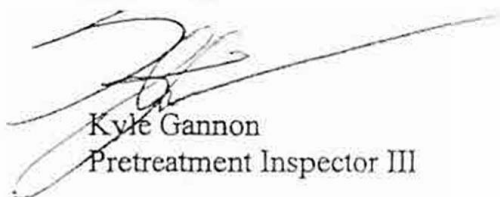
Sample Location #1

Parameter	#Of Analyses	Standard Type	Avg Conc.	Avg Limit	Type
Acetone	1	EPA	33.710 mg/L	8.7 mg/L	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 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 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 that the NBC Office of Pollution Prevention 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. 262. If you should have any questions regarding this letter, contact me at 461-8848, ext. 490.

Sincerely,



Kyle Gannon
Pretreatment Inspector III

KG:sm

NOTICE OF VIOLATION
FAILURE TO SATISFY NBC REQUIREMENTS



January 03, 2023

Mr. Ryan Blaney
Arigna Irish Pub & Coal Fire Pizza
507 Armistice Boulevard
Pawtucket, RI 02861

Dear Mr. Blaney:

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
Repair Grease Trap	Letter	11/8/2022	11/30/2022

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,

Travis Costa
Senior Pretreatment Technician

NOTICE OF VIOLATION
FAILURE TO SUBMIT COMPLIANCE REPORT



January 03, 2023

Mr. David Mumm
Willowick Residential
50 Park Row West
Providence, RI 02903

Dear Mr. Mumm:

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-2022

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,


Travis Costa
Senior Pretreatment Technician

**NOTICE OF VIOLATION
FAILURE TO MEET STANDARDS (NBC SAMPLE)**

March 28, 2023

Ms. Joshua Medina
Denison Pharmaceuticals, LLC
1 Powder Hill Road
Lincoln, RI 02865



Dear Ms. Medina

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 March 07, 2023. 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
3/7/2023	BOD	Grab	11.518	LOCAL	5.000 Lbs/1000g

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,


Kyle C. Gannon
Pretreatment Inspector III

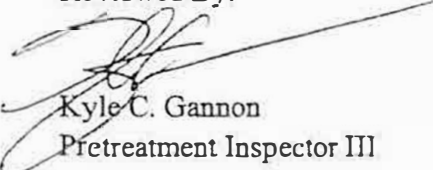
WASTEWATER SAMPLE ANALYSIS



Company Name: Denison
Pharmaceuticals, LLC
Company Address: 1 Powder Hill Road
Lincoln, RI 02865
Location Name: Sample Location # 1
Type of Sample: Grab
Date of Sample: March 07, 2023

Parameter	Concentration (mg/l)
BOD	1382.2
CADMIUM	0.015
CHROMIUM	0.075
COPPER	0.02
ETHYL ACETATE	0.13
ISOPROPYL ACETATE	0.05
LEAD	0.075
N-AMYL ACETATE	0.05
NICKEL	0.05
OIL & GREASE-T	30.37
SILVER	0.025
TSS	31
TTO	0.11
ZINC	0.153

Reviewed By:


Kyle C. Gannon
Pretreatment Inspector III

Notice of Violation
Failure to Meet Standards (Manhole)



December 4, 2023

Mr. Joseph Accaoui
Tanury Industries
6 New England Way
Lincoln, RI 02865

Dear Mr. Accaoui:

The Narragansett Bay Commission (NBC) regularly conducts surveillance monitoring of its users. This monitoring is done by installing automatic samplers in manholes isolating that company. The samplers are programmed to collect composite samples of the wastewater discharging through the manhole.

On October 18, 2023, the NBC conducted surveillance manhole sampling of Tanury Industries and Tanury Industries PVD, Inc. The analytical results from the upstream manhole indicate full compliance with NBC discharge limitations. The analytical results from the down stream manhole indicate noncompliance with the following parameter:

<u>Parameter</u>	<u>Sampling Type</u>	<u>Results</u> <u>(mg/L)</u>	<u>Daily Maximum</u> <u>(mg/L)</u>
Copper	Composite	1.547	1.20
Nickel	Composite	2.838	1.62

It has been determined that your firm is the sole source of the non-compliant wastewater since the upstream results were in full compliance. You must submit a report by January 15, 2024 detailing the cause of the high concentrations of and a proposal to ensure that wastewater from your facility is in compliance at all times.

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 461-8848 ext. 262.

If you have any questions regarding this letter, please contact me at 461-8848 ext. 490.

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle C. Gannon".

Kyle C. Gannon
Pretreatment Inspector III

Enclosure

Cc: Tanury Industries PVD, Inc. - File



Manhole Sample Analysis

Company:	Tanury Industries	Tanury Industries PVD, Inc.
Address:	6 New England Way Lincoln, RI 02865	7 New England Way Lincoln, RI 02865
Date of Sample:	October 18, 2023	
Type of Sample:	Composite	

<u>Parameter</u>	Upstream Manhole Concentration (mg/L)	Downstream Manhole Concentration (mg/L)
Cadmium	<0.015	<0.015
Chromium	<0.075	0.1661
Copper	0.048	1.547
Cyanide	<0.004	0.193
Lead	<0.075	<0.075
Nickel	<0.050	2.838
Silver	<0.025	0.0592
Zinc	0.128	0.344
pH (standard units)	7.2	9.37

Reviewed by:

Kerry M. Britt
Pretreatment Manager

NOTICE OF VIOLATION
LETTER OF DEFICIENCY



August 28, 2023

Mr. Jakob Geiger
Synagro Northeast, LLC
85 Branch Street
Pawtucket, RI 02860

Certified Mail
Return Receipt Requested

91 7108 2133 3937 9778 5490

RE: 120 Mill Street, Cumberland, RI

Dear Mr. Geiger:

This letter serves to summarize the Narragansett Bay Commission (NBC) inspection of your facility conducted on August 11, 2023. During the inspection, Mr. Spencer Crooks represented your firm. The following deficiency was noted:

At the time of inspection, polymer was spilled on the ground around the area of the polymer feed tank. Mr. Crooks stated that the spill had occurred that day when filling the tank. Absorbent material had been applied to the spilled liquid to aid in the cleaning the spill. The polymer feed tank was not in a spill containment pad as detailed in the Spill and Slug Prevention Control Plan (SSPCP) that your firm submitted to the NBC. As stated in Section G of your permit (copy enclosed), you must maintain the SSPCP in effect at all times. Therefore you must immediately place the polymer feed tank in spill containment. Please note that all chemical storage containers on site must be kept in spill containment structures at all times. You must submit written notification that the spill has been cleaned and that the polymer feed tank has been placed in spill containment by September 15, 2023.

