

PRETREATMENT PROGRAM

ANNUAL REPORT

JANUARY 1, 2021 - DECEMBER 31, 2021



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***

LETTER TO COMPANIES SUBJECT TO MASS-BASED LIMITS



January 19, 2021

NAME
COMPANY
STREET
CITY, STATE, ZIP

Category #:

Dear Mr./Ms. :

As you may be aware the Narragansett Bay Commission (NBC) was issued revised permits by the Rhode Island Department of Environmental Management (DEM) in September, 2017. The revised permits required the NBC to conduct an evaluation of the Local Discharge Limitations for both the Field's Point (FP) and Bucklin Point (BP) districts. This evaluation required the NBC to develop local limits for Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS), Total Nitrogen (TN) and Ammonia (NH₃). Some companies discharge more of these pollutants than others and have been doing so for many years. When the new local limits were developed, we wanted to allow these companies to continue to discharge at the same concentrations as much as possible and be in compliance with the new limits. It was determined the best way to develop these new limits was to calculate mass-based limits for these categories of users which historically discharge the largest loads of these pollutants. These mass-based limits were developed so the majority of companies currently sampling for these pollutants would be in full compliance without the need for additional pretreatment. The DEM granted preliminary approval of the proposed limits and the NBC Rules & Regulations are being revised to incorporate the new limits.

Your company falls into one of these categories and will be subject to the mass-based limits listed below. To determine which of the limits apply to your facility please refer to the category number listed above. Enclosed is a fact sheet to assist you with determining if your analytical results which are typically in mg/L comply with the mass-based limits which are in pounds (lb)/1000 gal. Also enclosed is a spreadsheet showing your analytical results that were submitted between January 1, 2019 and December 31, 2020. This spreadsheet details if the results would have been in compliance with the new mass-based limits. If any of your results for these parameters indicate that you exceeded the new limit it is recommended that you contact the NBC Technical Analysis and Compliance (TAC) section for free technical advice on achieving and maintaining compliance with the new limits. For information on how the NBC can assist your company, please contact Jim Kelly, TAC Manager, at 401.461.8848 ext. 262.

Category	Cat. #	BOD (lbs/1000 gal)	TSS (lbs/1000 gal)	TN* (lbs/1000 gal)	NH ₃ * (lbs/1000 gal)
Pharmaceutical Operations	14	5	5	-	-
Textile Operations	23	20	20	-	-
Industrial Laundries	25	10	10	-	-
Facilities Discharging Toxic and/or Prohibited Pollutants with High Conventional Pollutant Loads	28	10	10	-	-
Non-Textile Operations Using Pigments & Dyes	29	20	20	-	-
Aerogel Manufacturing with High Conventional Pollutant Loads**	32	570	10	300 lbs/day	300 lbs/day
Wholesale Food Processing Operations with High Conventional Pollutant Loads	33	75	75	10	2
Manufacturers with High Conventional Pollutant Loads with Low Flow	34	10	10	-	-
Brewing & Distilling Operations	36	10	10	-	-

*Seasonal limit applicable from May 1st through October 31st

**Discharge limits only applicable in the Bucklin Point District

Once the DEM grants approval to proceed with revising the Rules and Regulations to incorporate the Local Limits, the NBC will issue a Public Notice specifying a comment period on the proposed revisions. A letter outlining the Public Comment period and the date to submit any comments will be issued under separate cover. Your permit will be revised to incorporate the new limits once all approvals are granted. The new mass-based limits will not be in effect until then.

I will be conducting a webinar on January 27, 2021 at 3:00 pm via Zoom to explain how to determine compliance with the new local limits and address your questions and concerns. The webinar can be accessed at:

<https://zoom.us/j/92040467924?pwd=c1BubkNvQlcxMUdGT0VodWtOcnhxZz09>

Meeting ID: 920 4046 7924

Passcode: 6ZQxiE

If you have any questions, please contact me at 401.461.8848 ext. 490.

Sincerely,

Kerry M. Britt
Pretreatment Manager

Enclosures



NARRAGANSETT BAY COMMISSION FACT SHEET

CONVERTING CONCENTRATION (mg/L) TO MASS-BASED LIMITS (lbs/1000 gal.)

The Narragansett Bay Commission (NBC) has implemented mass-based local limits for Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS), Total Nitrogen (TN) and Ammonia (NH₃) for nine categories of companies. These limits were developed to provide additional loading capacity for companies that perform these type of process operations since higher mass loadings are typical for these types of businesses. This fact sheet is to help you understand how to calculate your mass loading discharge levels so you can determine if your firm is in compliance with the standards. The analytical results you receive from your licensed laboratory are reported as a concentration, typically in mg/L or ppm. In order to determine if you are in compliance with the lbs/1000 gallon limit, this Factsheet will explain how to perform a simple calculation to determine if your firm is in compliance. The NBC Mass-Based Limits are provided in the table below:

NBC Mass-Based Limits

Category	Cat. #	BOD (lbs/1000 gal)	TSS (lbs/1000 gal)	TN* (lbs/1000 gal)	NH ₃ * (lbs/1000 gal)
Pharmaceutical Operations	14	5	5	-	-
Textile Operations	23	20	20	-	-
Industrial Laundries	25	10	10	-	-
Facilities Discharging Toxic and/or Prohibited Pollutants with High Conventional Pollutant Loads	28	10	10	-	-
Non-Textile Operations Using Pigments & Dyes	29	20	20	-	-
Aerogel Manufacturing with High Conventional Pollutant Loads**	32	570	10	300 lbs/day	300 lbs/day
Wholesale Food Processing Operations with High Conventional Pollutant Loads	33	75	75	10	2
Manufacturers with High Conventional Pollutant Loads with Low Flow	34	10	10	-	-
Brewing & Distilling Operations	36	10	10	-	-

*Seasonal limit applicable from May 1st through October 31st

**Discharge limits only applicable in the Bucklin Point District

Simplified Calculation Method - The simplest way to convert the analytical results from mg/L to lbs/1000 gallons is to divide the result report by your lab in mg/L by 120, a conversion factor. Alternatively, you can multiply the result by 0.00834, which would yield the same result. The calculations below show how this conversion factor was calculated:

$$\frac{\text{milligrams (mg)}}{\text{Liter (L)}} \times \frac{1 \text{ pound (lb)}}{453592 \text{ mg}} \times \frac{3.78541 \text{ L}}{1 \text{ gallon}} \times \frac{1000 \text{ gal}}{\text{thousand gallons}} = \frac{0.00834 \text{ lb}}{\text{thousand gallons}}$$

So dividing mg/L by 120 yields the same result as multiplying mg/L by 0.00834.



NARRAGANSETT BAY COMMISSION
CONVERTING CONCENTRATION (mg/L) TO MASS (lbs/1000 gal.)
WORK SHEET

Company Name: _____
Sample Date: _____
Sample Location: _____

Calculate Daily Flow: Read water meter at start and end of sampling period.

Opening Meter Reading: _____ (gal or cf)
Closing Meter Reading: _____ (gal or cf)

Flow (F) = Closing Meter Reading - Opening Meter Reading (gal or cf)
Flow (F) = _____ - _____ = _____ (gal or cf)

For Cubic Feet Meters: $F_{(gal)} = F_{(cf)} \times 7.48$
 $F_{(gal)} =$ _____ cubic feet $\times 7.48 =$ _____ gal

Fill in Lab Results: Enter the results from your lab report

Pollutant: BOD _____ mg/L
TSS _____ mg/L
Total Nitrogen _____ mg/L
Ammonia _____ mg/L

Calculate Mass-Based limits for each pollutant in your category: Divide your lab result by 120 to obtain your results in lbs/1000 gallons.

Pollutant: BOD _____ mg/L $\div 120 =$ _____ lbs/1000 gal
TSS _____ mg/L $\div 120 =$ _____ lbs/1000 gal
Total Nitrogen _____ mg/L $\div 120 =$ _____ lbs/1000 gal
Ammonia _____ mg/L $\div 120 =$ _____ lbs/1000 gal

Compare you results with the limits in the table and circle to indicate if you are in compliance

Pollutant: BOD Compliance Achieved? Yes / No
TSS Compliance Achieved? Yes / No
Total Nitrogen Compliance Achieved? Yes / No
Ammonia Compliance Achieved? Yes / No



January 27, 2021

FP NEW DISCHARGE LIMITS
Mass Mailing - All FP District Users
List Attached

Category #:

Dear _____ :

As you may know the Narragansett Bay Commission (NBC) was issued new permits which became effective in December 2017 from the RI Department of Environmental Management (DEM). The permits required the NBC to evaluate the local discharge limitations that permitted industrial and commercial dischargers are required to comply with. The evaluation has been completed and the DEM has granted preliminary approval to revise the local limits. Pursuant to R.I. Gen. Laws §42-35 *et seq.* the NBC will be publishing a Notice of Proposed Rulemaking, which will occur on or before February 1, 2021. The notice will be available on the Rhode Island Secretary of State's website and the Narragansett Bay Commission website at: <https://www.narrabay.com/about-us/rules-regulations/>. The proposed rule will be open for public comment for thirty days after publication. You may request a public hearing on the proposed rulemaking within ten days of the publication.

If you have any comments regarding the proposed rulemaking, please submit them within thirty days of the initial Notice of Proposed Rulemaking by email to klongval@narrabay.com or by mail to:

Kallie Longval, Esq.
Narragansett Bay Commission
One Service Road
Providence, RI 02905

A table with the proposed limits is enclosed with this letter and a summary of the proposed changes is outlined below.

Metals:

- There are no changes for the daily maximum discharge limits for cadmium, chromium, copper, lead, nickel, mercury, silver, and zinc.
- A daily maximum discharge limit of 0.40 mg/L for arsenic has been established for landfills. All other facilities will have a daily maximum limit of 0.02 mg/L for arsenic.
- There will no longer be a monthly average limit for any metal.

Cyanide:

- The daily maximum limit of 0.58 mg/L for cyanide is only applicable to metal finishing (category 11) and non-ferrous precious metal forming (category #15) facilities. All other facilities will have daily maximum limit of 0.40 mg/L for cyanide.
- There will no longer be a monthly average limit for cyanide.

Total Oil & Grease (fats, oils & grease): There is no change to the limit of 125 mg/L.

Total Toxic Organics (TTO): There is no change to the limit of 2.13 mg/L.

pH: There is no change to the pH range of 5.0 standard units (su) to 11.0 su.

Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS):

- Mass-based limits have been proposed for some categories of facilities. The categories and limits can be found attached to this letter.
- A local limit of 300 mg/L has been proposed for both BOD and TSS for most facilities. Any exceedance will result in the issuance of a Notice of Violation.

Nutrients:

In order to comply with strict seasonal limits for nitrogen imposed on the treatment plant, the NBC was required to establish local limits for total nitrogen and ammonia.

- The limits for these limits will be enforceable from May 1st through October 31st.
- Mass-based limits have been proposed for some categories of facilities. The categories and limits can be found attached to this letter.
- All other facilities will have a seasonal daily maximum limit of 115 mg/L for nitrogen and 50 mg/L for ammonia.

If you have any questions, regarding this letter please contact me at 401.461.8848, ext. 490.

Sincerely,



Kerry M. Britt
Pretreatment Manager

Enclosure

NARRAGANSETT BAY COMMISSION
FIELD'S POINT DISCHARGE LIMITS

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 Precious 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	0.40
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

Field's Point Mass-based Limits

Category	BOD (lbs/1000 gal)	TSS (lbs/1000 gal)	Total Nitrogen (lbs/1000 gal)	Ammonia (lbs/1000 gal)
Pharmaceutical Operations (Category #14)	5	5	-	-
Textile Operations (Category #23)	20	20	-	-
Industrial Laundries (Category #25)	10	10	-	-
Facilities Discharging Toxic and/or Prohibited Pollutants with High Conventional Pollutant Loads (Category #28)	10	10	-	-
Non-Textile Operations Using Pigments & Dyes (Category #29)	20	20	-	-
Wholesale Food Processing Operations with High Conventional Pollutant Loads (Category #33)	75	75	10	2
Manufacturers with High Conventional Pollutant Loads with Low Flow (Category #34)	10	10	-	-
Brewing & Distilling Operations (Category #36)	10	10	-	-



January 27, 2021

BP NEW DISCHARGE LIMITS
Mass Mailing - All BP District Users
List Attached

Category #:

Dear _____ :

As you may know the Narragansett Bay Commission (NBC) was issued new permits which became effective in December 2017 from the RI Department of Environmental Management (DEM). The permits required the NBC to evaluate the local discharge limitations that permitted industrial and commercial dischargers are required to comply with. The evaluation has been completed and the DEM has granted preliminary approval to revise the local limits. Pursuant to R.I. Gen. Laws §42-35 *et seq.* the NBC will be publishing a Notice of Proposed Rulemaking, which will occur on or before February 1, 2021. The notice will be available on the Rhode Island Secretary of State's website and the Narragansett Bay Commission website at: <https://www.narrabay.com/about-us/rules-regulations/>. The proposed rule will be open for public comment for thirty days after publication. You may request a public hearing on the proposed rulemaking within ten days of the publication.

If you have any comments regarding the proposed rulemaking, please submit them within thirty days of the initial Notice of Proposed Rulemaking by email to klongval@narrabay.com or by mail to:

Kallie Longval, Esq.
Narragansett Bay Commission
One Service Road
Providence, RI 02905

A table with the proposed limits is enclosed with this letter and a summary of the proposed changes is outlined below.

Metals:

- There are no changes for the daily maximum discharge limits for cadmium, chromium, copper, lead, mercury, silver, and zinc.
- The daily maximum limit for arsenic has been decreased to 0.03 mg/L.
- The daily maximum limit of 1.62 mg/L for nickel is only applicable to metal finishing (category 11) and non-ferrous precious metal forming (category #15) facilities. All other facilities will have a daily maximum limit of 0.50 mg/L for nickel.
- There will no longer be a monthly average limit for any metal.

Cyanide:

- The daily maximum limit of 0.50 mg/L for cyanide is only applicable to metal finishing (category 11) and non-ferrous precious metal forming (category #15) facilities. All other facilities will have a daily maximum limit of 0.40 mg/L for cyanide.
- There will no longer be a monthly average limit for cyanide.

Total Oil & Grease (fats, oils & grease): There is no change to the limit of 125 mg/L.

Total Toxic Organics (TTO): There is no change to the limit of 2.13 mg/L.

pH: There is no change to the pH range of 5.0 standard units (su) to 11.0 su.

Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS):

- Mass-based limits have been proposed for some categories of facilities. The categories and limits can be found attached to this letter.
- A local limit of 300 mg/L has been proposed for both BOD and TSS for most facilities. Any exceedance will result in the issuance of a Notice of Violation.

Nutrients:

In order to comply with strict seasonal limits for nitrogen imposed on the treatment plant, the NBC was required to establish local limits for total nitrogen and ammonia.

- The limits for these limits will be enforceable from May 1st through October 31st.
- Mass-based limits have been proposed for some categories of facilities. The categories and limits can be found attached to this letter.
- All other facilities will have a seasonal daily maximum limit of 115 mg/L for nitrogen and 50 mg/L for ammonia.

If you have any questions, regarding this letter please contact me at 401.461.8848, ext. 490.

Sincerely,



Kerry M. Britt
Pretreatment Manager

Enclosure

NARRAGANSETT BAY COMMISSION
BUCKLIN POINT DISCHARGE LIMITS

Parameter	Maximum Daily Limit (mg/L)
Ammonia	50 ⁺ *
Arsenic	0.03
Biochemical Oxygen Demand (BOD)	300*
Cadmium	0.11
Chromium	2.77
Copper	1.20
Cyanide (Metal Finishing and Non-Ferrous Precious Metal Forming Facilities)	0.50
Cyanide (All other users)	0.40
Lead	0.69
Mercury	0.06
Nickel (Metal Finishing & Non-Ferrous Precious Metal Forming Facilities)	1.62
Nickel (All other users)	0.50
Nitrogen	115 ⁺ *
Total Oil & Grease (O&G)	125
Silver	0.40
Total Suspended Solids (TSS)	300*
Total Toxic Organics (TTO) including xylene and acetone	2.13
Zinc	1.67
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

Bucklin Point Mass-based Limits

Category	BOD (lbs/1000 gal)	TSS (lbs/1000 gal)	Total Nitrogen (lbs/1000 gal)	Ammonia (lbs/1000 gal)
Pharmaceutical Operations (Category #14)	5	5	-	-
Textile Operations (Category #23)	20	20	-	-
Industrial Laundries (Category #25)	10	10	-	-
Facilities Discharging Toxic and/or Prohibited Pollutants with High Conventional Pollutant Loads (Category #28)	10	10	-	-
Non-Textile Operations Using Pigments & Dyes (Category #29)	20	20	-	-
Aerogel Manufacturing with High Conventional Pollutant Load (Category #32)	570	10	300 lbs/day	300 lbs/day
Wholesale Food Processing Operations with High Conventional Pollutant Loads (Category #33)	75	75	10	2
Manufacturers with High Conventional Pollutant Loads with Low Flow (Category #34)	10	10	-	-
Brewing & Distilling Operations (Category #36)	10	10	-	-



February 18, 2021

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

Dear _____ :

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

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

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

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

Please download the application and return it by March 19, 2021 to:

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

Page 2

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

Sincerely,

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

Kerry M. Britt
Pretreatment Manager

cc: Jim Kelly



March 2, 2021

**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 2020, 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 2021. If you have any questions regarding this letter or the NBC Pretreatment Program in general, feel free to contact the engineer or technician responsible for regulating your firm at 461-8848, ext. 490.

Sincerely,

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

Kerry M. Britt
Pretreatment Manager

KMB:smb

cc: Pretreatment Engineers/Technicians



March 8, 2021

PERFECT COMPLIANCE

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

Dear _____ :

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

A. Harrison & Company, Inc.
Eagle Laundry, Inc.
Electrolizing, Inc.
Godfrey & Wing, Inc. d/b/a Impco
HP Services
Induplate, LLC
International Chromium Plating Co., Inc.
Interplex Engineered Products, Inc.
John H. Collins & Sons Company
Mahr, Inc.
Manchester Street, LLC

Materion Technical Materials, Inc.
Metallurgical Solutions, Inc.
Pawtucket Power Associates
Providence Metallizing Company, Inc.
Stackbin Corporation
Tanury Industries PVD, Inc.
Technodic, Inc.
Teknor Apex Company
Tiffany and Company
Truex, Inc.
Univar USA, Inc.

An advertisement recognizing the achievements of these companies was published in the Providence Journal on February 25, 2021. Aligned herewith is a copy of the advertisement for your reference.

Sincerely,

Kerry M. Britt
Pretreatment Manager

KMB:smb

NARRAGANSETT BAY COMMISSION
Perfect Compliance
in recognition of Significant Industrial User Perfect Compliance in 2020

The Narragansett Bay Commission recognizes these Significant Industrial User companies for perfect regulatory compliance with Pretreatment Program regulations during 2020:

A. Harrison & Company, Inc.	Eagle Laundry, Inc.
Electrolizing, Inc.	Godfrey & Wing, Inc.
HP Services, Inc.	Inc. d/b/a Impco, Inc.
Induplate, LLC	International Chromium Plating Co., Inc.
Interplex Engineered Products, Inc.	John H. Collins & Sons Company
Manchester Street, LLC	Mahr, Inc.
Metallurgical Solutions, Inc.	Materion Technical Materials, Inc.
Pawtucket Power Associates	Providence Metallizing Company, Inc.
Stackbin Corporation	Tanury Industries, PVD, Inc.
Technodic, Inc.	Teknor Apex Co.
Tiffany & Company	Truex, Inc.
Univar USA, Inc.	

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

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



March 10, 2021

MASS MAILING

**Categories 11 through 59 - Both Districts
List Attached**

Dear :

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

SIGNIFICANT NON-COMPLIANCE CRITERIA

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

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

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

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

PLEASE NOTE THAT THE NBC DOES NOT WANT TO PUBLISH THE NAME OF ANY FIRM, BUT WE MAY HAVE NO CHOICE. On February 25, 2021, the names of twelve (12) firms from both districts were published in an advertisement in the Providence Journal due to their SNC status. These firms were billed by the NBC for the reimbursement cost for this public notice. A copy of this public notice is enclosed for your information. Only you can ensure that the name of your firm is not published for being in Significant Non-Compliance with NBC and EPA regulations. Please feel free to contact the Pollution Prevention staff of the Technical Analysis & Compliance Section if the NBC can be of assistance with your compliance endeavors. Good luck maintaining full compliance during 2021.

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

Sincerely,

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

Kerry M. Britt
Pretreatment Manager

KMB:smb

Enclosures

cc: Pretreatment Engineers and Technicians



SIGNIFICANT NON-COMPLIANCE CRITERIA

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

EXPLANATION OF SIGNIFICANT NON-COMPLIANCE (SNC) CRITERIA

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SNC Criteria G Failure to accurately report non-compliance.

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

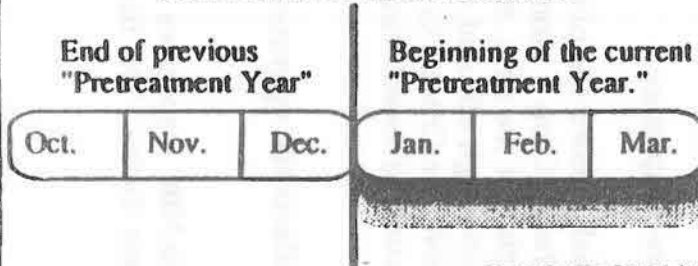
SNC Criteria H Any violation that adversely effects the operation or implementation of the pretreatment program.

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

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

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

FIRST EVALUATION PERIOD



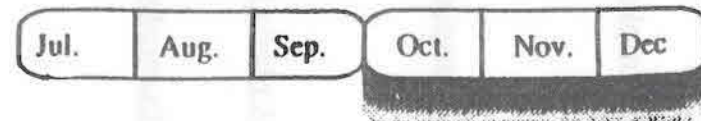
SECOND EVALUATION PERIOD



THIRD EVALUATION PERIOD



FOURTH EVALUATION PERIOD



End of the current "Pretreatment Year."

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."

The Narragansett Bay Commission

PUBLIC NOTICE

Firms in Significant Non-Compliance

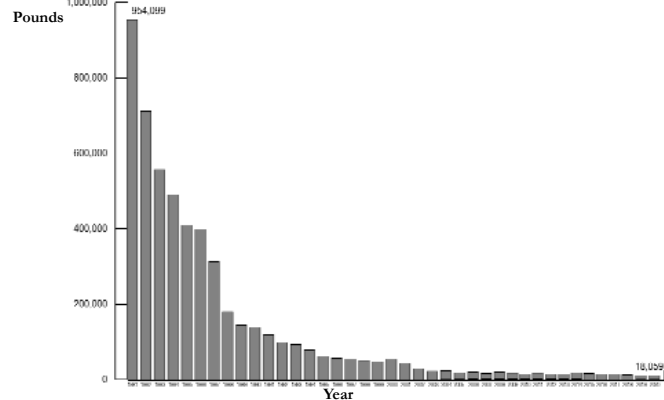


THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGULATION 40 C.F.R. 403.8(f) (2) (vii) and Article 10 of the Narragansett Bay Commission, Rules and Regulations require the NBC to publish annually the names of all industrial users in Significant Non-Compliance (SNC) with pretreatment standards and other pretreatment requirements during the preceding year. Companies deemed to be in Significant Non-Compliance are those industrial users who have violated any of the Significant Non-Compliance criteria listed, as defined by Article 2 of the NBC Rules and Regulations during the time period from October 1, 2019 through December 31, 2020. The parameter for which a company was not in compliance and/or the specific administrative deficiency are listed after the company name. The number(s) in parentheses correspond to the type of SNC criteria specified below. Some of the firms listed below may have been issued an Administrative Order in which administrative and/or civil penalties may have been assessed. Many of the companies listed have made significant progress toward correcting the violation and may now be in compliance.

Significant Non-Compliance Criteria:

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

Total Metals Influent to Field's Point WWTF, 1981-2020



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 98.1% 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

Lincoln		
Company Name	Violations Cited	Present Status
Michael Healy Designs, Inc.	Failure to submit report on time (6)	Report has been received
Zebra Technologies Corporation	Failure to submit report on time (6)	Report has been received
Pawtucket		
Ecological Fibers, Inc.	Zn (1,2)	Firm is still experiencing compliance issues
Harris Industries, Inc.	Failure to submit report on time (6)	Report has been received
Hasbro, Inc.	Failure to submit reports on time (6)	Reports have been received
Summit Manufacturing Corporation	Failure to submit reports on time (6)	Reports have been received
Cumberland		
Texcel Industries	Failure to submit report on time (6)	Report has been received
East Providence		
BEST Engineered Surface Technologies, LLC	Failure to submit reports on time (6)	Reports have been received

Field's Point Service Area

Providence		
Company Name	Violations Cited	Present Status
Bella's Jewelry	Failure to submit reports on time (6)	Reports have not been received
Providence Specialty Products, LLC	O&G (1, 2)	Firm is still experiencing compliance issues
Rhode Island Chemical Corporation	Failure to submit reports on time (6)	Reports have been received
Rhode Island Chemical Corporation	Failure to submit reports on time (6)	Reports have been received
Johnston		
Ballard Mack Sales and Service of RI, Inc.	O&G (1,2)	Firm is now in compliance

Vincent J. Mesolella, *Chairman* • Laurie A. Hornidge, *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.

April 8, 2021

2020 SNC PUBLIC NOTICE

Dear «Title» «LastName»:

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 25, 2021 as being in SNC with NBC or EPA regulations for the reporting period of October 1, 2019 through December 31, 2020. 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 10, 2021 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 \$206.00 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, 2021. (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.



May 18, 2021

MASS MAILING
All Users - Field's Pont District
List Attached

Category #

Dear _____ :

As you are aware the Narragansett Bay Commission (NBC) has been in the process of revising the Rules and Regulations for Use of the Wastewater Facilities (Rules & Regulations) to include new local limits. The revised Rules & Regulations have been approved by the RI Department of Environmental Management (DEM) and RI Secretary of State's Office (SOS). The Rules & Regulations, including the new local limits, become final and enforceable on June 1, 2021. The local limits can be found in Section 1.5.4, Specific Facility Limitations. Enclosed please find a table of the Field's Point discharge limits which must replace Table 1 of your Wastewater Discharge Permit. Also enclosed is a revised Self-Monitoring Compliance Report (SMCR) form which replaces the SMCR that you have been submitting with any analytical results. It is important to compare your results with the limits on the second page of the new SMCR form to determine if you are in compliance with the new limits.

There are two other notable revisions to the Rules & Regulations:

- The regulations regarding the installation of grease removal equipment have been moved to Section 1.8.8, Grease Removal Systems.
- Section 1.8.9, Best Management Practices, has been added.

The revised Rules & Regulations can be found on the NBC website at the following link:

<https://narrabay.com/programs-and-initiatives/pretreatment/rules-regulations/>

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

Sincerely,

Kerry M. Britt
Pretreatment Manager

Enclosures

cc: Pretreatment staff

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		Limitation
Category/Categories	Parameter(s)	(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.



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,



May 18, 2021

MASS MAILING
All Users - Bucklin Pont District
List Attached

Category #

Dear _____ :

As you are aware the Narragansett Bay Commission (NBC) has been in the process of revising the Rules and Regulations for Use of the Wastewater Facilities (Rules & Regulations) to include new local limits. The revised Rules & Regulations have been approved by the RI Department of Environmental Management (DEM) and RI Secretary of State's Office (SOS). The Rules & Regulations, including the new local limits, become final and enforceable on June 1, 2021. The local limits can be found in Section 1.5.4, Specific Facility Limitations. Enclosed please find a table of the Bucklin Point discharge limits which must replace Table 1 of your Wastewater Discharge Permit. Also enclosed is a revised Self-Monitoring Compliance Report (SMCR) form which replaces the SMCR that you have been submitting with any analytical results. It is important to compare your results with the limits on the second page of the new SMCR form to determine if you are in compliance with the new limits.

There are two other notable revisions to the Rules & Regulations:

- The regulations regarding the installation of grease removal equipment have been moved to Section 1.8.8, Grease Removal Systems.
- Section 1.8.9, Best Management Practices, has been added.

The revised Rules & Regulations can be found on the NBC website at the following link:

<https://narrabay.com/programs-and-initiatives/pretreatment/rules-regulations/>

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

Sincerely,

Kerry M. Britt
Pretreatment Manager

Enclosures

cc: Pretreatment staff

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.



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? _____

December 29, 2021

2022 FEE PAID LETTER STICKER
SEPTAGE HAULERS

Permit Number: «PERMIT_NUMBER»

Dear «TITLE» «LASTNAME»:

Enclosed please find «NUMBER» 2022 Narragansett Bay Commission (NBC) permitted Septage Hauler Identification Sticker(s). Effective January 1, 2022, a sticker must be affixed to the inside windshield of each NBC permitted truck for identification purposes. Vehicles without a sticker will not be permitted to dump at the NBC Septage Receiving Facility.

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

Sincerely,

Sulema Martinez
Pretreatment Clerk

Enclosure(s)

***NEWSPAPER AND MAGAZINE
ARTICLES***



LATEST

Construction set to start on £350M Rhode Island sewer tunnel scheme

13 JAN, 2021 | BY CLAIRE SMITH

Construction of the Pawtucket Tunnel in Rhode Island, US has reached a major milestone with no proceed issued to the joint venture contractor CB3A, formed by Bouygues US subsidiary CBNA Barletta and Aecom.

The 3.5km long, 9m diameter combined sewer overflow tunnel is the third phase of work to improve water quality in the Narragansett Bay in the Rhode Island Delta for the Narragansett Bay Com

The first phase of the project started in 2001 with the 5km long Providence Tunnel and the second phase, which was completed in 2015, saw combined sewer overflows added to the Providence Tunnel.

The tunnel will be excavated at depths of up to 52m below ground level along the route of the Providence River using a tunnel boring machine designed to cope with the varied geology. The work also includes the construction of three main shafts and four drop shafts to collect water and connect into the main tunnel.

Construction is expected to take four years to complete.

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Narragansett Bay Commission Issues Pawtucket Tunnel Notice To Proceed



WRITTEN BY TRIS THOMAS ON 13/01/2021 ([HTTPS://TUNNELLINGJOURNAL.COM/2021/01/13/](https://tunnellingjournal.com/2021/01/13/)) IN NEWS ([HTTPS://TUNNELLINGJOURNAL.COM/CATEGORY/NEWS/](https://tunnellingjournal.com/category/news/))

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As part of the program to improve water quality in Narragansett Bay, the Narragansett Bay Commission has issued to CB3A joint-venture notice to proceed with the work on the Pawtucket Tunnel Project. This joint venture comprises CBNA, a US-based subsidiary of Bouygues Travaux Publics, and local civil works contractor Barletta Heavy Division. The contract is worth €394M (Bouygues Travaux Publics' share is €256M).

Located in the Rhode Island Delta, approximately 75km south of Boston, the Pawtucket Tunnel Project is the first part of phase 3 of the Bay's water management modernization program (Phase IIIA). CB3A is responsible for the design and construction of the tunnel and its ancillary structures.

The 3.5km long (11,600ft) main tunnel will be excavated along the Seekonk River using a TBM specially designed to accommodate the varied geology of the route. Its 9m (30ft) internal diameter will enable it to collect and store a significant proportion of the region's rainwater, waste water and industrial water pending treatment by the water treatment plant.

The project also involves the excavation of three main shafts, one of which will serve as a pumping station and supply the existing treatment plant. 4 drop shafts will also be built to collect water, as well as their connecting tunnels to the main tunnel. Carried out in the heart of an urban residential area, the project will be subject to measures designed to protect the environment and minimize the impact of the work on local residents.

CB3A will be supported by engineering company Aecom to carry out the design and will also promote local employment and the integration of local businesses when organizing the work.

The contract is for a period of 48 months.

The three-phase CSO program kicked off in 2001 with construction of a three-mile long, 26ft wide deep-rock tunnel under Providence to store stormwater runoff. Phase II, completed in 2015, added CSO interceptors to the Providence Tunnel, several sewer separation projects, and a wetlands storage facility. The final phase is focused on the construction of the Pawtucket Tunnel underneath the communities of Pawtucket and Central Falls. The tunnel, which will be is designed to store 58.5 million gallons of combined sewer overflows.

The tunnel is expected to be operational in 2026.



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How Much Virus Is in the Water? Narragansett Bay Commission Participates in National COVID-19 Study

Sunday, January 24, 2021

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The Narragansett Bay Commission has been accepted to participate in a COVID-19 study conducted by the U.S. Department of Health & Human Services (HHS) and the Centers for Disease Control & Prevention (CDC).

The study is designed to rapidly monitor 100 million people across the United States through wastewater surveillance for monitoring the COVID-19 epidemic and to identify best practices for wastewater SARS-CoV-2 assessment and subsequent data analytics across the country.

Questions about coronavirus transmission via wastewater began in May of 2020 as the World Health Organization began to raise questions.

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In October, MIT reported that the university began piloting a wastewater testing program as a new tool to help keep the campus community safe this semester.

Image: Noun Project CC



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"In a project that will run through the fall semester, wastewater from seven buildings on campus will be tested each day for SARS-CoV-2, the virus that causes COVID-19. The project is designed to determine if wastewater testing

can be an effective early warning system for COVID-19 outbreak on campus, and is being evaluated as a complementary tool in the Institute's response to the pandemic, along with clinical testing, contact tracing, and other measures," reported MIT.



Bucklin Point Wastewater Treatment Facility, PHOTO: NBC

How Much Virus Is in the Water

The NBC's Bucklin Point Wastewater Treatment Facility in East Providence is participating in Phase I of the study, during which raw wastewater influent is tested twice weekly for six weeks. Phase I will assess 10% of the US population through wastewater monitoring. Monitoring began December 27, 2020.

The second phase will enroll additional treatment plants in order to ramp up to the goal of surveilling 30% of the US population. All data will be compiled and relayed to communities by HHS, with the goal of returning data as soon as possible for local health departments to make quick, actionable decisions.

"Wastewater treatment has always been essential to public health, protecting our citizens from diseases and epidemics like dysentery and cholera," said NBC Chairman Vincent Meola. "It's a natural progression of our public health mission to contribute to the fight against COVID. We are very proud to be a part of this study providing valuable data to our country's leaders during this challenging time."

A paper published in *Nature* reported, "The health risk of COVID-19 via waterborne transmission may be greater than initially assumed, and wastewater should be further studied as a potential pathway for COVID-19 transmission. Evidence for the presence of SARS-CoV-2 RNA in wastewater systems is accumulating around the world. The large number of infected individuals in the current pandemic together with the high infectivity of SARS-CoV-2 could present a new challenge for wastewater treatment and call for future assessment of the risk for transmission via wastewater reuse. Such risks might be expected to be highest in areas with high population density, direct exposure to aerosolized wastewater as well as regions that lack adequate wastewater collection, treatment and disinfection."

"Extensive research into the frequency of detecting the infectious SARS-CoV-2 in wastewater is urgently needed to gain

- (1) critical information on the abundance of viruses in raw wastewater, treated wastewater and the receiving environment, which can be used to generate a quantitative risk assessment;
- (2) information on removal efficiencies through the wastewater treatment train;
- (3) disinfection requirements according to virus loading and transmission via WWTPs to ensure complete removal of SARS-CoV-2 for wastewater reuse; and (4) epidemic surveillance for policymakers on the outbreak, extent and prevalence of the COVID-19 pandemic within the community," wrote the report published in August.

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Lt. Gov. McKee expects Raimondo's cabinet to stay through his own inauguration, unclear how long after that



Katherine Gregg

The Providence Journal

PROVIDENCE — Lt. Gov. Dan McKee expects every member of current Rhode Island Gov. Gina Raimondo's cabinet to stay through his own imminent, mid-term inauguration as Raimondo's replacement.

How long they actually stay is another question.

For example, Commerce Secretary Stefan Pryor "has told the incoming governor that he is exploring all his options," according to Pryor spokesman Matt Sheaff. (For what it's worth: Pryor was a Yale Law School student in the mid-1990s with Raimondo and her husband, Andrew Moffit.)

Democrat Raimondo is poised to resign mid-term to take a new job, in Washington, as President Joe Biden's commerce secretary. Her confirmation hearing was Tuesday. An committee vote on her nomination is anticipated next Wednesday, February 3.

The exact timing of Raimondo's departure is unclear. But Sen. Roger Wicker, the Mississippi Republican who chairs the U.S. Senate Committee on Commerce, Science and Transportation, told Raimondo on Tuesday: "I do not believe you will be serving as governor of the state of Rhode Island for very much longer."

Against that backdrop, McKee is preparing for his move up one flight to the governor's State House suite as soon as next week. He has set 5 p.m. Tuesday as the deadline for those seeking appointment by him as R.I.'s next lieutenant governor to submit "a letter of interest" online to his transition team at www.mckeetransition.com/.

McKee, who had no working relationship with fellow Democrat Raimondo and no role in her administration's pandemic response efforts, issued this statement:

“Selecting the next lieutenant governor provides an opportunity to reimagine Rhode Island’s governance model and demonstrate how the lieutenant governor’s office can be leveraged to support the state’s pandemic response and economic recovery.

“Our team looks forward to engaging in the selection process and identifying a partner to work closely with our administration starting on day one.”

Brown University has confirmed that one contender - former Central Falls Mayor James Diossa - started worked on January 25, on a six-month job as senior advisor to the Brown Policy Lab.

According to a statement from Diossa, conveyed by the Brown public relations staff: "The Policy Lab conducts applied research to improve public policy in Rhode Island and beyond, bringing together experts from government, universities, and community organizations to collaborate and develop evidence-based policy and programs that improve lives and strengthen communities.

"As Senior Advisor, I will work closely with The Policy Lab Director, David Yokum, and senior staff to provide strategic advice on The Policy Lab's engagement with state and local government partners at a high level...in particular, assessing and revising a proposal for a statewide municipal student internship program to support Rhode Island's recovery from COVID-19 and undertaking exploratory conversations with an array of prospective partners to refine this proposal and identify sources of philanthropic support."

Asked if Diossa was taking his name out of the running for lieutenant governor, his political spokesman Chris Hunter said: : "He's still open to the opportunity for public service."

McKee's transition team plans to post updates on www.mckeetransition.com.

Raimondo, meanwhile, appears to have spent much of the last week or so talking, in advance of Tuesday's confirmation hearing, to the members of the U.S. Senate Committee on Commerce, Science and Transportation.

Both she and they referenced these detailed conversations where the senators laid out the issues on their minds from "salmon infrastructure" and fishing in the Pacific Northwest to China trade policy — so she could address them at the hearing.

On Tuesday, her Rhode Island press office announced a spate of 11th hour appointments to state boards and commissions.

Most but not all were reappointments, such as the reappointment of organized labor activist Scott Duhamel and retired union chief Stan Israel to the State Labor Relations Board.

An online profile describes Duhamel as an assistant to the general president of the International Union of Painters and Allied Trades and the secretary-treasurer of the Rhode Island Building and Construction Trades Council. Israel was the long time executive vice president of SEIU District 1199.

Her new appointees include some familiar names, such as former Auditor General Ernest Almonte to the Narragansett Bay Commission.

Other new appointees include Bill Stone to the board of the R.I. Commerce Corporation. Stone is a co-founder and managing member of Outside CFO, Outside GC, which describes itself as "the nation's largest provider of on-demand general counsel services," and Patent GC, "an on-demand provider of intellectual property legal services."

She also appointed Mark Amato, president and CEO of Innova Logic, to the governor's Workforce Board; former Providence City Councilman Peter Mancini to the R.I. Convention Center Authority and Marcy Reyes, founder and CEO of The Financial Literacy Youth (FLY) Initiative, to the R.I. Public Transit Authority.

Explaining the rush of appointments in what could be Raimondo's last week as the state's elected governor, spokeswoman Audrey Lucas said: "Making appointments to Rhode Island's boards and commissions is a responsibility that Governor Raimondo takes seriously, and one that has been significantly delayed as a result of the COVID-19 pandemic."

<https://www.valleybreeze.com/2021-02-23/north-providence/andoscia-appointed-board-overseeing-nbc>

Andoscia appointed to board overseeing NBC

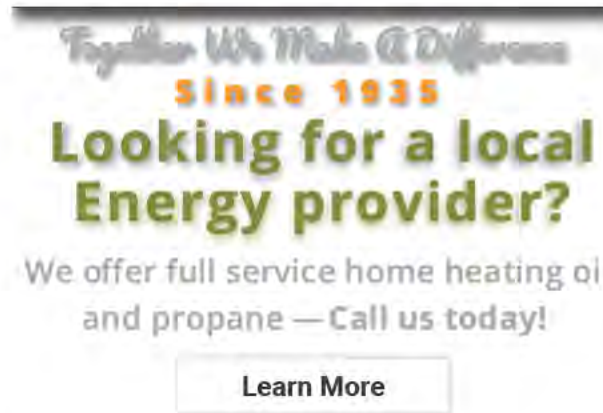
Feb 23, 2021



NORTH PROVIDENCE – Gov. Gina Raimondo has appointed Lisa Andoscia, president of North Providence-based Rosewood Consulting Inc., to a two-year term on the Board of Commissioners tasked with overseeing operations of the Narragansett Bay Commission.

NBC was created by the Rhode Island General Assembly in 1980 to reduce pollution and improve the water quality of Narragansett Bay and its tributaries. In 1987, Narragansett Bay was designated an Estuary of National Significance by the United States Congress.

The NBC is governed by a 19 member Board of Commissioners and is empowered with responsibilities ranging from ensuring that the NBC operates with a balanced budget to approving contracts for improving and sustaining the treatment facilities and wastewater collection system



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Andoscia is a successful grant writer for numerous local communities, including North Providence, Smithfield and Cumberland.