Failure to correct the aforementioned deficiency can result in the initiation of enforcement action against your firm. Please note that the NBC can assess administrative penalties up to \$25,000 per violation per day.

If you have any questions or require further assistance, please feel free to contact me at 461-8848, ext. 490.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael McBurney".

Michael McBurney
Assistant Pretreatment Manager

MM:rcf

Enclosure

NOTICE OF VIOLATION
NOTICE OF PH VIOLATIONS



November 15, 2023

Ms. Brenda Dexter
Hope Global
50 Martin Street
Cumberland, RI 02864

Dear Ms. Dexter

I have reviewed the October pH Monitoring Report submitted on November 06, 2023. Based upon this report, your facility has exceeded the pH discharge limitation as follows:

LOW LIMIT VIOLATIONS

2

HIGH LIMIT VIOLATIONS

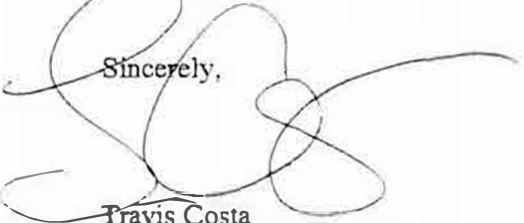
0

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. 262.

Please feel free to contact me at 461-8848 if you have any questions regarding this matter.

Sincerely,


Travis Costa
Pretreatment Inspector II

**NOTICE OF VIOLATION
FAILURE TO MEET STANDARDS (USER SAMPLE)**

November 07, 2023

Mr. Kevin Bell
Rhode Island Bioenergy, LLC
705 Palomar Airport Road, Suite 200
Carlsbad., CA 92011



Dear Mr. Bell

The sample results for November which were received by this office on November 06, 2023 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
10/23/2023	Total Nitrogen	Composite	148.000	LOCAL	115.000 mg/L

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. 262.

Sincerely,

A handwritten signature in black ink, appearing to read "N. Daggett".

Nathan P. Daggett
Pretreatment Inspector IV

**NOTICE OF VIOLATION
FAILURE TO SUBMIT COMPLIANCE REPORT**



December 01, 2023

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 compliance monitoring results for the month(s) of:

Sample Location # 1

June-2023, July-2023, August-2023, September-2023, October-2023

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,

Nathan P. Daggett
Pretreatment Inspector IV

NOTICE OF VIOLATION
FAILURE TO SATISFY NBC REQUIREMENTS



January 3, 2024

Mr. Don DePetrillo
The Original Italian Bakery, Inc.
915 Atwood Avenue
Johnston, RI 02919

Dear Mr. DePetrillo:

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
Resampling Results for Total Oil and Grease	Letter	6/30/2023	8/18/2023

You must satisfy the past due Narragansett Bay Commission (NBC) requirement as detailed in the above referenced document. 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 of 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,

A handwritten signature in black ink, appearing to read "Jayna R. McCarvill".

Jayna R. McCarvill
Pretreatment Inspector I

JRM:rcf

**NOTICE OF VIOLATION
FAILURE TO SUBMIT CERTIFICATION**



October 31, 2023

Dr. Benedict Ingegneri
Benedict J. Ingegneri Jr. DMD PC Inc.
3231 Mendon Road
Cumberland, RI 02864

Dear Dr. Ingegneri:

In accordance with your permit issued by the Narragansett Bay Commission (NBC), it is necessary for you to submit a Certification for the month of:

September-2023

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 cursive script, appearing to read "Jayna R. McCarvill".

Jayna R. McCarvill
Pretreatment Inspector I

NOTICE OF VIOLATION
FAILURE TO SUBMIT COMPLIANCE REPORT



October 31, 2023

Ms. Maria Correia
3 Flags Bakery
1255 Broad Street
Central Falls, RI 02863

Dear Ms. Correia:

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
September-2023

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,

A handwritten signature in black ink, appearing to read "Jayna R. McCarvill".

Jayna R. McCarvill
Pretreatment Inspector I

NOTICE OF VIOLATION
LETTER OF DEFICIENCY



October 19, 2023

Mr. Geovanny Tavares
La Casona
768 Broad Street
Central Falls, RI 02863

Dear Mr. Tavares:

This letter serves to summarize the Narragansett Bay Commission (NBC) inspection of your facility on October 4, 2023. During the inspection, the automatic grease removal unit (GRU) in the basement was inspected and the following deficiencies were noted:

1. The automatic GRU had power supplied to it when plugged in, but the wheel assembly and timer unit would not function when tested. In addition, the wiper blades were missing from the unit. As stated in Section D of your permit, the GRU shall be fully operational on a twenty-four (24) hour basis whenever kitchen operations are being conducted. The GRU 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. Therefore, the GRU must be immediately cleaned, serviced, and returned to proper working condition by November 30, 2023. This service must include the installation of wiper blades on the wheel assembly of the unit.
2. A sample port was installed on the top of the discharge pipe of the automatic GRU. As discussed during the inspection, this configuration of sample port does not allow for the collection of process wastewater discharging from the GRU. Therefore, you must install a sample port on the bottom of the discharge pipe to allow for sample collection. I have enclosed a depiction of NBC acceptable sample ports for your reference.
3. A grease removal unit logbook could not be provided at the time of the inspection. As indicated in Section F(1) of your permit (copy enclosed), you are required to maintain a logbook, detailing the daily cleaning of the GRU and the name of the individual conducting the activity. Maintenance activities which must be documented in the logbook include the following:

Page 2
La Casona

- 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

Beginning immediately, La Casona must maintain a logbook for the GRU in accordance with the above-mentioned section of the permit. I have enclosed an additional logsheets for your use. Please make ample copies for future use.

Failure to correct the aforementioned deficiencies may 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.

If you have any questions or require further assistance, please contact me at 461-8848, ext. 490.

Sincerely,



Jayna McCarvill
Pretreatment Inspector I

JM:lp

Enclosures

NARRAGANSETT BAY COMMISSION
ADMINISTRATIVE ORDER # FP-01-23

IN THE MATTER OF:

**PROVIDENCE SPECIALTY PRODUCTS, LLC
33 DEARBORN STREET
PROVIDENCE, RI, 02909**

**COMPLIANCE ORDER
AND
PENALTY ASSESSMENT**

AND

MARK FEDERICO, SR.