RI's List of Impaired Waters Approved by USEPA

PROVIDENCE – The Department of Environmental Management (DEM) is announcing today that the US Environmental Protection Agency (USEPA) has approved Rhode Island's recommendations to remove impairments from parts of three waterbodies from USEPA's List of Impaired Waters under Section 303(d) of the Clean Water Act. As a result of stringent permitting and long-term investments in pollution abatement infrastructure and practices, segments of Upper Narragansett Bay, Mount Hope Bay, and the Blackstone River impairments now meet water quality standards. The announcement helps to underscore the importance of Question 2 – the Beach, Clean Water, Green Bond, which is on the special referendum ballot March 2. If approved by voters, Question 2 includes an investment of \$15 million for drinking water and clean water. This would fund much-needed upgrades to drinking and wastewater treatment facilities, combined sewer overflow prevention, and stormwater management.

Rhode Island's recent federal Clean Water Act reporting approved by EPA highlights some big wins for clean water in our bays and rivers and the need to continue investing in protecting and restoring our waters!" said DEM Director Janet Coit. "People in every community in our state can feel and enjoy the benefits of clean water and places that are accessible for public recreation. We owe it to our families to keep investing in quality of life – and we owe it to the generations to come who count on us to be good stewards of our beautiful state. Pay it forward by voting yes on Question 2 next Tuesday."

Every state, tribe, and territory are required under the federal Clean Water Act to assess and report on the condition of the state's waters. As part of the process, DEM identifies those surface waters that do not meet water quality criteria and require the development of a water quality restoration study and recommends waters or impairments that should be removed from the list because they meet water quality standards. Segments of three major Rhode Island waterbodies have demonstrated significant water quality improvements and therefore the impairments described below have been removed from the 2018-2020 impaired waters list. As a result of stringent permitting and investments in pollution abatement infrastructure and practices, segments of Upper Narragansett Bay, Mt. Hope Bay, and the Blackstone River impairments have been delisted as they now meet water quality standards.

Portions of Upper Narragansett Bay The investments made to address combined sewer overflows from the Narragansett Bay Commission (NBC) sewer system has resulted in increased shellfish harvesting opportunities in the Upper Bay – in 2017 DEM lifted rainfall related shell fishing restrictions on one portion of Upper Narragansett Bay (Conditional Area B) that had been in place for over 70 years. Removal of this restriction due to improvement in water quality supported delisting the bacteria impairment from this area. Two areas of Upper Narragansett Bay were listed as impaired for bacteria in 1992, but restrictions to shell fishing use had already been in place since the 1940s. The completion of Phases I and II of the NBC combined sewer overflow (CSO) project eliminated a significant volume of combined sewage and stormwater that previously entered the Upper Narragansett Bay via the Providence River. The resulting improvement in water quality has allowed the area previously identified as Conditional Area B by the DEM shell fishing program to operate on an approved status and Conditional Area A to close at 1.2" versus of 0.5" of rainfall since May 2017. DEM expects further improvements in water quality once Phase III of the CSO project is implemented.

EPA applauds the hard work done by Rhode Island DEM and their local partners to achieve the delisting and reopening of the Upper Narragansett Bay segment for shell fishing use. This outcome, along with the water quality improvements in Mt. Hope Bay and the Blackstone River, is the result of a productive and effective partnership between federal, state, and municipal government, along with local advocates, all of whom are working together to achieve better water quality and a healthier environment. Rhode Island is yielding impressive results from their investments to improve water quality," said US EPA Acting Regional Administrator Deb Szaro.

Mt. Hope Bay (fish bioassessments) In 1996 DEM included Mt. Hope Bay on its impaired waters list due to the sharp decline in the number and diversity of fish associated with operations of the Brayton Point Power Station in Somerset, MA. DEM's Division of Marine Fisheries conducted a review analysis of historical and recent available Mt. Hope Bay and Narragansett Bay finfish community data to evaluate abundance and species composition prior to and after construction of the cooling towers. The analysis showed that the large reduction in water withdrawn from and heat discharged to the Bay was followed by a realignment of the Mt. Hope Bay finfish community with that of Narragansett Bay.

Blackstone River (total phosphorus (TP) and dissolved oxygen (DO) impairment) This impairment was identified in 1996 (DO) and 1998 (TP) from extensive monitoring and application of a DO model leading to stringent phosphorus limits at five wastewater treatment facilities (WWTF) in Rhode Island and Massachusetts. Continuous dissolved oxygen data collected in 2017 and documentation of phosphorus reductions at the WWTF plants and data collected in the river over the last 10-15 years showed a significant drop in phosphorus levels as a result of the WWTF phosphorus reductions. The data show that TP and DO are no longer impairments for the Rhode Island portion of the Blackstone River, protecting aquatic life.

In October 2020, DEM held a virtual public workshop to present findings of the full statewide assessment of water quality conditions, including the draft impaired waters List. During the workshop, DEM representatives described the state's water quality assessment

process, general findings of this assessment including new waterbody impairments added to the impaired waters list and the proposed removal of others. The state's priorities for completing the federally mandated water quality restoration studies were also discussed.

DEM's Office of Water Resources biennially assesses the quality of the state's surface waters by comparing available monitoring data against the state's established water quality criteria to determine whether the waters are suitable for such uses as swimming, fish/shellfish consumption, and aquatic life. The results of this assessment are presented in the state's Integrated Water Quality Monitoring and Assessment Report (Integrated Report), which documents the overall quality of the state's waters. It includes a five-part Integrated List which provides available information on each of the state's lakes, ponds, rivers, streams and estuarine waters. The process of conducting the assessment is documented in the Consolidated Assessment and Listing Methodology at:
<http://www.dem.ri.gov/programs/benviron/water/quality/pdf/calm20.pdf>.

As part of the process, DEM identifies those surface waters that do not meet water quality criteria for which a water quality restoration study known as a Total Maximum Daily Load (TMDL) is required in accordance with the federal Clean Water Act. These impaired waters are placed on the state's 303(d) List, which also establishes a schedule for development of the federally mandated studies. The 2018-2020 303(d) list is included in the state's Impaired Waters Report, available on-line on DEM's website at:
<http://dem.ri.gov/programs/benviron/water/quality/pdf/iwr1820.pdf>

For information on DEM programs and initiatives, visit www.dem.ri.gov. Follow us on Facebook at www.facebook.com/RhodeIslandDEM or on Twitter (@RhodeIslandDEM) for timely updates.

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Pollution

3 Major R.I. Waterbodies Show Signs of Improvement

March 01, 2021

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Investments made by the Narragansett Bay Commission to address combined sewer overflows eliminated a significant volume of sewage and stormwater that previously entered upper Narragansett Bay. (Frank Carini/ecoRI News)

By ecoRI News staff

The Environmental Protection Agency (EPA) has approved Rhode Island's recommendations to remove impairments

from parts of three waterbodies from the federal agency's list of impaired waters.

As a result of stringent permitting and long-term investments in pollution abatement infrastructure and practices, segments of upper Narragansett Bay, Mount Hope Bay, and the Blackstone River now meet water-quality standards, according to the Rhode Island Department of Environmental Management (DEM).

Every state, tribe, and territory are required under the federal Clean Water Act to assess and report on the condition of its waters. As part of the process, DEM identifies those surface waters that don't meet water-quality criteria and requires the development of a restoration study. The state agency also recommends waters or impairments that should be removed from the list because they meet water-quality standards.

Segments of three major Rhode Island waterbodies have demonstrated significant improvements, according to DEM. The following is a look at the waterbodies removed from the state's 2018-2020 impaired waters list:

Portions of upper Narragansett Bay

The investments made to address combined sewer overflows from the Narragansett Bay Commission (NBC) sewer system have resulted in increased shellfish

harvesting opportunities in the upper bay, according to DEM.

In 2017 DEM lifted rainfall-related shellfishing restrictions on one portion of upper Narragansett Bay that had been in place for more than 70 years. The completion of Phases I and II of the NBC's **combined sewer overflow (CSO) project** eliminated a significant volume of sewage and stormwater that previously entered the upper bay via the Providence River.

The resulting improvement in water quality has allowed the area previously identified as Conditional Area B by the DEM shellfishing program to operate on an approved status and Conditional Area A to close at 1.2 inches of rainfall vs. 0.5 inches since May 2017. DEM said it expects further improvements in water quality once Phase III of the CSO project is completed.

Mount Hope Bay^[1]_[SEPI]

In 1996 DEM included Mount Hope Bay on its impaired waters list because of the sharp decline in the number and diversity of fish associated with operations of the Brayton Point Power Station in Somerset, Mass.

DEM's Division of Marine Fisheries conducted a review analysis of historical and recent available Mount Hope Bay and Narragansett Bay finfish data to evaluate abundance and species composition prior to

and after construction of the power plant's cooling towers. The analysis showed that the large reduction in water withdrawn from and heat discharged to the bay was followed by a realignment of the Mount Hope Bay finfish community with that of Narragansett Bay.

Blackstone River^[1]_[SEP]

The impairments were identified in 1996 (dissolved oxygen) and 1998 (total phosphorus) from extensive monitoring, which led to stringent phosphorus limits at five wastewater treatment facilities (WWTF) in Rhode Island and Massachusetts.

Continuous dissolved oxygen data collected in 2017 and documentation of phosphorus reductions at the WWTF plants and data collected in the river during the past 10-15 years showed a significant drop in phosphorus levels, according to DEM. The data show that TP and DO are no longer impairments for the Rhode Island portion of the Blackstone River, protecting aquatic life.

In October, DEM held a [virtual public workshop](#) to present findings of the full statewide assessment of water-quality conditions, including the draft impaired waters list. The agency's Office of Water Resources biennially assesses the quality of the state's surface waters by comparing available monitoring data against the state's established water-quality criteria to determine whether the waters are suitable for

such uses as swimming, fish/shellfish consumption, and aquatic life.

The results of this assessment are presented in the state’s Integrated Water Quality Monitoring and Assessment Report, which documents the overall quality of the state’s waters. It includes a five-part integrated list that provides information on each of the state’s lakes, ponds, rivers, streams, and estuarine waters.

As part of the process, DEM identifies those surface waters that don’t meet water-quality criteria for which a restoration study known as a Total Maximum Daily Load (TMDL). These impaired waters are placed on the state’s 303(d) list.

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richard pastore

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So in 1970 EPA was formed under the Nixon administration and two years later congress passed the Clean Water Act... and we were off and running. The industrial age beginning at the turn of the century used the surface waters of the state as receptacles for domestic and industrial waste ranging from sewage to tinuvin from Ciba-geigy. Inorganic toxicity (heavy metals & chemicals), low dissolved oxygen, eutrophication (overabundant algal growth) etc combined to murder the water quality of the Bay, north of Prudence Island. Under the Clean Water Act congress allocated massive amounts of funds to assist the states and localities in remediating pollution. Construction grants for sewage treatment, Clean Lakes Program for fresh water impoundment improvements, along with years of pollution assessment and remediation planning through a number of other mandates of the CWA. Ultimately the states were delegated to administer the CWA (among other EPA programs). In a very short sighted move much of the Federal grant funding ended

around the 1980s to be replaced by Federal loan programs which greatly slowed clean up efforts. (Interesting how we can spend money to build stupid walls now-a-days but didn't want to continue successful pollution abatement funding back then).

Regardless here we are in 2021. After almost 50 years and the efforts of the Feds and the locals (DEM and the Narragansett Bay Commission) in addition to a lot of public funds in the form of state wide bonds and rate payer charges, we are acknowledging the success of all those efforts. Well good for us. (EPA Region I 1974-1988)

Featured



State Lawmakers Question Handling of Seekonk River Oil Spills

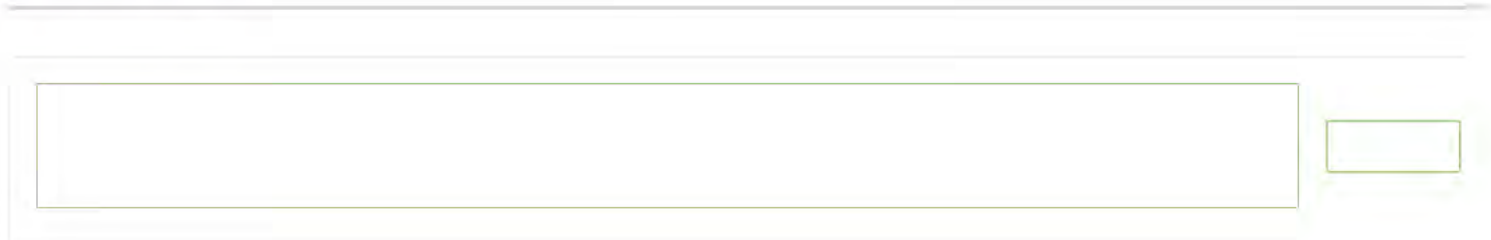


Oil Spilled Into Seekonk River from Pawtucket Brownfield Project



Industrial Agriculture to Blame for Harmful Ammonia Deposition in Narragansett Bay, New Study Finds

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Narragansett Bay Commission Staff Recognized for Excellence in Clean Water & Environmental Services

Thursday, March 11, 2021

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The Narragansett Bay Commission's (NBC) two wastewater treatment facilities, financial staff, and three NBC employees have received awards for excellence from the Rhode Island Clean Water Association.

"Rhode Island is a better place because of these environmentalists and these clean water facilities," said NBC Chairman Vincent Mesolella. "The dedication of the staff and the excellence of our water treatment mean that Narragansett Bay is cleaner than it has been in 150 years and that the next generation will have a beautiful bay and rivers to enjoy."

The NBC's Field's Point Wastewater Treatment Facility in Providence received the Gold Award from the Rhode Island Clean Water Association (RICWA) for perfect permit compliance for two consecutive years and Joseph Mattera Safety Award which recognizes exemplary effort in employee safety.



Nora Lough

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The NBC's Bucklin Point Wastewater Treatment Facility in East Providence also received the Gold Award for two consecutive years of permit compliance.

In addition, Paul Desrosiers, NBC's Technical Advisor for Operations, received the Carmine J. Goneconte Operator of the Year Award. This award from RICWA recognizes Desrosiers for demonstrating the highest level of leadership and performance in wastewater operation. The award honors Carmine Goneconte, who served the NBC and the State of Rhode Island for over three decades as the Operations Manager at both the Fields Point and Buckland Point Facilities.



Vin Mesolella, chair of NBC

RICWA honored NBC's Biologist II Nora Lough with the Clair N. Sawyer Award, which recognizes those who have given truly outstanding service in one or more of the following aspects of the wastewater industry; university teaching, operator training, research, application of innovation to improve the water environment and the development of technical publications that advance the knowledge of wastewater practitioners. The award honors Dr. Clair N. Sawyer who served New England, the nation, and the world as a professor, consultant and technical author, who pioneered many innovative concepts in wastewater treatment technology.

Laboratory Manager Walter Palm received the Crystal Crucible Award from the New England Water Environment Association, which recognizes and honors individuals for their outstanding contributions that promote increased professionalism in the wastewater laboratory field. Among many other activities, Walter was honored for his role in educating, training, participating on laboratory committees, and serving as a judge in the laboratory category during the annual Wastewater Operator's Challenge.

Finally, NBC received its nineteenth consecutive Distinguished Budget Award with Special Capital Recognition and Special Performance Measure Recognition from the Government Finance Officers Association (GFOA). The award recognizes outstanding budget documents that incorporate policy, finance, operations, and communication.

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Narragansett Bay Commission Elects Mesoellella for 30th Term as Chairman

Wednesday, April 07, 2021

GoLocalProv News Team

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The Board of Commissioners of the Narragansett Bay Commission have voted unanimously to reaffirm its current slate of officers: Chairman Vincent Mesoellella, Vice Chairman Angelo Rotella, and Treasurer Robert Andrade. 2021 marks Mesoellella's 30 years at the helm of the internationally recognized clean water agency.

"The accomplishments of the Narragansett Bay Commission and this Board is an extreme source of pride for me, as I know it is for all of us," Mesoellella said upon the vote. "I thank you, for the thirtieth time, for the confidence you have bestowed upon me. Together, this Board and this Commission has made Rhode Island a better place and we will continue on that mission."

During Mesoellella's leadership, NBC has been named twice a Utility of the Future and received numerous national and regional awards for operational, managerial, and fiscal excellence as well as for community engagement and environmental education.



Vin Mesoellella - chair of NBC for 30 terms

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In addition, the agency has established itself as a leader in renewable energy, with approximately 80% of its annual energy needs met by NBC-owned renewable sources, such as wind, solar, and biogas.

In the 1990s, as Mesoilella assumed the Chairmanship, the NBC embarked on a comprehensive three-phase plan to deal with Combined Sewer Overflows (CSO), which has resulted in significant improvement in water quality in Narragansett Bay and great enhancements in both bathing beaches and the shellfishing industry. The final phase of the CSO project started construction in 2021

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BUSINESS FOOD & DRINK

McKee administration launches business assistance tool that helps those who want to open a restaurant in Rhode Island

Business assistance tool provides step-by-step guide for those who want to open a restaurant

by **Ryan Belmore**
May 4, 2021





Governor Dan McKee, in partnership with the RI Department of Business Regulation (DBR) and Rhode Island Commerce, today announced the launch of a new website which helps users navigate how to open a new restaurant in Rhode Island.

“Small businesses and especially restaurants are not just the backbone to our economy, but important places in our community,” said Governor Dan McKee in a statement. “We know that Rhode Island small businesses have been hit very hard during this pandemic and we hope this website will help spur more businesses, more entrepreneurship, and more jobs for our state.”

The website, <https://openarestaurant.commerceri.com>, provides a general overview and road map of how to navigate entrance into the restaurant industry, including guiding users through obtaining necessary local and state permits and



Despite the challenges of the COVID-19 pandemic, Rhode Island once again broke a new record of registered businesses, with more than 10,000 new businesses registered with the Secretary of State's office last year, an 11% increase from 2019. The state has set a new record of business registrations every year since 2015.

“We created this to help entrepreneurs who enter the foodservice business, even if they didn't know quite where to begin,” said DBR Director Liz Tanner in a statement. “This one-stop resources comes as a result of cross-collaboration throughout the state agencies and we are thankful for all of their participation and cooperation.”

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The site comes as a result of partnership through many organizations and across many state and local government agencies, quasi-state agencies, and trade associations. In addition to DBR and Commerce, these agencies include: the RI Department of Health, RI Department of Environmental Management, RI Department of Labor and Training, RI Department of Transportation, RI Department of State, RI Division of Taxation, Office of the State Fire Marshal, RI Coastal Resources Management Council, the Narragansett Bay Commission, City of Pawtucket, and the RI Hospitality Association.

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RYAN BELMORE



Ryan Belmore is the Owner and Publisher of What's Up Newp. He was born and raised in Rhode Island and graduated from Coventry High School. He serves as Vice President of Fort Adams Trust and serves on the Board of Directors for Potter League for Animals. Ryan also is currently the Senior Editor - North America for Mountain News, publisher of OnTheSnow. Ryan is a member of Local Independent Online News (LION) Publishers and North American Snowsports Journalists Association (NASJA).

More by Ryan Belmore

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SPORTS

Fishing Report: Council recommends quahog digs in Providence River

By **Dave Monti** Special to The Journal

Published 6:53 p.m. ET May 6, 2021

The Providence River has been too polluted to dig quahogs in areas north of Conimicut Point, but a portion of the lower river may soon open as a "conditional" shellfishing area.

On Monday night, the Rhode Island Marine Fisheries Council recommended that the lower portion of the Providence River from Conimicut Point to Gaspé Point in Warwick change from a "prohibited" to a "conditional" area. The lower portion of the river is now clean enough to be open on a conditional basis.

The challenge writing about this topic is that some members of the public will take this news too enthusiastically and fish there whenever they want to shellfish, which is illegal. The truth is that if the Fisheries Council recommendation is approved by Janet Coit, director of the Department of Environmental Management, the new conditional area will be open just a total of 27 days in spring and summer.

Conditional areas are subject to closures after heavy rain events. If closure occurs, the next approved day on the calendar will be open until all 27 days of fishing are allowed to occur. Recreational anglers will have to check daily if the new conditional area is open, as it will be illegal to fish there on most days.

Congratulations to the DEM, the RI Shellfisherman's Association, Save the Bay, the Narragansett Bay Commission and all who worked hard for many years to make the lower Providence River clean enough to quahog. It is a great day for clean water, a clean Bay and those fishing for quahogs.

Quahog Week is May 17-23

Quahog Week is the perfect way to celebrate the quahog. The weeklong celebration highlights restaurants, markets, fisherman and food-based businesses committed to growing Rhode

Island's local food economy with a special focus on quahogs.

Throughout Rhode Island, participating restaurants and markets will feature quahog-based dishes and specials during Quahog Week.

Visit www.dem.ri.gov/riseafood/news.php for a sample of the mouth-watering menu items and specials to be offered during Quahog Week.

Learn how to fly-fish

Join the Rhode Island DEM on Saturday, May 22, from 9 a.m. to 3 p.m. to learn about the equipment you will need to fly fish, how to tie a fly, how to properly cast a fly line and then how to fish a pond stocked with trout. Equipment, materials and a box lunch provided. Families with children 10 and older are invited to participate. Space limited, registration required, fee is \$15 a person. Contact Kimberly Sullivan to register at kimberly.sullivan@dem.ri.gov.

Marine Fisheries Council highlights

The Rhode Island Marine Fisheries Council met May 3. The council makes commercial and recreational fishing regulation recommendations to the director of the DEM, Janet Coit, for consideration as regulations.

In addition to the items above, highlights included the recommendation of three new members to the Shellfish Advisory Panel — Dennis Erkan of West Kingston, a retired marine biologist; Chris Sperry of South Kingstown, a recreational shellfisherman and fin fish angler; and Cameron Ennis of Charlestown, an attorney and executive director of the Ocean State Aquaculture Association.

A continuation of the Quonochontaug Pond oyster moratorium and approval of the RI Saltwater Recreational Fishing License program 2020 Report was recommended by the council. Saltwater licenses increased by 9,000 in 2020 for a total of 57,732. A review of projects completed in 2020 and planned expenditures/projects for 2021 are included in the report. Projects this year will include work on the Westerly Main Street boat ramp, stock assessment support, continued recreational angler intercept interview support and the maintenance of existing boat ramps.

Where's the bite?

Striped bass. I caught (very) small school bass in Greenwich Cove Sunday and will try again Thursday night. Dave Henault of Ocean State Tackle in Providence said: "Anglers have been catching larger school bass with a keeper caught Saturday night in the Seekonk River." "School striped bass are in the Pawcatuck River, coves and estuaries but no reports of multiple keepers being caught," said Mike Wade of Watch Hill Outfitters in Westerly. John Littlefield of Archie's Bait & Tackle in Riverside said: "No reports of keepers, but anglers are catching school bass from shore at Sabin Point and along Veterans Memorial Parkway, East Providence."

Tautog. "Tautog fishing picked up this weekend with large keepers caught by Capt. BJ Silvia of Flippin-Out Charters and Billy Silvia reached his commercial 10-fish limit this week, fishing the mouth of Bristol Harbor," said Henault. "Things are slow here with tautog," said Mike Wade of Watch Hill Outfitters in Westerly. "The Connecticut season started and there were no fish, as the water was too cold."

Squid fishing. The squid are in and on the move in Hyannis, Jamestown, Newport and the Sakonnet River. "It is often hit or miss as squid are constantly moving," said Henault. Wade said: "Squid fishing has exploded. We have squid in Galilee, Goat Island [Newport] and down here out in front of Westerly and off Stonington."

Freshwater fishing has been steady as the water was cold but now as it is warming, both the trout and largemouth bass bite are good," Wade said. Henault reported: "The largemouth bass bite has been good for customers at Olney Pond, Lincoln; Stump Pond, Coventry; and Turner Reservoir, East Providence." Littlefield said: "Lincoln Woods is producing trout for customers as well as Willet Avenue Pond, Riverside, as they restocked the pond last week. One of my young customers caught a 3- and a 5-pound largemouth bass at the Grist Mill Pond."

Dave Monti holds a captain's master license and charter fishing license. He serves on a variety of boards and commissions and has a consulting business focusing on clean oceans, habitat preservation, conservation, renewable energy, and fisheries related issues and clients. Forward fishing news and photos to dmontifish@verison.net or visit www.noflukefishing.com.

● **BREAKING** STATEWIDE MASK MANDATE FOR K-12 SCHOOLS WILL BE LIFTED FEB. 28, BAKER SAYS

BREAKING: STATEWIDE MASK MANDATE FOR K-12 SCHOOLS WILL BE LIFTED FEB 28, BAKER SAYS

RI POLITICS

Central Falls Mayor Rivera delivers first budget address

Budget proposal calls for no tax increases, a \$50,000 Affordable Housing Fund, and speed cameras

By [Edward Fitzpatrick](#) Globe Staff, Updated May 10, 2021, 5:31 p.m.





Central Falls Mayor Maria Rivera JONATHAN WIGGS/GLOBE STAFF

CENTRAL FALLS, R.I. — Central Falls Mayor Maria Rivera delivered her first budget address on Monday, outlining priorities in a \$19.3 million spending plan for fiscal year 2022. This city of about 19,500 people has been hard hit by the pandemic, but Rivera said, “This is our season of overcoming.”

 City of Central Falls, RI · Folk Share

“Presenting a city budget that does not put more financial pressure on our residents was top of mind for me. As I went door-to-door to visit residents and businesses, I

heard our community loud and clear to hold the line on taxes. I am pleased to report that this – my first city budget as Mayor – includes no tax increases! During this pandemic, I know even a small increase could mean the difference between a family being able to cover a necessity, like rent. This decision was... [See more](#)

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10

Here are six takeaways from her short speech, [which was shared via Facebook Live](#):

No tax increases. “As I went door-to-door to visit residents and businesses, I heard our community loud and clear to hold the line on taxes,” Rivera said. “During this pandemic, I know even a small increase could mean the difference between a family being able to cover a necessity like rent.”

Funding for COVID-19 programs continues. “If you live in our city, please help us by encouraging your neighbors and loved ones to get vaccinated. We will continue to make this process easy and accessible,” Rivera said. “This budget continues our necessary work for COVID vaccines, testing, and steps to keep our public buildings sanitized and safe. This virus has taken too much from us already, and we must do all we can to rid it from our community once and for all.”

Affordable Housing Fund forming. “I am launching and investing \$50,000 into a new Affordable Housing Fund,” Rivera said. “Our recent three-day housing summit identified more than a dozen housing projects that can directly create jobs and develop safe, affordable housing for our residents. This is just the beginning of this necessary work.”

Plans brewing for a community center. “Together with Congressman (David) Cicilline, we have outlined a vision for a new community and senior center – something our city has been without for a decade,” Rivera said. “The lack of this community center has been challenging on many fronts, including making our vaccine distribution efforts more difficult. I hope to share details with you on this

exciting investment in the very near future.”

Speed cameras coming. “One of the most common complaints I hear from residents time and time again is regarding speeding,” Rivera said. “To stop this in our neighborhoods, we’ll be installing new speed cameras to directly address this concern, and lay out a clear plan for introducing these. All of our residents deserve safer streets to drive, park, and walk on.”

Input sought on federal funding. “As we begin receiving federal recovery dollars, I am putting together a community-based advisory committee to support the efficient use of the funds,” Rivera said. “I am looking forward to our community helping us identify important ways to spend this money like working with our parks and recreation department to identify a project for our community.”

Looking to transfer sewer system. “As an older city, our infrastructure is also older. Though we are part of the Narragansett Bay Commission, most of the sewer lines are the city’s responsibility, with costly repairs happening on an as-needed basis,” Rivera said. “Together with Representative Joshua Giraldo and Senator Jonathon Acosta, we have started to lay the foundation to transfer ownership of deteriorating sewer infrastructure to the Narragansett Bay Commission.”

Edward Fitzpatrick can be reached at edward.fitzpatrick@globe.com. Follow him on Twitter [@FitzProv](https://twitter.com/FitzProv).

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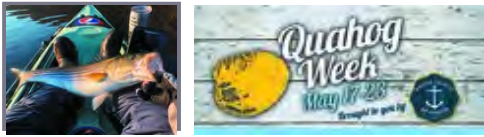
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Kayak fishing basics and more



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SPRING STRIPERS FROM A KAYAK: learn kayak fishing basics and more from Todd Corayer of Wakefield, RI, expert kayak fisherman and fishing writer, May 24 at a RI Saltwater Anglers Association online seminar.



Posted Thursday, May 13, 2021 1:00 am

By CAPTAIN DAVE MONTI

I have always felt privileged to interview Rhode Island's best fishermen and charter captains and then write about the expert fishing strategies and tactics they relate. Todd Corayer, a great fisherman and award winning fishing writer, is one of those Rhode Island fishing experts.

This month Corayer will share his kayak fishing expertise at a Rhode Island Saltwater Anglers Association (RISAA) online seminar. He has fished with his kayak throughout the region and his fishing writing appears in newspapers in Rhode Island, On-the-Water magazine, as well as radio, TV and podcast fishing reports.

On Monday, May 24, 7 p.m. Todd will speak about "Four seasons of Kayak Fishing." Visit www.risaa.org if you are interested in attending. He will share how to properly rig a kayak for fishing, water safety as well as rods, flies, lures and electronics you might want to consider.

RISAA members attend free. Non-members are welcome with a \$10 donation to the RISAA Scholarship Fund. For information contact Steve Medeiros, president, at 401.826.2121 or steve@risaa.org. Quahogging in lower Providence River one step closer

The Providence River has been too polluted to dig quahogs in areas north of Conimicut Point, however, a portion of the lower river may soon open as a "conditional" shellfishing area.

Monday night the Rhode Island Marine Fisheries Council (RIMFC) recommend that the lower portion of the Providence River from Conimicut Point to Gaspe Point, Warwick change from a "prohibited" to a "conditional" area. The lower portion of the River is now clean enough to be open on a conditional basis.

The challenge writing about this topic is that the some members of the public will take this news too enthusiastically and fish there whenever they want to shellfish which is illegal. The truth is that if the RIMFC recommendation is approved by Janet Coit, Director of the Department of Environmental Management (DEM), the new conditional area will be open just a total of 27 days in spring and summer.

Conditional areas are subject to closures after heavy rain events. If closure occurs the next approved day on the calendar will be open until all 27 days of fishing are allowed to occur. Recreational anglers will have to check daily if the new conditional area is open as it will be illegal to fish there on most days.

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Visit www.dem.ri.gov/riseafood/news.php (<http://www.dem.ri.gov/riseafood/news.php>) for a sample of the mouthwatering menu items and specials being offered during Quahog Week.

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Where's the bite?

Striped bass. Mike Hallowell of the Tackle Box, Warwick, said, "We had a customer catch a 40-inch striped bass off Godard Park using an SP Minnow floating lure. And, the school bass bite has intensified too." Sam Toland of Sam's Bait & Tackle, Middletown, said, "We had two fish caught off 2nd Beach, Middletown in the 32-inch range but for now most of the fish are school size." "Bass fishing is just starting to pick up with some keepers being caught but fish are still small," said Dave Henault of Ocean State Tackle.

Tautog. "Some customers are catching very large fish ready to spawn with many of them being releases by customers. The bite is on at Fort Adams and other places along the Bay coast," said Sam Toland of Sam's Bait. Other anglers are reporting a number of fish to 19 inches being caught with a lot of shorts mixed in. Expert catch & release tautog angler David Garzoli said, "Launched out Wickford Sunday and bounced around between Prudence, Newport and Jamestown. Picked up 19 tog in 15-40 feet of water. 25 feet being the most productive. Nine keepers to 19 inches. All tagged and released. Fish bit Asian and green crabs. Jigs and rigs." Dave Henault of Ocean State Tackle said, "The tautog bite is just starting to pick up out in front of Newport, but the bite in the Bay remains strong." Ken Ferrara of Ray's Bait & Tackle, Warwick said, "Tautog are all over the Bay both Asian and green crabs are working for anglers."

Squid. Dave Henault of Ocean State Tackle said, "The boat bite for squid subsided this weekend but the shore bite continues with small squid instead of the larger squid caught for the past couple of weeks. This is a good sign as the fluke usually follow the smaller squid runs." Sam Toland of Sam's said, "Squid fishing this weekend was hit or miss at the bridges and off the Goat Island Causeway, Newport."

Freshwater largemouth bass bite remains strong with minnows and artificial worms. Henault of Ocean State said, “Stump Pond in Smithfield, Turner Reservoir in East Providence and even Only Pond at Lincoln Woods continue to yield some nice largemouth bass for customers.”

Dave Monti holds a captain's master license and charter fishing license. He serves on a variety of boards and commissions and has a consulting business focusing on clean oceans, habitat preservation, conservation, renewable energy, and fisheries related issues and clients. Forward fishing news and photos to dmontifish@verison.net or visit www.noflukefishing.com (<http://www.noflukefishing.com>).

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Johnston High School Basketball

Good Afternoon Johnston High school families this is Dr. DiLullo. This evening the Johnston High School boys basketball team was scheduled to play Pilgrim High School in Warwick. Unfortunately, we have learned that a few of our students had planned on attending the game with the intention of harassing the Pilgrim community. Recently, that school lost its longtime and much beloved Principal to the COVID virus. Some of our students have posted very negative images of that principal which has caused outrage in the Pilgrim community. Our understanding of the plan for tonight's game was for students to wear black to mock the funeral of this individual. To maintain the safety of all, this game was postponed to a later date. Our students are in danger of losing the opportunity to attend games not only in the Warwick community but in other communities as well because of the poor behavior of a few spectators. Parents, please discuss this behavior with your

(/stories/johnston-pilgrim-hoops-shut-down-after-

social-media-exchange,171267)

Johnston-Pilgrim hoops shut down after social media exchange (/stories/johnston-pilgrim-hoops-shut-down-after-social-media-exchange,171267)

The Pilgrim and Johnston High School boys basketball teams were set to square off for an evening match in Warwick on Tuesday, but that afternoon, the game was postponed due to ...

The Providence Journal

LOCAL

Quahogging in the Providence River to open for the first time in 75 years



Alex Kuffner

The Providence Journal

Published 5:54 p.m. ET May 14, 2021 | Updated 8:12 a.m. ET May 17, 2021

WARWICK In yet another sign that the waters in and around Narragansett Bay are cleaner than they have been in generations, state regulators are opening up an area in the lower Providence River to quahogging for the first time in at least 75 years.

Staff at the Rhode Island Department of Environmental Management combed through records going back that long and could find no evidence of shellfishermen being allowed in waters as far north.

“In that time, there was never any shellfishing allowed,” said Angelo Liberti, chief of surface water protection for the DEM. “That’s the huge news here.”

More: Narragansett Bay is changing forever. Here's why one fish is never coming back.

More: Winter flounder, a Rhode Island favorite, are vanishing from the Bay

The opening announced on Friday at the kickoff event for the state’s annual Quahog Week comes on the back of major improvements in water quality in the Bay that have allowed the DEM to gradually allow more shellfishing further up the Bay. The latest move expands access to about a third of the Providence River.

“After decades of being overwhelmed by untreated raw sewage after rainfall, today Narragansett Bay is cleaner and healthier than ever,” said DEM director Janet Coit. “It’s really exciting progress and it’s because of strong laws, strong implementation, strong enforcement and many, many, many millions of dollars of investment.”

What's changed to make the Providence River cleaner?

The expansion of shellfishing in the Bay is a direct result of advances in how stormwater is being managed in Providence and other cities in the state's urban core. If enough rain falls in a short amount of time, tainted runoff can overwhelm old stormwater infrastructure. Sometimes mixed with untreated sewage, it washes through storm drains into the Bay and its tributaries, potentially contaminating shellfish beds.

In 2008, the Narragansett Bay Commission, which operates the largest wastewater treatment system in Rhode Island, completed a 3-mile-long combined sewer overflow tunnel under Providence that captures polluted stormwater during heavy rains and stores it for treatment later. Six years later, smaller interceptor tunnels along the Woonasquatucket and Seekonk rivers were built to capture more runoff.

The final piece of the \$1.5 billion project, the costliest public works plan in Rhode Island history, is set to get underway this summer, with the construction of a second enormous tunnel, this one stretching 2.2 miles under the east bank of the Seekonk River in East Providence and Pawtucket.

The impacts on water quality so far have been dramatic. Bacteria levels in the Bay have dropped by 50 percent since the first two phases were completed, according to testing by the Bay Commission. The DEM has done its own tests that confirm the improvements.

In 2011, the agency first started relaxing its shellfishing rules, but the bigger changes came six years later when it removed the rain restrictions on about half the upper Bay and relaxed the restrictions on the other half.

What does it mean for commercial and recreational shellfishermen?

So Conditional Area B — waters that are north of the line from Warwick Point to Poppasquash Point in Bristol and south of the line from Rocky Point pier in Warwick to Colt State Park pier in Bristol — instead of closing after 0.8 inches of rain, now has no rain restriction.

And for Conditional Area A — which extends from the northern edge of Conditional Area B to the mouth of the Providence River — the rainfall trigger was raised from 0.5 inches to 1.2 inches in a 24 hour period.

The new 1,900-acre area in the lower Providence River, which runs north to a line between Gaspee Point in Warwick and Bullock Point in East Providence, will open at 8

a.m., May 26, but access will be tightly controlled for the foreseeable future.

It will only be open to quahoggers on 27 predetermined summer mornings this year. It will close if 0.5 inches of rain fall and remain off-limits for seven days afterward to allow any contamination to filter out of clams in the area.

Shellfishermen will only be allowed to harvest quahogs, or hard-shell clams, from the area, not mussels or soft-shell clams.

Despite the tight regulations, quahoggers see the opening as a milestone, allowing them into a new area that, because it was protected from harvest pressure for so long, is densely populated by clams.

“The Providence River, itself, is something we’ve been waiting for for some time,” said Michael McGiveney, president of the Rhode Island Shellfisherman’s Association. “We’re really hoping it can be a game-changer for our industry.”

He believes it can be the start of a push even further up into the river.

“We’re hoping that we can keep heading north,” he said.

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Pawtucket's Heon Named "Environmental Educator of the Year" by Narragansett Bay Commission

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The Narragansett Bay Commission (NBC) has named Kimberly Heon, a second-grade teacher at Agnes Little Elementary School, as its 2020-2021 NBC Watershed Explorer Environmental Educator of the Year.

The NBC's Watershed Explorers program provides hands-on water quality education to students in grades 2-5.

Heon, a 30-year veteran of the Pawtucket system, has participated in the NBC's Watershed Explorer program for over fifteen years, engaging her students in hands-on water quality science and weaving important environmental lessons into other parts of her curriculum to reinforce her students' knowledge of key environmental science concepts.

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NBC Environmental Education Coordinator Cynthia Morissette presented Heon with the inaugural award during Teacher Appreciation Week.

"I am extremely proud to present the first NBC Watershed Explorer Educator of the Year Award to Mrs. Heon," Morissette said. "She is an exceptional educator who works tirelessly to create the most comprehensive educational experiences for her students. Her compassion and dedication, ensuring that all students love learning is what makes her so special."

Over the last year, even with all the difficulties and challenges of distance learning, Heon continued to support the Watershed Explorer Program. Her students' involvement with NBC remained strong through virtual lessons, conducting water testing, building models of a watershed, learning about macroinvertebrates, and creating informational posters about a variety of water-dependent critters.

"I am a proud graduate of Pawtucket Schools- attending Baldwin Elementary, Slater Junior High School and Shea Senior High School," remarked Heon. The University of Rhode Island graduate says her favorite subject to teach is

Science, and over the past year, he and her student have virtually followed the progress of a Robin family, from nest making to fledgling and completed a virtual dissection of owl pellets in conjunction with the Audubon Society

"Mr Heon is a shining example of what every educator should strive to be," said Morissette as she delivered the award



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Kimberly Heon, a second-grade teacher at Agnes Little Elementary School

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The above video is just one example among countless others statewide of stormwater runoff gushing after a rainstorm. This scene at innumerable locations plays out every time it rains in Rhode Island, which, in this age of global heating, is happening with more intensity more frequently.

Besides rushing a smorgasbord of land-based pollutants into Rhode Island's marine waters, including Narragansett Bay, the state's economic crown jewel, stormwater runoff also exacerbates coastal erosion.

Stormwater runoff, like tidal action and storm surge, erodes waterways and increases coastal flooding. It is, among many other things, stressing the Ocean State's prized natural resource.

Narragansett Bay's 700 billion gallons of water cover 150 square miles, and its 1,700-square-mile watershed nurtures thousands of species of flora and fauna. This watershed, which is shared by Rhode Island and Massachusetts, also supports more than 2 million residents and attracts roughly 12 million tourists annually. Some 300,000 professionals and amateurs fish its waters every year, and more than 30,000 recreational boaters annually explore the bay and its many tributaries.

Estimates have suggested that the total value of the natural resources of the Narragansett Bay watershed — 60 percent of which resides in Massachusetts while 90 percent of its waters are in Rhode Island — exceeds several billion dollars annually. The bay's health is important, but it's threatened

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In Rhode Island, about 14 percent of the Narragansett Bay watershed is under streets, roofs, driveways and parking lots. These surfaces hurry stormwater containing bacteria (from animal and human waste), nutrients (from fertilizers), pesticides (from lawn and garden chemicals), petroleum byproducts and other fluids (from motor vehicles) and other contaminants into the bay when it rains.

The number of extreme precipitation events occurring annually in Rhode Island has doubled since 1914, according to the [Green Infrastructure Coalition](#). Since 1905, the amount of annual precipitation in Rhode Island has increased by 12 inches, mostly during non-summer months, according to the [University of Rhode Island/Rhode Island Sea Grant Climate Change Collaborative](#).

The result of this accumulating non-point pollution is toxic algae blooms, contaminated recreational waters, stressed infrastructure, closed beaches and shellfishing areas and lost money.

Within Rhode Island, impervious cover by municipality in the Narragansett Bay watershed ranges from 3 percent to 40 percent. When asphalt, cement and shingles cover between 10 percent and 25 percent, nearby streams show clear signs of degradation. When such cover is less than 10 percent, streams support a wide range of life. More than 25 percent impervious cover leads to impaired waters such as the Seekonk and Providence rivers.

Relentless development within the Narragansett Bay

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intense storms, will generate even more runoff in the future and at faster rates.

To address the problems associated with stormwater runoff, more rain needs to be absorbed into the ground. That means installing green infrastructure — rain gardens, rain barrels, and bioswales — and ripping up pavement.

Teresa Crean, a community planner and coastal management specialist with the Coastal Resources Center at URI, noted small-scale interventions, like planting trees and vegetative buffers and mowing grassy areas less, move the needle when it comes to better managing stormwater runoff.

While major enterprises, most notably the Narragansett Bay Commission's [three-phase combined sewer overflow project](#), have greatly reduced the amount of stormwater being discharged into Narragansett Bay, Crean said smaller, less expensive projects can accomplish plenty, including helping to engage stakeholders in an important but often overlooked issue. Smaller projects also empower communities to adapt.

“Those kind of projects add up and they get neighborhoods involved,” said Crean, who has been working with state and local officials and the public for the past dozen years on stormwater management and other coastal issues. “Taking up asphalt roads to nowhere and building rain gardens makes a difference.”

And Rhode Island, she noted, has a lot of asphalt and



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random patches of impervious surface are slowly being ripped up.



This kind of infrastructure, on River Road in Providence, quickly delivers stormwater runoff to the banks of coastal waters, in this case the Seekonk River, that exacerbates shoreline erosion. (Frank Carini/ecoRI News photos)

Antiquated infrastructure

Late last year the Green Infrastructure Coalition produced a video that highlighted some of the problems being caused by stormwater runoff along River Road in Providence. The road, which runs next to the Seekonk River, a tidal estuary that empties into Narragansett Bay, is part of a mini-watershed that includes York Pond, Blackstone Boulevard, Irving Avenue, Gulf Avenue and Loring Avenue. Much of the stormwater runoff from this area drains into Baileys Lower Cove.

Municipalities, including Providence, largely manage stormwater with outdated infrastructure practices —

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municipalities lack the staff and funding to maintain their aging stormwater infrastructure.

The most visual result of this lack of municipal attention is that unmaintained storm drains fill with sediment, which causes rain to back up, flooding streets, homes and businesses. But there are more-subtle implications.

The Green Infrastructure Coalition's 12-minute video features Wenley Ferguson, director of habitat restoration for Save The Bay, talking about some of the projects implemented and planned for this East Side mini-watershed to lessen the impacts of stormwater runoff.

She noted riprap was placed in one significant area along River Road to help alleviate the erosion of the Seekonk River's banks.

"We have a lot of stormwater coming down from Irving Avenue, where it joins with River Road, and that runoff comes down with such velocity that it literally has caved this bank away," Ferguson said. "There is a granite block wall all along the Seekonk River here and the velocity of that stormwater runoff over years and years of no management of the stormwater literally has caused this entire bank to collapse."

Before the city added that riprap a few years ago, this area where stormwater was pouring into the Seekonk River was a "complete gully," she said. The city is also working on repairing the granite wall that years of unmanaged stormwater has crippled

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address the volume of water that comes down and discharges at this point.”



This expanse of asphalt at the intersection of Irving Avenue and Loring Avenue on Providence's East Side drives stormwater runoff to the banks of the Seekonk River.

The plan, she said, is to reduce that volume by installing stormwater infiltration areas, such as bioswales, further up the River Road watershed.

Ferguson noted there also have been discussions about depaving parts of the wide, steep intersection where Irving Avenue, coming down from Blackstone Boulevard, meets up with Loring Avenue.

Ripping up pavement, like proposed for this area, creates three benefits when it comes to managing stormwater: slows the speed of runoff; allows for filtration into the ground; and creates more space to install bioswales and rain gardens.

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... and using the space where the pavement has been removed for stormwater infiltration. There's a lot of real estate here to manage the stormwater before it gets to that discharge that you saw where the erosion was occurring and there was literally no space to do any stormwater management."

Editor's note: The video is of a stormwater outfall pipe on Brownell Lane in Portsmouth that eventually empties into the East Passage of Narragansett Bay.

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Narragansett Bay Commission to break ground on massive new wastewater tunnel in Pawtucket

The new 2.2 mile long wastewater tunnel under Pawtucket will address pollution problems in the Seekonk & Blackstone Rivers as well as Narragansett Bay

June 16, 2021 1:29 pm by [Tim Studebaker](https://www.abc6.com/bios/tim-studebaker/)



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TOP VIDEOS



PAWTUCKET, R.I. (WLNE) – This Friday, workers are digging on a huge tunnel under the city of Pawtucket to deal with air pollution that makes it into Rhode Island. It's part of a project called the Combined Sewer

An advertisement for Wave's Home Equity Line of Credit (HELOC). The top part shows a person's hands holding a tablet that displays the Wave website with a HELOC offer. Below the tablet, there is a dark blue banner with white and yellow text. On the left, it says "HOME EQUITY LINE OF CREDIT (HELOC)". In the center, it says "as low as 2.49% APR** For the 1st 12 months". On the right, it says "With Wave's New Rates You Can Totally Own Your Own Home". There is a "SKIP" button in the bottom right corner of the video frame.

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Jamie Samons is the Public Affairs Manager for the Commission. She says the original wastewater systems in Providence, Pawtucket, and Central Falls were built in the 1800s. She adds, "At that time, it was common to have sanitary sewage from homes and businesses and storm water that came off of streets go into the same pipe."

This means that during big storms, dirty, polluted water would end up in area rivers.


Samons says, "In 1872, that was a great solution. In 1972, that became illegal under the federal Clean Water Act."

The modern solution: underground tunnels that could store the combined wastewater after a storm, giving treatment facilities time to clean it. It started with a 3-mile tunnel and some smaller pipes under Providence.

Samons says, "Those two phases have been so successful that you probably saw a couple of weeks ago, 1,900 acres of shellfishing grounds in the Providence River were opened that had been closed for 75 years. That's precisely why we do these projects."

On Friday, they'll break ground on Phase III, that new tunnel under the city of Pawtucket.

Samons says, "It's about 2.2 miles long and will eliminate the overflows that are currently going into the river."



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The new tunnel is also expected to improve water quality in the Blackstone River and Narragansett Bay.

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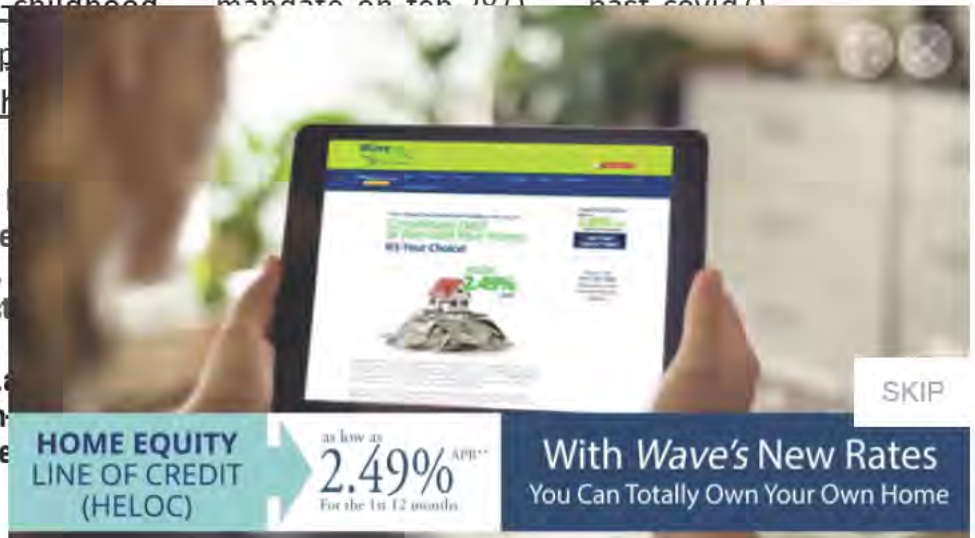
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VIDEO: Narragansett Bay Commission Breaks Ground on Historic \$800 Million Project

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The Narragansett Bay Commission officially broke ground on the Pawtucket Tunnel as a part of its RestoredWaters RI project on Friday.

The 2.2 mile-long, deep rock tunnel is the centerpiece of Phase III of the NBC's Combined Sewer Overflow (CSO) Project, which will enhance and protect the Seekonk and Blackstone Rivers and Upper Narragansett Bay.

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VIDEO: NBC Chairman Vin Mesolella Talks About Project ABOVE

RestoredWaters RI is the largest public works project in Rhode Island history

According to NBC, it will create 1,700 direct or indirect jobs, improve shellfishing and swimming beaches and create green space for public access

In 2019, Mesolella appeared on GoLocal LIVE where he talked about the environmental -- and economic -- impact [WATCH THAT VIDEO HERE](#)

About NBC

The Narragansett Bay Commission (NBC) owns and operates Rhode Island's two largest wastewater treatment facilities, treating over 30 BILLION gallons of wastewater each year.

The NBC has been recognized nationally and internationally for excellence, including being named a Utility of the Future in 2017 and 2020, being named a US Clean Water Success Story in 2020, and receiving five Excellence in Management Awards at the Platinum level from the National Association Clean Water Agencies



The project in Pawtucket on Friday Photo GoLocal

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Narragansett Bay Clean Water Project: Ground Broken In Pawtucket

A two mile tunnel will anchor Phase III of the NBC's massive initiative to keep wastewater out of the Seekonk and Blackstone Rivers.



Mary Serreze, Patch Staff

Post Feb 1 2021 at 2:02 pm ET Up at Feb 1 2021 at 2:20 pm ET

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RIDEM director Janet Coit and Narragansett Bay Commission Chairman Vincent Mesoella break ground on Phase III of the NBC's ambitious CSO project. (Mary Serreze/Patch)

PAWTUCKET, RI — Friday marked a historic day in a years-long effort to clean the waters of Narragansett Bay and the rivers that feed it.

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Dignitaries joined the Narragansett Bay Commission to break ground on the Pawtucket Tunnel — a 2.2 mile underground conduit that will gather wastewater and stormwater from Pawtucket and Central Falls. It will store the polluted water and feed it into the Bucklin Point Wastewater Treatment Plant in East Providence. The treated water will then be discharged.

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Let's go!

A who's who of environmental advocates and government officials gathered

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treatment plant. U.S. Sen. Sheldon Whitehouse, U.S. Rep. Jim Langevin, Pawtucket Mayor Donald Grebien, Central Falls Mayor Maria Rivera, and East Providence Mayor Bob DaSilva delivered remarks, while NBC chairman Vincent Mesolella served as master of ceremonies

Janet Coit, director of the R.I. Department of Environmental Management, made what will likely be her last public appearance in the Ocean State before heading to Washington D.C. to take a job in the Biden administration.

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"I couldn't have scripted a better way to close out my ten-and-a-half years serving the people of Rhode Island," Coit said. She said it has been gratifying to help clean up Narragansett Bay. She noted that the lower Providence River was opened to quahogging this year for the first time in 75 years. Coit thanked everyone, including the construction crews doing "dirty and dangerous work" to build the infrastructure.

Mesoella said before Phases I and II of the project, that 2 billion gallons of combined stormwater and raw sewage would enter the bay, and that at one point, the US EPA was levying fines in the amount of \$25,000 per day. Phase I was completed in 2008. He said that Phase III will dramatically reduce remaining pollution.

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Langevin and Whitehouse both said the project will support jobs, economic development, and the environment.

"The Narragansett Bay is the sparkling center of our state and vitally important to our economy," Whitehouse said.

"You can't be from Rhode Island without being pro-environment," said Langevin. "To quote Joe Biden, 'This is a big deal.'"



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The deep rock tunnel is the centerpiece of Phase III of the NBC's Combined Sewer Overflow (CSO) Project, a multi-year project to protect the Seekonk and Blackstone rivers from sewer overflow events. Such events typically happen during periods of heavy rain when wastewater treatment plants overflow. The overflows have polluted the Narragansett Bay for decades.

The tunnel itself is expected to take five years to complete, and boring is scheduled to begin in about two years. The tunnel will run along the east side of the river. Nine properties will be demolished to make way for the project, officials said.



The NBC's wastewater treatment plant at Bucklin Point

The NBC manages Rhode Island's largest wastewater treatment operation

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On a bright note for Pawtucket and East Providence, Mesolella — the Narragansett Bay Commission chairman — said a public park will be built near Bucklin Point when project construction is completed

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Narragansett Bay Commission to start work on Pawtucket Tunnel

By **Mary MacDonald** - June 18, 2021 6:04 am



THE NARRAGANSETT BAY Commission plans to begin the Pawtucket Tunnel phase of its Combined Sewage Overflow project on Friday. / COURTESY NARRAGANSETT BAY COMMISSION

PAWTUCKET – The Narragansett Bay Commission on Friday will begin construction of the Pawtucket Tunnel, a 2.2-mile, deep-rock tunnel that will form the third phase of its Combined Sewer Overflow project.

The tunnel will be designed to keep untreated wastewater from entering the Seekonk and Blackstone rivers, and then affecting the Upper Narragansett Bay.

The project, based at 804 School St., is part of the commission's Restored Waters RI program, according to a news release.

The project will involve more than 1,700 jobs and is one of the largest public works projects in the state's history, according to the Narragansett Bay Commission.

Mary MacDonald is a staff writer for the PBN. Contact her at MacDonald@PBN.com.



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The Providence Journal

LOCAL

Work begins on giant sewer overflow tunnel to protect Narragansett Bay



Alex Kuffner

The Providence Journal

Published 5:39 p.m. ET June 18, 2021 | Updated 8:29 a.m. ET June 19, 2021

PAWTUCKET It's known as the biggest construction project in Rhode Island that nobody ever sees.

But the impact of the decades long, \$1.5 billion effort to build a vast underground system to capture overflows of runoff and sewage before the tainted water reaches Narragansett Bay can be found in plain sight.

It's visible on a daily basis in the Bay's water, which is clearer than it's been in generations.

A more dramatic manifestation came last month when environmental regulators opened up shellfishing in the lower Providence River for the first time in at least 75 years. A fleet of quahoggers spent the morning raking for clams between Barrington and Warwick, plying their trade farther north than they'd been allowed in recent memory.

"Seeing people out there harvesting, in record time filling their buckets with beautiful, delicious Rhode Island seafood, what could be more visible and more tangible than that?" said Janet Coit, the outgoing director of the Rhode Island Department of Environmental Management.

The improvements are set to continue. Coit joined a host of other state officials and elected leaders Friday for the official groundbreaking of the third and final phase of the Narragansett Bay Commission's Combined Sewer Overflow project.

It's Rhode Island's Big Dig

Dubbed RestoredWaters RI, the CSO is the most expensive public works project in state history. And the work getting underway now construction of an enormous tunnel running

2.2 miles along the east side of the Seekonk River – is the costliest piece, with a price tag of \$836 million.

It will be the capstone to an effort that began in 2001 with the start of construction of a \$360-million, three-mile long, 26-foot-wide tunnel deep under Providence to store overflows. The second phase included construction, at a cost of \$187 million, of ancillary pipes to connect to the tunnel.

Work wrapped up on the first two phases in 2014. Since then, the commission had been finalizing the plan for the final phase, which would bring its system into full compliance with the federal Clean Water Act.

While the plan includes a host of smaller stormwater projects, including those that incorporate natural elements, the centerpiece is construction of the 30-foot-wide storage tunnel that will stretch from the Bucklin Point wastewater treatment plant in East Providence up the Seekonk and Blackstone rivers and into Pawtucket.

Workers started excavating the main drop shaft on the Pawtucket waterfront in April and are aiming to dig down 115 feet below the surface. A giant boring machine, set to arrive from Germany in a year, will be dismantled, lowered into the shaft and reassembled to start work on the main tunnel.

The commission, which operates the largest wastewater-treatment network in the state, serving 360,000 residents and 8,000 businesses, was once “recognized as the worst polluter in Rhode Island and maybe one of the worst in New England,” said its chairman, Vincent Mesoletta. After the first tunnel was completed, the difference was immediate.

How wastewater storage helps the Bay

Runoff from rains is considered one of the leading threats to the cleanliness of Narragansett Bay because it can carry bacteria that can close beaches and shellfishing beds and nutrients that can cause unhealthy algae blooms. In older combined systems, it can also mix with untreated sewage before being expelled from outfalls.

The first two phases of the project are able to capture about 60% of the stormwater that passes through the NBC system. The third phase is aimed at taking care of nearly all of the rest. The captured water is piped to treatment plants gradually, averting the rain-driven overloads that fouled the Bay's coastlines for generations.

Since the tunnel network went into use, it has diverted 12.5 billion gallons of untreated stormwater. Bacteria levels in the Bay have dropped by 50%, according to testing by the commission. The University of Rhode Island has also found that levels of nutrients had dropped to half of what they were in the 1990s.

“The Bay is the heart of our state. It’s the sparkling center of our state. It’s vitally important to our economy,” said U.S. Sen. Sheldon Whitehouse. “To see it get this kind of support is really outstanding.”

The Providence Journal

NEWS

Former DEM chief Janet Coit named to lead U.S. fisheries office



Alex Kuffner

The Providence Journal

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PROVIDENCE It's a rare thing for someone to occupy a Cabinet level position in state government under three different governors. But Janet Coit was able to do it, steering the Rhode Island Department of Environmental Management for a decade, the longest tenure of any director in the 44-year history of the agency.

Now, she's set to take a set of traits — diligence, diplomacy, likeability — that she used to great effect as Rhode Island's top environmental official to what will surely be a more challenging position on the national stage. On Monday, U.S. Secretary of Commerce Gina Raimondo, Coit's former boss in the Rhode Island State House, announced the selection of Coit to lead the National Oceanic and Atmospheric Administration's fisheries office.

More: Longtime head of state DEM leaving for Washington

Raimondo described Coit as a source of trusted counsel while she was governor and said she will bring a wealth of experience to what's also known as the National Marine Fisheries Service.

“Janet has dedicated her career to conserving natural resources, protecting our coastlines and environment and promoting local, sustainable agriculture and seafood,” Raimondo said.

Overseeing America's fishing policies can be a thankless job in the best of times. It's a position caught in the middle of a fishing industry that generally wants fewer restrictions and environmental advocates who generally argue for more.

But the work of the fisheries service is getting even harder as the agency is pulled into a brewing fight over coastal waters between fishermen and the developers of offshore wind farms.

Coit is no stranger to Washington politics. A lawyer by profession, she was a legal clerk in the Justice Department and the Department of the Interior, counsel for the Senate environment committee and environmental coordinator for both John H. Chafee and his son Lincoln in their Senate operations.

In a long interview last week, Coit wouldn't say much about the expectations for her new job in Washington as she waited for the official word to come down from the Commerce Department. But she was certain that offshore wind will be in the mix.

“That’s going to be such a hot-button issue that I’m heading into,” she said.

Hopes for collaboration on offshore wind

Coit has gotten a taste of the conflicts around the industry here in Rhode Island, which so far has seen more activity by developers than any other state. Over the last two years, the nation’s first two major offshore wind projects had to work out deals to compensate local fishermen for interfering with their livelihoods before state coastal regulators gave their approval.

Fisheries experts from the DEM were consulted on the first proposal from Vineyard Wind, and while fishermen weren't happy with the \$16.7-million offer from the Massachusetts-based project, an advisory board representing their interests signed off on the agreement.

The DEM scientists weren't involved in talks over the second project, the South Fork Wind Farm. Negotiations went down a more contentious path that still resulted in approval of a \$5.2 million compensation fund by the Coastal Resources Management Council, but without the backing of the Fishermen’s Advisory Board.

Coit doesn't go so far as saying that the DEM played the critical role in how the two sets of negotiations differed, but she does believe that input from nonpartisan fisheries experts can only help.

What she sees as an alternative to the rancor of recent proceedings is the more collaborative planning process, with input from fishermen, scientists and policymakers, that paved the way for the Block Island Wind Farm, the five-turbine project that was the first offshore wind farm in the nation.

“The use conflicts between offshore wind — which, to meet our clean energy goals, needs to be scaled up — and other ocean uses, primarily fishing, are the rubber meeting the road right

now,” Coit said. “What I think was important about the [Rhode Island process] and needs to be replicated at the federal level is sorting through these issues at the front end.”

'The hardest thing I've done'

Coit is no stranger to tough decisions about complex energy issues. As DEM director, she was one of three members of the state’s Energy Facility Siting Board when Chicago company Invenergy proposed building a \$1-billion fossil fuel-burning power plant in Burrillville.

Then-Governor Raimondo stood with the Invenergy CEO at the announcement of the proposal in 2015, promising its success. But while construction unions and business groups embraced the project, environmental groups derided it and Burrillville residents led a tireless campaign against it.

After a seemingly endless series of hearings and countless filings, the siting board voted unanimously against the application in 2019, ruling that the power plant wasn’t needed to meet New England’s energy needs, in part because of the development of cleaner sources of energy. Coit described the nearly four-year-long process as “probably the hardest thing I’ve done.” She sees the decision as an inflection point as the balance has tipped towards renewables.

The ruling was applauded by opponents, but leading up to the vote, she and the other members were excoriated by some for a perception that they were being too kind to Invenergy. Coit said she received threatening emails.

“At the end of the day, I actually think the process meant that people were listened to, issues were surfaced and dealt with thoughtfully,” she said. “And the outcome, I think, is a decision that stands up.”

Margaret Curran, the head of the Public Utilities Commission at the time who chaired the siting board, recalled the proceedings similarly, pointing to “emotion on both sides that was really directed at the board.” She was impressed by how Coit handled herself.

“If anything, I cherish the Invenergy experience because I got to work so closely with Janet,” said Curran, who is now a lawyer with the Conservation Law Foundation, a group that fought the project.

But Paul Roselli, president of the Burrillville Land Trust and a leader of the opposition, has a very different view. He doesn’t believe that the DEM did enough to illuminate the potential

negative impacts of the power plant on the watershed and local flora and fauna. He has little sympathy for Coit and other members of the board.

“Could have saved us all a lot of pain and suffering,” he said. “They put us through this nightmare.”

Criticism and plaudits

Folks in Burrillville aren't the only ones who aren't entirely happy with Coit or the job DEM has done under her guidance.

Save The Bay has repeatedly called out the agency for what it believes is a failure to adequately enforce environmental laws. The environmental group acknowledges that staffing constraints and budget cuts by the General Assembly have weakened the agency, but it questions why cases have taken so long to resolve. Exhibit A is RI Recycled Metals, the scrap-metal operation on the Providence River, which was first cited by the DEM for pollution nearly a decade ago but is still in operation today as its case winds through the courts.

And there are those that believe the Executive Climate Change Coordinating Council, the state government group known as the EC4 that Coit chaired, didn't do enough on the most pressing environmental crisis facing the world. One citizens group that assessed the council's work titled its report “Insufficient.”

On the first issue, Coit has always said she understands the frustration, but at least in regard to RI Recycled Metals, the issue is out of DEM's hands now and in the judicial system. More broadly, Raimondo requested additional enforcement staff in her budget proposals but never got legislative approval, Coit points out.

And in regard to climate policy, Coit said that also falls on the General Assembly. She said she was advocating behind the scenes for mandatory emissions-reduction targets long before Governor Dan McKee signed the Act on Climate this past spring.

Timmons Roberts, Ittleson professor of environmental studies and sociology at Brown University, said that in a way Coit was too good at her job. If someone less personable had been the public face of climate policy in Rhode Island, there may have been more pushback from citizens and advocates, he argues.

“She was very good at defending the governor's agenda,” said Roberts, a member of an advisory group to the EC4.

The environmental community is generally supportive of the work that Coit has done. The Rhode Island office of The Nature Conservancy — of which Coit was director before then Gov. Lincoln Chafee selected her for the DEM post in 2010 — has worked closely with her on dam removals to allow migratory herring to reach their spawning grounds along the Pawcatuck River and to build new access points to the water, such as the pier at Rocky Point. John Torgan, TNC's current director in Rhode Island, described Coit as “a force of nature.”

“While she was comfortable and capable running a large bureaucracy, she also made time to get out in the field digging clams, fishing, doing river clean ups, and being a voice for beautiful nature in Rhode Island,” he said.

Meg Kerr, senior director of policy for the Audubon Society of Rhode Island, applauded Coit for improving the DEM's reputation, upgrading state parks and advocating for climate action. And despite his organization's critique, Jonathan Stone, executive director of Save The Bay, said Coit's accomplishments “will benefit Rhode Islanders for generations to come.”

“Janet will be a stellar addition to the Biden administration as they work to solve the many challenges facing our oceans and fisheries,” said U.S. Sen. Sheldon Whitehouse.

Legacy on the environment

Coit, a 57 year old Barrington resident who is married with two grown children, is known to work long hours and be an exacting boss. She lugged reams of Invenergy filings to her family's cabin in the Adirondacks to pore over on weekends. She sent emails to staff deep into the night and before sunrise — and fired off texts to this reporter more than once suggesting corrections to stories.

But she has also always seen herself as a cheerleader, ready to offer a kind word and focus on the strengths of the DEM rather than its shortcomings. She spent her last weeks on the job doing what she loves best: spending time outdoors with DEM staff.

She went out on the research vessel John H. Chafee while the crew did a trawl survey of Narragansett Bay, part of a long-term monitoring project of the largest estuary in New England. She accompanied agency scientists to Napatree Point in Westerly one night when horseshoe crabs came ashore to mate.

“It's magical,” she said, of the latter experience. “There's a full moon. The waves are crashing around you.”

After pausing, she added, “It’s about honoring the work that DEM does.”

On Friday, her last day at work, she spoke at the groundbreaking for the final piece of a giant project to store and treat overflows of stormwater and sewage before they can reach the Seekonk River and the Bay. The celebration of the continuing cleanup of Rhode Island’s central water body — what she calls the biggest environmental success in the state — seemed a fitting ending to her time at the DEM. She devoted part of her time at the podium to recognizing the contributions of the people in the agency’s water office.

An avid reader, she’s in the middle of a biography of Alexander the Great, the king of ancient Macedon, and, with a laugh, said it’s giving her inspiration as she moves on to a new endeavor.

What does Coit see as her legacy? The historic improvements in water quality in the Bay that were largely driven by the DEM, certainly. The revitalization of the Woonasquatucket River corridor in partnership with community groups is another. And she’s proud of the revamping of Lincoln Woods, Colt and other state parks.

Walking away from the agency she’s led for so long will be difficult, but she’s confident that she’s leaving it in good hands. Terrence Gray, the DEM’s deputy director for the past three years, will take charge on an interim basis, and Coit hopes McKee will keep him on permanently.

“I’m just stepping into a river and stepping out of it,” she said. “This stuff is going to keep flowing.”

Aquaculture & Fisheries

Lower Providence River is Clean Enough to Quahog, and Fish are Fair Game, Too

June 23, 2021

By CAITLIN FAULDS/ecoRI News staff

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PROVIDENCE — Years of work and millions of dollars in investment are paying off for the Providence River, and with it, fishing and shellfishing opportunities have increased.

This spring the Rhode Island Department of Environmental Management (DEM) opened



In late May the Rhode Island Department of Environmental Management classified as 'conditionally approved' about 1,900 acres of the lower Providence River to shellfish harvesting. (DEM)

the lower third of the Providence River to quahogging on a conditional basis for the first time in more than 75 years. And experts say the river is clean enough to fish, too.

“This is a tremendous day for Rhode Island that many never thought possible,” DEM director Janet Coit said in a [statement](#) last month. “The opening of these new shellfishing grounds is the result of water quality improvements from decades of intense efforts to clean up the Providence River and Narragansett Bay.”

Quahogging in the Providence River — which forms at the confluence of the Woonasquatucket and Moshassuck rivers, is joined downstream by the Seekonk River and becomes Narragansett Bay past Conimicut Point and Nyatt Point — has been restricted as far back as records go because of water quality issues related to stormwater runoff, industrial pollutants and wastewater overflows.

Shellfish health “closely mirror[s] that of their water environment,” according to Annemarie Beardsworth, who spoke on behalf of DEM and the Department of Health (DOH), which work closely together on issues relating to safe seafood harvesting. Quahogs, the official shellfish of Rhode Island, can be impacted by the accumulation of toxins related to marine algae and by fecal

coliform bacteria that can enter the river with wastewater overflow.

Sixteen monitoring stations in the Providence River help public-health agencies keep up with changes in water quality and understand where hazards are located.

Recent advances in environmental laws and wastewater treatment facilities have helped make the Providence River healthy for quahogs and for human consumers, according to DEM.

The “largest single contributing factor” in creating a shellfish-friendly environment, Beardsworth said, was the construction of the combined sewer overflow (CSO) storage tunnel 250 feet below the city of Providence by the Narragansett Bay Commission (NBC).

The 3-mile tunnel catches and holds stormwater in heavy precipitation events, according to NBC public affairs manager Jamie Samons.

After stormwater inflow has decreased, she said stored water is pumped back up to the water treatment facility at Fields Point to be treated and discharged into the river. Since going online in 2008, the tunnel has captured nearly 13 billion gallons of wastewater overflow that would have gone directly into the Providence River and Narragansett Bay without being treated.

“It’s entirely due to that project,” Samons said. “Over the past several years shellfishing closures have been relaxed all through the upper bay and now we’re into the Providence River and it’s because water quality has improved so much because of this.”

The tunnel and additional wastewater treatment updates have decreased post-storm bacteria concentrations in the Providence River by 41 percent, according to the NBC. These levels still increase in the Providence River after rain events of more than half an inch but return to normal after three to four days. Shellfish are safe to consume after an additional three-day waiting period, according to DEM.

“Our decades of work and investment in clean water ... have real and meaningful impact for Rhode Island’s environment, public health and economy,” NBC chairman Vincent Mesolella said in last month’s statement. “And now, as the benefits move further up into the Providence River, even more, Rhode Islanders can enjoy access to clean water in their communities.”

On June 18, the [NBC broke ground](#) on an additional tunnel below Pawtucket and Central Falls which, according to Samons, should prevent overflows breaching the Seekonk and Blackstone rivers and further improve downstream water quality.

“The goal is to meet the requirements of the federal Clean Water Act of 1972, which is to make navigable waters of the U.S. fishable and swimmable,” Samons said. “And we’re getting closer and closer.”



The lower third of the Providence River was recently opened to quahogging for the first time in more than 75 years. (Joanna Detz/ecoRI News)

The Providence River, however, will likely never be fully open to shellfish harvesting, according to Beardsworth, DOH’s internal communications manager. Federal requirements, she said, prohibit harvesting from waters that could be impacted by pollution sources and legacy contaminants left by old industry. The odds of shellfish intaking these pollutants grow in proximity to Providence.

It’s more likely that shellfish harvesting — restricted this summer to 27 mornings and dependent on the amount of recent rainfall — will eventually be allowed in a wider set of conditions, Beardsworth said.

However, DOH and DEM both give the go-ahead for the consumption of fish caught in the upper Providence River, provided anglers have the [right licenses](#) and catch within [season and possession limits](#).

Back in 2012, ecoRI News [reported](#) uncertainties around fishing in the Providence River and other surrounding urban waterways.

DOH's former chief of environmental health risk assessment Robert Vanderslice told ecoRI News then that no federal laws mandated the monitoring of fish toxicity and little funding existed to take on the issue.

The Environmental Protection Agency still hands water quality reporting over to state public health agencies, according to Dave Deegan, regional spokesperson for the EPA's Northeast region.

Though Rhode Island's biennial report on the [State of the State's Waters](#) has grown more comprehensive in recent years, "insufficient information" is noted regarding fish consumption in the upper and lower Providence River in the state's [latest water report](#).

Beardsworth said DOH and DEM work closely to monitor fish toxicity, with funding through the [Agency for Toxic Substances and](#)

Disease Registry and the Centers for Disease Control and Prevention (CDC).

In an elaborate partnership, DEM catches fish and works with Roger Williams University and the EPA's Narragansett laboratory for toxicity testing. DEM then provides the lab results to DOH, which interprets the data and identifies any potential public risk.

If a public hazard were identified, DOH and DEM would issue a joint press release, notify stakeholders and issue a public-health advisory, something that hasn't occurred "in many years," Beardsworth said.

Anglers and shellfishers can also call DEM's seasonal [Bay Line](#) to report any environmental issues or water quality concerns.

Though sewer overflows pose less risk to fish health, according to Beardsworth, the NBC also provides a map that gives [real-time sewage overflow updates](#) for the upper Providence River and its tributaries. The NBC notes "increased health risks from non-contact recreational activities," including fishing, during rainstorms and up to 48 hours after sewage overflows.

DOH does hold some concerns about mercury and polychlorinated biphenyls (PCBs) in certain fish caught in the

Providence River, according to Beardsworth. DOH advises weekly limits on fish consumption and recommends children and women who are or may become pregnant avoid shark, swordfish, bluefish and striped bass caught in Rhode Island.

But in most cases, Beardsworth said “the levels of pollutants are not high enough to outweigh the nutritional benefits of the fish themselves.”

Most fish caught in the Providence River aren’t “born and raised in that water,” which is added assurance that they’re healthy and safe to consume, according to John Lake, supervising marine biologist with DEM and contact for the state’s [Marine Recreational Fisheries Program](#).

“A lot of the fish that you would catch up in the Providence River are fish that don't reside there year-round,” Lake said. “Right now, actually, is a great time to go fishing for striped bass up in that area.”

ecoRI News staffer Brian P. D. Hannon contributed to this story.

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Waste Management

Narragansett Bay Commission Digs into Final Phase of Pollution-Reducing Sewer Overflow Tunnel Project

June 23, 2021

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Video and text by BRIAN P. D. HANNON/ecoRI News staff

PAWTUCKET, R.I. — The end of a remote street where heavy construction equipment



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state and municipal politicians and various administrators, organizers and advocates.

Yet the June 18 groundbreaking ceremony hosted by the Narragansett Bay Commission (NBC) marked the opening of the final phase in the largest public works project ever undertaken in Rhode Island, and likely the project's last public appearance for some time as the work to benefit the surface estuary heads underground.

The groundbreaking attended by 100 guests officially opened the third stage of the utility's combined sewer overflow (CSO) project, known as "Restored Waters RI," which is expected to create 1,700 jobs in an effort to raise water quality in Narragansett Bay and its watershed and subsequently improve health and environmental conditions.

NBC chairman Vincent Mesolessa said the eventual completion of the phase-three tunnel will be followed by construction of a park to benefit residents of East Providence, Central Falls and Pawtucket with bike paths, estuary overlooks and recreational and educational areas.

"The citizens will definitely see the benefits



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NBC operates Rhode Island's two largest wastewater treatment facilities, Fields Point in Providence and Bucklin Point in East Providence, which together treat more than 30 billion gallons of wastewater annually. Combined wastewater systems can treat sewage and stormwater during heavy rains. The new CSO tunnel beginning in Pawtucket will run 2.2 miles and provide a 65-million-gallon capacity to contain water and wastewater resulting from foul weather overflows until the liquid can be processed.

"It will hold the storm-related sewage overflows that currently go into the Seekonk and Blackstone rivers," NBC public affairs manager Jamie Samons said of the tunnel originating in a lot off School Street.

"It's going to greatly enhance the quality of the water in those rivers, make the communities safer and healthier and it will have effects on the bay, as well," she said.

The CSO project began with the 1993 approval of the three "deep-rock" tunnels and seven underground storage facilities at a cost of nearly \$470 million. The final phase of the project is projected to cost \$836 million and be completed by 2027.

Additional components of Phase III, such as

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The venture is the result of a consent agreement with the Rhode Island Department of Environmental Management (DEM) to address storm-related sewage overflow entering Narragansett Bay in violation of the 1972 federal Clean Water Act.

The first construction phase completed in 2008 consisted of a tunnel and support facilities capable of diverting 1.1 billion gallons of water and wastewater to the Fields Point plant rather than flowing directly into Narragansett Bay. The second phase concluded in 2014 reduced discharge from 17 sewer overflows in the bay's watershed.

Samons said employees refer to the RestoredWaters RI subterranean tunnels as “the biggest projects you’ll never see.” The benefits are expected to include reopened shellfishing grounds and restored public spaces, such as a new beach at the Sabin Point waterfront park along the Providence River in East Providence.



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The recent groundbreaking was attended by 100 guests and many of them donned a hard hat and grabbed a shovel. (Brian P. D. Hannon/ecoRI News)

The recent groundbreaking ceremony included comments from two members of Rhode Island's congressional delegation, Sen. Sheldon Whitehouse and Rep. Jim Langevin. Pawtucket Mayor Donald Grebien, Central Falls Mayor Maria Rivera and East Providence Mayor Bob DaSilva sat in the front row as representatives of communities directly served by the forthcoming tunnel.

Whitehouse said the Restored Waters RI project already has helped end the days when residents watched pollution lines expand and prevent fishing and swimming in increasingly large sections of the bay.

“With the work of the Narragansett Bay Commission, with the CSO, we’ve seen that turn around,” he said. “Just a month ago, shellfishermen went up into new, clean waters that hadn’t been fished for decades, and it’s because of this great work. And the bay is the heart of our state, it’s the sparkling center of our state. It’s vitally important to our economy and to see it get this kind of support is really outstanding.”

Langevin said the tunnel project will help

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The groundbreaking marked DEM director Janet Coit’s final public appearance before heading to Washington, D.C., to join U.S. commerce secretary and former Rhode Island Gov. Gina Raimondo, who announced June 21 that Coit will lead the National Oceanic and Atmospheric Administration (NOAA) Fisheries office. Coit will also serve as deputy NOAA administrator and acting assistant secretary of commerce for oceans and atmosphere.

New DEM acting director Terrence Gray, who previously served as the agency’s deputy director for environmental protection, was on hand in Pawtucket as Coit lauded DEM, NBC, water customers and workers engaged in the “dangerous and hard” tunnel construction.

“But for the ratepayers of NBC — and critically important to recognize this organization, the strong laws, the work of DEM and enforcement of the laws — we wouldn’t be here celebrating this,” Coit said.

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buried in this is the cost: an astounding \$836 million! Surely there must be a less expensive way to take care of the remaining sewage pollution after the first 2 phases but the Bay Commission seems to love building their empire and enriching their contractors to the maximum extent possible.

Bay Commission bills have already skyrocketed from the first two phases. And it is paid for in a very unfair way, not based on the runoff from roads, parking lots, roofs that causes most of the problem, but from how much water a ratepayer uses plus a hefty monthly fee. Look at an aerial photo of



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Dean St interchange and more, plus all the parking lots and regular roads. Those who use these roads and parking lots apparently pay zero for treating the runoff it causes if they don't live in the metro area. So metro area residents have to pay while those wealthy enough to live down the Bay pay nothing and get enhanced property values if indeed this \$863 million will actually make the Bay appreciably cleaner. So much for equity!

Featured



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Pawtucket Tunnel project begins

ETHAN SHOREY, Valley Breeze Editor

Jun 22, 2021



Official break ground on the new Pawtucket Tunnel project last Friday

PAWTUCKET – The Narragansett Bay Commission last Friday broke ground on its Pawtucket Tunnel project, a milestone that's seen plenty of advance legwork leading up to it.

The tunnel is the centerpiece of Phase III of the NBC's Combined Sewer Overflow Abatement Program. The project, known as RestoredWaters RI, consists of a 2.2-mile long, 125-foot deep tunnel, which will store and transport storm-related sewage to the NBC's Bucklin Point Wastewater Treatment Facility for full treatment.

The NBC constructed a similar tunnel for Phase I of the CSO project. Since going online in 2008, the Phase I tunnel has captured 12.5 billion gallons of water and transported that water to the Field's Point Wastewater Treatment Facility. Without this project, storm-related sewage overflows would go into waters untreated, say officials.

Restored Waters RI is the largest public works project in Rhode Island history; tunnel construction is estimated at \$836 million. The project will create 1,700 direct or indirect jobs, improve shellfishing and swimming beaches, and create green spaces for public access, said those in attendance last week.

The Valley Breeze reported last November that the NBC had purchased 10 properties on or near the Pawtucket riverfront to help facilitate construction of the massive new stormwater tunnel. The former Masonic Temple at 50 Pleasant St. was one of 10 properties, including several homes, purchased for a combined \$6.85 million. That total represented only a fraction of the \$548 million estimated cost for the tunnel work.

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

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

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

“We know Rhode Islanders value a clean and healthy bay,” said NBC Chairman Vincent Mesolella. “We’re very proud of infrastructure investments Narragansett Bay Commission ratepayers have made over the past two decades to mitigate the century old issue of CSOs and we are confident that this final phase of the CSO project will result in a bay that will continue to be a beloved resource for our children and grandchildren. We call this project RestoredWaters RI because it will, quite literally, give these waters back to our community.”

Due to the success of Phases I and II of the NBC’s CSO program, 3,711 acres of shellfishing grounds have been reclassified from “conditional” to “open” and portions of the Providence River that have been closed to shellfishing for 75 years have now reopened. Continued expansion of shellfishing grounds and recreational areas are anticipated as the project continues.

“The biggest environmental success story in our state is the progress we are making cleaning up Narragansett Bay and our rivers,” said DEM Director Janet Coit. “This is happening because of implementation of strong laws by DEM and major investments and actions by the NBC and others. I can’t say enough about the hard work of DEM and the NBC. This project will continue that progress, resulting in cleaner rivers and continuing to improve water quality in the upper Bay.”

“Water quality in Narragansett Bay has come a long way in recent decades, and RestoredWaters RI will build on that progress,” said Sen. Sheldon Whitehouse. “This project is an investment in making sure the next generation of Rhode Islanders can grow up in a safe environment with clean beaches, a thriving ocean, and healthy fisheries.”

URBAN STORMWATER

Final phase of Narragansett Bay CSO Program breaks ground

Rhode Island's largest public works project is designed to reduce annual CSO volumes and improve the water quality in Narragansett Bay

June 30, 2021



X



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Construction has kicked off for the final phase of the Narragansett Bay Commission's (NBC) Combined Sewer Overflow (CSO) Program, which is expected to reduce overflow volumes by 98 percent and treat stormwater before it flows into the Narragansett Bay. The program will also reduce the closure frequency of shellfish beds in the bay, which has had a major economic impact

LEADERS
MUNICIPAL WATER 2022

the lead designer and program manager for Phase III of the project.