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-RICR-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 provides 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 the 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. Providence Specialty Products, LLC (“Providence Specialty”) is a Rhode Island limited liability company conducting operations that discharge process wastewater containing pollutants into the NBC’s facilities.
2. Providence Specialty is a user of the NBC’s facilities as defined by the Rules and Regulations, § 1.2.
3. Mark Federico, Sr. is an individual residing in Providence, RI, and is an owner and manager of Providence Specialty.
4. In accordance with the Act and the NBC’s Rules and Regulations, the NBC issued Wastewater Discharge Permit #P3304-010-1023 (“Permit”) to Providence Specialty and Mark Federico, Sr. (collectively “Permittee”) on or about May 25, 2021, authorizing the Permittee to discharge into the NBC’s facilities so long as the Permittee adhered to the conditions of its permit and complied with the Rules and Regulations. The Permit became effective on June 1, 2021. Prior to June 1, 2021, Permittee’s discharges into the NBC’s facilities were authorized by and subject to the terms of Permit #P3404-006-1023.
5. Permittee has a history of noncompliance and was issued Administrative Order #FP-02-19 on or about December 26, 2019, citing Permittee for: (a) failure to comply with the NBC’s effluent pH limitations; (b) failure to comply with the NBC’s effluent discharge limitations for Total Oil and Grease (fats, oils, and grease); (c) failure to notify the NBC of discharge violations within twenty-four (24) hours of discovering the violations; (d) failure to submit Self-Monitoring Compliance Reports on time; (e) failure to submit pH Monitoring Compliance Reports on time; and (f) failure to comply with NBC requirements, to wit: failure to maintain a logbook of pH probe cleanings and calibrations, failure to accurately record pH values, failure to maintain a logbook of boiler and water softener discharges and maintenance, and failure to remove the discharge hose from the boiler as required.
6. On or about January 9, 2020, Permittee filed a written request for an administrative hearing on Administrative Order #FP-02-19. In lieu of proceeding to an administrative hearing, the NBC and Permittee executed a Consent Order to resolve Administrative Order #FP-02-19.
7. In accordance with the terms of the Consent Order, Permittee installed a Clean Water Technologies automated pretreatment system on or before August 20, 2020, which was meant to permanently address and correct Permittee’s pH and Total Oil and Grease violations. However, Permittee has continued to violate the NBC’s pH and Total Oil and Grease limits, as well as other conditions of its Permit.
8. In accordance with the Permit, Permittee is prohibited from discharging effluent with a pH of less than 5.0 standard units or more than 11.0 standard units.

9. Permittee has experienced continuous violations of the pH standards contained in its Permit since its effective date of June 1, 2021. Numerous Notices of Violation (NOV) were issued to Permittee between August 2021 and July 2023 for exceeding the NBC's effluent discharge limits for pH. (See Attachment I).
10. On multiple occasions Permittee was advised to relocate its pH probe so the probe would remain submerged and avoid erroneous pH readings. To date, the pH probe has not been relocated.
11. In accordance with the Permit, Permittee is prohibited from discharging an effluent containing Oil and Grease in excess of NBC's discharge limits for Total Oil and Grease of 125 mg/L.
12. Numerous NOVs were issued to Permittee between August 2021 and May 2023 for exceeding the NBC's discharge limits for Total Oil and Grease. (See Attachment II.)
13. Several NOVs were issued to Permittee between August 2021 and January 2023 for failing to submit pH Monitoring Compliance Reports on time. (See Attachment III).
14. Two NOVs were issued to Permittee between May 2022 and October 2022 for failing to submit Self-Monitoring Compliance Reports (SMCRs) and results on time. (See Attachment IV).
15. Numerous NOVs were issued to Permittee between August 2021 and July 2023 for failing to comply with various NBC requirements; to wit: failure to submit resampling results, failure to submit process plans, failure to submit an SDS Sheet as required, failure to submit a permit application, and failure to submit a permit application fee. (See Attachment V).
16. In accordance with the Permit and pursuant to EPA regulations 40 CFR 403.12(g)(2), Permittee is required to notify the NBC of any discharge violation within twenty-four (24) hours of becoming aware of the violation. Permittee has continually failed to notify NBC within twenty-four (24) hours of becoming aware of a violation.
17. Numerous NOVs were issued to Permittee between March 2022 and July 2023 for failing to report Permit violations within twenty-four (24) hours of becoming aware of the violation. (See Attachment VI).
18. Multiple NOVs were issued to Permittee between August 2021 and November 2022 for failing to analyze for all parameters as required in its Permit. (See Attachment VII).

THEREFORE, based on the above findings, Permittee is hereby notified of the following violations:

Violation A: Failure to comply with the NBC's effluent discharge limits for pH.

Violation B: Failure to comply with the NBC's effluent discharge limits for Total Oil and Grease.

Violation C: Failure to submit pH Monitoring Compliance Reports on time.

Violation D: Failure to submit Self-Monitoring Compliance Reports and analytical results on time.

Violation E: Failure to satisfy NBC requirements on numerous occasions; to wit, failure to submit: resampling results, process plans, an SDS Sheet as required, a permit application, and a permit application fee.

Violation F: Failure to notify the NBC of discharge violations within twenty-four (24) hours of discovering the violation.

Violation G: Failure to monitor and analyze for all parameters required by the Permit.

**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 § 403.5 National pretreatment standards: Prohibited discharges.

(b) *Specific prohibitions.* In addition, the following pollutants shall not be introduced into a POTW:

(2) Pollutants which will cause corrosive structural damage to the POTW, but in no case Discharges with pH lower than 5.0, unless the works is specifically designed to accommodate such Discharges;

40 CFR § 403.8 Pretreatment Program Requirements: Development and Implementation by POTW.

(f) *POTW pretreatment requirements.* A POTW pretreatment program must be based on the following legal authority and include the following procedures. These authorities and procedures shall at all times be fully and effectively exercised and implemented.