Phase III involves the construction of the Pawtucket Tunnel, a 2.2 mile long, 30 foot diameter tunnel running underneath the communities of Pawtucket and Central Falls. Located at depth ranges of 115 to 155 feet below grade, the tunnel is designed to store 58.5 million gallons of combined sewer overflows. The CSO Program's first phase kicked off in 2001 with the construction of a three mile long, 26 foot wide deep rock tunnel under Providence to store stormwater runoff. Phase II, completed in 2015, added CSO interceptors to the Providence Tunnel, several sewer separation projects, and a wetlands storage facility.

The project's design-builder is CB3A, a joint venture comprised of CBNA, a U.S.-based subsidiary of French construction engineering firm Bouygues Travaux Publics, and local civil works contractor Barletta Heavy Division, in association with designer AECOM. Notice to proceed has been granted under a design-build contract worth \$450 million.

"We are so looking forward to breaking ground on this critical clean water project next month

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- ⊕ Laboratory Equipment, Supplies & Services
- ⊖ Membranes
- ⊕ Meters & Meter Reading Equipment

enhance our urban communities and Narragansett Bay as a whole. Because of this project, the next generation of Rhode Islanders will only ever know a clean bay and vibrant urban rivers. We value our relationship with Stantec and CB3A; we know they take issues of ratepayer affordability seriously and we appreciate the work they are doing with us to approach the dual goals of environmental and fiduciary excellence,” said Vincent J. Mesolella, Chairman of the Narragansett Bay Commission.

Designing for cost savings and optimization

Stantec and Pare Corporation have been involved with the project since 2014, during which time the team has identified numerous cost savings and project optimizations. Stantec utilized proprietary WARi™ (Weighted Average Residential index) methodology to analyze affordability scenarios and develop a four-sub-phase implementation plan that would maintain NBC’s affordability goals.

The first and largest sub-phase, known as IIIA, includes construction of the Pawtucket Tunnel, which is expected to be operational by 2027.

Once operational, the tunnel, along with several

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- ⊕ Pumps
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- ⊕ Sampling & Analyzing Equipment & Instrumentation
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- ⊖ Security Equipment, Systems
- ⊖ Sludge Dewatering & Processing Equipment
- ⊖ Stormwater Equipment & Services
- ⊖ Tanks & Structures
- ⊖ Trenchless Equipment / Technology
- ⊕ Valves, Seals, Packing & Related Products

discharge which would otherwise overflow into the river leading into Narragansett Bay. The remaining sub-phases, which include additional near-surface conveyance facilities, green stormwater infrastructure, and a 10-foot diameter stub tunnel, will be completed in stages to help reduce the cost to NBC's rate payers.

During the Pawtucket Tunnel procurement phase, CB3A proposed further cost and time saving Alternative Technical Concepts, including raising the tunnel by 25 feet, tunnel liner ring design alternatives, and relocation of the tunnel pump station and launch shaft locations.

“With the frequency and intensity of storms on the rise, the time is now for communities to take action to protect human health and the environment,” said Melissa Carter, Vice President, Stantec. “We are delighted to see ground break on the final phase of this momentous project, which will support the local economy and protect Rhode Island's beaches and water quality in Narragansett Bay for generations to come.”

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Shifting Sands

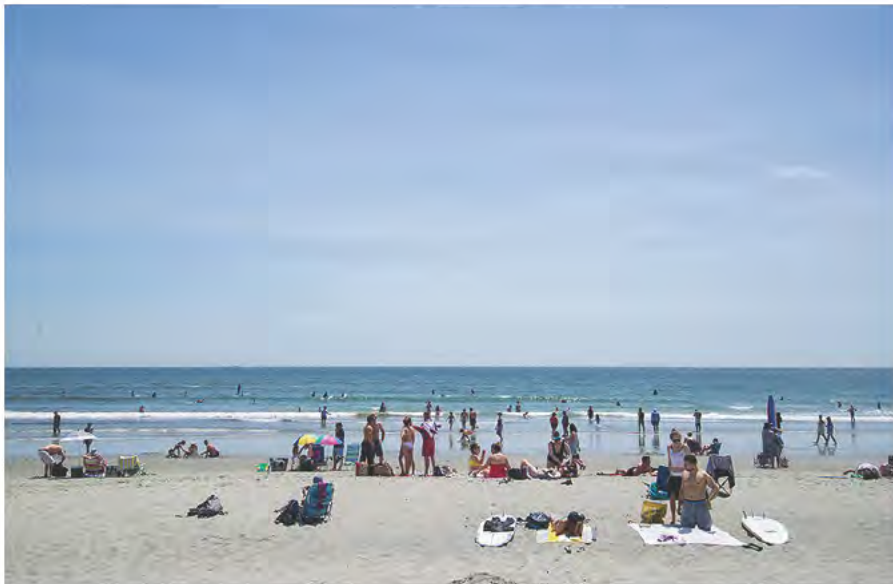


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R.I. Beach Health Responds to Better Stormwater Management

July 19, 2021



Beachgoers enjoy a sunny day at Second Beach in Middletown. Beach closures in Rhode Island are trending downward. (Joanna Detz/ecoRI News)

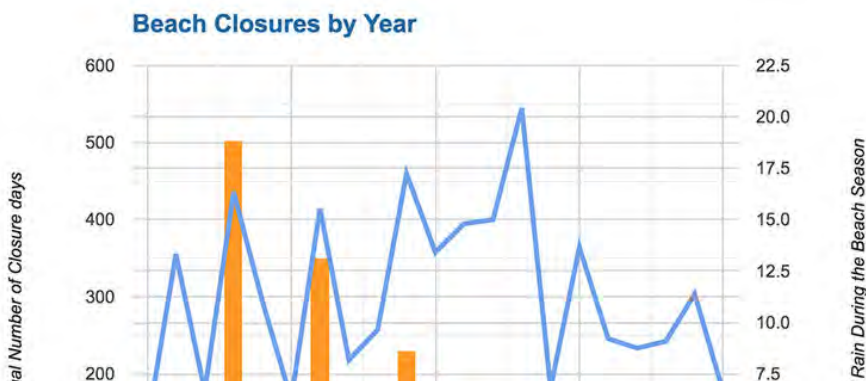
By FRANK CARINI/ecoRI News staff

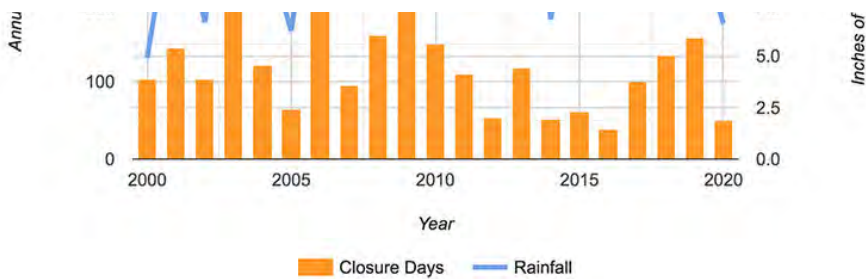
Many of the changes witnessed along Rhode Island’s coastline during the past two decades are noticeable and concerning, especially when it comes to the impact on the brick-and-mortar environment that replaced the natural world.

The seaside town of South Kingstown provides a telling example of Mother Nature’s brisk alternations. Less than 20 years ago, a sandy carpet fronted Matunuck Beach Road and Ocean Mist, an iconic Ocean State watering hole. That carpet of disintegrated rock and fine mineral particles has largely been replaced by briny water. The Atlantic Ocean now laps beneath beachfront bars and restaurants and is advancing on the infrastructure buried beneath Matunuck Beach Road.

There are, however, unseen changes to the Ocean State’s waterfront that are cause for optimism.

The amount of sand in front of them may be shrinking, but water quality at Rhode Island’s signature attractions — its tourist-filled, economically important beaches — is improving.





Beach closures in Rhode Island have been closely tied to precipitation, so reducing stormwater runoff plays an important role in limiting contamination risks. (DOH)

In the first decade of the 2000s, beach closures were **trending in the wrong direction**. In 2003, Rhode Island beaches were closed a staggering 503 times because high levels of bacteria, usually following a rainstorm, made them unsafe.

Three years later, in 2006, Rhode Island lost a combined 351 summer beach days. The most beach days lost to unsafe water quality since then was 2009's 230. Last year, the Ocean State experienced 51 closure days. So far this year, five marine beaches — Goddard State Park Beach and Conimicut Point Beach in Warwick, Easton's Beach on Newport, Third Beach in Middletown and Mackerel Cove Beach in Jamestown — have been closed to swimming for a total of 19 days during what so far has been a wet summer.

The closure of Rhode Island beaches is closely linked to precipitation — the more we get the more stress on our coastal waters. Wind direction, currents and the tides also play a role.

Stormwater runoff from roads, parking lots, roofs and other impervious surfaces washes contamination, including bacteria and other pathogens, into the Ocean State's salt waters, either directly or indirectly via freshwater pathways. Wastewater overflows, made possible by heavy amounts of

rain, also deliver contaminants, such as fecal coliforms, escherichia coli and enterococci, to beach waters.

In 2010, a year after Rhode Island saw 230 beach days lost to polluted waters, that number dropped to 149. The state received about 4 inches less of rain during the 2010 beach season — Memorial Day to Labor Day — but the drop also coincided with Phase I of the Narragansett Bay Commission's [Combined Sewer Overflow Abatement Program](#) going online. Phase II went online six years later.

The Phase I tunnel built beneath Providence stores combined sewer and stormwater during heavy rains. Once a storm has passed, this combined wastewater is treated before being released into Narragansett Bay. The second phase finished in 2014 reduced discharge from 17 sewer overflows in the bay's watershed.

The Narragansett Bay Commission's hundreds of millions of dollars of work has been complemented by green infrastructure projects in the watershed municipalities of Newport, Warren, Barrington and Bristol, to name a few.



Bioretention rain gardens in the parking lot of Bristol Town Beach have helped reduce the amount of stormwater that reaches the beach unfiltered. (Frank Carini/ecoRI News)

At Bristol Town Beach, for example, the town installed a new parking lot with six bioretention rain gardens, which allow runoff to be filtered through native vegetation before it's transported to an underground drainage basin. A hydrodynamic separator system was also installed to capture fine-particulate pollutants, and a vegetated swale was added at the outfall of the drainage system, which removes silt and pollution from stormwater.

Other projects were multimillion-dollar efforts that took considerable coordination and/or public buy-in. The city of Warwick has removed thousands of cesspools and installed municipal sewer connections in the Oakland Beach area. The work has helped highly stressed Oakland Beach address its long history of water-quality issues.

The \$6 million Easton's Beach [UV Stormwater Disinfection System](#) treats polluted runoff before it's released into Easton's Stream, which empties in the popular Aquidneck Island beach. The ultraviolet system of lights began operating in May 2011 and has helped reduce the number of days Easton's Beach and Atlantic Beach have been closed to swimming.

Of course, the combined sewer overflow work done in Providence and other projects undertaken in the Narragansett Bay watershed didn't help beaches along Rhode Island's open-ocean South County coast or those in Little Compton.

Stormwater management projects at and around beaches statewide have helped decrease the amount of polluted runoff making its way into Rhode Island waters of all shapes and sizes. The installation of rain gardens, rain barrels and

bioswales, finding illicit discharges, the ripping up unnecessary pavement and concrete, fixing broken pipes, and, yes, increased street sweeping have reduced and filtered stormwater flow.

All of these efforts, both large and small, are making a difference, as beach closures are trending down. In 2013, Rhode Island's four-month beach season got soaked with nearly 20.5 inches of rainfall — the highest amount of summer rain recorded in the past two decades by 3.2 inches. That season 119 beach days were lost. In comparison, the combined 503 beach days lost in 2003 happened during a beach season that experienced 16.3 inches of rainfall.



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)

ecoRI News recently spoke with Courtney Schmidt, staff scientist for the [Narragansett Bay Estuary Program \(NBEP\)](#), about the state of Rhode Island's beaches. Every five years the NBEP publishes a report on the state of Narragansett Bay and its watershed. The [most recent report](#), published in 2017, notes state and local agencies monitor Narragansett

Bay's 37 licensed beaches and close individual beaches when water tests show high counts of bacteria.

The Rhode Island standard for enterococci, found in human and animal waste, is a maximum of 60 colony-forming units (cfu) per 100 milliliters in both fresh and saltwater beaches. Anything above that is considered unsafe for recreational use. [Additional factors](#) are also taken into account when closing a beach, including history of contamination, precipitation and flushing rates, as it can take up to three days for the results of bacterial tests to be returned.

“We have healthy beaches on the whole,” Schmidt said. “But monitoring beach water quality, especially those beaches in highly developed areas, remains a priority.”

The Warwick resident said the Department of Health and Department of Environmental Management do an excellent job monitoring the health of Rhode Island's 67 licensed marine beaches.

She noted, however, that beach health “is a very local issue” that demands local stormwater and pollution problems be addressed locally.

Among the areas where beach pollution remains a high concern, despite local efforts to address the problem, is Greenwich Bay. Its beaches, such as Oakland Beach, Buttonwoods Beach and Conimicut Point Beach, which is responsible for 12 of the 19 lost beach days this summer, face some of the most challenging impairment issues in Rhode Island.

Greenwich Bay, circled by development, is a prime example of a host of pollution issues from multiple sources — stormwater runoff and septic and cesspool leakage,

according to Schmidt. Those problems are exacerbated by the fact Greenwich Bay doesn't flush well or quickly.

While steps are being taken to address the issues plaguing Greenwich Bay beaches, bacterial levels in the waters of the Providence River have dropped by at least 50 percent, according to Schmidt.

“The idea of opening an urban beach is closer than ever before,” she said.

The state's Urban Beach Initiative is tracking water-quality improvements at four places in upper Narragansett Bay: Bold Point and Fields Point in Providence and Rose Larisa Memorial Park and Sabin Point in East Providence.

“Fields Point and Bold Point appear to be approaching conditions at three urban beaches that are open for swimming, Barrington, Warren and Bristol town beaches,” according to the [2019 Rhode Island Beach and Recreational Water Quality Report](#).

But even as strides have been made since 2000 to reduce the number of Rhode Island beach days lost to pollution, the climate crisis is keeping the pressure on the state's already-stressed marine waters. For one, warmer waters will create conditions for bacteria and harmful algae to thrive and grow.

“How we sustain and protect this resource that is part of our culture and a big part of our economy will require equitable decisions,” Schmidt said.

To check the status of a beach you plan to visit, [click here](#).

To see more stories in this series, [click here](#).

After decades of work, light at end of CSO tunnel

By **Mary MacDonald** - July 23, 2021 2:11 am



DIGGING IT: Workers for the contractor CB3A start working on the main shaft of the combined sewer overflow tunnel that will run more than 100 feet below the city of Pawtucket. The shaft, located on School Street in Pawtucket, will be 60 feet in diameter and will allow a boring machine to be lowered in. / COURTESY NARRAGANSETT BAY COMMISSION/PETER GOLDBERG

What happens beneath the streets of Providence and surrounding cities is unseen by residents, but after heavy rainfall, the result always ends up in nearby rivers and Narragansett Bay.

For decades, following storms, the street drains and sewers that are part of the city's underground infrastructure had overflowed, discharging untreated water into waterways. A massive undertaking begun more than 20 years ago by the Narragansett Bay Commission, to replace its century-old sewer and water runoff infrastructure below ground, has entered a final phase.

In late June, the commission started construction of the third and final tunnel that will capture as much as 58.5 million gallons of this mixed overflow and retain it so it can be safely treated before discharge. The final phase of the Combined Sewer Overflow Abatement Program affects the Seekonk River, which flows into Narragansett Bay and includes communities such as East Providence, Pawtucket and Providence.

The planning for the program dates in the early 1990s. Officials say the first two CSO storage tunnels dug with massive boring equipment – one completed in 2008 and the second in 2014 – have been a huge success. The first tunnel has prevented about 1.1 billion gallons of wastewater from flowing into the bay before being treated, according to NBC.

Tests have shown that pollution levels in the bay have dropped to the point that shellfish beds near Providence have been opened for the first time in decades.

But the Seekonk River remains a source of pollution, particularly after heavy rainstorms.

Upon completion, the third tunnel is expected to further reduce the frequency of closures of shellfish beds.

For the project engineers, the final phase marks the end of a long-term commitment.

'Even though it is a long-term project ... at the end of the day it's very rewarding.'

MELISSA CARTER, Stantec Inc. vice president

They have designed the Pawtucket tunnel, a 2.2-mile-long, 30-foot-wide tunnel that will run below Pawtucket and Central Falls.

The \$450 million construction project is being handled through a design-build contract that includes CB3A, a U.S.-based subsidiary of a French construction and engineering firm, and Massachusetts-based Barletta Heavy Division Inc.

The tunnel is expected to be completed in 2027. It will replace a system that now relies on piping that combines sewer discharges from homes and businesses and runoff from roads, buildings and other impervious surfaces, according to Jamie Samons, NBC public affairs officer.

"This was great technology in 1872, but in 1972, under the federal Clean Water Act, all of those became illegal," she said of the original systems.

From an engineering standpoint, the challenge of the latest phase included finding cost savings that would not hurt the responsiveness of the new system, according to Melissa Carter, a vice president at Stantec Inc., the Canadian company leading design and engineering on the project since 2014.

"The main challenge was trying to optimize the plan," Carter said. With phase three, engineers examined earlier models and started revising the plan to try to minimize costs. "We really wanted to look at minimizing cost but getting as much out of the existing performance system as we could," she said.

One of the results of those engineering changes was a decision to raise the final tunnel by 25 feet. It will now run from about 115 feet to 155 feet deep, sloping to a pumping station that will then deliver untreated water to the Bucklin Point Wastewater Treatment Facility in East Providence.

To determine whether such changes would work, engineers used a digital modeling tool, called a digital twin, and went into the field to capture real-time data following storms. They were able to determine whether the modified system would work under various conditions.

Tunnel projects are always challenging, Carter said, because engineers can't "see" underground. To determine the conditions, the engineering companies involved in the project, including Pare Corp., of Lincoln, took deep-rock borings several hundred feet apart all along the proposed route "to try to characterize the rock as much as we can," Carter said.

That process took about two years, according to Brandon Blanchard, managing engineer for Pare.

Providence is among many communities in the country that have embarked on the combined sewer overflow systems, Blanchard said. Similar efforts have been undertaken in recent years in Boston, in Hartford, Conn., and in New York and Philadelphia. Each system is unique, however, as the soil and setting conditions differ.

Before the first CSO tunnel was completed, Samons said, the Narragansett Bay Commission's system had 75 to 150 sewer overflows a year. The goal of the program is to provide enough underground storage to capture the flow from a three-month storm, one that could drop as much as 1.65 inches of rain in six hours.

"So the goal, at the end of the program, is we see only a few overflows each year," Samons said.

When construction of the connection to the existing sewers begins, vertical shafts will be created using controlled blasts. But people above ground should not feel much of that, given the depth, Carter said.

A tunnel boring machine, with a diameter of 30 feet, will slowly drill through the earth to clear the space for the tunnel itself, continuously grinding the rock in front of it, Carter said.

The third tunnel will have a wide impact when completed, Carter said. "Not just to the environment but to the community," she said. "Even though it is a long-term project and seeing the payoff is not going to be immediate, at the end of the day it's very rewarding."



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Getting to the meat of shellfish matter in RI over pricing, shortages and closures

by R.J. HEIM, NBC 10 NEWS
Friday, July 23rd 2021



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It was just a shell of a story Thursday that aired on NBC 10 News, where we misstated that Flo's Clam Shack in Middletown wasn't selling any of its namesakes for a while because of high prices for the shellfish

Now, we're fleshing out the facts where it turns out clams are still on the menu at the popular seaside eatery, just not a certain variety.

But prices everywhere are up for other shellfish. That's because the rain we've gotten this month is closing harvest areas.

Storm water runoff is the main reason for the high number of shellfish beds being closed this month, brought on by the excessive rain, nearly 5 inches above average for July here.

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Topher Hamblett, director of the environmental nonprofit "Save the Bay," explained, "When the rain hits the ground, it picks up all the pollutants that are on the ground, including pet waste, animal waste, along with fertilizers, petroleum, all kinds of pollutants."

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Narragansett Bay.

Jody Kind, a quahogger by trade for decades in Rhode Island, said, "We've had 1.2" of rain multiple times this summer, so we've been closed out of most of the bay where we make most of our money."

Even though the closures have financially impacted shellfishermen, it's to protect the integrity of the product.

"Rhode Island has always been more restrictive on our closures than any other state around us. Rhode Island has never had an issue with an illness from our shellfish. Thank God we've been more restrictive," added King.

From Gaspee Point in Warwick, southward to Conimicut Point, some 1900 acres of water had historically been closed to shellfishing, until this year.

The conditional opening target for this year is more than 2 dozen days, but so far,

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rain

"One day of heavy heavy rain can result in a week of shellfish bed closures," said Hamblett.

The toxins and pollutants get in to the water that can contaminate the clams.

"And they need time to flush with the tides," said King.

Meanwhile, chowders, clam cakes, stuffies from Narragansett Bay are still on the menu at Flo's, just not the softshells from Massachusetts and Maine. Little necks are available too at wholesale and retail outlets, and steamers are nearly double the price due to the closures combined with seasonal demand.

All we need is a drying trend for the shellfish market to stabilize once again.

MORE TO EXPLORE



PR 21-18 Patacsil v. Narragansett Bay Commission et al. – No violation

The Complainant filed three complaints, each alleging that public bodies violated the APRA by denying her APRA requests.

The Complaint against the Narragansett Bay Commission alleged that the NBC improperly denied the Complainant's request for the names and addresses of individuals delinquent 90 days or more on their sewer bills. The NBC stated that disclosure of this information would be an unwarranted invasion of the relevant individuals' personal privacy. We concluded that NBC's determination that the privacy interests of the individuals outweighed any public interest in disclosure did not violate the APRA.

The Complaint against the Town of North Providence alleged that the Town improperly withheld responsive documents in response to the Complainant's request for a list of addresses with taxes overdue by 6 months or more. The Town stated that the only responsive document it maintained was the Tax Sale list on the Town's website, which it provided to the Complainant. Because the undisputed evidence in the record presented to us demonstrated that all responsive documents maintained by the Town were provided to the Complainant, we found no violation.

The Complaint against the City of Woonsocket alleged that the City violated the APRA by denying the Complainant's request for a list of addresses with taxes overdue by 6 months or more. In response, the City provided evidence that it had provided the Complainant with responsive records. Because the undisputed evidence demonstrated that the Complainant was provided with responsive records, we found no violation.

This press release can be viewed online at <http://www.einpresswire.com/article/547330481/>

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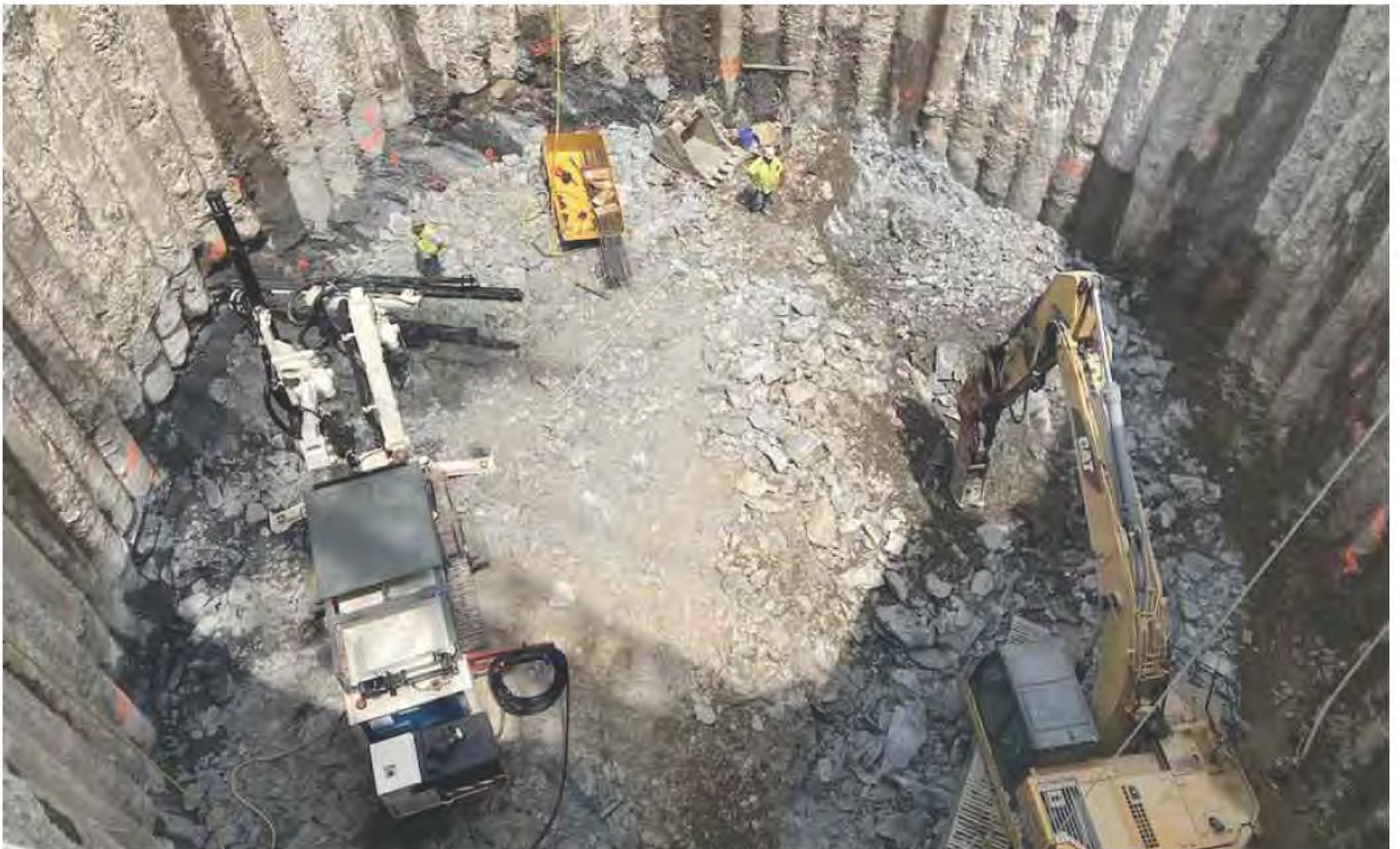
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Rhode Island Sees Daylight at the End of Its 'Big Dig'

A crew prepares to drill a massive tunnel in final phase of the largest single public works project in state history



A crew is preparing for the boring of a massive tunnel near the Seekonk River in Pawtucket, R.I. as part of the final phase of the \$800 million Narragansett Bay Commission Combined Sewer Overflow (CSO). Photo by Pete

Williamson, courtesy of CB3A

July 30, 2021

Johanna Knapschaefer

A construction crew now is set to bore a massive tunnel near the Seekonk River in Pawtucket, R.I. in the third and final phase of Rhode Island's "Big Dig." The \$1.5-billion Narragansett Bay Commission Combined Sewer Overflow (CSO) program is the largest single public works project in state history.

CB3A—a joint venture of contractors CBNA, a U.S. unit of French giant Bouygues and Barletta Construction LLC, Canton, Mass., with AECOM—are collaborating on the estimated \$450-million design-build contract to be completed by 2027. Smaller components of this phase, which began last month, include an interceptor gate and screening structure, and will continue until 2041, according to a spokeswoman at Stantec, the lead designer and program manager for the final phase.

The Edmonton, Alberta-based firm is collaborating with Pare Corp., Lincoln, R.I.

The 2.2-mile-long, 30-ft dia. tunnel runs beneath Pawtucket and Central Falls at a depth ranging from 115 ft to 155 ft below grade. The facility will be able to store up to 58.5 million gallons of overflows, said a Stantec press statement in June. The tunnel is set to be operational in 2026 with final completion by 2027.

Initial Work

Hoping to launch the tunnel boring machine (TBM) in early summer 2022, CB3A is constructing the launch shaft and tunnel pump station shaft simultaneously, says Pete Williamson, deputy project manager for CB3A.

"The temporary support of excavation in soil, for both shafts, is complete and performing well," Williamson says. The team is currently "excavating the rock portion of the [shaft] with ancillary work, including electrical and other utility feeds to support the TBM mining ongoing," he adds.

CB3A will mine the tunnel with a Herrenknecht TBM, a dual mode machine capable of operating in both the open mode and earth pressure balance closed mode, the JV says. The rock bore diameter is 33.79 ft and final inside diameter is 30.17 ft.

During the tunnel procurement phase, CB3A proposed cost and time-saving concepts including raising the tunnel by 25 ft, tunnel liner ring design alternatives and relocation of the tunnel pump station and launch shaft, Stantec said.

One major challenge of the complex project in a dense urban environment "is to construct the multiple drop shafts, located throughout the tunnel's 2.2-mile alignment," Williamson says. "Each shaft is constructed in varying ground conditions and rigorous vetting of the design and constructability is needed, all while putting great weight on progressing construction activities in close proximity of local residents and stakeholders."

Vincent J. Mesoleslla, chairman of owner/operator Narragansett Bay Commission, notes the project as “critical” for “the next generation of Rhode Islanders ... to only ever know a clean bay and vibrant urban rivers.”

The first part of final phase work, which began last month, is expected to shrink overflow volume by 98% and treat stormwater before it flows into the Narragansett Bay, said Stantec.

“With the frequency and intensity of storms on the rise, the time is now for communities to take action to protect human health and the environment,” says Melissa Carter, a Stantec vice president.

In addition to challenges associated with schedule and ongoing concerns about supply chain volatility, the team seeks a solution for how it will dispose of an estimated 840,000 tons of pulverized rock material excavated during tunnel mining, she says. “There’s limited opportunity for disposal or beneficial reuse of this material,” Carter says.

Despite the challenges, the team predicts the phase will be completed on time, Carter says.

Benefits of Prior Work

The region is already showing signs of progress from earlier phase work.

“As a result of the first two phases of the program ... we’ve seen about 85 extra shell fishing days a year and are anticipating similar benefits from this tunnel,” says Jamie Sammons, Commission public affairs manager. “We’ve seen shell fishing grounds in the upper Providence River that have been closed for 75 years have now been opened, in addition to more swimming beaches open upstream from the river; we are anticipating similar benefits from the second tunnel.”

Stantec and Pare have identified many cost savings measures for the project by utilizing proprietary WARi (Weighted Average Residential Index) methodology. Stantec developed its proprietary WARi method as “a more accurate representation using 53 data point in the Census tract instead of two traditionally used by the EPA [Environmental Protection Agency] to determine the cost burden on ratepayers,” Carter says.

The three-phase CSO program began in 2001 with construction of a three-mile long, 26-ft-wide deep-rock tunnel under Providence to store stormwater runoff. A prior phase finished in 2015 added CSO interceptors to the Providence Tunnel, several sewer-separation projects and a wetlands storage facility.

An additional 10-ft dia. stub tunnel project is set to begin in 2031 with construction to be started in 2035, Carter notes.

Pump Station Will Cut City's Sewage Overflow

Boston Commits to Equitable Site Redevelopment

D.C. Mass Timber Project Adds Three Floors to Commercial Building



Johanna Knapschaefer, *ENR's* New England Special Correspondent, has been writing about trends in design and construction of buildings, bridges, tunnels and other infrastructure for more than a decade. She also profiles award-winning industry leaders and delves into broader construction issues such as workforce training, worker safety and health, climate change remediation and emerging offshore wind and tidal energy developments. Over the past two decades, her articles have appeared in *Architectural Record*, *BusinessWeek*, the *Boston Globe*, *American Banker*, *Modern Metals*, *BusinessNH Magazine*, *Pittsburgh Magazine* and many other publications. Johanna is fluent in Japanese, and taught English and academic writing in the Science and Engineering Department of Ritsumeikan University, Kyoto, while living in Japan for eight years.

When not writing, Johanna enjoys mountain climbing, singing and playing her Spanish guitar.

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Stantec and Pare Corp. break ground on final phase of Narragansett Bay Commission's combined sewer overflow program

August 13, 2021 - Rhode Island (<https://nerej.com/section/RI>)

Pawtucket, RI Construction has kicked off for the final phase of the Narragansett Bay Commission's (NBC) Combined Sewer Overflow (CSO) Program, which is expected to reduce overflow volumes by 98% and treat stormwater before it flows into the Narragansett Bay. The program will also reduce the closure frequency of

shellfish beds in the bay, which has had a major economic impact on the community. Stantec, supported by teaming partner Pare Corp., is serving as the lead designer and program manager for Phase III of the project.

Phase III involves the construction of the Pawtucket Tunnel, a 2.2-mile long, 30-foot diameter tunnel running underneath the communities of Pawtucket and Central Falls. Located at depth ranges of 115- to 155-feet below grade, the tunnel is designed to store 58.5 million gallons of combined sewer overflows. The CSO Program's first phase kicked off in 2001 with the construction of a three-mile long, 26-foot wide deep-rock tunnel under Providence to store stormwater runoff.

Phase II, completed in 2015, added CSO interceptors to the Providence Tunnel, several sewer separation projects, and a wetlands storage facility.

The project's design-builder is CB3A, a joint venture comprised of CBNA, a U.S.-based subsidiary of French construction engineering firm Bouygues Travaux Publics, and local civil works contractor Barletta Heavy Division, in association with designer AECOM. Notice to proceed has been granted under a design-build contract worth \$450 million.

"We are so looking forward to breaking ground on this critical clean water project next month, the largest single public works project in the State of Rhode Island and one that will greatly enhance our urban communities and Narragansett Bay as a whole. Because of this project, the next generation of Rhode Islanders will only ever know a clean bay and vibrant urban rivers. We value our relationship with Stantec and CB3A; we know they take issues of ratepayer affordability seriously and we appreciate the work they are doing with us to approach the dual goals of environmental and fiduciary excellence," said Vincent Mesoella, chairman of the Narragansett Bay Commission.

Designing for cost savings and optimization

Stantec and Pare Corp. have been involved with the project since 2014, during which time the team has identified numerous cost savings and project optimizations. Stantec utilized proprietary WARI™ (Weighted Average Residential index) methodology to analyze affordability scenarios and develop a four-sub-phase implementation plan that would maintain NBC's affordability goals.

The first and largest sub-phase, known as IIIA, includes construction of the Pawtucket Tunnel, which is expected to be operational by 2027. Once operational, the tunnel, along with several near-surface conveyance facilities, will address the most environmentally beneficial components of the program to capture combined sewer discharge which would otherwise overflow into the river leading into Narragansett Bay. The remaining sub-phases, which include additional near-surface conveyance facilities, green stormwater infrastructure, and a 10-foot diameter stub tunnel, will be completed in stages to help reduce the cost to NBC's rate payers.

During the Pawtucket Tunnel procurement phase, CB3A proposed further cost and time saving Alternative Technical Concepts, including raising the tunnel by 25 feet, tunnel liner ring design alternatives, and relocation of the tunnel pump station and launch shaft locations.

"With the frequency and intensity of storms on the rise, the time is now for communities to take action to protect human health and the environment," said Melissa Carter, vice president, Stantec. "We are delighted to see ground break on the final phase of this momentous project, which will support the local economy and protect Rhode Island's beaches and water quality in Narragansett Bay for generations to come."

A sustainable water future is complex and dynamic. By viewing water as an integrated system, Stantec is helping to confront global water challenges and accelerate the pathway to a more sustainable, reliable, and affordable future that provides improved water, energy, and infrastructure solutions.

Tags:

Shifting Sands

Shifting Sands

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Rhode Island's Largest Wastewater Treatment Facility Keenly Aware of Climate Crisis

August 16, 2021



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A climate vulnerability assessment was conducted on the Fields Point Wastewater Treatment Facility on the banks of the Providence River to address such issues as rising waters and storm surge. (Brian P. D. Hannon/ecoRI News photos)

Upper Narragansett Bay plant cleans Providence sewage with focus on health, technology and nature

By BRIAN P. D. HANNON/ecoRI News contributor

PROVIDENCE — The wastewater operation in Rhode Island's capital is based on the 19th-century sewers of Paris, but has evolved from a detour into the river to a system able to recycle millions of gallons daily with the aid of gravity, three wind turbines and microbial employees consuming the organic material people are happy to flush and forget.

The development of the [Fields Point Wastewater Treatment Facility](#), including system upgrades and the incorporation of renewable energy, is rooted in an appreciation for the basic reliance residents have on natural resources, according to [Narragansett Bay Commission \(NBC\)](#) public affairs manager Jamie Samons. The NBC owns and operates the facility.

“We think of ourselves as an environmental organization,” she said. “We take dirty water and we make it clean.”

The history of the NBC springs from Fields Point, the third-oldest sewage treatment facility in the country. The commission also owns and operates the Bucklin Point Wastewater Treatment Facility on the East Providence shoreline.

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120 million gallons of waste daily. Most of them are in low-lying areas, anchored downhill around Narragansett Bay and the rivers feeding it. They use gravity to help lessen pumping and electricity costs.

The historic floods of March 2010 revealed weaknesses in the state's wastewater infrastructure when it comes to the challenges presented by the climate crisis.

Fields Point, besides being the state's largest wastewater treatment facility, is also located in upper Narragansett Bay, along the banks of the Providence River off Save the Bay Drive. Sea-level rise, storm surge and more frequent and severe weather increasingly put the plant at risk.

A 2017 study, "Implications of Climate Change for Rhode Island Wastewater Collection & Treatment Infrastructure," determined Fields Point is one of seven wastewater treatment facilities that would be largely inundated during a 100-year storm and among the 10 plants most at risk from the climate crisis.

To protect surrounding neighborhoods from a breach at the facility, Fields Point conducted a [climate vulnerability assessment](#), instituted a resiliency plan and incorporated mitigation strategies into upgrades. Future changes could include new water-tight doors and berms around tanks. There's no easy or inexpensive solution to immediately eliminate threats posed to the shoreline facility by the climate crisis.

"None of us have a crystal ball and all of us have limits" said



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The relocation of Fields Point — or any other wastewater treatment facility in Rhode Island — isn't currently planned, but could become an idea for consideration when a facility reaches its design life, according to Patenaude.

While relocating may eventually be more cost-effective than rebuilding in an existing spot, Patenaude said municipalities and plant operators each have their own “menu of options” that best address their situation.

Patenaude and Samons said climate-change planning is essential for wastewater operations. Those plans can include equipment upgrades and replacement, staff training and pre- and post-storm analysis of factors from the technical to the basic, such as whether employees can reach a facility during severe weather.

Samons said climate change is “absolutely front and center” in every decision NBC makes.

“It's a part of our strategic plan, it's a part of our capital plan. It is built into all capital and operating decisions that we make,” she said. “We deal with the effects of climate change every day. We see bigger storms, more intense storms, so it's absolutely critical for us to consider these things.”



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Jamie Samons, the Narragansett Bay Commission's public affairs manager, says climate change is front and center in every decision the organization makes.

European style

In the mid-1800s, the population of Providence wasn't significantly smaller than its current count of about 180,000. But the city at that time also was home to more than 300,000 horses, which were not particular about using designated areas to complete the food digestion process. The resulting waste was often swept through streets and into homes by rain. It helped spread an outbreak of cholera, prompting city officials to eventually build a sewer system to take wastewater off the streets.

The city turned to Europe for ideas. Providence's head engineer traveled across the Atlantic and found a model for the Ocean State in the sewers under Paris. Constructed in 1901 and owned by the city of Providence until 1980, Fields Points served its purpose of redirecting wastewater for decades.

"It was a great engineering solution in 1872, but it became illegal in 1972," Samons said. "When it rains a lot, those sewers get overwhelmed and then you have to provide a relief point, and the relief point is out to the river."

The operation fell into such disrepair that the General Assembly created the NBC to take over in 1982. The original chemical house is listed on the National Register of Historic Places and the building remains part of the

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Fields Point, with a capacity of up to 77 million gallons per day for full, advanced treatment, has a combined system enabling treatment of sewage from homes and businesses and stormwater runoff during heavy rains. The operation is one of only three combined systems in the state, along with Pawtucket and Central Falls. Fields Point treats 40-50 million gallons of wastewater on an average, dry day. In wet weather, the facility can handle up to 200 million gallons daily, although at the elevated flow rate not all of the water receives full treatment.

Stormwater runoff carries an array of debris, from commuter trash to sporting and seasonal items.

“We’ll get things like sticks and stones and Dunkin’ Donuts cups and soccer balls,” said Samons, explaining the water passes through the plant’s first stage of “bar screens” resembling window security, which catch large things such as Venetian blinds and decorated Christmas trees. “Those are obviously things someone just shoved down a manhole.”

In the next treatment phase, the water moves 1-2 feet per second into large, outdoor tanks and is left to sit for about a half-hour. The system removes primarily inorganic debris such as sand and asphalt before traveling to a larger tank where organic material — the kind you flush — separates from oil and grease and can be removed.

Despite the open-air location, even those vaccinated from the coronavirus may find themselves reaching for their masks to filter the biological bouquet emanating from these

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said Samons, noting the liquid emerges about 85 percent clean, but not clean enough.

Small bits of excrement without enough density to sink are put through a biological process using single-cell bacteria, known among staff as “bugs,” which combine with air injected by bubble diffusers similar to those in fish tanks or hot tubs.

“These bugs, the sole reason that they live is to eat poop,” Samons said. “We know these guys are useful workers. They are our most valued employees. So we recycle them and use them again.”

Another set of bugs then removes nitrogen. The element is problematic for waterbodies like Narragansett Bay because the nitrogen can fertilize algae, which decomposes and robs oxygen needed by marine life. The facility’s integrated fixed film activated sludge process went online in 2014 and has reduced nitrogen input by more than 85 percent while preventing additional land use in the “really constricted footprint” of Providence, Samons said.

“Normally when you remove nitrogen you have to build additional tanks, and we don’t have room,” she said. “With this technology we were able to keep it in our existing tanks. It’s just been a really elegant solution for us.”

After the bugs compete their work, the water may still contain small amounts of pathogenic bacteria that are disinfected with sodium hypochlorite, better known as bleach. Dumping bleach into Narragansett Bay is illegal.

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“It takes about 12 hours from start to finish,” Samons said of the process, which the facility conducts around the clock every day of the year.

The capacity for stormwater capture is increased by a 3-mile-long tunnel running 250 feet below Providence, which holds excess water until the overflow recedes and can be treated at Fields Point.

“On an average we’re getting about a billion extra gallons of water a year here at this facility,” Samons said. “Since 2008 when it went online we’ve captured about 12 and a half, 13 billion gallons that then comes here and gets full treatment.”

To see more stories in this series, [click here](#).

Editor’s note: Brian P. D. Hannon was a ecoRI News staffer when he filed this story.

1 Comment

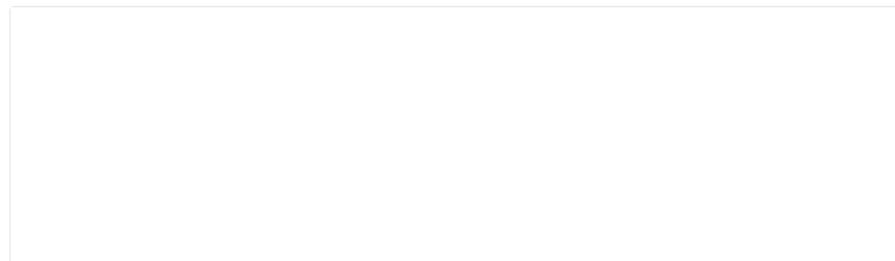
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NEWPORT NEWS

RI Infrastructure Bank Bond refinancing returns \$880,000 in savings to the City of Newport

Refinancing of Clean Water and Safe Drinking Water State Revolving Fund bonds generates \$6.4 million in total savings to Infrastructure Bank clients.

by **Ryan Belmore**
September 13, 2021

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Rhode Island Infrastructure Bank (Infrastructure Bank) today announced total savings of \$6.4 million from a recent refinancing of Clean Water and Safe Drinking Water State Revolving Fund bonds.

These savings will be returned to the Bank’s municipal and quasi-public clients, including:

- Narragansett Bay Commission \$2.6 million

- City of Newport \$880,000



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loans were originally funded with these bonds,” said Jeffrey R. Diehl, Executive Director and CEO of the Bank in a press release. “We are pleased to be returning these savings directly to 27 cities, towns, and quasi-public utilities across Rhode Island. Savings that can be reinvested in other clean or drinking water infrastructure projects.”



RYAN BELMORE



Ryan Belmore is the Owner and Publisher of What's Up Newp. He was born and raised in Rhode Island and graduated from Coventry High School. He serves as Vice President of Fort Adams Trust and serves on the Board of Directors for Potter League for Animals. Ryan also is currently the Senior Editor - North America for Mountain News, publisher of OnTheSnow. Ryan is a member of Local Independent Online News (LION) Publishers and North American Snowsports Journalists Association (NASJA).

More by Ryan Belmore

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GOVERNMENT & REGULATIONS

Narragansett Bay Commission gains \$45M loan from R.I. Infrastructure Bank



A Narragansett Bay Commission graphic shows part of an underground storage tunnel that will will prevent sewer-contaminated stormwater from overwhelming the Bucklin Point wastewater treatment plant.

NARRAGANSETT BAY COMMISSION

IN THIS ARTICLE

Environment
Topic



By Mary Serreze
Reporter, Providence Business First
Nov 15, 2021
Updated Nov 15, 2021, 3:03pm EST

The Rhode Island Infrastructure Bank is giving a \$45 million Clean Water State Revolving Fund loan to the Narragansett Bay Commission to advance its decades-long effort to

prevent combined sewer overflows from polluting the Narragansett Bay and its tributaries.

The loan will help finance a 2.2 mile, 30-foot diameter tunnel that will run under the cities of Pawtucket and Central Falls. The tunnel will have the capacity to store 58.5 million gallons of wastewater overflow, and prevent the contaminated water from overwhelming the Bucklin Point wastewater treatment plant in East Providence.

“This \$45 million loan from the Clean Water State Revolving Fund will save NBC \$3.3 million in financing costs and support the creation of more than 1,200 jobs. We are proud to partner with NBC to help finance infrastructure projects that will improve water quality in the Ocean State,” said Infrastructure Bank CEO Jeffrey R. Diehl.

The state-sponsored financing will also fund improvements at the Field's Point wastewater treatment facility in Providence. The loan will help finance green infrastructure across NBC's system, including tree box filters, bio-retention basins, and infiltration chambers, the Infrastructure Bank said in a news release.

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“This loan will allow us to upgrade our Field’s Point facility while making system-wide green infrastructure improvements. We thank the Infrastructure Bank’s team for working with us to finance these infrastructure investments,” said Vincent J. Mesolella, chairman of the Narragansett Bay Commission.

Diehl and Mesolella said the project will improve and protect water quality in Narragansett Bay and its tributaries for generations to come.

The Pawtucket tunnel is expected to take five years to complete. The \$548 million project already received a loan covering half the cost from the Environmental Protection Agency, EcoRI reported in 2020.

Planning for the overall water cleanup effort began in 1997. In 2001, Phase I of the project began, and since its completion in 2008, water quality has dramatically improved in upper Narragansett Bay and the Providence River. Phase II, which eliminated outfalls in the Seekonk and Woonasquatucket rivers, was completed in 2015.

Officials held a groundbreaking for Phase III in June. The NBC is the state's largest wastewater utility.

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NARRAGANSETT BAY COMMISSION

Perfect Compliance

in recognition of Significant Industrial User Perfect Compliance in 2020

The Narragansett Bay Commission recognizes these Significant Industrial User companies for perfect regulatory compliance with Pretreatment Program regulations during 2020:

A. Harrison & Company, Inc.	Eagle Laundry, Inc.
Electrolizing, Inc	Godfrey & Wing,
HP Services, Inc.	Inc. dba Impco, Inc.
Induplate, LLC	International Chromium Plating
Interplex Engineered	Co., Inc.
Products, Inc.	John H. Collins & Sons Company
Manchester Street, LLC	Mahr Inc.
Metallurgical Solutions, Inc.	Materion Technical Materials, Inc.
Pawtucket Power Associates	Providence Metallizing Company, Inc.
Stackbin Corporation	Tanury Industries, PVD, Inc.
Technodic, Inc	Teknor Apex Co.
Tiffany & Company	Truex, Inc.
Univar USA, Inc.	



Has your company demonstrated extraordinary environmental efforts this year?

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Vincent J. Mesolella, *Chairman* • Laurie A. Horridge, *Executive Director*
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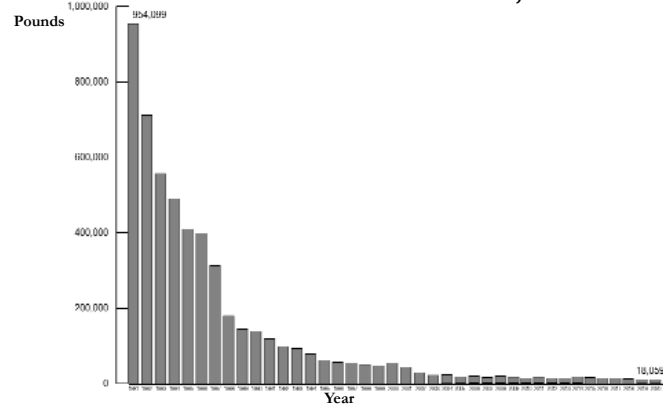
Firms in Significant Non-Compliance

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGULATION 40 C.F.R. 403.8(f) (2) (vii) and Article 10 of the Narragansett Bay Commission, Rules and Regulations require the NBC to publish annually the names of all industrial users in Significant Non-Compliance (SNC) with pretreatment standards and other pretreatment requirements during the preceding year. Companies deemed to be in Significant Non-Compliance are those industrial users who have violated any of the Significant Non-Compliance criteria listed, as defined by Article 2 of the NBC Rules and Regulations during the time period from October 1, 2019 through December 31, 2020. The parameter for which a company was not in compliance and/or the specific administrative deficiency are listed after the company name. The number(s) in parentheses correspond to the type of SNC criteria specified below. Some of the firms listed below may have been issued an Administrative Order in which administrative and/or civil penalties may have been assessed. Many of the companies listed have made significant progress toward correcting the violation and may now be in compliance.

Significant Non-Compliance Criteria:

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

Total Metals Influent to Field's Point WWTF, 1981-2020



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 98.1% 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

Lincoln		
Company Name	Violations Cited	Present Status
Michael Healy Designs, Inc.	Failure to submit report on time (6)	Report has been received
Zebra Technologies Corporation	Failure to submit report on time (6)	Report has been received
Pawtucket		
Ecological Fibers, Inc.	Zn (1,2)	Firm is still experiencing compliance issues
Harris Industries, Inc.	Failure to submit report on time (6)	Report has been received
Hasbro, Inc.	Failure to submit reports on time (6)	Reports have been received
Summit Manufacturing Corporation	Failure to submit reports on time (6)	Reports have been received
Cumberland		
Texcel Industries	Failure to submit report on time (6)	Report has been received
East Providence		
BEST Engineered Surface Technologies, LLC	Failure to submit reports on time (6)	Reports have been received

Field's Point Service Area

Providence		
Company Name	Violations Cited	Present Status
Bella's Jewelry	Failure to submit reports on time (6)	Reports have not been received
Providence Specialty Products, LLC	O&G (1, 2)	Firm is still experiencing compliance issues
Rhode Island Chemical Corporation	Failure to submit reports on time (6)	Reports have been received
	Failure to submit reports on time (6)	Reports have been received
Johnston		
Ballard Mack Sales and Service of RI, Inc.	O&G (1,2)	Firm is now in compliance



NARRAGANSETT BAY COMMISSION ELECTS MESOLELLA FOR 30TH TERM AS CHAIRMAN

At the April 2021 meeting of the Narragansett Bay Commission, the Board of Commissioners voted unanimously to reaffirm its current slate of officers: Chairman Vincent Mesoellella, Vice Chairman Angelo Rotella, and Treasurer Robert Andrade. 2021 marks Mesoellella's thirtieth year at the helm of the internationally-recognized clean water agency.

"The accomplishments of the Narragansett Bay Commission and this Board is an extreme source of pride for me, as I know it is for all of us," Mesoellella said upon the vote. "I thank you, for the thirtieth time, for the confidence you have bestowed upon me. Together, this Board and this Commission has made Rhode Island a better place and we will continue on that mission."

Under Mesoellella's leadership, the NBC has been named twice a Utility of the Future and received numerous national and regional awards for operational, managerial, and fiscal excellence as well as for community engagement and environmental education. The NBC has established itself as a leader in renewable energy, with approximately 80% of its annual energy needs met by NBC-owned renewable sources, such as wind, solar, and biogas. In the 1990s, as Mesoellella assumed the Chairmanship, the NBC embarked on a comprehensive three-phase plan to deal with Combined Sewer Overflows (CSOs), which has resulted in significant improvements in water quality in Narragansett Bay and great enhancements in both bathing beaches and the shellfishing industry. The final phase of the CSO project starts construction in 2021.

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NBC LAUNCHES LIVE CSO MAP

The Narragansett Bay Commission (NBC) has launched a live on-line map that tracks the status of combined sewer overflows (CSOs) and dry weather overflows (DWOs) into the Providence, Moshassuck, Woonasquatucket, West, and Seekonk Rivers.

“Reliable infrastructure---including pipes, treatment plants, trained and committed staff---is critical for clean water,” said NBC Chairman Vincent Mesoletta, “and so is information. This map offers the public an important tool to see what’s happening in our rivers.”

The map, on the NBC’s website at <https://narrabay.com/csomap>, uses a real-time web-based notification system to provide advanced monitoring and will show overflows as they occur and keep them visible for up to 48 hours. The development of this interactive tool was required by the Rhode Island Department of Environmental Management and is based on efforts in other states and wastewater jurisdictions to notify the public of sewage overflows. The NBC map is the first of its kind in Rhode Island.

CSOs are the legacy of an historic sewer system. In the late 1800s, most larger cities across the nation built sewer systems to carry rain water and sewage in the same pipe. This is called a combined sewer. During dry weather conditions, the sewer system typically works very well. But, during heavy rainstorms, these combined flows can exceed the capacity of the sewer system and overflow into local rivers and Narragansett Bay. This is a combined sewer overflow, or CSO. CSOs violate the Federal Clean Water Act.

The NBC embarked on a three-phase project in 2001 to construct deep rock storage tunnels to temporarily store the flow from these CSOs during the storm and then transport it to the wastewater treatment facility when the storm ends. Phases I & II of NBC's Comprehensive CSO Project have eliminated approximately 60% of CSOs to upper Narragansett Bay, at the rate of 1.1 billion gallons of combined sewage per year. Phase III, which begins construction in 2021, will eliminate another 38% resulting in an 80% reduction in shellfish bed closures, fewer bathing beach closures and a cleaner healthier Bay for all Rhode Islanders.

Development of the map included input from several stakeholder groups including the Woonasquatucket River Watershed Council, Save the Bay, and the Community Boating Center. "The Woonasquatucket River Watershed Council (WRWC) has been a long-time partner with the NBC to make the Woonasquatucket cleaner," commented Alicia Lehrer, Executive Director of the WRWC. "We share a long-term vision of making the Woonasquatucket swimmable and fishable for all. We are so excited about NBC's real-time CSO map so we can all watch together as the river improves and know when we need to be cautious."

"Through the efforts of DEM, NBC and many partners, we have made incredible progress in cleaning up Rhode Island's waters," said DEM Director Janet Coit. "Today our bays, rivers, and coastal waters are cleaner and healthier, supporting our economy and increasing shellfishing and recreational opportunities. Kudos to NBC for implementing this new alert tool and for their investments in sewer system operations, maintenance, and monitoring."

"I'm very proud of the work the NBC team, in conjunction with DEM and our stakeholders, to bring this project to fruition," Mesolella added. "It speaks to the high quality and reliability of the NBC's flow monitoring program and enables more Rhode Islanders to safely experience and enjoy our rivers and bay, which is of course the goal we're all striving for."

The website also provides information about the NBC sewer system, the possible causes of sewer overflows, and general language about recreation and contact with urban rivers.

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NARRAGANSETT BAY COMMISSION NAMES PAWTUCKET'S HEON "ENVIRONMENTAL EDUCATOR OF THE YEAR"

The Narragansett Bay Commission (NBC) has selected Kimberly Heon, a second-grade teacher at Agnes Little Elementary School, as its 2020-2021 NBC Watershed Explorer Environmental Educator of the Year. The NBC's Watershed Explorers program provides hands-on water quality education to students in grades 2-5 and has won numerous national awards for excellence.

Heon, a thirty-year veteran of the Pawtucket system, has participated in the NBC's Watershed Explorer program for over fifteen years, engaging her students in hands-on water quality science and weaving important environmental lessons into other parts of her curriculum to reinforce her students' knowledge of key environmental science concepts.

NBC Environmental Education Coordinator Cynthia Morissette presented Heon with inaugural award during Teacher Appreciation Week. "I am extremely proud to present the first NBC Watershed Explorer Educator of the Year Award to Mrs. Heon," Morissette said. "She is an exceptional educator who works tirelessly to create the most comprehensive educational experiences for her students. Her compassion and dedication, ensuring that all students love learning is what makes her so special."

Over the last year, even with all the difficulties and challenges of distance learning, Heon continued to support the Watershed Explorer Program. Her students' involvement with NBC remained strong through virtual lessons, conducting water testing, building models of a watershed, learning about macroinvertebrates, and creating informational posters about a variety of water-dependent critters.

"I am a proud graduate of Pawtucket Schools- attending Baldwin Elementary, Slater Junior High School and Shea Senior High School," remarked Heon. The University of Rhode Island graduate says her favorite subject to teach is Science, and over the past year she and her students have virtually followed the progress of a Robin family, from nest-making to fledgling and completed a virtual dissection of owl pellets in conjunction with the Audubon Society.

"Mrs. Heon is a shining example of what every educator should strive to be," said Morissette as she delivered the award.



One Service Rd Providence, RI 02905

Contact Us Employment

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NBC NEWSLETTERS



NBC Pipeline

January 2021

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

News Briefs...

Welcome to NBC...



Meet Vanessa Houayes!

Vanessa is the new NBC Lab Technician at the Water Quality & Science Building and is from Swansea, Massachusetts.



Meet Carissa Porreca!

Carissa started her position as an NBC Customer Service Rep. on December 20th. She previously worked as a Florist Manager at Stop & Shop and hit record breaking sales last Valentines Day. She enjoys reading, floral related things and spending time with family and her dog Blitz.



Meet Coby Koehler!

Coby started his position as an Environmental Monitor on December 6th. Coby has two beautiful girls, named Ava and Kira.



Meet Brannon Green!

Brannon started on December 20th as an Operator I at Field's Point.



Meet John Motta!

John has gone from a temp to full time NBC employee as of December 20th. John's position will be Helpdesk1 in the IT department. John is from Lincoln, RI and enjoys game design.



Meet Lindsey Hazard!

Lindsey will be the new Field's Point Clerk starting on January 3rd. She previously worked at Whitmarsh Corporations as a Case Manager. She has one child and loves watching Grey's Anatomy.

Use or Lose Update

Due to COVID-19 impacts NBC will extend the deadline for utilizing vacation "Use or Lose" time from December 19, 2020 to January 16, 2021. Please note if you are at your maximum allowable carry over time, any vacation time accrued during the extended "Use or Lose" time period will also need to be discharged by January 16th. Upfront personal time is now currently available; upfront vacation time will not be available until January 17, 2021. Please plan accordingly and remember to coordinate all time off with your supervisor and obtain all necessary approvals.

NBC Promotions & Retirements

Wishing the following NBC employee success in their new position.

Promotions: Brian McGinn to FP Process Monitor

Happy New Year

Casual Day Fund

In December, the NBC Casual Day Fund Committee conducted a raffle virtually to choose a winner to pick a 501(c)(3) charitable organization of their choice to make a donation. All employees who participate in Casual Day were automatically entered and our lucky winner is **Elaine DelRossi!** Elaine chose for NBC to donate to the St. Jude Children's Research Hospital. The Casual Day Fund also made a donation to the Special Olympics of RI.



Congratulations...

To NBC Biologist **Nora Lough** for receiving the Clair N. Sawyer Award from the New England Water Environment Association (NEWEA). The award honors those who have given truly outstanding service in one or more of the following aspects of the wastewater industry; university teaching, operator training, research, application of innovation to improve the water environment and the development of technical publications that advance the knowledge of wastewater practitioners.



Nora works closely with RIDEM and RICWA sitting as chair of operator training in RI. She is involved with operator training for NEWEA, NEIWPC, and RICWA. In addition to operator training, Nora is on the NEWEA Lab Practices Committee, Laboratory Certification Subcommittee and Vice President of the RICWA.

The NEWEA Annual Conference will be held virtually this year due to COVID-19. The virtual event will be held January 26th-28th and February 2nd-4th from 11:30 AM - 3:30 PM. NEWEA is planning a yearlong recognition of all their 2020 awardees starting the first week of their annual conference.

Congratulations Nora!

Biospark Educates BP on Cogenerator Biogas System

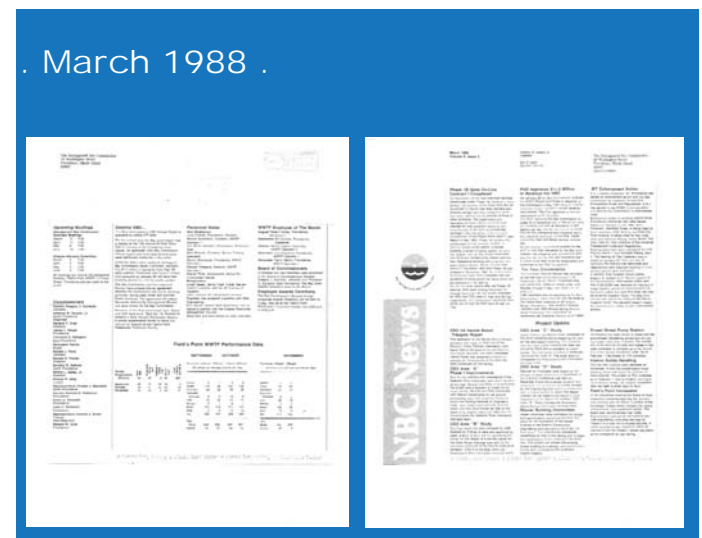
On December 14th, Biospark and NBC had a successful startup of the Cogenerator Biogas system and provided BP staff with an overview of the system and the engine. The Biogas Cogenerator will run off the methane gas from BP's 4 existing digesters and power up to 40% of the electricity we use to run the facility. This will save money and provide cleaner emissions. The system has the ability to run on both methane and natural gas.



-- Submitted by Marc Pariseault & TJ Harrington

Pipeline Throwback

Maintenance Manager **Ron Goodinson** has been working for NBC for 33 years and came across an old Pipeline from March of 1988. Pipeline's were mailed to employee's homes during that time and it was still their source of updates and information for what's happening at NBC, listing the Commissioners, Board Meeting dates for the year, employee of the month, performance data and plans/progress for CSO Phase I. [Click here](#) to read the full March 1988 Pipeline.



First Storm of the Season, NBC Cleans Up

NBC would like to give a big shout out to all those warriors that worked through the snow event December 16th-17th. This was the first big snow we've had in a long time, receiving about 8"-10" of snow. Field's Point, Bucklin Point and IM all had extra staff working multiple shifts to keep up with the snow. The wind was giving everyone grief by blowing the snow back into the areas just cleared.



Photo Submission: Tyler Bissonnette, Bucklin Point

Bucklin Point had new staff that joined in with the others to really help out. The plant operated well throughout the event with no power issues, but staff were at the ready, just in case.



Photo Submission: Tony DiLorio, Field's Point

Field's Point had some staff shortages that really put an extra burden on those that did help out, but they did an excellent job. The plant operated well and let the extra hands on deck deal with the snow.

IM worked through the night and into the day to move lots of snow. The equipment all worked well for these seasoned snow experts.

Everyone helping out during this event did an excellent job keeping so many areas safe and accessible for the rest of NBC staff and it is much appreciated!



Pictured left: Bernard Harwood & Jesse Gomez, BP.



Pictured right: Pedro Sanders, IM.



Photo Submission: Eric Bogosian, Field's Point

-- Submitted by Meg Goulet

Traffic Jam at Bucklin Point

Environmental Monitor, Gerard Hamel snapped this photo for us while at Bucklin Point. These wild turkeys were holding up traffic through the plant on December 21st.








NBC Pipeline

February 2021

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

Calendar of Events *for February*

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

Six More Weeks of Winter...

Phil the famous Pennsylvania Groundhog saw his shadow on the snowy Tuesday morning of February 2nd, declaring there will be six more weeks of winter. NBC's Legal Counsel, Kallie Longval made these adorable Groundhog cupcakes for her team to celebrate!



News Briefs...

Welcome to NBC...



Meet Nigel Yattaw!

Nigel is a re-hire and started back at NBC on January 17th as Mechanic I at Bucklin Point.



Meet Michelle Asels!

Michelle will be Finance's new Administrative Assistant. She is from Warwick, loves Kayaking and attended RIC, majoring in Finance and Economics.



Meet Christopher Brasil!

Chris started his position as FP Operator I on January 17th. Chris previously worked as a sheet metal mechanic before becoming an Operator. He enjoys painting, working on his bike and traveling to his favorite spot, Colorado.

PPAC Announces Jo-Ann Ragosta Memorial Scholarship

NBC's dear friend and colleague, **Jo-Ann Ragosta** passed away on September 10, 2020 after a battle with cancer. Not only was she a long time employee of NBC, she sat on the Providence Performing Arts Center's (PPAC) Board of Directors from 1998 until her passing and was Chairperson of PPAC's Community Outreach Committee.

Jo-Ann had a passion to assist talented young artists in the RI School Community, which prompted the Ragosta family to establish the Jo-Ann Ragosta Memorial Scholarship.



Spring Tuition Reimbursement

Applications for tuition reimbursement must be submitted by **Friday, February 5th** for all Local 1033, Council 94 and Non-Union Employees. Applications should be forwarded to **Karen Musumeci at One Service Road.**

Each Application **must be** accompanied by a short course description taken from the college catalog. Courses eligible for reimbursement should be related to your job or for career enhancement within the NBC. Blank Application forms may be obtained from the Commission's Human Resources Office or by going on Baynet.

If you have any questions regarding the program, please contact **Diane Buerger at ext. 340.**



COVID Testing

NBC has established a voluntary COVID testing program throughout the organization. Testing

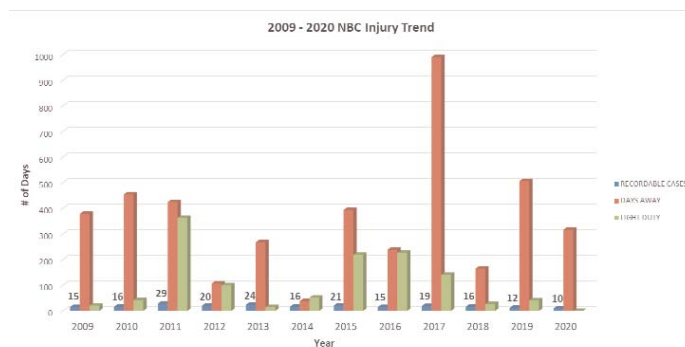


will be conducted on-site and results will be available 15 minutes after taking the test. It is important to note that while receiving a negative test result will not relieve employees from adhering to established mask wearing, disinfecting and social distancing practices, testing will assist in the fight against the spread of the virus.

For more information on where to get tested and how to sign up for testing please check with your manager or supervisor for more details.

NBC Injuries Continue to Decline

NBC's TAC Section is proud to announce that the number of OSHA-recordable injuries throughout NBC have declined for the fourth consecutive year! This is a huge testament to the dedication to safety exhibited by all NBC employees on a daily basis. As shown in the graph below, the number of recordable cases at NBC has decreased steadily since 2017. Every NBC employee should feel proud of this achievement. The following statistics from 2019 - 2020 are also very impressive:



- Number of Days Away from Work decreased by 38%.
- Number of Light Duty Days decreased by 100%.
- Number of Recordable Cases decreased by 17%.

What is an OSHA Recordable Injury?

While any workplace injury is undesirable and unfortunate, some injuries have worse outcomes than others. An OSHA Recordable Injury is any work-related injury that results in any one of the following:

- Death
- Unconsciousness
- Days Away from Work
- Medical treatment beyond first aid
- Returning to work on Light/Restricted Duty
- Illness diagnosed by a medical professional.

Through effective safety training, on-the-job awareness and management commitment, NBC employees can work together to make 2021 the safest year on record.

-- Submitted by Dave Aucoin

Facility Update:

- Field's Point has recently had some issues with the SCADA system that runs plant operations. The **FP Control Systems Team** has been putting in a lot of hard work after hours to make sure the SCADA system is available to FP staff. Without SCADA FP would have no choice but to run the plant manually.
- Recently one of FP's 40MGD sewage pumps at the Main Pump Station shorted out. **Maintenance** stayed after hours to work on the problem and the **Electricians** were able to get it unwired and the **Mechanics** removed the motor to the #1 Pump which is roughly 8,000 lbs. They were able to get the new motor in place all within 8 hours. FP staff still continues to work on this and plan to have the pump back in service as soon as possible.



A BIG thank you to the Field's Point Team for all their hardwork!

-- Submitted by Eric Bogosian

Show Off Your NBC Blanket!

How are you using your NBC blanket? Send us a selfie or a picture to share in next months Pipeline! **Cynthia Morissette** and **Shaylyn Forloney** have been using it with their kiddos (cuteness overload below)!



Amira Morissette



Francesca Forloney





NBC Pipeline

March 2021

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Calendar of Events *for March*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1	2	3	4	5	6
					Payday	
7	8	9	10	11	12	13
14	15	16	17	18	19	20
 Daylight Savings Begins			 St. Patrick's Day		St. Joseph's Day Payday	 First Day of Spring
21	22	23	24	25	26	27
						Passover Begins
28	29	30	31			
Palm Sunday Full Moon						

NBC Casual Day Update

NBC will be making a donation this month to the Wounded Warrior Project (WWP) in honor of Bill Badger and Stephen Kruwell. WWP is a charity and veterans service organization that offers a variety of programs, services and events for wounded veterans of the U.S. military. For more information visit www.woundedwarriorproject.org.



News Briefs...

Welcome to NBC...



Meet Alan Birchall!

Alan Started as a Field's Point Operator I on February 14th. He is from Pawtucket, RI and previously worked as an Industrial Mechanic before coming to NBC. Alan has a daughter and enjoys anything sports related!



Meet Jarrett Sweet!

Jarett started as an Operator I for Field's Point. He's from East Providence, RI.



Meet Kayla Bessette!

Kayla is one of NBC's new Customer Service Representatives. She is from North Providence and has a happy 1 year old daughter. Kayla previously worked for Blue Cross Blue Shield RI. She is currently working to finish her bachelors degree and loves reading and snow tubing in her free time!

Rapid COVID Testing Offered for NBC Staff

Just a friendly reminder, NBC has established a voluntary COVID testing program throughout the organization. Testing will be conducted on-site and results will be available 15 minutes after taking the test. It is important to note that while receiving a negative test result will not relieve employees from adhering to established mask wearing, disinfecting and social distancing practices, testing will assist in the fight against the spread of the virus.



For more information on where to get tested and how to sign up for testing please check with your manager or supervisor for more details.

In Loving Memory...

NBC is saddened to announce that two long time NBC employees passed away this month.

Bill Badger

passed away unexpectedly in his home on February 5th. Bill worked worked as a Process Monitor for over 20 years at Bucklin Point until his retirement in 2014. He was a dedicated NBC employee and will be missed.



Stephen Kruwell

passed away unexpectedly on March 1st at the young age of 33 years old. Stephen was the BP Asset Management Assistant, working for NBC since 2008.



Stephen was involved in all aspects of operations and maintenance, purchasing, budget preparation and maintaining capital service agreements. Stephen was a team player and could be relied upon to help-out wherever and whenever needed. Stephen was also a member of the RI National Guard and took great pride in serving our country.

Bill Badger and Stephen Kruwell will be missed by all of NBC.

Staff Complete Successful ESPS Shutdown

With a lot of strategic planning and preparation, NBC's Field's Point, IM, Engineering and Construction staff coordinated a shutdown of the Ernest Street Pump Station in the early morning hours of Friday, February 26th. Reason for this shutdown was to conduct a thorough inspection of critical components to the Pump Station to



Photo: Principal Environmental Engineer Bob Baglini

better prepare for upcoming repairs needed. Shutdown began at 2 AM and went as planned. Thank you to all the staff involved making this inspection a huge success, you are all #H2oHeroes!

-- Submitted by Meg Goulet

Finance Receives GFOA Award

The Government Finance Officers Association of the United States and Canada (GFOA) has awarded NBC the the Distinguished Budget Award with special Capital Recognition and special Performance Measures Recognition. NBC has received this prestigious award for 19 years consecutively.



In order to receive this award, a governmental unit must publish a budget document that meets program criteria and must be rated either proficient or outstanding by at least two of the three reviewers in all four categories; policy document, financial plan, operations guide, and communications device. In order to obtain Special Capital Recognition the governmental unit must receive outstanding ratings in capital expenditures and debt by all three reviewers. Special Performance Measure Recognition is obtained when three viewers must find the performance measures to be outstanding. **Congratulations Finance!**

RICWA Awards NBC with Four Prestigious Awards Postponed Due to the Pandemic

Four awards were recently announced from the Rhode Island Clean Water Association (RICWA) due to COVID19 forcing cancellation of the May 2020 awards banquet and the Fall 2020 banquet, the selection for awards was instead done virtually.



FP and BP Receive RICWA Gold Awards: The RICWA Gold Award is a significant honor, it is given annually to a wastewater treatment facility in special recognition of the facility's perfect permit compliance for two consecutive years. FP and BP have about 250-300 opportunities to violate permit requirements everymonth. Exceedance of just one parameter takes you out of the running from receiving this award.

The RICWA Gold Award is a true testament to the excellent work done by the staff at both facilities who make sure they are monitoring and treating the wastewater 24/7 to stay in compliance.

A. Joseph Mattera Safety Award: RICWA issued the Field's Point facility the A. Joseph Mattera Safety award for 2019.

The Mattera Safety Award is given annually to large wastewater treatment facilities greater than 5 MGD in special recognition for the facilities exemplary effort in employee safety.

Carmine J. Goneconte Operator of the Year Award: NBC's Technical Advisor for Operations,

Paul Desrosiers received this award for demonstrating a high level of leadership and performance in wastewater operations. Paul has been with NBC for 31 years and now works with both plants sharing and educating others with his many years of experience and knowledge in wastewater management. Paul helps train new operators for their licenses and assists with special projects like the aerobic digesters and biosolid disposal alternatives.



Congratulations FP, BP & Paul Desrosiers!

Congratulations...

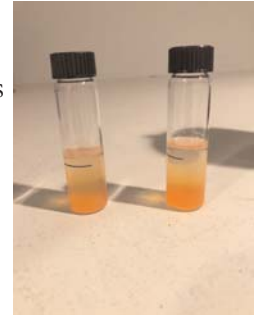
To NBC's Lab Manager **Walter Palm** on receiving the Crystal Crucible Award from NEWEA.

This award recognizes and honors individuals for their outstanding contributions that promote increased professionalism in the wastewater laboratory field. Those contributions include significant, active participation in wastewater analyses, education, training, safety, certification, management, and/or planning; involvement in promoting the professional recognition of the wastewater analysis profession; active participation on the NEWEA Laboratory Practices Committee; papers or articles related to the wastewater analysis profession that have been accepted by state, regional, or national publications; technical presentations at professional conferences; active participation in the WEF Laboratory Practices Committee. Walter is an active member in the NEWEA community and wastewater industry. Walter is involved with educating, training, participating on laboratory committees and serving as a judge in the laboratory category during Operation Challenge Events. **Congratulations Walter!**



Recent Testing Show Major Improvement in the Woono River

For the first time in 18 years **Cynthia Morissette** received two negative fecal colliform tests at Riverside Park in Providence which is located along the Woonasquatucket River along the Woono River Greenway in the Olneyville area. In the 18 years she has been teaching and testing with her NBC Watershed Explorers at Riverside Park results have always been positive for fecal. We have the work of NBC, NBC's CSO Project, clean up efforts from local organizations and volunteers and the Woonasquatucket River Watershed Council to thank for that. We are finally starting to see results from all the time, effort, money, determination and dedication put into restoring the Woonasquatucket. ABC6 spotted our social media posts and wanted to share this great news, click the link below to check it out!

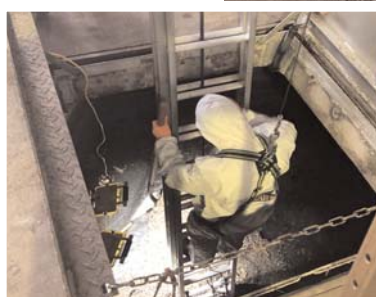


ABC6 Feature: Woonasquatucket River water test results provide encouraging news

Bucklin Point Repairs City Water Line

A city water line ruptured late in the day on Tuesday, February 23rd. Water in various areas of the plant needed to be shutoff to analyze the problem. The issue was repaired by IM, BP Maintenance and Operations. Plant Operations were back to normal on Wednesday afternoon, February 24th. Engineering and Construction will be working to find a solution for the rest of the old city water piping that is over 70 years old originating back to when the plant was first built in the 1950's.

On top of this unexpected waterline rupture at BP, staff were also cleaning heavy debris in two of the four grit channels. With all the extra help on deck from IM and Construction they were able to get both jobs accomplished. Great job BP, IM, Construction and Engineering!



-- Submitted by BP Managers



NBC Pipeline

April 2021

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Calendar of Events *for April*

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

News Briefs...

Welcome to NBC...



Meet Jason Trenholm!

Jason started as a BP Operations Supervisor on March 14th. Jason is from Fall River, MA and previously worked for Veolia Water in Taunton. He has 3 children and enjoys history and community theatre. Jason originally went to college for acting!



Meet Gerald Lagasse!

Gerry will start on April 11th as NBC's Assistant Construction Manager. Gerry previously worked for Hart Engineering for 33 years and has worked on some of the largest construction projects in the state. Gerry lives in Burrville with his wife, son and their dog Tilly.



Meet Rosalina Fascitelli!

Rosie started on March 28th as a Pretreatment Clerk. Rosie Previously worked for Fuller Packaging before joining the NBC team. She enjoys gardening and spending time with her two children and two grandchildren.

Rapid COVID Testing Offered for NBC Staff

Just a friendly reminder, NBC has established a voluntary COVID testing program throughout the organization. Testing will be conducted on-site and results will be available 15 minutes after taking the test. It is important to note that while receiving a negative test result will not relieve employees from adhering to established mask wearing, disinfecting and social distancing practices, testing will assist in the fight against the spread of the virus.



For more information on where to get tested and how to sign up for testing please check with your manager or supervisor for more details.

Congratulations...

To FP Operations Manager **Nathan Boiros** and his wife Stacie on the birth of their second baby boy, Bennett Ronald Boiros.



Bennet was born on April 1st, weighing 8 lbs 6 oz and measuring 20 inches long. Mom and baby are doing well and their oldest Chase is so excited to be a big brother!

To FP Mechanics **Norman Rodolewicz, John Schupp, Norman Ellinwood, Mark Taylor, Luis Lubo, Roberto Castellanos, Michael Hernandez and Troy Zillich** on receiving their certification training for acid waste piping installation and repairs.

Chemical (Acid) waste piping is used in the NBC Laboratory to carry the waste from work stations to a neutralization pit in the WQSB basement. This piping must be electrically fused at all connections to prevent leakage. Local and Federal code requires that persons installing or repairing this piping be certified by attending a hands-on training.



This training was provided to NBC free of charge by one of NBC's vendors, Ryan Herco at Flow Solutions of Coventry, RI.

Mechanics Perform Routine Maintenance on FP Screw Lift Pumps

On Monday, March 8th, Maintenance staff performed routine preventative maintenance on the lower bearing for screw lift pump #2. During this inspection, the stub shaft on the bearing was found to be damaged from a faulty grease seal. This would cause a loss of lubricant and eventually lead to catastrophic failure. Having a spare bearing in stock,



Pictured: Mark Brasil & Roberto Castellanos

Maintenance staff replaced the entire lower bearing. This is a difficult procedure with several safety factors to address. The 96 inch screw must be stabilized and supported while the bearings are replaced. There are then several alignments and torque adjustments that are required to a balanced screw pump. This task was completed by **Norman Ellinwood, Mark Brasil** and **Roberto Castellanos**. Great job!

--Submitted by Ron Goodinson



March 10th was a very eventful day for Field's Point. The wind turbines were shutdown due to scheduled maintenance by National Grid. Senior Electrician **Wes Andrew** stayed after hours to help get the wind turbines back online once National Grid completed their work. Unfortunately this did not go as planned and the entire plant lost power.

Operations staff on duty, **Joe Celona, Diego Matamoros** and **Brannon Green** along with **Wes** took immediate action and were being directed by Operations Supervisor **Ryan Patnode**. The crew took control over the situation and were able to get the plant running back to normal in a short amount of time. There were a few other power glitches later on that evening that Operations came across but overall they did a great job handling this emergency situation.

NBC would also like to thank the Control Systems Team, **Art Sheridan, Jack Fascitelli** and **Marcos Quinones** on all their hard work and long days they've put in recently. The SCADA system that runs Operations was lost when there was an update with NBC's computer system. A lot of time and effort behind the scenes went into getting this operational again. Thank you for all your hardwork! #h2oHeroes

--Submitted by Eric Bogosian

RICWA President Presents Awards to NBC

In the March edition NBC mentioned the RICWA recently awarded NBC four prestigious awards for the 2019 year. Due to COVID, RICWA award ceremonies were postponed twice. RICWA President, Peter Connell took the time to present Field's Point their awards on March 12th and Bucklin Point on March 24th both within a very small circle of staff to congratulate NBC. Field's Point received the Gold Award and the A. Joseph Mattera Safety Award, Paul Desrosiers received the Carmine J. Goneconte Operator of the year award and Bucklin Point also received the Gold Award. For more information on these awards visit the [March Pipeline](#).



Pictured above: Laurie Horridge, Meg Goulet, Bill Dolan, Marc Pariseault, TJ Harrington, Fred Diez, Kim Sandbach & Peter Connell.



Pictured above: Paul Desrosiers, Eric Bogosian, Nathan Boiros, & Steve Cote.



NBC Pipeline

May 2021

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Calendar of Events *for May*

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

News Briefs...

Welcome to NBC...



Meet Steven Castaldi!

Steven started as a Bucklin Point Operator I on April 25th. Steven is from Smithfield, RI.

NBC Employee Promotions

Wishing the following NBC employee success in their new position.

- **Joe Prata** was promoted to BP Asset Management Assistant.
- IM's **Dan Barlow** and **Dave Weisman** were promoted to IM Operator III.

NBC COVID-19 Updates...

Just a friendly reminder, NBC continues to offer rapid COVID tests on-site throughout the organization and results are available 15 minutes after taking the test. It is important to note that while receiving a negative test result will not relieve employees from adhering to established mask wearing, disinfecting and social distancing practices, testing will assist in the fight against the spread of the virus.

For more information on where to get tested and how to sign up for testing please check with your manager or supervisor for more details.

In addition to helping make NBC a safe working environment and encouraging vaccinations, NBC is offering a one-time \$100 payment to each employee who provides proof of their COVID-19 vaccination. This is an additional benefit and separate from the Blue Cross Wellness Program. All you need to do is email a photo of your official **COVID-19 Vaccination Report Card** to **Belinda McLaughlin** in HR.

NBC Test Data as of April 30th..