(1) *Legal authority.* The POTW shall operate pursuant to legal authority enforceable in Federal, State or local courts, which authorizes or enables the POTW to apply and to enforce the requirements of sections 307 (b) and (c), and 402(b)(8) of the Act and any regulations implementing those sections. Such authority may be contained in a statute, ordinance, or series of contracts or joint powers agreements which the POTW is authorized to enact, enter into or implement, and which are authorized by State law. At a minimum, this legal authority shall enable the POTW to:

(i) Deny or condition new or increased contributions of pollutants, or changes in the nature of pollutants, to the POTW by Industrial Users where such contributions do not meet applicable Pretreatment Standards and Requirements or where such contributions would cause the POTW to violate its NPDES permit;

(ii) Require compliance with applicable Pretreatment Standards and Requirements by Industrial Users;

(iii) Control through Permit, order, or similar means, the contribution to the POTW by each Industrial User to ensure compliance with applicable Pretreatment Standards and Requirements. In the case of Industrial Users identified as significant under § 403.3(v), this control shall be achieved through individual permits or equivalent individual control mechanisms issued to each such User except as follows.

(B) Both individual and general control mechanisms must be enforceable and contain, at a minimum, the following conditions:

(3) Effluent limits, including Best Management Practices, based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law;

(4) Self-monitoring, sampling, reporting, notification and recordkeeping requirements, including an identification of the pollutants to be monitored (including the process for seeking a waiver for a pollutant neither present nor expected to be present in the Discharge in accordance with § 403.12(e)(2), or a specific waived pollutant in the case of an individual control mechanism), sampling location, sampling frequency, and sample type, based on the applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law;

(iv) Require

(A) the development of a compliance schedule by each Industrial User for the installation of technology required to meet applicable Pretreatment Standards and Requirements and

(B) the submission of all notices and self-monitoring reports from Industrial Users as are necessary to assess and assure compliance by Industrial Users with Pretreatment Standards and Requirements, including but not limited to the reports required in § 403.12.

(v) Carry out all inspection, surveillance and monitoring procedures necessary to determine, independent of information supplied by Industrial Users, compliance or noncompliance with applicable Pretreatment Standards and Requirements by Industrial Users. Representatives of the POTW shall be authorized to enter any premises of any Industrial User in which a Discharge source or treatment system is located or in which records are required to be kept under § 403.12(o) to assure compliance with Pretreatment Standards. Such authority shall be at least as extensive as the authority provided under section 308 of the Act;

(vi)(A) Obtain remedies for noncompliance by any Industrial User with any Pretreatment Standard and Requirement. All POTW's shall be able to seek injunctive relief for noncompliance by Industrial Users with Pretreatment Standards and Requirements. All POTWs shall also have authority to seek or assess civil or criminal penalties in at least the amount of \$1,000 a day for each violation by Industrial Users of Pretreatment Standards and Requirements.

(2) *Procedures.* The POTW shall develop and implement procedures to ensure compliance with the requirements of a Pretreatment Program. At a minimum, these procedures shall enable the POTW to:

(viii) Comply with the public participation requirements of 40 CFR part 25 in the enforcement of National Pretreatment Standards. These procedures shall include provision for at least annual public notification in a newspaper(s) of general circulation that provides meaningful public notice within the jurisdiction(s) served by the POTW of Industrial Users which, at any time during the previous 12 months, were in significant noncompliance with applicable Pretreatment requirements. For the purposes of this provision, a Significant Industrial User (or any Industrial User which violates paragraphs (f)(2)(viii)(C), (D), or (H) of this section) is in significant noncompliance if its violation meets one or more of the following criteria:

(A) Chronic violations of wastewater Discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits, as defined by 40 CFR 403.3(l);

(C) Any other violation of a Pretreatment Standard or requirement as defined by 40 CFR 403.3(l) (daily maximum, long-term average, instantaneous limit, or narrative Standard) that the POTW determines has caused, alone or in combination with other Discharges, Interference or Pass Through (including endangering the health of POTW personnel or the general public);

(D) Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under paragraph (f)(1)(vi)(B) of this section to halt or prevent such a discharge;

(E) Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance;

(F) Failure to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;

(G) Failure to accurately report non-compliance;

(H) Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local Pretreatment program.

40 CFR § 403.12 Reporting requirements for POTW's and industrial users.

(h) *Reporting requirements for Industrial Users not subject to categorical Pretreatment Standards.* The Control Authority must require appropriate reporting from those Industrial Users with Discharges that are not subject to categorical Pretreatment Standards. Significant Non-categorical Industrial Users must submit to the Control Authority at least once every six months (on dates specified by the Control Authority) a description of the nature, concentration, and flow of the pollutants required to be reported by the Control Authority. In cases where a local limit requires compliance with a Best Management Practice or pollution prevention alternative, the User must submit documentation required by the Control Authority to determine the compliance status of the User. These reports must be based on sampling and analysis performed in the period covered by the report, and in accordance with the techniques described in 40 CFR part 136 of this chapter and amendments thereto. This sampling and analysis may be performed by the Control Authority in lieu of the significant non-categorical Industrial User. For Industrial Users for which EPA or the authorized state, tribe, or territory is the Control Authority, as of December 21, 2025 or an EPA-approved alternative date (see 40 CFR 127.24(e) or (f)), all reports submitted in compliance with this section must be submitted electronically by the industrial user to the Control Authority or initial recipient, as defined in 40 CFR 127.2(b), in compliance with this section and 40 CFR part 3 (including, in all cases, subpart D to part 3), 40 CFR 122.22, and 40 CFR part 127. 40 CFR part 127 is not intended to undo existing requirements for electronic reporting. Prior to this date, and independent of 40 CFR part 127, the Industrial Users for which EPA or the authorized state, tribe, or territory is the Control Authority may be required to report electronically if specified by a particular control mechanism or if required to do so by state law.

(o) *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, including documentation associated with Best Management Practices. Such records shall include for all samples:

- (i) The date, exact place, method, and time of sampling and the names of the person or persons taking the samples;
- (ii) The dates analyses were performed;
- (iii) Who performed the analyses;

(iv) The analytical techniques/methods use; and

(v) The results of such analyses.

(2) Any Industrial User or POTW subject to the reporting requirements established in this section (including documentation associated with Best Management Practices) shall be required to retain for a minimum of 3 years any records of monitoring activities and results (whether or not such monitoring activities are required by this section) and shall make such records available for inspection and copying by the Director and the Regional Administrator (and POTW in the case of an Industrial User). This period of retention shall be extended during the course of any unresolved litigation regarding the Industrial User or POTW or when requested by the Director or the Regional Administrator.

(3) Any POTW to which reports are submitted by an Industrial User pursuant to paragraphs (b), (d), (e), and (h) of this section shall retain such reports for a minimum of 3 years and shall make such reports available for inspection and copying by the Director and the Regional Administrator. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the Industrial User or the operation of the POTW Pretreatment Program or when requested by the Director or the Regional Administrator.