Tests administered: 475
Negative Tests: 469
Positive Tests: 4 (2 employees, 2 tests each)
Invalid Tests: 2

Congratulations...

To Environmental Monitor **Amanda Kezirian** on the birth of her baby girl, Mackenzie. Mackenzie was born on April 12th at 11 PM weighing 6 lbs 12 oz measuring 18 7/8" long. Mom and baby are doing well.



The EM team estimated the weight and exact date and time the baby would be born and the winners were; Eliza Moore guessed the exact weight of baby Mackenzie, Bekki Songolo and Tom Uva were the closest to the actual birth day and Joe Guerreiro guessed the exact time Mackenzie was born.

Congratulations Amanda!

NBC Confined Space Rescue Drill

NBC conducted a confined space rescue drill on May 4th at the NBC Odor Control Facility on Calvary Street in Providence. These drills are required by OSHA standards every year.



Special thanks to the **IM Department** and to **Dave Weisman** for making the 911 call and conveying the situation in a calm manner. The drill was a success and the Providence Fire Department were grateful to learn about this confined space in NBC's district. There will be more drills in the upcoming weeks this month. Stay tuned...

Local Organizations Participate in Earth Clean Ups Thanks to Some Help from NBC

NBC announced the grantees for the 2021 Earth Day River Clean Up Grant Program. Hundreds of volunteers from different organizations gather to remove thousands of pounds of tires and debris from the beds and banks of the rivers, ponds and shorelines of Rhode Island during these annual Earth Day clean ups. Grantees for this year are: Woonasquatucket River

Watershed Council, Blackstone River Watershed Council/Friends of the Blackstone, City of Central Falls, The Empowerment Factory, Save the Bay, Neutaconkanut Hill Conservancy, Inc., Blackstone Valley Tourism Council/Keep Blackstone Valley Beautiful, Town of Smithfield, Waterman Street Dog Park Association, Partnership for Providence Parks, Blackstone Heritage Corridor, Inc., Lincoln Conservation Commission, East Providence Public Works, Friends of the Moshassuck, Ten Mile River Watershed Association, City of East Providence, Edgewood Waterfront Preservations Association.



Volunteers from one of the Woonasquatucket River Watershed Council's Earth Day clean ups.

NBC Teams Up with Other State Agencies on How to Open a Restaurant

On May 4th Governor McKee along with the RI Department of Business Regulation and RI Commerce launched a new website which helps future restaurant owners navigate the process of opening a restaurant in RI. The website is a one-stop resource providing a general overview of how to navigate the opening of a restaurant, including guiding users through obtaining necessary local and state permits and licenses.



A big shout out to Pretreatment Manager, **Kerry Britt** for all the time and effort put in to help develop and streamline the permitting process for those in the Narrabay service area for the website. John Zuba, retired Permits and Planning Manager also assisted with the sewer connection permit side of things.

Visit the website [here](#).

NBC Honors Twenty-two Companies for Perfect Compliance

This year marks NBC's 26th Annual Merit Award celebration honoring twenty-two companies in the NBC service area for perfect compliance and one company a Stormwater Management Award.



Each year NBC recognizes those companies among its 1500 permitted users who have achieved perfect regulatory compliance and outstanding pollution prevention in the previous year. These last two years awards were mailed to the recipients instead of holding our annual awards breakfast due to COVID-19 restrictions, NBC hopes that next year things will be different and awards can be given in person.

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.

The companies in perfect compliance include: A. Harrison & Company, Inc., Eagle Laundry, Inc., Electrolizing, Inc., Godfrey & Wing, Inc. dba Impco, Inc., HP Services, Inc., Induplicate, LLC, International Chromium Plating Co., Inc., Interplex Engineered Products, Inc., John H. Collins & Sons Company, Manchester Street, LLC, Mahr Inc., Metallurgical Solutions, Inc., Materion Technical Materials, Inc., Pawtucket Power Associates, Providence Metallizing Company, Inc., Stackbin Corporation, Tanury Industries, PVD, Inc., Technodic, Inc., Teknor Apex Co., Tiffany & Company, Truex, Inc., and Univar USA, Inc.

NBC also recognized Farm Fresh RI for the 2020 Stormwater Management Award. NBC instituted a Stormwater Management Award in 2007 to recognize those companies, organizations or individuals that successfully use Best Management Practices to minimize stormwater impacts on the NBC sewer collections system.

Bucklin Point Replaces Dry Weather Effluent

There has been a lot of action at Bucklin Point as of late. On April 20th Operations, Maintenance along with Applied Dynamics replaced the number 2 dry



weather effluent. Pam Ciolfi and Dave Brouillard were instrumental in coordinating this very important Capital project. This job required precision planning and execution.

Imperatore Crane service arrived at Bucklin Point at 8:30 AM to setup while maintenance took out the skylight so the pump could be removed and replaced. This job had to be done under almost perfect conditions and other than a strong breeze that made things tricky coming in through the roof of the building the weather cooperated. NBC would like to thank Dave Brouillard, Mark Healy and Cliff Koehler for supervising the job, and would also like to thank Fred Diez, Mike Arlan, Tim Henshaw, Michael D'Arezzo, Bill Dolan, Ed Migley and Gene Medeiros for making this difficult job look easy. Great teamwork!



-- Submitted by Marc Pariseault

NBC Announces First Ever, Environmental Educator of the Year Award

NBC has chosen to introduce for the first time the Environmental Educator of the Year Award.

NBC has selected Kimberly Heon, a second-grade teacher at Agnes Little Elementary School for the 2020-2021 school year. NBC Environmental Education Coordinator **Cynthia**



Morissette presented Heon with the award during Teacher Appreciation Week.

Heon, a thirty year veteran of the Pawtucket system, has participated in the NBC's Watershed Explorers program for over 15 years, engaging her students in hands-on water quality science and weaving important environmental lessons into other parts of her curriculum to reinforce her students' knowledge of key environmental science concepts.

Over the last year, even with all the difficulties and challenges of distance learning, Heon continued to support the Watershed Explorer Program with her students. She is a shining example of what every educator should strive to be.

Boot & Rx Safety Glasses Reimbursements

The annual boot reimbursement period for authorized safety glasses and PPE boot purchases begins July 1, 2021, through October 31, 2021. Eligible employees are allowed one pair of approved PPE boots per fiscal year and one pair of safety glasses every two years. Forms for approval and reimbursement can be found on Baynet, [here](#).

Contact Meg Goulet at x302 or Dave Aucoin at x418 with questions or for more information.





NBC Pipeline

June 2021

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 June*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		1	2	3	4	5
6	7	8 FP & PT EA 11:30 - 12:30 PM	9 LAB EA 9-10 AM COB & IM 10 - 11:30 AM	10 BP EA 11:30 - 12:30 PM	11	12
13	14	15	16	17	18 Payday	19
	 Flag Day				CSO Phase III Ground breaking	
20  Father's Day	21  First Day of Summer	22	23	24 Full Moon	25 Payday	26
27	28	29	30			

News Briefs...

Mark Your Calendars...

NBC is overdue for a well deserved employee appreciation event. Mark your calendars and join us outside for a specialty drink and snack from Presto Strange O' Coffee Truck June 8-10th depending on your location.

Please be sure to get approval to attend from your supervisors or managers so we can maintain coverage. If you have any questions or concerns, please contact **Talia Cheshier** at ext. 394.



FP & PT: June 8th 11:30 AM - 12:30 PM
LAB: June 9th 9 AM - 10 AM
COB & IM: June 10th 10 AM - 11:30 AM
BP: June 10th 11:30 AM - 12:30 PM

FP & BP second and third shifts will have items from Presto Strange O' Coffee Co. provided in their break areas.

Thank you for all you do!

NBC COVID-19 Updates...

Just a friendly reminder, NBC continues to offer rapid COVID tests on-site throughout the organization and results are available 15 minutes after taking the test. It is important to note that while receiving a negative test result will not relieve employees from adhering to established mask wearing, disinfecting and social distancing practices, testing will assist in the fight against the spread of the virus.

For more information on where to get tested and how to sign up for testing please check with your manager or supervisor for more details.

In addition to helping make NBC a safe working environment and encouraging vaccinations, NBC is offering a one-time \$100 payment to each employee who provides proof of their COVID-19 vaccination. This is an additional benefit and separate from the Blue Cross Wellness Program. All you need to do is email a photo of your official **COVID-19 Vaccination Report Card** to **Belinda McLaughlin** in HR.

NBC Test Data as of June 1st..

Tests administered: 564
Negative Tests: 557
Positive Tests: 4
(2 employees, 2 tests each)
Invalid Tests: 3

Welcome...



Meet Esther Levia!

Esther will start on June 6th as a Customer Service Representative. She is from Guatemala, has 3 children and enjoys gardening. Her bilingual background and previous experience will be a huge help to the Customer Service Team.

Congratulations...

To Assistant Customer Research Supervisor, **Gary Gannon** and family. Gary's son Brenden graduated from URI on May 22nd with a major in Kinesiology and a minor in Biology working his way towards becoming a PA. Congratulations and best of luck on your future endeavors.



Plant Flow Shut Down

Field's Point had a Plant Flow Shutdown on Tuesday, May 18th. The sewage pumps were shut off at Ernest Street Pump Station at 2 AM so the contractor, DOC, could block the discharge from sewage pumps #3 & #4. This work was done in preparation for rebuilding the isolation gates. DOC also swapped out the motor (pictured below) that lifts the gates for flow to pass through the plant.

Like every shutdown, this takes a lot of coordination and teamwork. Operations, Maintenance, Interceptve Maintenance, Environmental Monitoring and DOC did a great job working together to get this mission accomplished. Stay tuned for future shutdowns coming up...



--Submitted by Eric Bogosian

In-Person Safety Training Resumes

On May 18th and 20th, two dozen NBC employees obtained CPR/AED & First Aid Certification in the Field's Point Education Room. These classes were special, as they were the first two full in-person safety training classes offered at NBC since March 2020. In-person safety training class sizes will remain at 12 employees (1 per seat) for the foreseeable future.

Due to COVID precautions, previous safety trainings have been conducted virtually.



-- Submitted by Dave Aucoin

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. All NBC employees are encouraged to take time to become reacquainted 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.
- 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.

To learn more about the signs and symptoms of different types of heat illnesses, including first aid measures for each, employees are encouraged to visit the OSHA Heat Illness Prevention Campaign website [HERE](#). This site offers a useful smartphone app "OSHA-NIOSH Heat Safety Tool," so information is always readily available.

-- Submitted by Dave Aucoin



Osprey Chicks Have Arrived at Bucklin Point

In the last week of March, three Osprey breeding pairs returned to Bucklin Point and began building their nests on NBC's Bucklin Point Osprey platforms. Thanks to the collaborative efforts of BP Operations, IT and TAC, NBC staff can view a livestream of one of the osprey families via our Intranet using the Chrome browser at <http://intranet/Pages/Osprey.aspx>.



Photo Credit: Jim Kelly

Ospreys mate for life and the same breeding pairs are seen returning to Bucklin Point annually. The camera has been monitoring the incubation of three eggs since the last week of April. The first hatchling just arrived on June 2nd. Tune in to the live feed to watch the next two chicks emerge and see dad bring fresh menhaden from the Seekonk River to the nest. Be sure to check out the @Narrabay Instagram feed for the next sixty days to learn about helicoptering and branching as the nestlings prepare for their first flight.

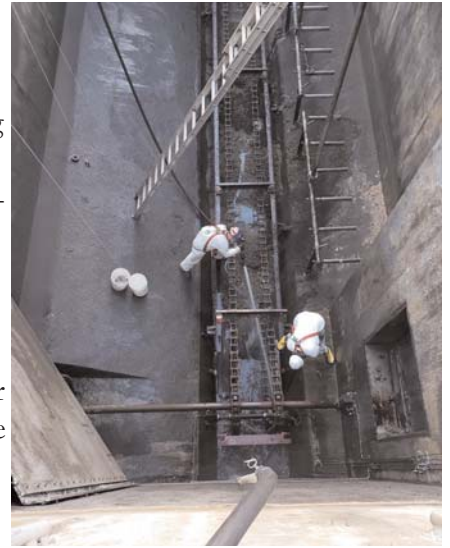


The osprey camera is powered by a portable photovoltaic system, built by BP Operations.

-- Submitted by Kerri Houghton

After a Rainy Weekend, FP Crew Clean Out Grit Tank #2

After a major rain event, Field's Point completed necessary cleaning to Grit Tank #2. The tank was having some issues over the long weekend due to the weather and the tanks collector was out of service from 3:50 AM on May 29th until 9:50 AM on June 1st.



The tank needed to be cleaned and operable ASAP once plant conditions allowed. The 3-11 PM shift and 11-7 AM shifts worked non-stop to accomplish the difficult task. Everyone on shift was involved in this project, whether it was the Operators in the tank, the Front



Group Operator making sure the grit washer was packed down and flowing, and the Process Monitors that would have to continuously monitor the pump flow and bump the pump repeatedly. Everyone did a fantastic job, this was a true definition of team-work!

-- Submitted by Mike Starnino

Hawk Spotted at Field's Point

NBC's Anthony Ciacciarelli spotted this beautiful creature on May 24th. We shared the photos on NBC social media to see if anyone might be able to identify what type of hawk it is. There are 8 species of hawks in the state of RI. Many suggested it was a Red-tailed Hawk.

Do we have any bird experts here at NBC that may be able to help confirm?



Shellfishing Beds Opened for the 1st Time in over 75 Years

May 26th marked the official opening of Conditional Area E, 1,900 acres of shellfishing beds in the lower Providence River, for the first time in at least 75 years. The opening was announced at a Quahog Week press ceremony held on May 14th at the Town Dock in Apponaug Cove and attended by the ES&C Director, **Tom Uva**. The press conference was well attended by media and politicians. Speakers included DEM Director Coit, Governor McKee, Lt. Governor Matos and RI Shellfishing Association President Mike McGivney. During the presentation Director Coit announced that the 1,900 acres of closed shellfishing grounds north of Conimicut Point would be conditionally opened for 27 predetermined days this summer, though the area will be closed for 7 days following 0.5 inches of rainfall.



This historic opening of these waters was made possible by the NBC's CSO Abatement Project, the first two phases of which have reduced bacteria and pollutant loading to these waters by 50%. Additional work by others throughout the region to reduce the impacts of stormwater has also contributed to this success story. Coit recognized the NBC and the success of the NBC's Phases I and II of the CSO Abatement Project as being responsible for the opening of the newly designated Conditional Area E. The NBC was also recognized by Mr. McGivney for our outstanding accomplishments and for managing the shellfish transplant program.

The NBC Bullocks Reach monitoring buoy is located approximately in the center of these new fishing grounds as shown in the map (next column).

State regulators and shellfishermen alike are celebrating this historic milestone. On the first day of shellfishing this area, the Providence Journal reported one quahogger raked-in his limit of 6 bushels in under 3 hours, selling the clams for about \$1,000, five times his usual daily income.

Congratulations to the NBC for this incredible outcome thanks to our dedication and investments in a clean upper Bay!



-- Submitted by Kim Kirwan

NBC Confined Space Rescue Drills

On May 19th and 26th, NBC conducted its final confined space rescue drills at Gate & Screening Structure #8 on Rathbone Street in Providence. The drills were once again conducted with the Providence Fire Department, in compliance with the rescue component of the OSHA Confined Space standard, which requires NBC to annually assess and evaluate outside rescue personnel capabilities.



Special thanks once again to the **IM Department** and to **IM Operator II, Chris Moran** for conducting the initial briefing with the on-scene first responders. These drills utilized a realistic mannequin to simulate an NBC IM Operator suffering an unwitnessed medical emergency while working approximately 30' underground.

-- Submitted by Dave Aucoin



NBC Pipeline

July 2021

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Calendar of Events *for July*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1	2	3
4  Independence Day	5 Independence Day HOLIDAY OBSERVED	6	7	8	9	10
11	12	13	14	15 Blood Drive COB - Main Conf. Room 9 AM - 1 PM	16 Payday	17
18	19	20	21	22	23 Full Moon Payday	24
25	26	27	28	29	30 Deadline to Enter Plastic- Free July Contest	31

NBC Employee Promotions

Wishing the following NBC employee success in their new position.

- **Ashley Petteruto** was promoted to Legal Administrative Assistant.
- **Jeffrey O'Keefe** was promoted to Environmental Monitor.

News Briefs...

RestoredWaters RI Breaks Ground

On June 18th, the NBC broke ground on Phase III of the CSO project also known as RestoredWaters RI. Phase III will consist of the construction of a 2.2 mile-long tunnel, 125 feet underground to assist with stormwater management at Bucklin Point.

This construction project will create jobs, and will result in more days for shellfishing, a healthy Seekonk and Blackstone River as well as Narragansett Bay.

NBC Chairman Mesolella, Executive Director Laurie Horridge, NBC's Board of Commissioners, former DEM Director Janet Coit, Congressman Langevin, Senator Whitehouse, other RI elected officials and NBC staff joined the NBC in celebrating this special event. The tunnel is expected to take 5 years to complete. Once completed a public park will be featured near the site for residents to enjoy by the water.



Former DEM Director Janet Coit & Chairman Mesolella, photo by Peter Goldberg.



Photo Credit: Peter Goldberg

Congratulations...

To **Crystine Marandola's** daughter and the NBC's IM Summer Intern, **Kiley Marandola** on graduating from LaSalle Academy on June 10th. Kiley was recruited to play soccer for Millersville University in Pennsylvania in the spring of her junior year just as the pandemic hit. She officially signed her letter of commitment on National Signing Day on November 11th.

Congratulations and best of luck, Kiley!



To **Pete Jarest's** daughter, Gracie on graduating from Regis College in Massachusetts with her Nursing degree on May 8th.

Congratulations Gracie and the Jarest family!



Follow us @narrabay





Help Someone Else

Give Blood

Narragansett Bay Commission

Thursday, July 15, 2021

9:00 am – 1:00 pm

COB

Main Conference Room

1 Service Road, Providence



DONATIONS BY APPOINTMENT!

(walk-ins **only** accepted if safe spacing permits at time of arrival)

www.ribc.org/drives to book

Sponsor Code 0665

Eat, hydrate, bring identification with you.

It is Safe to Donate! www.ribc.org/safety

Congratulations & Thank You

Congratulations to the following NBC staff on passing their wastewater certification exams...

Tyler Bissonette Grade 4
Cole Paolo Grade 2
Sonia Sanchez Grade 2
Matthew Fitzpatrick Grade 1



Paul Desrosiers has been spending a lot of time tutoring staff that has asked for help and it has made a significant difference in the number of exams passed. NBC has seen higher percentage rates of passing grades than we have in years past.

Thank you **Paul Desrosiers** and congratulations **Tyler, Cole, Sonia** and **Matthew!**

Energy Update

89.67% of NBC's energy has come from renewables so far for 2021. Many thanks to NBC staff that work diligently on NBC's renewable energy projects.



Plastic-Free July

Can you imagine a world without plastic?

It's impossible. There are so many items that are part of our daily routine that include plastic. Environmental Education Coordinator **Cynthia Morissette** wrote a great blog post on the NBC Watershed Explorers website on this issue, check it out [here](#).

A scientific prediction that has been discussed a lot recently with regard to plastic is that by the year 2050, there will be more plastic in the ocean than fish. There are many people and organizations that are working hard to make sure that that does not happen.

Plastic-free July is a movement that is recognized by organizations around the world. It asks people to pledge to take plastic out of some of their daily routines and make July as plastic-free as possible.

NBC is taking part in the movement and decided to make it a contest. As a team we can help make a positive impact and change the 2050 prediction by using less plastic in our lives.

How to enter? Send us a picture of what you've done this month to use less plastic in your daily routine and include a few sentences explaining to be entered to win a prize. Send your photos and explanations to **Talia Cheshier** at tcheshier@narrabay.com by July



Photo Credit: Sims Lifecycle Services

CONSIDER GETTING THE COVID-19 VACCINE & BE ENTERED TO WIN!

The NBC encourages all staff to get the COVID-19 vaccine. As more staff members get vaccinated, the sooner we will reach herd immunity and the sooner we can all return to normal.

DID YOU KNOW?

Having COVID is not a good substitute for getting the vaccine. A new study found that antibody response induced by mRNA vaccination against COVID-19 is stronger and more protective than that of natural infection.

COVID-19 vaccines available in the US cannot make you sick or infect you with COVID-19. You may experience some side effects but that is your body developing an immune response to the virus.

COVID-19 and its more dangerous variants are still spreading throughout the unvaccinated population.

THERE ARE MANY BENEFITS & REWARDS FOR NBC EMPLOYEES THAT ARE FULLY VACCINATED...

COVID-19 Sweepstakes

NBC is providing a \$100 incentive to each employee fully vaccinated when showing proof of vaccination card.

You can also utilize sick time to obtain your vaccination during work hours.

Everyone fully vaccinated and providing their paperwork to HR by September 3rd will automatically be eligible to win one of these prizes...

- + Extra personal day
- + Win 1 of 4 \$250 cash prizes
- + Win 1 of 2 \$500 cash prizes
- + GRAND PRIZE - \$1,000 cash prize

All prizes subject to standard tax deductions.

COVID-19 Updates

As of June 30th, if you are fully vaccinated and have submitted your vaccination information to HR you will NOT be required to wear a mask at any NBC facility. For employees who are fully vaccinated and feel more comfortable wearing a mask, you may continue to do so. If HR has not received confirmation of your vaccination, NBC will assume you are unvaccinated.

Employees who are not fully vaccinated, or who have not submitted their vaccination information to HR, must continue to wear a mask except when sitting alone (not standing) at their desk. This includes whenever you are moving about the facilities, in all NBC common areas (hallways, breakrooms, common work areas, elevators, etc.), when attending meetings and whenever interacting with the public. The mask must be worn correctly at all times, covering both your nose and mouth.

If you are not yet vaccinated please consider doing so. There are many benefits of being vaccinated and some NBC incentives being offered (see photo in left column). As you all know, policies and guidelines with regard to COVID-19 are changing frequently so we reserve the right to modify our policies as needed. If you have any questions on this policy change, please speak with your supervisor, or call the HR offices at ext. 435.

Employee Appreciation

NBC had a successful, well deserved employee appreciation event June 8th - 10th. Presto Strange O' Co. did an excellent job providing staff with specialty coffee drinks, lemonades and cookies while staff were able to socialize for a short time outside, seeing many faces in person that we haven't seen in almost a year and a half. Many NBC staff that had been working remote for quite some time, returned back to the office full time that week. Thank you NBC staff for making it a successful employee appreciation event!



Just a friendly reminder, NBC continues to offer rapid COVID tests on-site throughout the organization and results are available 15 minutes after taking the test.

It is important to note that while receiving a negative test result will not relieve employees from adhering to established mask wearing, disinfecting and social distancing practices, testing will assist in the fight against the spread of the virus.

For more information on where to get tested and how to sign up for testing please check with your manager or supervisor for more details.

NBC Test Data as of June 25th

Tests administered: 592

Negative Tests: 585

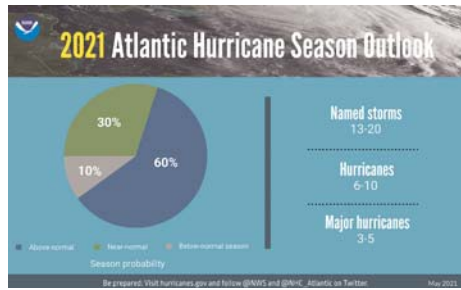
Positive Tests: 4

(2 employees, 2 tests each)

Invalid Tests: 3

2021 Hurricane Season Forecast

The National Oceanic and Atmospheric Administration (NOAA) has released its forecast for the 2021 Atlantic



Hurricane Season, which runs from June 1st through November 30th each year. Forecasters predict a 60% chance of an above-normal season with an estimated total of 13-20 named storms, 3-5 of which are predicted 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. A brief video of this season's hurricane forecast can be viewed [HERE](#).

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

Wastewater Heroes

NBC would like to give a round of applause to wastewater heroes **Sean O'Keefe, Chris Brasil & Brannon Green** for their heroic efforts on June 23rd. During second shift at FP they received an alert from the Port of Providence that their was a duck in distress along the NBC fence line and she may have had a duckling fall into the storm drain. Sean headed to the area to check it out and only to find that 6 of her ducklings had fallen into the storm drain.



Pictured: Sean O'Keefe



Pictured left to right: Chris Brasil & Brannon Green

Chris and Brannon were called in to assist and the three of them immediately jumped into action. The manhole cover to the storm drain was carefully removed and a large scoop sampler and debris nets were used to retrieve them safely and quickly.

They successfully saved all 6 ducklings and placed them one by one far away from the drain in a safe area and the mother duck soon returned to her ducklings.

Thank you Sean, Chris and Brannon for helping reunite this feathered family!





NBC Pipeline

August 2021

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Calendar of Events *for August*

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

Thank You from the RI Blood Center

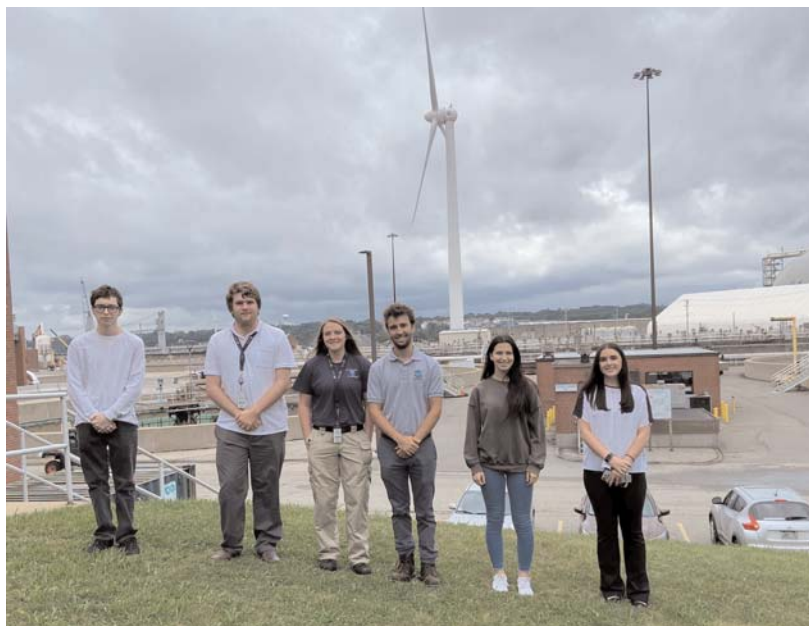
The July NBC Blood Drive had **18 donors**, resulting in **17 donations** which will help save **51 lives!**



News Briefs...

NBC Intern Spotlight

NBC celebrated National Intern Day on July 29th with this summer's six interns throughout the organization. Interns received some cool NBC swag and enjoyed some PVDonuts. Get to know a little bit about our interns below...



From left to right:

Ian Gray, NBC Lab intern. Ian is working in the nutrients lab this summer, running tests on the saltwater samples from all over the Providence area. He is a chemistry major at the University of Edinburgh in Scotland and will be entering his Sophomore year this coming fall. He is interested in environmental work which is why he was interested in interning at NBC this summer.

Ian Wenskowicz, NBC IT Intern. Ian is a student at Rhode Island College and will be entering his final semester this fall to complete his degree in Computer Science. This internship has been extremely beneficial for his degree and gaining the experience of working in a professional environment. Ian has spent the summer picking up old hobbies that he was unable to do during the pandemic, like playing Magic the Gathering since stores have begun to re-open for events.

Mackenzie Payne, EMDA Intern. Mackenzie will be starting her Junior year in the fall at the University of Rhode Island. She is majoring in Environmental Science and Management. Working with EMDA has been very informative for Mackenzie and will

Best of luck...

To Environmental Monitoring Supervisor **Bekki Songolo**! Bekki and her family moved to Zambia in South Africa at the end of July. Her last day with NBC was July 1st and NBC held a small gathering to send her off. Her husband is originally from Zambia and they still have a lot of family there. They plan to work in the farming industry and their two children will attend an international school. NBC wishes the Songolo family the best of luck on their new adventure!



Congratulations...

To Field's Point Process Monitor **Brian McGinn** and wife Bianca on their Wedding held at Kirkbrae Country Club in Lincoln, RI on July 25th.



Congratulations to the beautiful couple!

Intern Spotlight Continued...

help her in completing her degree in Environmental Science. In her free time she enjoys playing sports and hiking with her dogs.

Shane Toma, Engineering Intern. Shane has been working on organizing and storing old construction plan sets and learning about the wastewater treatment process. He will be a Junior at the University of New Hampshire in the fall. Some of Shane's hobbies include skiing, riding dirt bikes and golfing.

Kiley Marandola, IM Intern. This is Kiley's second year interning with IM at NBC. Kiley graduated from LaSalle Academy this past June and will be attending Millersville University in Pennsylvania in the fall. She was recruited by them just before the pandemic hit last spring to play soccer for the University. She has helped IM with data entry and scanning old files for storage. This has been a busy summer for Kiley, on top of interning at NBC she also works at Shaw's market part time and is part of a summer soccer league.

Jessica Galego, Engineering & Construction Intern. Jessica has been working on scanning NBC's easement files and re-organizing the library. She attends the University of Massachusetts Amherst, majoring in Marketing. She will be going into her Sophomore year this fall in the Isenberg School of Business. Her hobbies include dancing competitively, working out, reading and hanging out with her friends, family and dog.

Best of luck to you all on the upcoming school year and thank you for being such awesome NBC Interns!



Stay Informed!



During an emergency, nothing is more important than clear communication and personal safety. In recent years, many mass notification software companies have launched different apps and web-based services to alert the public to emergencies. NBC employees should be aware that all cities and towns in Rhode Island now offer a free software called "CodeRed."

CodeRed is a community emergency notification service that allows public safety personnel to notify area residents and businesses by phone, email and text about emergency situations. Such situations may include severe weather, power outages, fires, floods, missing or lost persons, gas leaks, or water main breaks. Employees can choose which alerts to receive, and if necessary, instructions are provided during each notification. Other benefits of the software include compatibility with TDD/TTY devices for those with hearing impairments, and employees can add as many phone numbers and email addresses to their account as they like. NBC employees are encouraged to either register through their town website or download the free CodeRed app for smart devices.

After registering with the CodeRed system, employees should add the following contacts to their smartphone, as CodeRed alerts do not come from any local area codes:

- Emergency Calls - (866) 419-5000
- General Calls - (855) 969-4636
- Weather Warnings - (800) 566-9780

--Submitted by *Dave Aucoin*

Arnold Mills Parade

IM Inspector **Anthony Cicciarelli** went all out, decorating his jeep for the Arnold Mills Parade on July 4th. The Arnold Mills Parade has been a Cumberland July 4th tradition since 1927. Anthony's son received his learners permit on July 6th, so it was an exciting few days for the Cicciarelli family - although he will not be driving the Jeep anytime soon!



COVID-19 Updates

As of June 30th, if you are fully vaccinated and have submitted your vaccination information to HR you will **NOT** be required to wear a mask at any NBC facility. For employees who are fully vaccinated and feel more comfortable wearing a mask, you may continue to do so. If HR has not received confirmation of your vaccination, NBC will assume you are unvaccinated.

Employees who are not fully vaccinated, or who have not submitted their vaccination information to HR, must continue to wear a mask except when sitting alone (not standing) at their desk. This includes whenever you are moving about the facilities, in all NBC common areas (hallways, breakrooms, common work areas, elevators, etc.), when attending meetings and whenever interacting with the public. The mask must be worn correctly at all times, covering both your nose and mouth.

If you are not yet vaccinated please consider doing so. There are many benefits of being vaccinated and some NBC incentives being offered (see photo in left column). As you all know, policies and guidelines with regard to COVID-19 are changing frequently so we reserve the right to modify our policies as needed. If you have any questions on this policy change, please speak with your supervisor, or call the HR offices at ext. 435.

Just a friendly reminder, NBC continues to offer rapid COVID tests on-site throughout the organization and results are available 15 minutes after taking the test.

NBC Test Data as of July 29th

Tests administered: 650
Negative Tests: 643
Positive Tests: 4
(2 employees, 2 tests each)
Invalid Tests: 3

It is important to note that while receiving a negative test result will not relieve employees from adhering to established mask wearing, disinfecting and social distancing practices, testing will assist in the fight against the spread of the virus.

For more information on where to get tested and how to sign up for testing please check with your manager or supervisor for more details.

CONSIDER GETTING THE COVID-19 VACCINE & BE ENTERED TO WIN!

The NBC encourages all staff to get the COVID-19 vaccine. As more staff members get vaccinated, the sooner we will reach herd immunity and the sooner we can all return to normal.

DID YOU KNOW?

Having COVID is not a good substitute for getting the vaccine. A new study found that antibody response induced by mRNA vaccination against COVID-19 is stronger and more protective than that of natural infection.

COVID-19 vaccines available in the US cannot make you sick or infect you with COVID-19. You may experience some side effects but that is your body developing an immune response to the virus.

COVID-19 and its more dangerous variants are still spreading throughout the unvaccinated population.

THERE ARE MANY BENEFITS & REWARDS FOR NBC EMPLOYEES THAT ARE FULLY VACCINATED...

COVID-19 Sweepstakes

NBC is providing a \$100 incentive to each employee fully vaccinated when showing proof of vaccination card.

You can also utilize sick time to obtain your vaccination during work hours.

Everyone fully vaccinated and providing their paperwork to HR by September 3rd will automatically be eligible to win one of these prizes...

- + Extra personal day
- + Win 1 of 4 \$250 cash prizes
- + Win 1 of 2 \$500 cash prizes
- + GRAND PRIZE - \$1,000 cash prize

All prizes subject to standard tax deductions.

Plastic-Free July

A scientific prediction that has been discussed a lot recently with regard to plastic is that by the year 2050, there will be more plastic in the ocean than fish. There are many people and organizations that are working hard to make sure that that does not happen.

Plastic-free July is a movement that is recognized by organizations around the world. It asks people to pledge to take plastic out of some of their daily routines and make July as plastic-free as possible.

NBC asked employees last month to take part in the movement and send us a photo and explanation on what they are doing to help use less plastic in their daily routines to be entered to win a prize. NBC had six awesome entries and each entry will receive a goodie bag this month of items to help them continue their plastic-free journey. Great job and thank you for participating!



NBC Chemist **Liz Kobr** and her son **Teddy** are committed to using reusable straws and silverware.

They purchased fun reusable sets to bring with them on food truck night.



NBC's Assistant Billing Supervisor **Steve Duque** and his wife have eliminated all plastic cups and straws in their home.

They purchased these aluminum straws to go with their wooden utensils to take on camping



NBC Laboratory Tech **Liz Medeiros** has switched to laundry strips instead of using a plastic jug of laundry detergent. The strips dissolve in the water and the packaging they come in can be recycled.



NBC Control Systems Associate **John Lombardi** uses silverware and his NBC mugs while eating and drinking here at NBC to prevent excess waste from disposable utensils and cups.



NBC Environmental Coordinator **Kim Kirwan** and her kids have been trying hard to reduce the use of plastic baggies and switched to Lunch Skins which are paper sandwich bags. They still continue to collect plastic caps to make their bench to help keep non-recyclable plastic out of the ocean.



NBC's **IT team** make it a point to use less plastic in their daily routines by using reusable cups or bottles. The kitchen water line on the second floor might be long when needing to refill but there is always good company while you wait!

Juvenile Osprey Spotted on BP Grounds

One of the Osprey chicks left the nest on July 25th and was grounded for about 2 days before returning to the nest with its siblings. BP Assistant Operations Manager **TJ Harrington** spotted the juvenile and was able to get a close shot of the beautiful bird.



Photo Credit: TJ Harrington

The chicks are currently in the post-fledging dependence phase which means that even though they can fly they still continue to depend on their parents for food and return to the nest.



NBC Pipeline

September

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

Calendar of Events *for September*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
5	6  Labor Day HOLIDAY	7	8	9	10 Payday	11 Patriot Day
12 Grandparents Day	13	14	15	16	17 Payday	18
19	20 Full Moon	21	22  First Day of Autumn	23	24	25
26	27	28	29	30		

Up Coming Flu Shot Clinics

NBC will be hosting free Flu Shot Clinics on these following dates...

- **October 6th at COB Main Conference Room 8:30 - 11 AM**
- **October 7th at Bucklin Point 2:30 - 3:30 PM**

Sign up details will be sent to your emails by HR.



News Briefs...

Welcome...



Meet Kaitlyn Benoit!

Kaitlyn started at NBC on August 15th with EMDA as the Environmental Monitor Clerk. She is from Westport, Massachusetts. Before joining NBC

Kaitlyn was a Teller at Loomi's, she has 2 cats and a fianc.



Meet Daniel Barber!

Daniel started at NBC on August 29th as the Senior NET Developer with IT. Daniel has a bachelors degree in Computer Science and is currently working

on completing his Masters Degree. He is from Taunton, Massachusetts and previously worked for Dunkin Brands as an engineer on their mobile app. He enjoys golfing, live music, cooking and watching his favorite TV show, Breaking Bad.

In Loving Memory

NBC has suffered another loss, **Ed Taylor** passed away at home surrounded by his loved ones on August 21st after a 20 year battle with cancer. Ed had been with NBC since January 1, 1992 when



Ed Taylor & TJ Harrington

NBC took over the Blackstone Valley District Commission. He served as the Union President for several years and was always a leader, team player, and coach, specifically for helping assist many Operators in passing their grade 1 operator exam over the years. His two passions in life were working for NBC and fishing. NBC will always remember his never ending smile, sense of humor, friendship and upbeat positive attitude.

--Submitted by Marc Pariseault

Congratulations...

To BP's Assistant Operations Manager **TJ Harrington** and his girlfriend Rossana on the birth of their beautiful baby girl, Vienna Luna Harrington. Vienna decided to make her appearance 3 weeks early, weighing 6lbs 9 oz. and 19.5 inches long.



August Employee Promotions

Wishing the following NBC employees success in their new position.

- **Michael Taylor** promoted to Senior Process Monitor
- **Sonia Sanchez** promoted to Process Monitor
- **Tyler Bissonnette** promoted to Monitoring Field Supervisor
- **Gene Medeiros** promoted to BP Operations Supervisor
- **Erin Child** promoted to Assistant Billing Supervisor

COVID-19 Updates

As of August 23rd 2021, the FDA has approved the Pfizer COVID-19 vaccine. As a result, NBC is imposing a mandatory vaccination requirement company-wide for all employees subject to applicable religious and medical exemptions. **Unvaccinated employees have until October 1, 2021 to meet the requirement.** The Moderna vaccine has a 28 day window and will no longer meet the deadline needs. Pfizer has a 21 day window which means that you will need your first shot by Thursday, September 9th. The Johnson and Johnson one shot vaccine is another option for employees to meet the deadline. Please plan accordingly. Unvaccinated employees are required to take a rapid test once a week until they are fully vaccinated.

In addition, NBC has re-issued the mask policy for ALL employees due to RI's status of high COVID-19 transmission. Masks must be worn properly covering the nose and mouth throughout the work day unless the employee has a separate office with a door.

With RI's high transmission rate we encourage employees to self-screen. Unfortunately the RIDOH is experiencing a

shortage in BinaxNOW tests so until that changes NBC will only be administering tests to the unvaccinated for their once a week test. NBC encourages all vaccinated employees who feel the need to be tested visit their local pharmacy or testing site.

As you all know, policies and guidelines with regard to COVID-19 are changing frequently so we reserve the right to modify our policies as needed. If you have any questions on this policy change, please speak with your supervisor, or call the HR offices at ext. 435.

NBC Test Data as of August 30th

Tests administered: 750

Negative Tests: 643

Positive Tests: 4

(2 employees, 2 tests each)

Invalid Tests: 3

September is National Preparedness Month

The Federal Emergency Management Agency (FEMA) annually designates the month of September as National Preparedness Month. With public outreach support from the National Safety Council (NSC) and Ready.gov, this annual observance is held to raise awareness about the importance of preparing for disasters and emergencies that could happen at any time. The theme for 2021 is to *"Prepare to Protect. Preparing for disasters is protecting everyone you love."* Click on this graphic to view a detailed list of weekly preparedness themes that NBC employees and their families can explore.



NBC employees are encouraged to always take an "All Hazards" approach to emergency planning. The following precautions apply to virtually all emergency situations:

- Download a reputable mass-notification software, such as CodeRed
- Download the FEMA app for resources, weather alerts and safety tips
- Develop and review a family communication plan
- Keep and maintain a hard copy of family and utility phone numbers
- Have an emergency kit in your vehicle and at least three days of food and water at home
- Know how to safely shut off utilities
- Store all important documents, such as birth certificates and insurance policies in a fire-proof safe or a safety deposit box
- Ensure that at least one family member is trained in first aid and CPR

-- Submitted by Dave Aucoin

IM Staff Provides Exceptional Service in Richmond Square

IM's **Tony Calenda, Pedro Sanders** and **Mike Smith**

received a great review from an NBC customer for exceptional service.

A local business had an issue with sewer back up in one of their buildings after one of our recent wet weather events. Tony went above and beyond to help them understand the ins-and-outs of their sewer and water connections.

The IM team conducted a thorough investigation and was able to give them a better understanding on how to resolve the issues. Pedro and Mike were the legs on the ground and completed the work in a timely manner. The local business was so pleased to see these men with great work ethic and passion for their job. **THANK YOU** Tony, Pedro and Mike for all you do!



The Safety Corner

• On-site audiograms for applicable NBC employees have been scheduled for 10/26 & 10/27 in the IM Garage. Mark your calendars!



• Online Bay Academy safety trainings will soon be assigned to all employees, based on job description. Keep an eye on your inbox!

2021 Season Recap of the Bucklin Point Osprey Mates

2021 was a great season for the Bucklin Point osprey mates! Thanks to our Friendly Neighborhood IT Department and Bucklin Point Maintenance staff, all NBC staff were able to view the season on the intranet or common space monitors. The birds entertained us with their nest building skills and kept us on the edge of our seats as we waited for the eggs to hatch! The young osprey mates arrived in April, a little later than usual. The newlyweds thoroughly investigated their new neighborhood before figuring out how to build a nest for the first time. As coastal nesting raptors, osprey collect most nesting material from within view of their nests. They see trash as a common resource to use to decorate their nests. This year we saw ribbon, gloves, masks, string and plastic bags. Soon after settling in, the love birds were expecting three baby chicks and six weeks later, all the hatchlings emerged happy and healthy. The chicks grew to their adult size in only seven weeks and began their flight training. At nine weeks, dad taught the fledglings how to hunt fresh menhaden from the Seekonk River. The family left for their wintering grounds at the end of August. We expect to see the same mates return to the nest next season!



June 4th, new hatchlings get fresh fish deliveries every few hours.



July 2nd, chicks start exploring the perimeters of the nest and branching out.

Each year adult osprey and young are found injured or perished from being entangled by rope, ribbon, netting or mesh bags. We must be vigilant to help turn the tide on the prevalence of marine debris on our coast, so that this problem does not become a crisis for future generations of people and wildlife. Here are three easy ways that you can make a difference and help our ospreys (and other marine wildlife!):

1. **Reduce your dependence on single use plastics:** bring your own bag, water bottle, and recycle what you can't reuse.
2. **Pick up plastic litter** that you find on the beach or bay and dispose of properly!
3. **Wear reusable masks:** disposable masks contain plastic and have made their way to our oceans and beaches.

--Submitted by Kerri Houghton



NBC Pipeline

October 2021

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 October*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1	2
					Payday	
3	4	5	6	7	8	9
			Flu Shots COB 8:30 - 11 AM	Flu Shots BP 2:30 - 3:30 PM		
10	11	12	13	14	15	16
	 Columbus Day HOLIDAY				Payday	
17	18	19	20	21	22	23
			Full Moon			
24	25	26	27	28	29	30
	Team Spirit Day	Tie-Dye Tuesday	Pumpkin Decorating Contest Costume Day	Throwback Thursday	Pink Out Day Payday	
31						
 Halloween						

News Briefs...

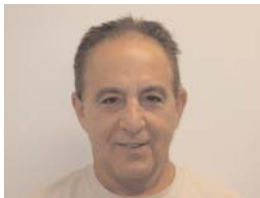
Welcome...



Meet Ross Dean!

Ross Dean started on September 12th as NBC's Planning Manager. Ross has a degree in Civil Engineering and previously worked for Caruso Homes as an Assistant Super.

He is from East Greenwich, RI and enjoys golf, boating, wood-working.



Meet Stephen Abbate!

Stephen joined the NBC on September 26th as an IM Operator II. Stephen previously worked for National Grid for 20 years and is OSHA 10 certified. He is from

Cranston, RI and enjoys motorcycling, snow mobiling and spending time with good friends and family, especially his 6 great-nieces and nephews.

NBC's Annual Pumpkin Decorating Contest

Join us **Wednesday, October 27th** for NBC's annual pumpkin decorating contest.

We are doing something a little different this year and going with a **theme!** The **2021 Pumpkin Decorating theme is**

Monsters & Villains, carve or decorate your favorite monster or villain from your favorite movie or tv show.

Due to COVID-19 restrictions we will NOT allow any outside treats to be brought in. Each section is welcome to decorate or carve a pumpkin for the contest. Seeing as though some departments are much larger than others, to be fair you will not be allowed to vote for your own pumpkin.

Pumpkins can be set up starting at 8 AM on the 27th, voting will take place from 10-2 PM and we ask that you pick up your pumpkins to clear out the room by 4 PM.

Any questions or concerns please contact, **Talia Cheshier at x394.**



Congratulations...

To **Mike Starnino**, Field's Point Operations Supervisor on receiving his RI Grade 4 Wastewater Operator License.



Mike was determined to obtain this difficult license. Congratulations from the Field's Point Operations team and the rest of the NBC!

To **Tyler Bissonnette**, Monitoring Field Supervisor passed his boating safety exam with RI DEM on September 17th.

NBC Spirit Week

Join us for NBC's 2nd annual Spirit Week, October 25th -29th! Employees are welcome to dress up and show their spirit. Don't forget to send pictures to share in November's Pipeline. We look forward to seeing all your creativity!



Monday 10/25: Team Spirit Day, rep your favorite sports team

Tuesday 10/26: Tie-Dye Tuesday, wear something tie-dye

Wednesday 10/27: Costume Competition day, wear your best costume and be entered to win a prize

Thursday 10/28: Throwback Thursday, wear your favorite decade

Friday 10/29: Pink Out, wear pink to support breast cancer awareness

September Employee Promotions

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

- **Kim Kirwan** transferred to Assistant Purchasing Coordinator
- **Anthony Ciacciarelli** promoted to IM Senior Inspector
- **Carissa Porreca** promoted to Billing Analyst

RI Water & Wastewater Response Network Receive EPA Merit Award

The RI Water and Wastewater Response Network (RIWARN) received the EPA Merit Award for its commitment to safe water throughout the pandemic. NBC's Safety Compliance Coordinator **Dave Aucoin** serves as Chairman of RIWARN; kudos to Dave on this well-deserved recognition and thank you for representing the state of RI and the NBC.



One of the photos used for the virtual ceremony.

Management and operations in the water and wastewater sector faced staff and chemical shortages, restricted access to assets and health and safety challenges throughout the pandemic. RIWARN assisted these facilities by organizing receipt and distribution of 20,000 FEMA cloth face coverings. They obtained and distributed non-contact IR forehead thermometers and kept staff up to date with information on chemical supply issues and cyber threats during the pandemic. Weekly call-ins and virtual trainings were also made available.

A virtual event was held to recognize the winners in September. The NBC provided photos of staff using the appropriate PPE to highlight RIWARN's award recognition in the 2021 EMA video.

Congratulations Dave & RIWARN!

COVID-19 Updates

The mask policy continues to be in place for ALL employees due to RI's status of high COVID-19 transmission. Masks must be worn properly covering the nose and mouth throughout the work day unless the employee has a separate office with a door. With RI's high transmission rate we encourage employees to self-screen.

The NBC continues to offer rapid COVID tests on-site throughout the organization and results are available 15 minutes after taking the test. It is important to note that

NBC Test Data as of October 1st

Tests administered: 960
Negative Tests: 954
Positive Tests: 3
Invalid Tests: 3

while receiving a negative test result, it will not relieve employees from adhering to established mask wearing, disinfecting and social distancing practices. Testing will assist in the fight against the spread of the virus.

For more information on where to get tested and how to sign up for testing please check with your manager or supervisor for details.

As you all know, policies and guidelines with regard to COVID-19 are changing frequently so we reserve the right to modify our policies as needed. If you have any questions, please speak with your supervisor, or call the HR offices at ext. 435.

COVID-19 Vaccine Sweepstakes Winners

Congratulations to the winners of the COVID-19 Vaccine Sweepstakes! Employees who submitted proof of vaccination prior to September 3rd were automatically entered to win one of these 8 prizes.

- **Anthony Crocenzi** - \$1,000
- **Joseph Guerreiro** - \$500
- **David Aucoin** - \$500
- **Karen Bonn** - \$250
- **Israel Morales** - \$250
- **James Golden** - \$250
- **Kara Taglianetti** - \$250
- **Kerri Houghton** - Personal Day





NBC Pipeline

November 2021

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Calendar of Events *for November*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1	2	3	4	5	6
7	8	9	10	11	12	13
Daylight Savings Time Ends			Blood Drive 9 AM - 1 PM COB	 Veteran's Day HOLIDAY	Open Enrollment Deadline Payday	
14	15	16	17	18	19	20
					Full Moon	
21	22	23	24	25	26	27
				Thanksgiving Day HOLIDAY	Payday	
28	29	30				
Hanukkah Begins						

Use or Lose



The deadline for utilizing “Use or Lose” vacation and personal time is **December 18, 2021**. 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.

News Briefs...

Welcome...



Meet John Cavanagh!

John started on October 10th as an Operator I at Field's Point. John is from Chepachet, RI and previously worked as a server at Matunuck Oyster Bar before working at NBC. His hobbies include hockey, cars and traveling to his favorite place, NH.



Meet Miguel Paulino!

Miguel started on October 10th as a Resident Representative. Miguel has three children and previously worked for MTA Capital Construction in NY. He is a big Boston Red Sox fan and loves to travel to anywhere there is clear water and beautiful beaches!



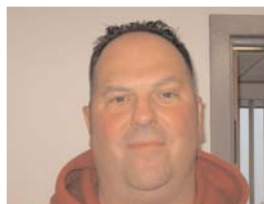
Meet Stiles Johnson!

Stiles started on October 10th as an Operator I at Field's Point. Stiles is from Providence and worked for Stop & Shop before working for NBC. He enjoys martial arts, exercising and traveling, especially to his favorite place, Cancun Mexico.



Meet Mark Johnson!

Mark started on October 24th as an Operator I at Field's Point. He resides in Johnston with his dog Bailey. His favorite travel destination spots are London and Toronto.



Meet Domenic DiMasi!

Domenic will start on November 7th as a Pretreatment Technician. He is from Warwick, RI and has a bachelors degree in Criminal Justice.



Open enrollment will take place November 3rd - 12th.

Open Enrollment is the annual opportunity for all benefits-eligible employees to make changes to their benefits options for the following year, including health, dental, vision and life insurance as well as voluntary products.

On-line enrollment instructions can be found on Baynet. Click Forms, Open Enrollment.

Employees that complete their online enrollment by November 5th will be entered into a raffle to receive one of five NBC golf umbrellas. The first 100 employees to complete open enrollment will receive an NBC lunch bag and goodies.

All completed forms must be submitted to HR by November 19, 2021.

Any questions please contact HR's **Brenda Smith at ext. 370** or **Crystine Marandola at ext. 376.**

COVID-19 Testing Data

As of October 29th...

Tests Administered: 1036

Negative Tests: 1030

Positive Tests: 3

Invalid Tests: 3

NBC Receives Stormy Award for Best Stormwater Idea in New England

The NBC received the Stormy Award from the New England Stormwater Collaborative for the Best Stormwater Idea in New England for the Macomber Field GSI project that was completed in the fall of 2020, part of CSO Phase III.

The New England Stormwater Collaborative was formed by the New England Water Works Association, New England Water Environment Association and the New England Chapter of the American Public Works Association. Each year the award is given out to three of the “best ideas” in stormwater management. The awards goals are to identify simple, imaginative, unique and inventive stormwater ideas in three categories; stormwater management/green infrastructure, political support/funding/outreach and program efficiency/technology.

A big thank you to NBC’s consultants, Stantec, Pare and Horsley & Witten for helping make this possible!

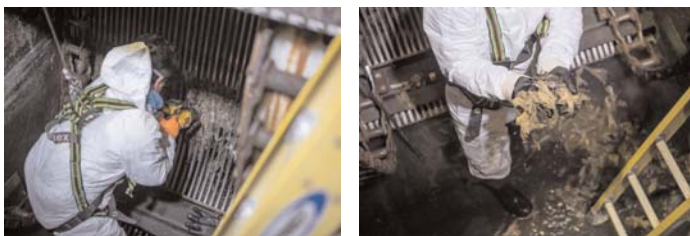


Aerial view of Macomber Field.

Clogging the System

NBC’s facilities have seen an increase in flushable wipes, baby wipes and/or cleaning wipes in and around our pipes and equipment. These can cause major problems, creating clogs and back-ups in the treatment system, possibly damaging wastewater equipment in homes and local streets.

The only items safe to flush are human waste and toilet paper. Toilet paper is designed to disintegrate in water throughout the pipes and sewage systems. Wipes will not disintegrate, although many of their packaging state they are “flushable”, they are not. NBC continues to create public awareness on social media outlets but having all of NBC on board will make even more of a difference. #NoWipesInThePipes



Bucklin Point Operator II, Cole Paola removing wipes that have built up in the bar screening process. Photo Credit: Peter Goldberg Photography

Things that hurt more than giving blood #226:  Stepping on a toy brick.

GIVE BLOOD

Narragansett Bay Commission

Wednesday, November 10, 2021
9:00 am – 1:00 pm
COB Main Conference Room
1 Service Road, Providence

ALL PRESENTING DONORS AT ALL CENTERS AND MOBILE DRIVES WILL BE ENTERED TO WIN ONE OF 2 PAIRS OF TICKETS TO SEE HAMILTON AT PPAC!

DONATIONS BY APPOINTMENT!
(walk-ins only accepted if safe spacing permits at time of arrival)
www.ribc.org/drives to book
Sponsor Code 0665

Eat, hydrate, bring identification with you.
Masks still required.

 Rhode Island Blood Center  #ribloodcenter

Wishing two long-time NBC Employees a Happy Retirement

Field's Point Process Monitor **Gary Cook** retired on October 23rd after 39 years of service with NBC and HR Manager **Diane Buerger** retired on October 29th after 21 years of service.

Both Gary and Diane have been with NBC through its many changes and challenges. The NBC would like thank you for your many years of service as well as your hardwork and dedication. You will truly be missed.

NBC wishes both Gary and Diane the best in their retirement!



Belinda McLaughlin, Diane Buerger & Brenda Smith at Diane's retirement celebration.



Eric Bogosian & Gary Cook on his last day of work.

Project Comeback

Another successful charity ride for Project Comeback with the support of NBC's **Anthony Ciacciarelli**, occurred on October 10th.

The trail ride, "Soldiers and Saddles" was put on by Ocean State Jeepsters, of which Anthony is a member. The charity event netted \$1,900 between registrations to participate to ride and raffle tickets.



Project Comeback's mission is to rescue horses, patiently re-educate these horses, and connect them with people who have endured trauma, primarily veterans.

For more information about Project Comeback, visit www.projectcomeback.org.

NBC's Annual Pumpkin Decorating Contest: Monsters vs. Villains



First place winner: IM's Frankenstein display



Second place winner: TAC's Demogorgon display from the show Stranger Things.



Third Place Tie goes to: Customer Service's display of the movie IT in the NBC sewer (left) and Executive's Freddy Krueger display (right).



IT's Squid Game display, a new show on Netflix.



EMDA's Headless Horseman display.



The Lab's Mike Wazowski pumpkin from the Movie Monsters Inc.



Legal's How the Grinch Stole Christmas display.

Spirit Week Highlights & Costume Competition Winners

Sports Day:



Tie-Dye Tuesday:



Throwback Thursday:



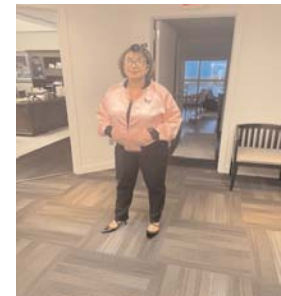
Costume Competition Day:



Group Costume Winner



Best Costume Overall



Pink Out Friday for Breast Cancer:





NBC Pipeline

December 2021

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Calendar of Events *for December*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17 Payday	18
19	20	21 First Day of Winter 	22	23	24 Christmas Eve Christmas Day Observed Payday	25 Full Moon Christmas Day 
26 Kwanzaa Begins	27	28	29	30	31 New Year's Eve New Year's Day Observed	

Use or Lose



The deadline for utilizing “Use or Lose” vacation and personal time is **December 18, 2021**. 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.

News Briefs...

Welcome...



Meet Frank Rodrigues!

Frank started on Decemeber 5th as NBC's new Asset Management Administrator. Frank resides in North Attleboro, Massachusetts with his daughters and their dog, Bella and guinea pig, Smores. Frank previously worked for Whirlpool Corporation before coming to NBC.



Meet Carolina Diaz!

Carolina started on December 5th as NBC's Fiscal Customer Service Clerk. Carolina previously worked for Skin Pros as a secretary/medical assistant. She has three daughters and a dog. Her favorite travel destination is Columbia



Raymond Pellegrino!

Raymond started on November 21st as a Field's Point Electrician.

Acknowledgement of Awards

During the November 9th Board of Commissioners Meeting five awards were presented to NBC staff for their excellence.

FP and BP both received the **RICWA Gold Award**. This award is a significant honor and is given annually to a wastewater treatment facility in special recognition of the facilities perfect permit compliance for two consecutive years. FP and BP have about 250-300 opportunities to violate permit requirements everymonth. Exceedance of just one parameter takes you out of the running from receiving this award.



From left to right: Steve Cote, Chairman Mesollela, Laurie Horridge & Eric Bogosian.



Providence Business news awarded the NBC the Best Places to work award for 2021, NBC's 11th consecutive year. NBC was one of 15 companies awarded in the Large Employer category (150-499 employees).

Thank you NBC staff for completing the surveys and feeling this is truly a great place to work!

Casual Day Fund

NBC will continue to host the Casual Day Charitable Giving Raffle like we have in years past at employee appreciation events.



Those who partipate in Casual Day will automatically have their name entered in the raffle. If your name is picked, the NBC Casual Day Fund will make a donation to the 501(c)(3) charitable organization of your choice. A winner will be chosen towards the end of the month, stay tuned!

Acknowledgement of Awards Continued...

The RICWA Gold Award is a true testament to the excellent work done by the staff at both facilities who make sure they are monitoring and treating the wastewater 24/7 to stay in compliance.



From left to right: TJ Harrington, Chairman Mesollela, John Contrino, Marc Pariseault & Laurie Horridge.

The **Carmine J. Goneconte Operator of the Year Award** was given to FP Operations Staff for demonstrating a high level of leadership and performance in wastewater operations. Senior Process Monitor **Steve Cote** and Assistant Ops Manager **Eric Bogosian** accepted the two awards on behalf of FP. BP's Gold Award was accepted by Assistant Ops Manager TJ Harrington, Senior E&I Tech John Contrino and Ops Manager Marc Pariseault.

The **EPA Environmental Achievement Award** and the **Stormy Award**, previously outlined in the [November Pipeline](#) were also presented on November 9th.

IM Manager **Mike Caruolo**, Assistant Ops Manager of FP **Eric Bogosian** and BP Ops Manager **Marc Pariseault** accepted the EPA Environmental Merit Award. **Kathryn Kelly** and **Chairman Mesollela** accepted the Stormy Award for their efforts on the Macomber Field Project, which helped NBC receive this award.



From left to right: Chairman Mesollela & Kathryn Kelly.



From left to right: Chairman Mesollela, Mike Caruolo, Laurie Horridge, Eric Bogosian & Marc Pariseault.

November Employee Promotions

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

- **Domingo Fontes** promoted to Process Monitor
- **Andrew Iasimone** promoted to Operations Supervisor
- **Robin Valenti** promoted to Customer Service Representative/Fiscal Clerk

Thank you!

for Helping Someone Else

 **RI Blood Center**

Narragansett Bay Commission

Your blood drive had **16** presenting donors.

Resulting in **14** donations.

Helping to save **42** lives!

As a result of your November 2021 Blood Drive, many patients in our community will have something to be thankful for this holiday season! Thank YOU!



COVID-19 Testing Data

As of November 30th...

Tests Administered: 1078

Negative Tests: 1072

Positive Tests: 3

Invalid Tests: 3

Congratulations RI-CONN United

NEWEA's RI-CONN United team won second place overall in the National Operations Challenge event at WEFTEC in October. A total of 32 teams competed in the 34th Annual Operations Challenge.

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

The RI-CONN United team included Rhode Islanders - Edward Davies from Quonset and Riley Greene from Narragansett as well as two team-



RI-CONN United Team.

mates from Connecticut, Ryan Harold and Jason Nenninger from New Haven. NBC's **Kim Sandbach** and **Nora Lough** participated as NEWEA judges for the event as well as Scott Goodinson from Narragansett and Patricia Cheseborough from NEIWPC.



NEWEA judges from left to right: Patricia Cheseborough, Scott Goodinson, Nora Lough & Kim Sandbach.

RI-CONN United received first place in the Laboratory events, first place in the Process events and third place in Collections, giving RI-CONN their overall second place win. Congratulations!

Employee Spotlight

Treatment Plant Operator Magazine featured NBC's Technical Advisor **Paul Desrosiers** in one of their latest issues.



Photo Credit: TPO Magazine.

For those of you who don't know, Paul began his career in teaching. Paul taught elementary school fresh out of college but tough times in the economy during the 1970s and having little seniority as a new teacher made him one of the first to be let go.

Paul was eventually hired as a training specialist for the NBC in 1989, eventually becoming Assistant Operations Manager at FP in 1992 and Operations Manager in 2015.

Paul will always love teaching and now here at NBC he gets the best of both worlds in his new position as Technical Advisor, teaching and training new staff in the wastewater field.

To read the full article visit: [Rhode Island Teacher Transitions into Long-Term Clean Water Career](#)

2021-2022 PROVIDENCE BRUINS

GROUP ROUTING

With Narragansett Bay Commission
December Group Offer
Featuring First Responders Weekend!



December Game Details

- Fri 12/10 vs First Responders Weekend
- Sun 12/12 vs First Responders Weekend
- *Away for 1st 2000 fans in the arena

SPECIAL HOLIDAY OFFER

- ONLY \$20 Per Ticket (Savings of 58% off Box Office pricing!)**
- FREE P-Bruins Sports Bottle for all kids!
- 100 Level Seating

PURCHASE ONLINE NOW AT:
www.ProvidenceBruins.com/GroupTickets

Then Enter Promo Code:
NARRABAY



INSTRUCTIONS: Once purchased, you will receive an email from Fevo, our group ticketing platform, with instructions to access your tickets. For more information, please call/email Anthony with the Bruins at (401) 680-4713 or Pontrolli@pescocountry.com.

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?

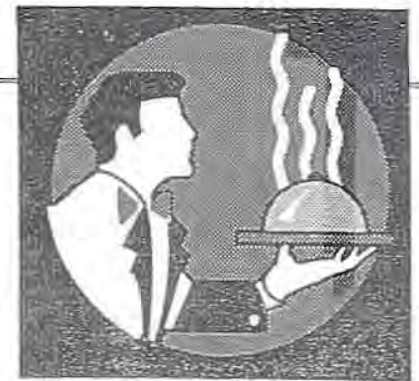
Grease discharges are predominantly generated from washing and cleaning operations and not from fryolators or deep frying units as most people might think. The pot washing sink, dishwasher pre-rinse station, and garbage grinder are the major sources of grease discharges to the sewer system.

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

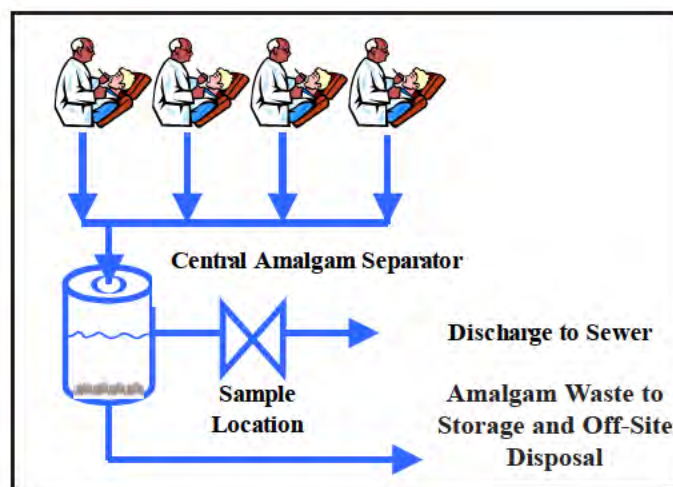
the Management of Waste Dental Amalgam

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!

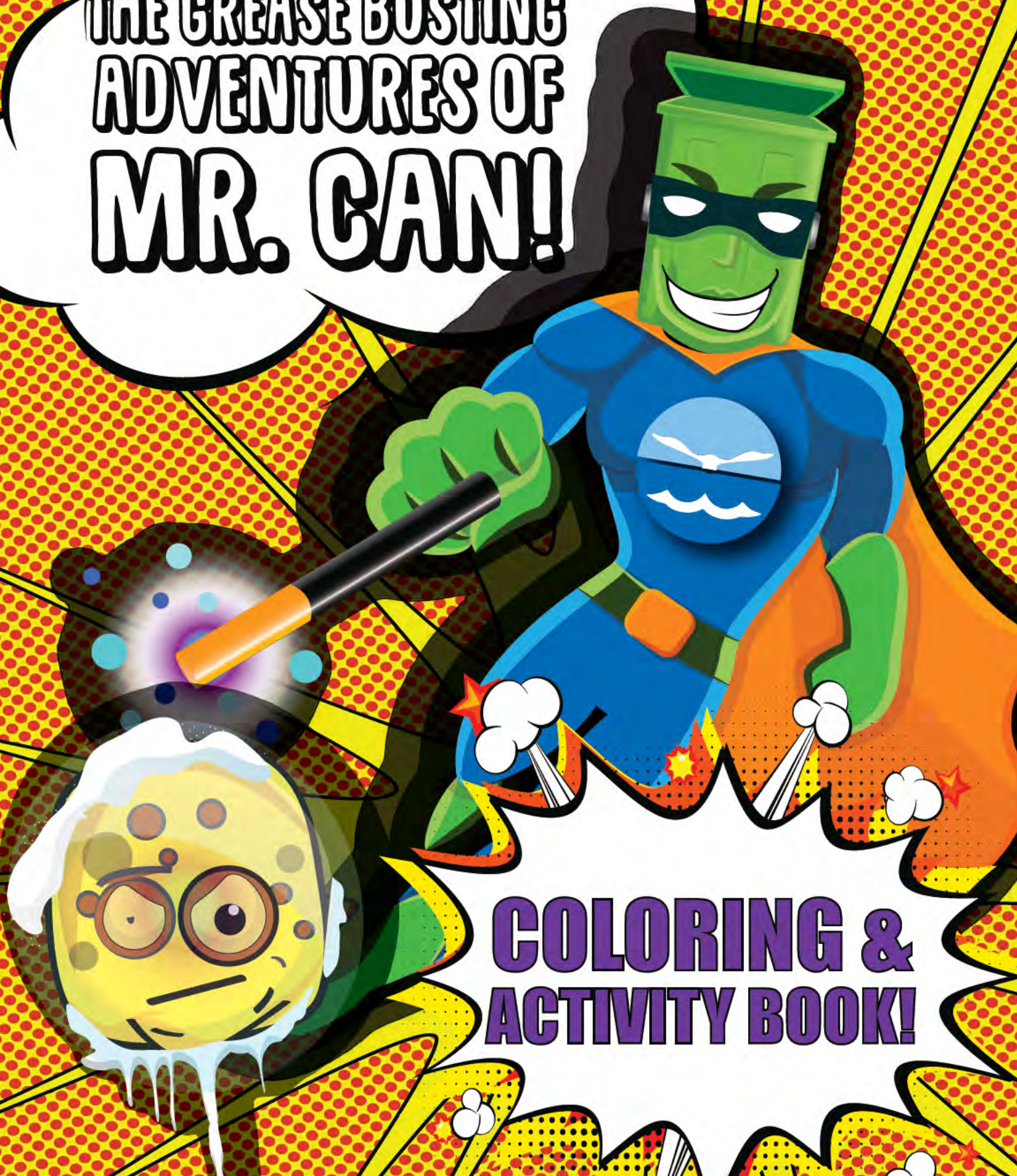
Together we can keep
the grease beasts off the
streets!



Narragansett Bay Commission
One Service Road, Providence, RI 02905
www.narrabay.com



**THE GREASE BUSTING
ADVENTURES OF
MR. CAN!**

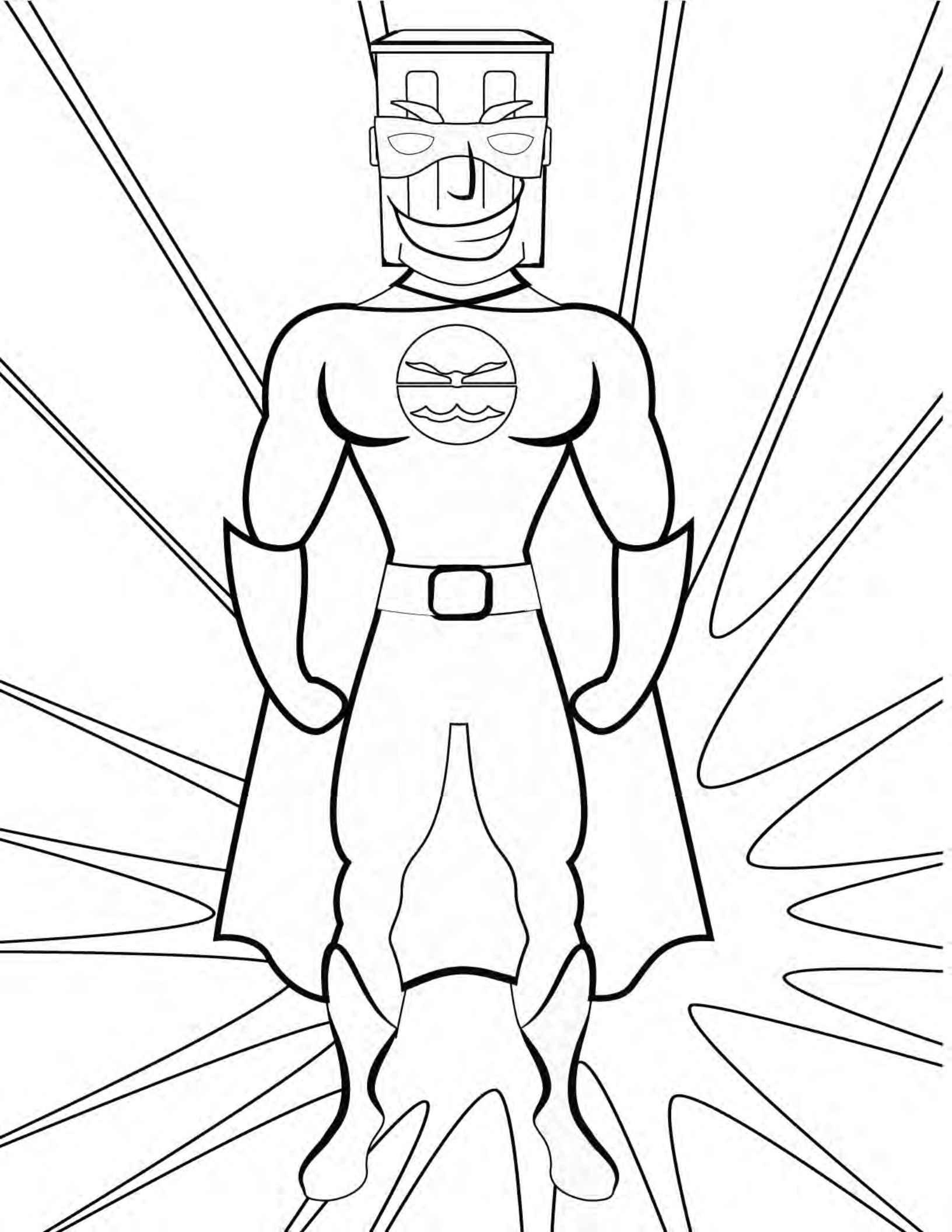


**COLORING &
ACTIVITY BOOK!**

**COOL IT
& CAN IT!**

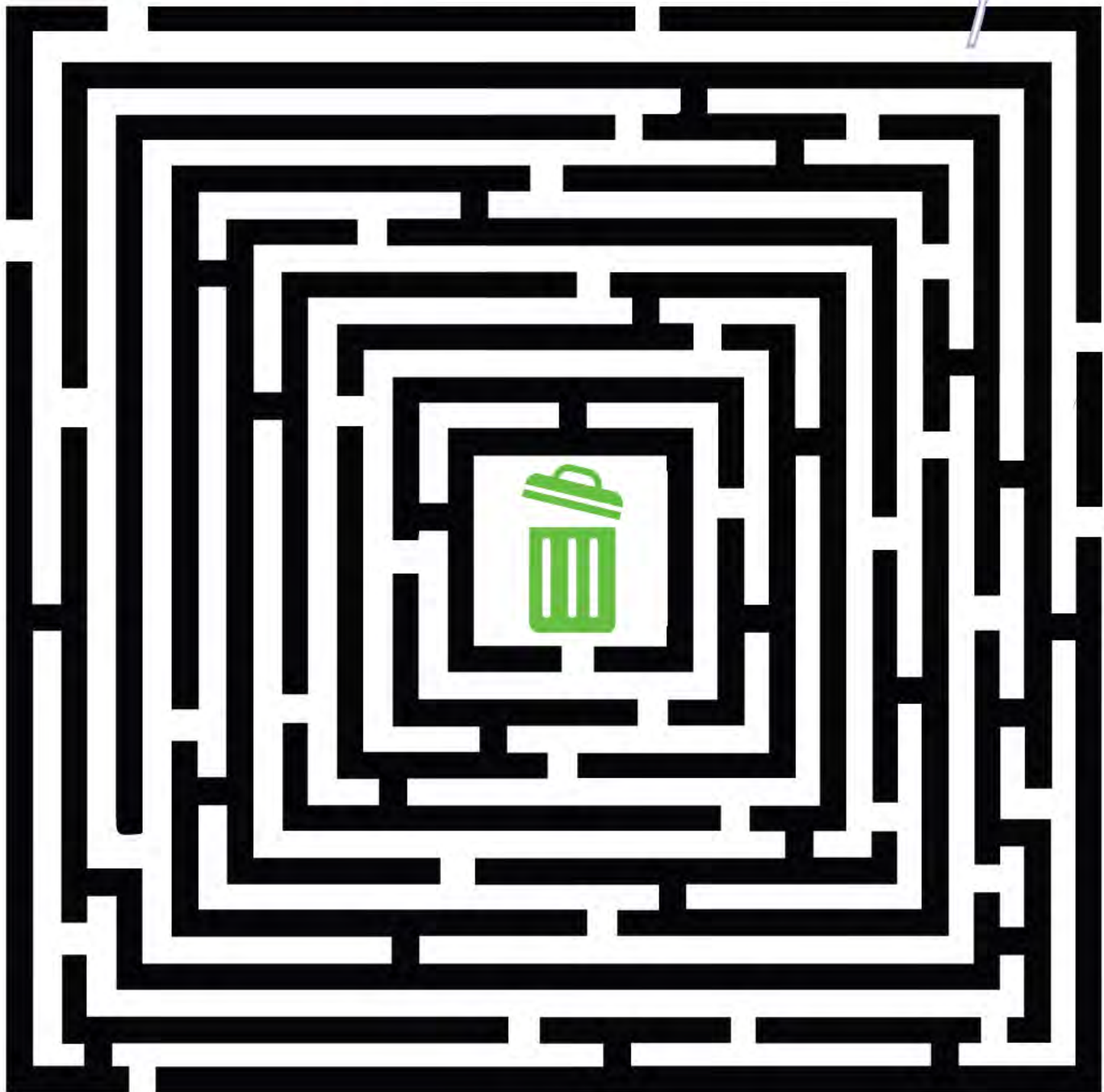


**Pledge to COOL IT & CAN IT and
help Mr. Can share the message
of proper grease disposal!**

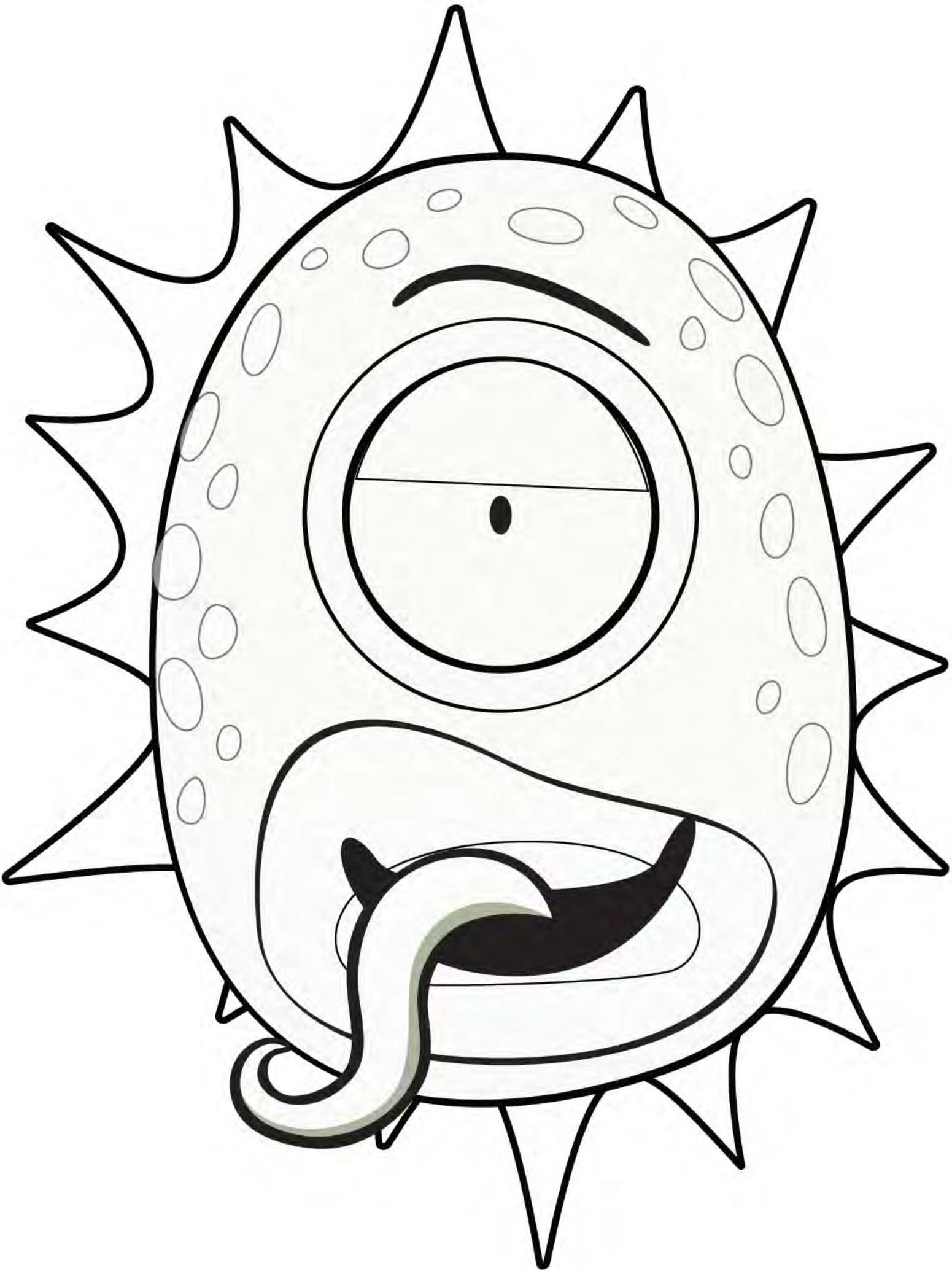


GUIDE THE GREASE!

Get this cooled off grease beast to the trash can in the center!

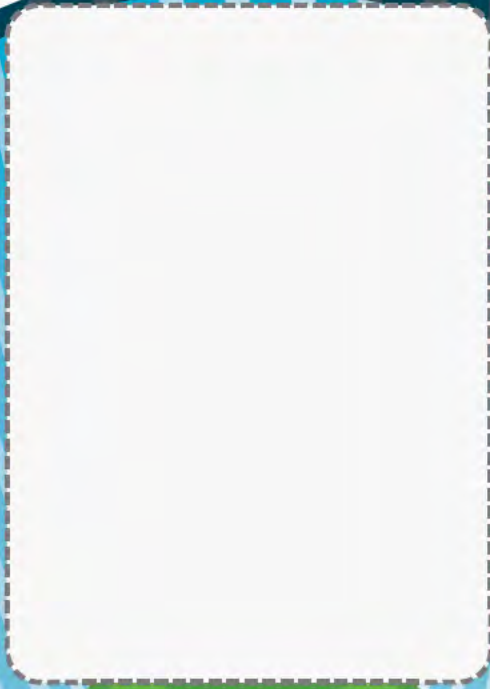






SUPER HERO FACE SWAP!

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!