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. . . .

Inspection powers: § 46-25-25.1:

(a) The commission is authorized to carry out all inspection, surveillance, and monitoring procedures necessary to determine, independent of information supplied by any person who discharges into the facilities of the project, compliance or noncompliance by the person with the pretreatment requirements prescribed by the commission.

(b) The commission or the duly authorized employees and agents of the commission, upon presenting identification and appropriate credentials, are authorized:

(1) To enter, without delay and at reasonable times, those premises (public or private) of any person or class of user, either receiving services from the commission or applying to services from the commission, in which a discharge source or treatment system is located or in which records required to be maintained pursuant to § 46-25-25, are kept;

(2) During regular working hours and at other reasonable times, and within reasonable limits and in a reasonable manner, to have access to and to copy any records, inspect any monitoring equipment or method required pursuant to § 46-25-25, and sample any effluents which the owner or operator of the discharge source is required to sample under § 46-25-25, and any rules and regulations adopted pursuant thereto.

(c) Any person obstructing, hindering, or in any way causing to be obstructed or hindered the commission or any of its employees or agents in the performance of their duties, or who shall refuse to permit the commission or any of its employees or agents entrance into any premises, buildings, plant, or equipment, or other places belonging to or controlled by the person, in the performance of his or her duties as such, shall be subject to the civil and criminal penalties set forth in §§ 46-25-25.2 and 46-25-25.3.

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

1.5.1 Authority

The NBC may limit, reject or prohibit any direct or indirect discharge of pollutants or combination of pollutants, as defined by applicable Federal or State law or as described below, into the facilities. The NBC may, in its discretion, affix labels to those tanks which contain substances which are prohibited from being discharged to the facilities or which may not be discharged to the facilities without adequate pretreatment.

1.5.3 Specific Discharge Limitations

- A. No person shall discharge or cause or allow to be discharged either directly or indirectly into the facilities any substance, water, or wastewater which has:
 - 5. A discharge effluent with a pH outside of the approved pH range or having any other corrosive properties capable of causing damage or hazard to facility equipment or structures or which may be injurious to NBC personnel. The pH range for Field's Point is 5.0 standard units (s.u.) to 11.0 s.u. The pH range for Bucklin Point is 5.0 s.u. to 11.0 s.u.
 - 9. Fats, wax, grease, or oils of vegetable or animal origin with concentrations in excess of one hundred (100) mg/l or containing other substances which may solidify or

become viscous at temperatures between zero degrees Centigrade (0° C) (thirty-two degrees Fahrenheit (32° F)) and forty degrees Centigrade (40° C) (one hundred four degrees Fahrenheit (104° F)). Waters or wastes containing such substances, excluding normal household waste, shall exclude all visible floating oils, fats and greases. The use of chemical or physical means (such as temperature variation, emulsifying agents, mechanical mixers) to bypass or release fats, oils and greases into the wastewater facilities is prohibited.

10. Total Oil and Grease (Fats, Oils and Grease) (FOG) of mineral, animal, vegetable and other origins is not to exceed one hundred twenty-five (125) mg/l.

1.5.4 Specific Facility Limitations

- A. No person shall discharge or cause or allow to be discharged either directly or indirectly into the facilities, any substance, water, or wastewater which has concentrations of the substances listed below in excess of the assigned discharge limitations. There will be no waivers or exceptions granted with respect to compliance with any of the limits listed below.

1. Field's Point Discharge Limitations:

Parameter	Maximum Daily Limit (mg/L)
Ammonia	50 ⁺ *
Arsenic (Landfills)	0.40
Arsenic (All other users)	0.02
Biochemical Oxygen Demand (BOD)	300* ++
Cadmium	0.11
Chromium	2.77
Copper	1.20
Cyanide (Metal Finishing and Non-Ferrous Metal Forming Facilities)	0.58
Cyanide (All other users)	0.40
Lead	0.60
Mercury	0.005
Nickel	1.62
Nitrogen	115 ⁺ *
Total Oil & Grease (O&G)	125
Silver	0.43
Total Suspended Solids (TSS)	300* ++
Total Toxic Organics (TTO) including xylene and acetone	2.13
Zinc	2.61
pH Range at all times	5.0– 11.0 standard units

+ Seasonal Limit applicable from May 1st to October 31st

* Applies to all users not subject to mass-based limits

++ Concentrations exceeding these limits may be subject to a surcharge as determined by rates set and approved by the Rhode Island Public Utilities Commission.

2. Field's Point Mass-based Limits:

Category	BOD (lbs./1,000 gal.)	TSS (lbs./1,000 gal.)	Total Nitrogen (lbs./1,000 gal.)	Ammonia (lbs./1,000 gal.)
Pharmaceutical Operations	5	5	-	-
Textile Operations	20	20	-	-
Industrial Laundries	10	10	-	-
Facilities Discharging Toxic and/or Prohibited Pollutants with High Conventional Pollutant Loads	10	10	-	-
Non-Textile Operations Using Pigments & Dyes	20	20	-	-
Wholesale Food Processing Operations with High Conventional Pollutant Loads	75	75	10	2
Manufacturers with High Conventional Pollutant Loads with Low Flow	10	10	-	-
Brewing & Distilling Operations	10	10	-	-

1.5.9 Remedies

A. If any wastewater is discharged or is proposed to be discharged to the wastewater facilities in violation of the limitations or prohibitions described in § 1.5 of this Part, the NBC may in its sole discretion:

1. Reject the wastes;

2. Require a discharger to demonstrate and implement those in-plant modifications which will reduce or eliminate the discharge of such substances to conform with this Part;
3. Require pretreatment, including storage facilities or flow equalization necessary to reduce or eliminate the objectionable characteristics or substances, so that the discharge will not violate this Part;
4. Require controls to be installed which will regulate the quantities and rates of discharge;
5. Require surcharge payments to be made to the NBC to cover its added cost of handling, monitoring, and treating the wastes which exceed threshold values in accordance with rates set and approved by the Public Utilities Commission;
6. Revoke a discharger's permit; and
7. Take any other administrative sanctions, enforcement actions, and remedial actions as may be desirable, necessary, or permitted to achieve the purpose of this Part.

SECTION 1.7 Inspection Powers

1.7.1 General Powers

- A. Inspections shall be conducted at the discretion of the NBC. Duly authorized employees and agents of the NBC, upon presenting identification and appropriate credentials, are authorized:
 1. To enter without delay and at reasonable times those premises (public or private) of any person or class of user either receiving services from the NBC or applying for services from the NBC in which a discharge source or treatment system is located or which records required to be maintained pursuant to R.I. Gen. Laws § 46-25-25 are kept;
 2. During regular working hours and at other reasonable times, and within reasonable limits and in a reasonable manner, to have access to and to copy any records, inspect any monitoring equipment or method required pursuant to R.I. Gen. Laws § 46-25-25 and sample and/or analyze any effluents which the owner or operator of such discharge source is required to sample and/or analyze under R.I. Gen. Laws § 46-25-25 and any Rules and Regulations adopted pursuant thereto; and
 3. During such on-site inspections, to carry out all inspections, surveillance, and monitoring procedures necessary to determine, independent of information supplied by any person discharging into the facilities, compliance or noncompliance with NBC pretreatment requirements.

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.

1.8.2 Compliance Required

No permit holder shall discharge industrial wastewater in excess of the quantity, rate of discharge, concentrations, or any other limits specified in the permit. Any person desiring to modify his or her permit must first apply for an amended permit.

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:
1. The average and maximum wastewater constituents and characteristics permitted in the process water discharges;
 2. Limits on rate and time of discharge or requirements for flow regulation and equalization;
 3. Requirements for installation of inspection and sampling facilities and specifications for self-monitoring;

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;
7. Compliance schedules;
8. Requirements for installation of pretreatment systems, spill and slug-prevention control plans and solvent-management plans;
9. Provisions for authorized NBC employees and agents to enter and inspect the premises, including provisions for copying records, inspecting monitoring equipment and sampling effluent;
10. Compliance with Federal, State, and other governmental laws, Rules, and Regulations;
11. Fees and costs including supplemental fees assessed because of the special nature of the user's effluent in accordance with the provisions of § 1.5 of this Part and additional costs and fees based on the costs of enforcing these Regulations or the permit, in accordance with R.I. Gen. Laws § 46-25-5(10);
12. Signatory requirements; and
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.

1.8.6 General Pretreatment Requirements

- A. Users shall provide wastewater treatment as required to comply with this Part, and shall achieve compliance with all Federal, State, and NBC pretreatment standards within the time limitations specified by the Federal, State, and/or NBC pretreatment Regulations. Any equipment or systems required to pretreat wastewater to a level acceptable to the NBC shall be provided, operated, and maintained at the user's expense. The user is responsible for following all equipment instructions provided by the manufacturer. Detailed plans showing the pretreatment equipment, systems, and operating procedures shall be submitted to the NBC for review and shall be acceptable to the NBC prior to construction and operation of the facilities. The design of industrial process wastewater treatment systems must be executed in accordance with R.I. Gen. Laws Chapter 5-8. The

following paragraphs set out the minimum requirements for pretreatment and water using process plans. The NBC may require additional documentation and/or detail of plans whenever it determines that such information is necessary to evaluate the pretreatment system or process operations.

- B. Any review and inspection conducted by the NBC is for the sole purpose of determining compliance with the technical provisions of these Regulations. The NBC does not assume responsibility for means, methods, or techniques used, or for the safety of construction work, the site, or for compliance by users with applicable laws and Regulations other than this Part.
- C. Review by the NBC does not constitute any form of guarantee or insurance with respect to the performance of the equipment and processes. The review of such plans and operating procedures will in no way relieve the user from the responsibility of modifying the equipment as necessary to produce an effluent acceptable to the NBC under the provisions of this section. Any subsequent significant changes in the pretreatment equipment or method of operation shall be reported to and be acceptable to the NBC prior to the user's initiation of the changes.

1.8.15 Wastewater Discharge Permit Revocation

- A. Wastewater discharge permits may be revoked for the following reasons:
 - 1. Failure to notify the NBC of significant changes in the quantity and quality of wastewater discharged prior to implementing such changes
 - 2. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application
 - 3. Falsifying self-monitoring reports
 - 4. Tampering with monitoring equipment
 - 5. Refusing to allow the NBC timely access to the facility premises and records
 - 6. Failure to meet effluent limitations
 - 7. Failure to pay fines
 - 8. Failure to pay user fees
 - 9. Failure to meet compliance schedules
 - 10. Failure to complete a wastewater survey or the wastewater discharge permit application

11. Failure to provide advance notice of the transfer of a permitted facility
 12. Violation of any pretreatment standard or requirement, or any terms of the wastewater discharge permit or the ordinance
- B. Wastewater discharge permits shall be voidable upon non-use, cessation of operations, or transfer of business ownership. All wastewater discharge permits are voidable upon the issuance of a new wastewater discharge permit.

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 that 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 this Part 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 a pending dispute or pending 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 dispute or litigation.

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 shall be done through industry self-monitoring and through monitoring performed by the NBC. All analyses, including sampling results submitted in support of any application reports, evidence, or as 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 sole discretion, require any user to monitor for any parameter which may pose a public health risk, may adversely impact NBC facilities, cause treatment plant process Interference or Pass through, and/or impact receiving water quality, including but not limited to, any new pollutants such as emerging pollutants of concern, which include, but are not limited to, PFAS compounds, pharmaceuticals, etc. 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 § 1.9.3(A)(3) of this Part below, wastewater samples collected for the purpose 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 time proportional sampling.
- b. For automatic samplers, the intake line hose must be at least one quarter inch (1/4") (0.6 cm) internal diameter and the velocity in the intake line must be maintained at least at two feet (2') 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

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, 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 the NBC might take under the Act and 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, PROVIDENCE SPECIALTY PRODUCTS, LLC and MARK FEDERICO, SR. are hereby ORDERED to:

1. Develop and submit a plan to the NBC to attain and maintain compliance with NBC effluent pH discharge limits and discharge limits for Total Oil and Grease (fats, oils, and grease) within thirty (30) days of receipt of this Compliance Order.
2. Implement the approved plan to attain and maintain compliance within thirty (30) days of receipt of NBC approval of said plan, or by the due date specified by the NBC in its approval, whichever is later.
3. Immediately implement steps to ensure all Self-Monitoring Compliance Reports and analytical results and all pH Monitoring Compliance Reports are timely submitted, and submit all required compliance monitoring reports and other required documentation to the NBC by the submission deadline.
4. Immediately implement steps to ensure notification is given to the NBC of any discharge violation within twenty-four (24) hours of becoming aware of the violation.
5. Pay an Administrative Penalty to the NBC of **twenty-eight thousand dollars (\$28,500.00)** within 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, Permittee has the right to file a written request with the Executive Director for a

hearing on said alleged violations within twenty (20) 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 twenty (20) day time period, the NBC shall provide written notice to Permittee of the date, time, and place for the hearing. If Permittee fails to request a hearing within the aforementioned time frame, this Order shall automatically become an immediate compliance order and Permittee shall be deemed to have waived the right to an adjudicatory hearing on the above cited violations.

IF PERMITTEE WAIVES ITS RIGHT TO AN ADMINISTRATIVE HEARING WITHIN TWENTY (20) DAYS AND FAILS TO COMPLY WITH THE REQUIREMENTS LISTED IN THE ABOVE ORDER, THEN PERMITTEE IS DEEMED TO BE IN DEFAULT AND THE NBC MAY IMMEDIATELY TAKE STEPS TO PREVENT ANY FURTHER FLOW FROM ENTERING THE FACILITIES. SAID STEPS MAY INCLUDE, BUT ARE NOT LIMITED TO, SEALING AND/OR PLUGGING THE CONNECTION AT THE POINT OF PROVIDENCE SPECIALTY PRODUCTS' CONNECTION TO THE FACILITIES. 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 PERMITTEE 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,

7/21/23

Date

Holly R. Ialongo

Holly R. Ialongo, Esquire
Chief Legal Counsel

CERTIFICATION

I hereby certify that on the **21st of July, 2023**, true and accurate copies of the within ADMINISTRATIVE ORDER AND PENALTY ASSESSMENT were sent by certified mail, return receipt requested to the following individual:

1. Providence Specialty Products, LLC, 33 Dearborn Street, Providence, RI 02909
2. Mark Federico Sr., 940 Quaker Lane, Apt. 2305, East Greenwich, RI 02818

07/21/2023

Date

Laurie Jean

Laurie Jean
Legal Administrative Assistant

ATTACHMENT I

Failure to comply with NBC's effluent discharge pH limits:

Parameter	Limit in standard units	Month	Minimum discharge limit violations	Maximum discharge limit violations	Late	NOV issued
pH	5.0 – 11.0	June 2021	22	0	Yes	08/03/2021
pH	5.0 – 11.0	July 2021	13	2	No	08/27/2021
pH	5.0 – 11.0	August 2021	14	2	No	09/02/2021
pH	5.0 – 11.0	September 2021	11	1	No	10/28/2021
pH	5.0 – 11.0	October 2021	12	1	No	11/30/2021
pH	5.0 – 11.0	November 2021	17	0	No	12/30/2021
pH	5.0 – 11.0	December 2021	15	0	No	02/01/2022
pH	5.0 – 11.0	January 2022	11	0	No	03/02/2022
pH	5.0 – 11.0	February 2022	13	0	No	03/30/2022
pH	5.0 – 11.0	March 2022	23	0	No	05/02/2022
pH	5.0 – 11.0	April 2022	15	0	No	05/31/2022
pH	5.0 – 11.0	May 2022	17	0	No	06/28/2022
pH	5.0 – 11.0	June 2022	15	0	No	07/29/2022
pH	5.0 – 11.0	July 2022	13	0	No	08/30/2022
pH	5.0 – 11.0	August 2022	8	0	No	10/04/2022
pH	5.0 – 11.0	September 2022	5	0	No	11/01/2022
pH	5.0 – 11.0	October 2022	6	0	No	12/05/2022
pH	5.0 – 11.0	November 2022	2	4	Yes	02/21/2023
pH	5.0 – 11.0	December 2022	0	1	No	01/31/2023
pH	5.0 – 11.0	January 2023	1	0	No	03/10/2023
pH	5.0 – 11.0	February 2023	1	0	No	04/06/2023
pH	5.0 – 11.0	March 2023	6	0	No	05/03/2023
pH	5.0 – 11.0	April 2023	16	0	No	06/01/2023
pH	5.0 – 11.0	May 2023	21	0	No	07/10/2023

ATTACHMENT II

Failure to Meet the NBC'S Discharge Limitations for Total Oil & Grease:

Parameter	Maximum Discharge Limit	Sample Location	Sampling Results (mg/L)	Sampling Date	NOV Issued
Oil & Grease	125.00 mg/L	# 2	760.00	07/22/2021	08/10/2021
Oil & Grease	125.00 mg/L	# 2	354	08/08/2021	09/07/2021
Oil & Grease	125.00 mg/L	# 2	393	08/16/2021	09/07/2021
Oil & Grease	125.00 mg/L	# 2	585.00	09/20/2021	10/04/2021
Oil & Grease	125.00 mg/L	# 1	510.00	09/20/2021	11/10/2021
Oil & Grease	125.00 mg/L	# 2	396.00	10/07/2021	10/28/2021
Oil & Grease	125.00 mg/L	# 1	140.00	10/14/2021	10/28/2021
Oil & Grease	125.00 mg/L	# 2	675.00	10/14/2021	10/28/2021
Oil & Grease	125.00 mg/L	# 2	335.00	12/27/2021	01/10/2022
Oil & Grease	125.00 mg/L	# 2	268.00	01/03/2022	01/20/2022
Oil & Grease	125.00 mg/L	# 2	987.00	01/10/2022	01/20/2022
Oil & Grease	125.00 mg/L	# 2	1100.00	01/17/2022	02/01/2022
Oil & Grease	125.00 mg/L	# 2	223.00	03/02/2022	03/14/2022
Oil & Grease	125.00 mg/L	# 2	571.00	04/13/2022	05/03/2022
Oil & Grease	125.00 mg/L	# 2	668.00	06/14/2022	06/28/2022
Oil & Grease	125.00 mg/L	# 2	220.00	06/15/2022	07/01/2022
Oil & Grease	125.00 mg/L	# 2	400.00	06/16/2022	07/01/2022
Oil & Grease	125.00 mg/L	# 2	183.00	07/13/2022	07/29/2022
Oil & Grease	125.00 mg/L	# 2	481.00	07/28/2022	08/11/2022
Oil & Grease	125.00 mg/L	# 2	980.00	08/04/2022	08/15/2022
Oil & Grease	125.00 mg/L	# 2	314.00	08/11/2022	08/31/2022
Oil & Grease	125.00 mg/L	# 2	184.00	09/01/2022	09/14/2022
Oil & Grease	125.00 mg/L	# 2	304.00	09/08/2022	09/21/2022
Oil & Grease	125.00 mg/L	# 2	237.000	10/31/2022	11/16/2022
Oil & Grease	125.00 mg/L	# 2	302.000	12/08/2022	12/22/2022
Oil & Grease	125.00 mg/L	# 2	358.000	12/15/2022	12/29/2022
Oil & Grease	125.00 mg/L	# 2	438.000	12/22/2022	01/30/2023
Oil & Grease	125.00 mg/L	# 2	246.000	01/05/2023	02/02/2023
Oil & Grease	125.00 mg/L	# 2	137.000	03/02/2023	03/29/2023
Oil & Grease	125.00 mg/L	# 2	339.000	03/16/2023	04/05/2023
Oil & Grease	125.00 mg/L	#2	131.000	04/27/2023	05/17/2023

ATTACHMENT III

Failure to submit pH compliance reports on time:

Month	# of NOVs Issued	Date NOV Issued	Status
June 2021	1	08/04/2021	Submitted 08/02/2021
November 2022	2	01/11/2023 01/31/2023	Submitted 02/08/2023

ATTACHMENT IV

Failure to submit Self-Monitoring Compliance Reports and results on time:

Month	# of NOVs Issued	Date NOV Issued	Status
April 2022	1	05/31/2022	Submitted 06/28/2022
August 2022	1	10/03/2022	Submitted 11/10/2022

ATTACHMENT V

Failure to Satisfy NBC Requirements:

Required Submittal	Issue Date	Due Date	NOVs Issued	Status
Resampling Results for Oil and Grease Location #2	06/23/2021	07/16/2021	08/02/2021	Submitted 08/05/2021
Resampling Results for Oil and Grease, Location #1	10/27/2021	12/15/2021	01/04/2022 02/01/2022	Submitted 02/22/2022
Resampling Results for Oil and Grease, Location #2	10/27/2021	12/15/2021	01/04/2022	Submitted 01/16/2022
Resampling Results for Oil and Grease and BOD Location #2	04/05/2022	05/24/2022	06/01/2022	Submitted 06/23/2022
Process Plans	08/09/2022	09/15/2022	10/03/2022 12/05/2022 01/11/2023 02/02/2023	Submitted 03/02/2023
Flocculant SDS Sheet	03/30/2023	04/15/2023	05/03/2023	Submitted 05/03/2023
Permit Application	04/05/2023	05/05/2023	06/01/2023 07/03/2023	Submitted 07/11/2023
Permit Application Fee	04/05/2023	05/05/2023	06/01/2023 07/03/2023	Submitted 07/11/2023

ATTACHMENT VI

Failure to report violations within 24 hours:

Parameter	Sample Date	Sample Result	Discharge Limitations Maximum	24 Hour Notice	Date NOV Issued
BOD	02/22/2022	117.50 lbs/1000 gal.	75 lbs/1000 gal.	No	03/08/2022
BOD	03/02/2022	104.17 lbs/1000 gal.	75 lbs/1000 gal.	No	03/14/2022
Oil & Grease	03/02/2022	223.00 mg/L	125 mg/L	No	03/14/2022
BOD	06/15/2022	158.33 lbs/1000 gal.	75 lbs/1000 gal.	No	06/29/2022
Oil & Grease	06/15/2022	220.00 mg/L	125 mg/L	No	06/29/2022
BOD	07/28/2022	196.67 lbs/1000 gal.	75 lbs/1000 gal.	No	08/11/2022
Oil & Grease	07/28/2022	481.00 mg/L	125 mg/L	No	08/11/2022
BOD	08/04/2022	110.83 lbs/1000 gal.	75 lbs/1000 gal.	No	08/15/2022
Oil & Grease	08/04/2022	980.00 mg/L	125 mg/L	No	08/15/2022
BOD	09/01/2022	181.67 lbs/1000 gal.	75 lbs/1000 gal.	No	09/14/2022
Oil & Grease	09/01/2022	184.00 mg/L	125 mg/L	No	09/14/2022
Oil & Grease	12/15/2022	358.00 mg/L	125 mg/L	No	12/29/2022
BOD	12/22/2022	153.333 lbs/1000 gal.	75 lbs/1000 gal.	No	01/30/2023
Oil & Grease	12/22/2022	438.000 mg/L	125 mg/L	No	01/30/2023
BOD	01/05/2023	169.167 lbs/1000 gal.	75 lbs/1000 gal.	No	02/02/2023
Oil & Grease	01/05/2023	246.000 mg/L	125 mg/L	No	02/02/2023
BOD	03/02/2023	105.000 lbs/1000 gal.	75 lbs/1000 gal.	No	03/29/2023
Oil & Grease	03/02/2023	137.000 mg/L	125 mg/L	No	03/29/2023
BOD	03/09/2023	160.833 lbs/1000 gal.	75 lbs/1000 gal.	No	04/05/2023
BOD	03/16/2023	197.500 lbs/1000 gal.	75 lbs/1000 gal.	No	04/06/2023
Oil & Grease	03/16/2023	339.000 mg/L	125 mg/L	No	04/06/2023
BOD	03/23/2023	87.50 lbs/1000 gal.	75 lbs/1000 gal.	No	04/26/2023
BOD	05/18/2023	138.333 lbs/1000 gal.	75 lbs/1000 gal.	No	06/01/2023
BOD	05/25/2023	190.833 lbs/1000 gal.	75 lbs/1000 gal.	No	06/12/2023
BOD	06/15/2023	275.833 lbs/1000 gal.	75 lbs/1000 gal.	No	07/14/2023

ATTACHMENT VII

Failure to analyze for all parameters as required by the Permit:

Month	Parameters not analyzed	Sample Location	Date NOV Issued	Due Date	Status
July 2021	Ammonia, Total Nitrogen	# 1 and # 2	08/10/2021	09/09/2021	#1 - submitted 10/25/2021 #2 - submitted 10/29/2021
October 2021	Ammonia, Total Nitrogen	# 1 and # 2	10/28/2021	11/26/2021	#1 - submitted 10/29/2021 #2 - outstanding
July 2022	TSS	# 1 and # 2	08/12/2022	09/30/2022	#1 and #2 - outstanding
October 2022	Ammonia, Total Nitrogen	# 1 and # 2	11/14/2022	12/14/2022	#1 – submitted 01/27/2023 #2 – submitted 01/11/2023