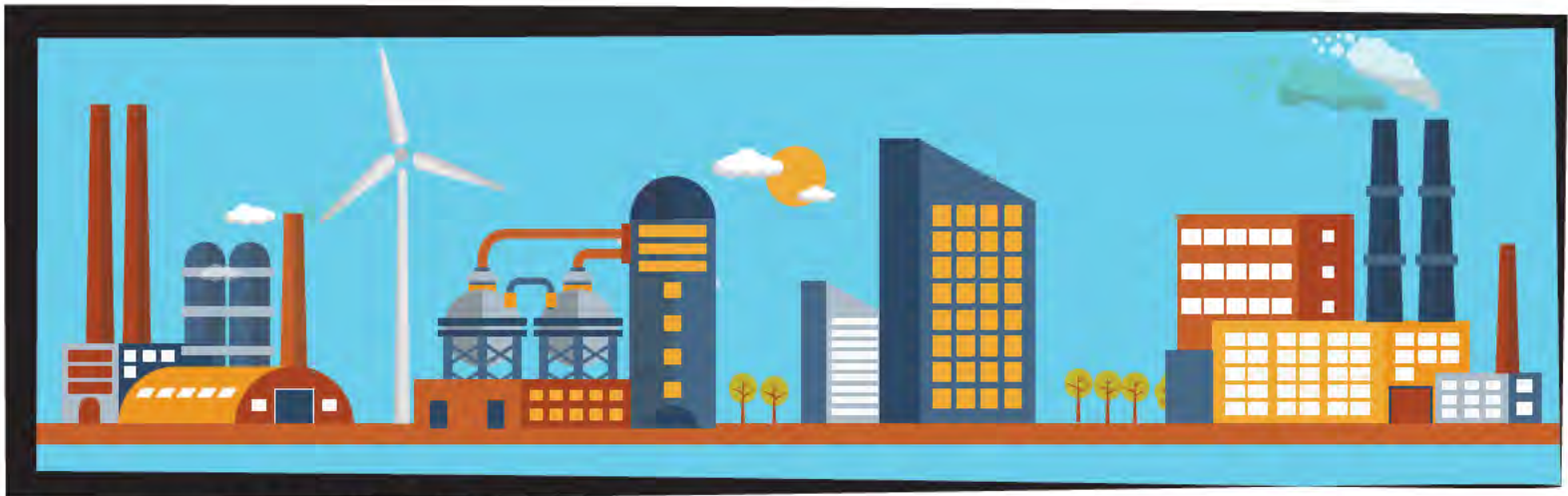




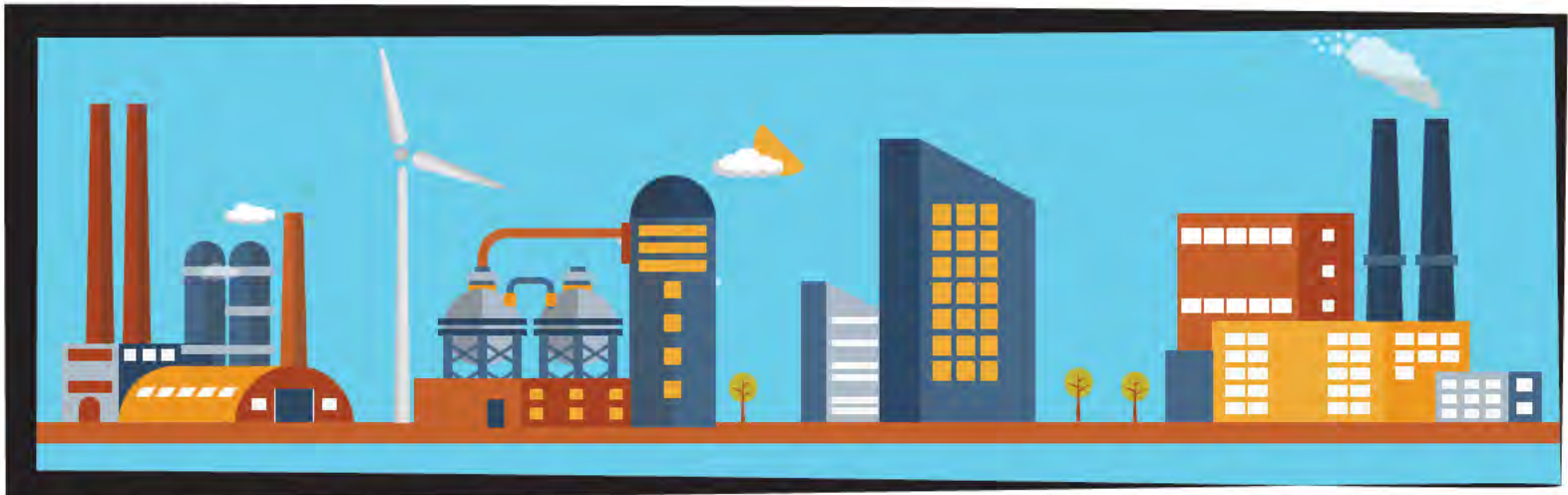


WASTEWATER TREATMENT
FACILITY IMAGE 1

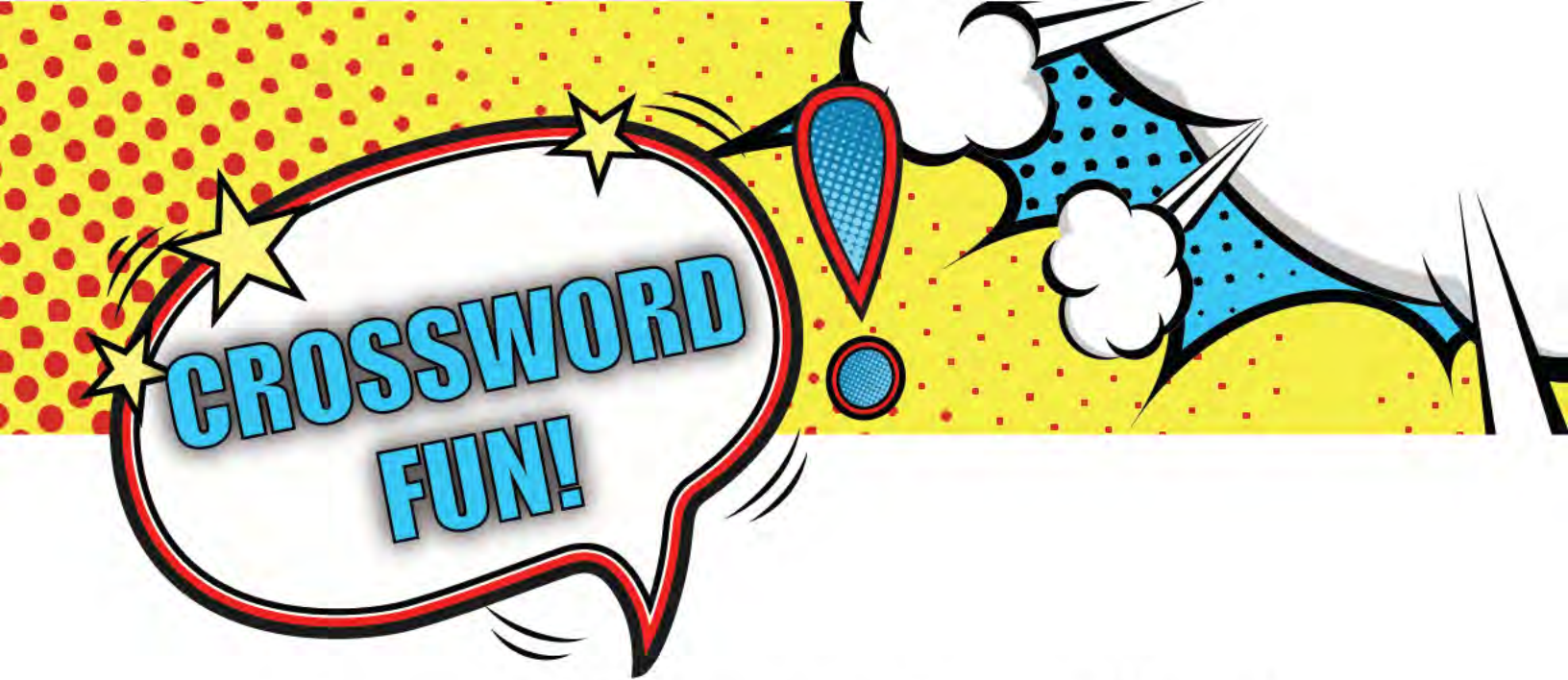
Compare wastewater treatment facility images 1 and 2.
Can you spot what's missing in image 2?
Draw a circle around those items!



WASTEWATER TREATMENT
FACILITY IMAGE 2







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 BA Y**





DRAW COMIC STYLE!

STEP 1

Sketch perspective lines to help you draw a super hero flying in the sky! Keep things simple at this stage. Just use a few lines and shapes to help you think about the pose.



STEP 2

Draw the rough shape of your super hero within your guides, paying attention to your perspective lines. The fists are near to us, so they need to look very big. The legs and feet are farther away so should appear smaller.



DRAW COMIC STYLE!

STEP 3

Add more detail. Sketch in the shapes of the hair and fingers, and give your super hero a simple, silly comic expression. To add movement, draw a flowing cape using curved lines.



STEP 3

Use a heavier pencil to add more detail and shadow. Go over the drawing in black ink pen or marker, then color your super hero in bright, comic-book colors!

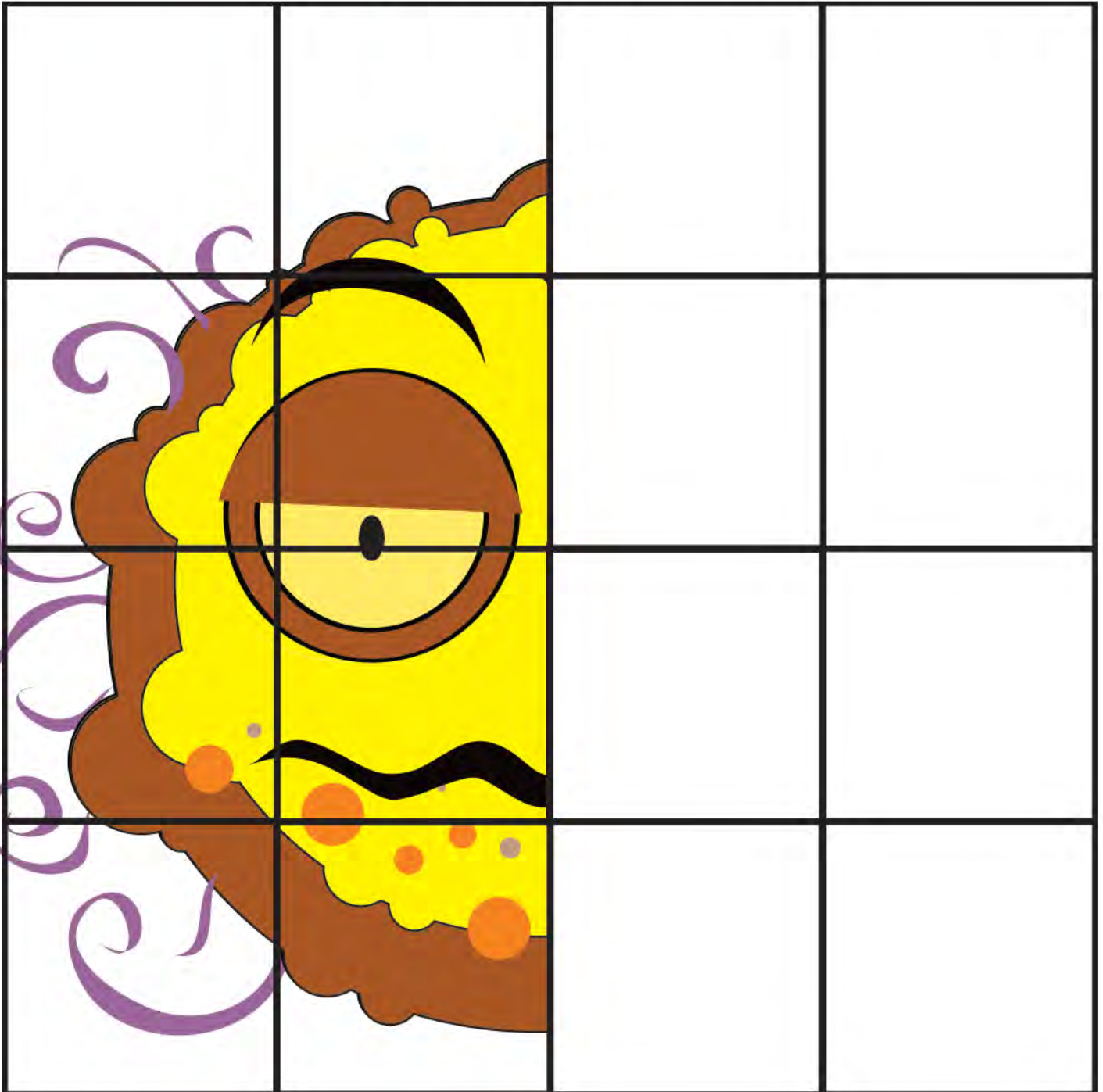


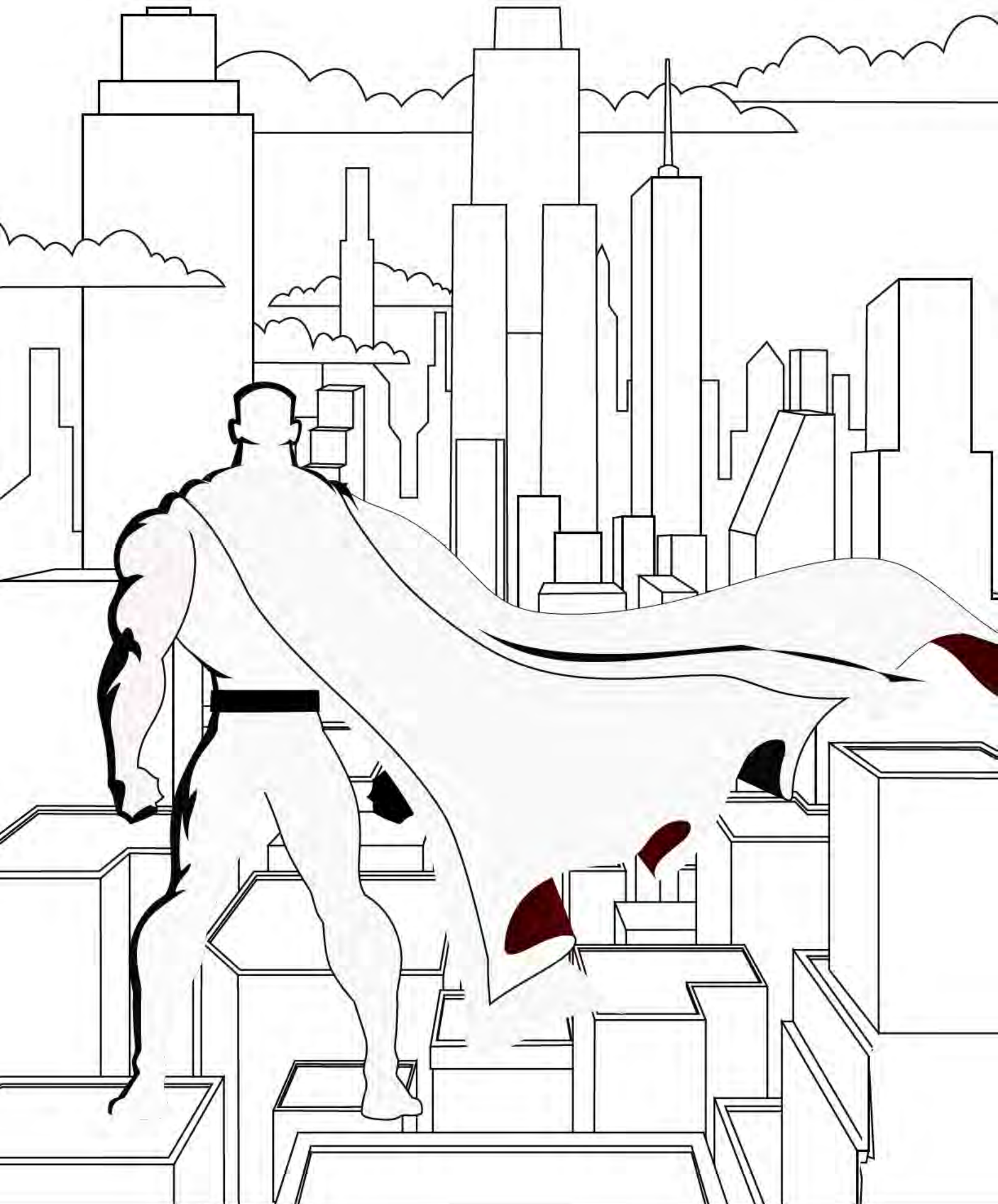
Comic style is about exaggerated elements and simple features. Once you've mastered your super hero, try drawing a whole comic strip!



**OTHER
HALF!**

Using the grid as a guide, complete the drawing of the grease beast.

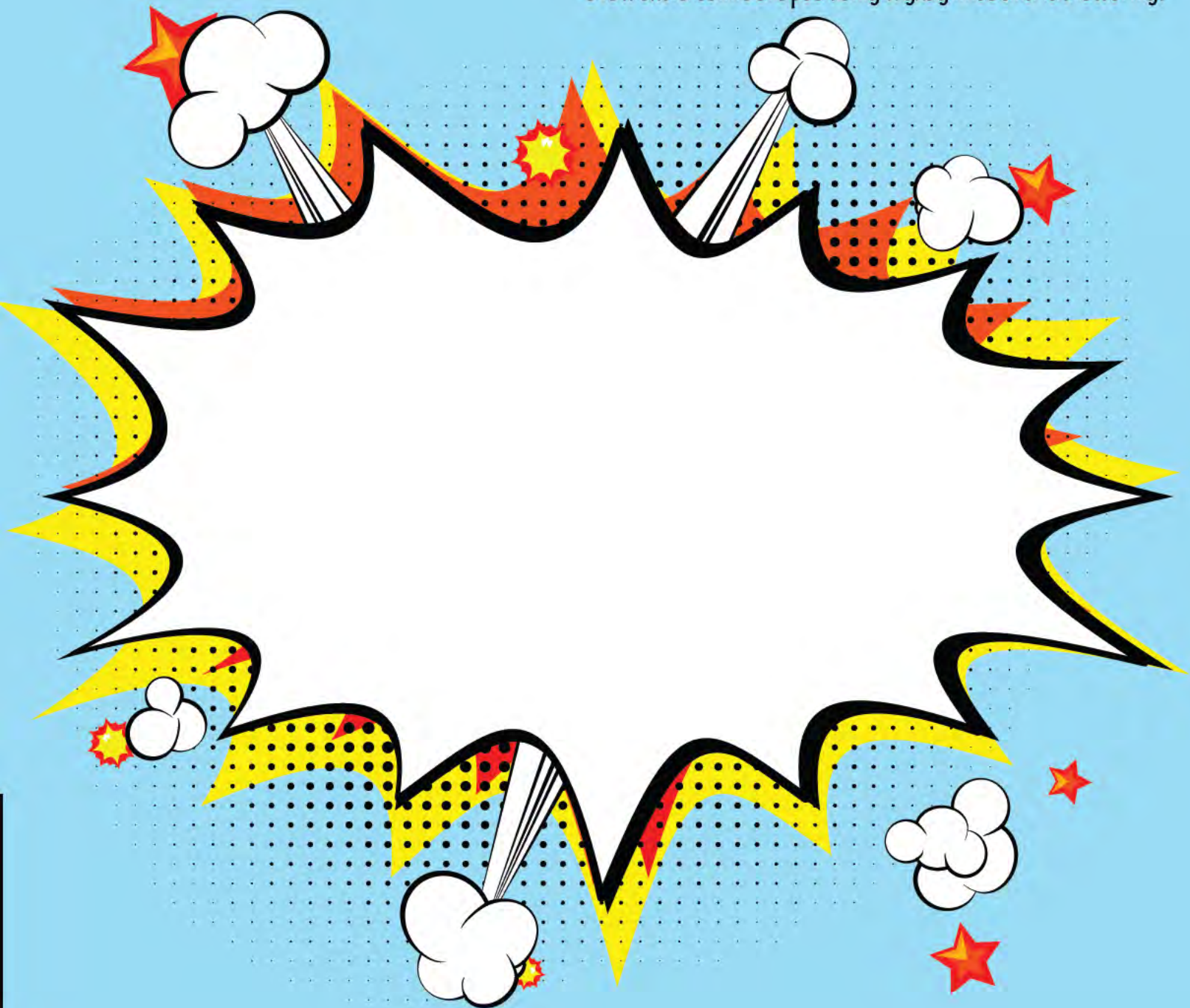


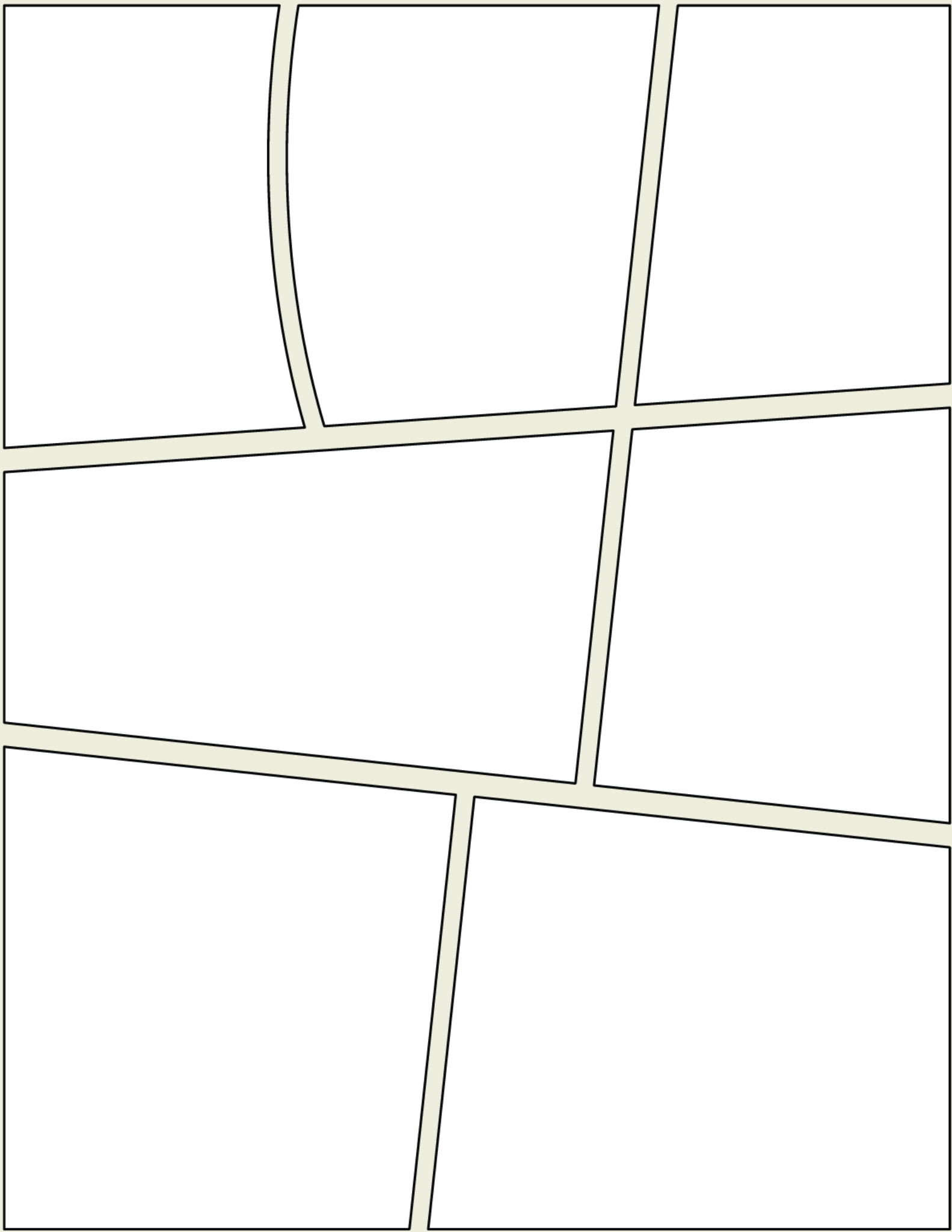


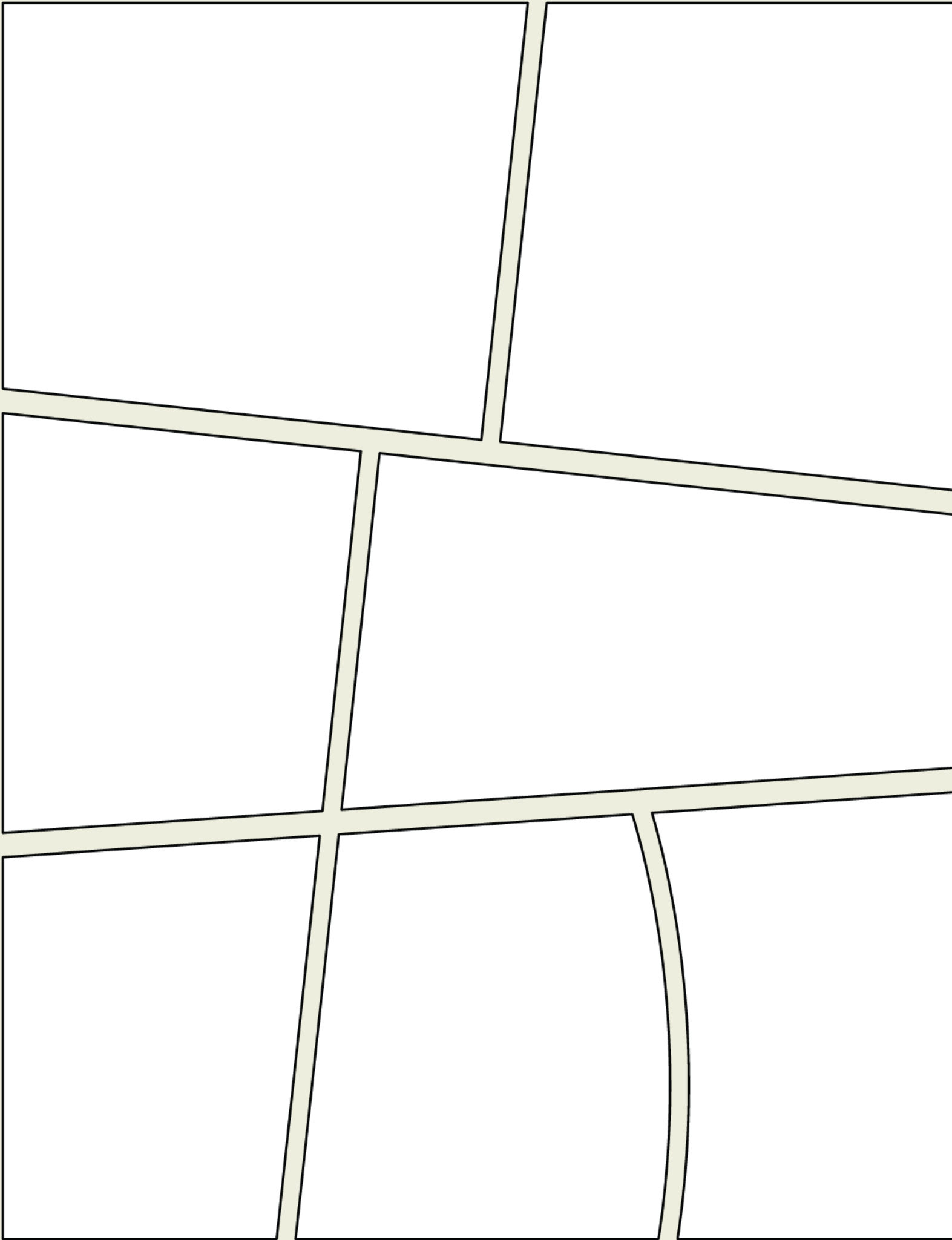


COMIC STRIP ADVENTURE!

In the next few pages draw your very own comic strip!
Every good comic strip has a super hero and one or two villains!
Start with a cool title below and let your imagination go wild!
Remember draw exaggerated elements and simple features.
Draw extra comic shapes using zigzag lines and fat lettering!







**COOL IT
& CAN IT!**

www.narrabay.com

Narragansett Bay Commission

One Service Road, Providence, RI 02905

**FATS, OILS, & GREASE
COMPLIANCE AND BEST MANAGEMENT
PRACTICES WORKBOOK
for
RESTAURANTS**

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:

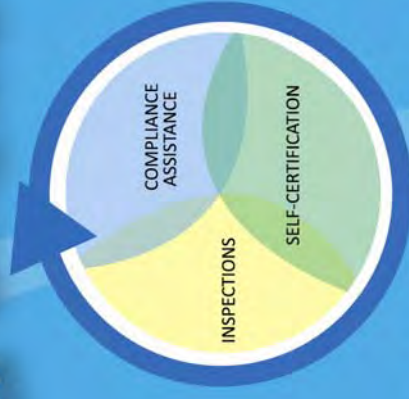
- On-site Technical Assistance
- Workshops
- Development and use of FOG Best Management Practices (BMPs)
- FOG management "Self-Evaluations"
- Compliance Inspections
- FOG data collection and analysis



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

LINCOLN SEPTAGE RECEIVING FACILITY

Septage Acceptance Policy Summary



Narragansett Bay Commission
Corporate Headquarters:
1 Service Road, Providence, RI 02905
Phone (401) 461-8848
Fax (401) 461-8540

Pretreatment Office
2 Ernest Street
Providence, RI 02905
Phone (401) 461-8848
Fax (401) 461-0170

Lincoln Septage Receiving Facility:
692 Washington Highway
Lincoln, RI 02865
Phone (401) 333-5610
Fax (401) 333-5610



OVERVIEW

The Narragansett Bay Commission (NBC) has upgraded the Lincoln Septage receiving station, installing new wastewater treatment equipment to reduce odors and remove solids contained in the septage. A six (6) inch hose connection has been installed to speed-up the discharge process and a computer tracking system has been installed for identification and billing streamlining purposes. This informational brochure provides an outline of procedures and practices which must be strictly followed to ensure the acceptance of your septage loads and the proper operation of the NBC facility.

PERMITTING REQUIREMENTS

- All trucks and/or trailers must be permitted with the NBC prior to bringing septage wastewater for disposal. Any changes, such as new or deleted vehicles, must be made known to the NBC Pretreatment office by submitting a new permit application with the correct information. It is the haulers' responsibility to ensure all registrations, insurance and DEM permits for vehicles are obtained and maintained in a valid state.
- Each permitted truck and/or trailer must be weighed empty and full to determine the capacity of the vehicle. This process must be overseen by NBC Pretreatment personnel. Appointments must be

scheduled in advance at 461-8848 Ext. 483 for this purpose.

- All trucks and/or trailers must have a NBC computer tracking chip programmed with identification and capacity information affixed to it.

- All trucks and/or trailers must have Permit Fee Paid and Permitted Volume stickers affixed.

MANIFEST REQUIREMENTS

- The manifest form must be completed in its entirety prior to arriving at the facility. The manifest requires the hauler to certify that only residential quality septage is contained in the truck that shall discharge.

- The manifest must clearly identify the origin of the load. The customer name, address and telephone number for that customer must be indicated for every load which is contained in the truck.

- A signature by the customer that your firm pumped must be on the manifest. If the customer was not home to sign the manifest, additional confirmation information regarding the customer is required in order to discharge the load. This could include a copy of the customer's signed check for the pump out or a photocopy of your company invoice to the customer. These documents must be attached to the manifest in lieu of a customer signature.

- Information provided on manifests is routinely checked by Pretreatment staff to verify the origin of the load. Pretreatment staff will routinely contact your customers.

PROCEDURES TO BE FOLLOWED AT THE STATION

- Upon arriving at the station, the driver is to wait in line to use the facility.
- When it is your turn, the facility operator will inspect the stickers on your vehicle, scan your computer chip and take your manifest and other associated information. If anything is not in order, the load will be refused.
- Prior to discharging you must take a sample under the perview of the station operator. This sample will be checked for pH and visual indications for grease or other suspected pollutants. The pH must be in the range of 5.5 to 12.0 standard units or the load will be refused. Detection of other suspected pollutants will also result in the load being refused.
- When given the OK to discharge, the hauler is to hook up to the six (6) inch discharge connection and proceed to empty the truck. Grease and/or gravel will foul the solids handling equipment and will be readily detected. **If your load contains grease and/or other dense solid material, such as gravel or rocks, do not bring it to the Lincoln facility.** It must be brought elsewhere for proper disposal.
- Upon completing the discharge, the hauler must properly clean up and make the station neat and safe for the next hauler. This includes putting away all hoses, shutting all



Narragansett Bay Commission

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

Vacation Shutdown Prohibited Sewer Discharges

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

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

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

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

Vincent J. Mesolella, *Chairman*

Raymond J. Marshall, P.E., *Executive Director*

ATTACHMENT VOLUME I

SECTION 2

***TYPICAL NBC WASTEWATER
DISCHARGE PERMITS***

***TYPICAL METALFINISHER
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B1106-080-0726

Company Name: **TRUEX INCORPORATED**

Facility Address: 300 Armistice Boulevard, Pawtucket, RI 02861

Mailing Address: 300 Armistice Boulevard, Pawtucket, RI 02861

Facility President: Mr. Jonathan D. Fain

Facility Authorized Agents: Mr. Everett Carvalho, Mr. Mark Buchan

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. Jonathan D. Fain and Truex Incorporated**, 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 17 pages with conditions A - V.

**This permit becomes effective on August 1, 2021
and expires on July 31, 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

July 22, 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 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 2,500 gallons but less than 10,000 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 limitation of 1.20 ppm and the monthly average limitation of 0.65 ppm at the combined point of cyanide process discharge, prior to combining with non-cyanide bearing wastewater streams, and at the discharge from the cyanide treatment system. Upon conducting an engineering review of the facility, it has been determined that the permittee does not utilize or store cyanide on site. Since there are no cyanide processes utilized at the facility, the EPA Total Cyanide Metal Finishing Standards will be applied at the final process discharge location, Sample Location #1. Since the NBC Total Cyanide limitations are more stringent than the EPA Total Cyanide limitations at this location, the NBC Total Cyanide limitations will be enforced at the final discharge location.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
 - a. Treated Metal Finishing Rinsewaters;
 - b. Treated Alkaline Soak Solutions;
 - c. Treated Acid Solutions;
 - d. Treated Etch Solutions;
 - e. Treated Lacquer Dip Solutions;
 - f. Treated Spiral Washer Wastewater;
 - g. Treated Air Compressor Condensate;
 - h. Treated Ion Exchange Regeneration Wastewaters;
 - i. Treated Floor Wash Water;
 - j. Treated Boiler Blowdown;
 - k. Treated Cooling Tower Purges (not to exceed 25 gallons per day);
 - l. Treated Dragout Solutions;
 - m. Treated Stormwater 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. Concentrated 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.

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 16, 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. However, portable pumps and/or flexible hoses will be permitted in the following areas for the following specified uses:

<u>Pump and/or Hose</u>	<u>Area</u>
Flexible hose from tanks #41 and #42 to electrolytic cells	Metal Recovery
Filter Press M-4 Pump Discharge	Precipitation
M-2 Floor Pump	Drain Trough
Metering Pump for various applications	Washroom
Spiral Washer Discharge	Washroom

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 Tank T4, collecting all process discharges specified in Section B(1)(a through l) of this permit.

Sample Location #2 - Effluent sampling tee on the outdoor oil/water separator, collecting all process discharges specified in Section B(1)(m) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Locations #1 and #2 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee shall 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 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 Tank T4, 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 collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Copper (Total)	Nickel (Total)	Zinc (Total)
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- b. During the months of April and October, on the same day 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 the entire operating day from the sample port on the discharge line of Tank T4, Sample Location #1 (i.e. one (1) grab sample collected every two (2) hours over an eight (8) hour operating day). Each grab sample must be preserved immediately upon

sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.6 grams of ascorbic acid must be added. The sample should then be retested for chlorine residual, and if it is present, the addition of ascorbic acid should be repeated. Once residual chlorine has been eliminated from the sample, the pH of the sample must be checked and elevated to greater than 12.0 standard units by the addition of sodium hydroxide, if necessary. Once the grab sample has been preserved to a pH greater than 12.0 standard units and no chlorine residual is detected, it may be composited with the other grab samples collected on that operating day. The composite of preserved grab samples must be refrigerated until analysis and must be analyzed within fourteen (14) days of collection for **Total Cyanide**.

- c. On the same day that the composite samples listed in Section E(2)(a) above are being collected, the permittee shall take four (4) grab samples at equidistant time periods over the entire operating day from the sample port on the discharge line of Tank T4, Sample Location #1. Each grab sample must be collected in a glass bottle, preserved, and analyzed individually in accordance with EPA protocols for the following parameter:

Total Oil and Grease (fats, oils and grease)

The mathematical average of the four grab samples will be used to determine compliance with the NBC discharge limitation of 125.0 ppm.

3. During the months of June and December, the permittee shall collect one (1) grab sample from the effluent sampling tee on the outdoor oil/water separator, Sample Location #2. Each 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)

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. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred;

- e. The amount of chemicals added to provide pretreatment of batch discharges;
 - f. pH and chlorine residual readings taken during the course of providing batch treatment of any process wastewater and the amount of sludge generated, where applicable;
 - g. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration, and other maintenance requests specified by inspectors of the NBC.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

G. Spill and Slug Prevention Control Plan:

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

H. Toxic Organic/Solvent Management Plan:

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

I. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR §403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350. Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC 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. Truex Incorporated shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Truex Incorporated 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 Truex Incorporated 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 Truex Incorporated 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.

EJS:NJD:smb

Attachments:

Self-Monitoring Compliance Report Form
Continuous pH Monitoring Report Form
Designation of Authorized Agent Form
RCRA Handbook
Twenty-four (24) Hour Violation Notification Fax Form
List of Licensed Laboratories
List of Toxic Organic Compounds

Table 1

NBC Effluent Discharge Limitations
Bucklin Point District

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

Truex Incorporated
Sampling Requirements

Month	Sample Location #1 Sample Port on the Discharge Line of Tank 4		Sample Location #2 Effluent Sampling Tee on the Outdoor Oil/Water Separator	
	Grab Sample*	Parameters	Grab Sample	Parameters
January				
February	X	Cu, Ni, Zn, O&G		
March				
April	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN, O&G		
May				
June	X	Cu, Ni, Zn, O&G	X	O&G
July				
August	X	Cu, Ni, Zn, O&G		
September				
October	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN, O&G		
November				
December	X	Cu, Ni, Zn, O&G	X	O&G

Legend

Cd - Cadmium Ni - Nickel
Cr - Chromium Ag - Silver
Cu - Copper Zn - Zinc
CN - Cyanide O&G - Total Oil and Grease (fats, oils, and grease)
Pb - Lead

*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 AND
STORMWATER DISCHARGES**

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Truex Incorporated

300 Armistice Boulevard

Pawtucket, RI 02861

PERMIT NUMBER: B1106-080-0726

PERMIT EXPIRATION DATE: 07/31/2026

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.

July 22, 2021

Initial Date of Issuance

/s/Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL PHARMACEUTICAL
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B1404-020-0426
Company Name: **DENISON PHARMACEUTICALS, LLC**
Facility Address: 1 Powder Hill Road, Lincoln, RI 02865
Mailing Address: 1 Powder Hill Road, Lincoln, RI 02865
Facility President: Mr. Douglas Hill
Facility Authorized Agents: Mr. Raymond Frenette, Mr. Victor Maia
User Classification: Pharmaceutical Manufacturing Operations
Categorical Standards Applicable: 40 CFR §439.47, Pretreatment Standards for New Sources

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Douglas Hill and Denison Pharmaceuticals, LLC**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 18 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 26, 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 ppm and the monthly average of 8.2 ppm for n-amyl acetate, ethyl acetate, and isopropyl acetate. Subpart D of the pharmaceutical regulations also requires categorical pharmaceutical manufacturers to maintain full compliance with the maximum daily discharge limit of 3.0 ppm and the monthly average limit of 0.7 ppm for methylene chloride. NBC discharge limits for the Bucklin Point Treatment Facility do not exist for n-amyl acetate, ethyl acetate, and isopropyl acetate. The categorical limits are therefore in effect for these parameters. Methylene chloride and acetone are included in the NBC list of Total Toxic Organics and must meet the more stringent local limit of 2.13 mg/L. NBC discharge limits for all other parameters in this permit are more stringent than the EPA categorical limitations. Therefore, NBC local limits will be applied and enforced for all other parameters.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions or process wastewater streams to the NBC facilities:
 - a. Treated Process Tank Wash Water;
 - b. Treated Laboratory Glassware Wash Water;
 - c. Reverse Osmosis Reject Wastewater;
 - d. Carbon Filter Backwash;
 - e. Softener Regenerant Wastewater;
 - f. Treated Air Compressor Condensate;
 - g. Non-Contact Cooling Water.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

C. Prohibitions:

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
 - a. Off-specification Product Batches;
 - b. Concentrated Raw Materials and Solutions;
 - c. Acidic Solutions with a pH less than 5.0 standard units;
 - d. Caustic Solutions with a pH greater than 11.0 standard units;
 - e. Degreasing Solutions;
 - f. Solvents;
 - g. Sludges;
 - h. Fuel and Lubricating Oils;
 - i. Laboratory Chemicals.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 16, 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 - Effluent monitoring station, collecting all process discharges specified in Section B(1)(a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit and with the EPA Pharmaceutical Manufacturing Standards referenced in Section A(5) of this permit.

2. The permittee shall provide additional pretreatment of the process wastewater discharges listed in Section B(1) above if determined necessary by the NBC to ensure that effluent limitations are met at all times. Plans of additional pretreatment systems must be submitted to the NBC for approval before beginning construction.
3. The permittee shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
4. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

E. Monitoring Requirements:

1. The permittee shall monitor the final pH, and volume of each treated batch discharge and shall record the data in the pretreatment system logbook referenced in Section F(1) of this permit. The final pH, and volume of each batch discharge is to be reported to the NBC monthly on a summary report within thirty (30) days from the end of the month in which the data was recorded. (See sample copy enclosed).
2. During the months of January, April, July, and October, until the expiration date of this permit, the permittee must conduct sampling from the effluent monitoring station, Sample Location #1, while a batch discharge is occurring.

- a. During the months of January, April, July, and October, one grab sample is to be collected in a glass container having a total volume greater than 20 ml. The grab sample must be preserved immediately upon sample collection in accordance with EPA Regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If the sample is known to contain residual chlorine, add sodium thiosulfate preservative (10 mg/40ml) to the empty sample bottles just prior to shipment to the sample site. If the sample is tested and residual chlorine is present then 0.008% by volume of sodium thiosulfate must be added (i.e., 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0-4° C until analysis. No air bubbles may be present in any grab sample or that sample must be discarded. The grab sample is to be analyzed within fourteen (14) days of collection by EPA Method 1666 for the following **Volatile Organic Compounds** specific to the Pharmaceutical Manufacturing Industry:

n-Amyl acetate
Ethyl acetate
Isopropyl acetate
Methylene Chloride

- b. During the months of January, April, July, and October, during the same batch discharge that samples in Section E(2)(a) are collected, one grab sample is to be collected, preserved, and analyzed in accordance with analytical method number D3695, D4763, 524.2, or 1624 and with EPA protocols for the following parameter:

Acetone

- c. During the months of April and October, during the same batch discharge that samples in Section E(2)(a) are collected, one grab sample is to be collected in a glass bottle with a Teflon lined cap with a volume of either 25 or 40 ml. The grab sample must be preserved immediately upon sample collection in accordance with EPA Regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0-4° C until analysis. No air bubbles may be present in the grab sample or that sample must be discarded. The grab sample is to be analyzed within three (3) days of collection for the **Volatile Organic Compounds (purgeables)** fraction of the Total Toxic Organics (TTO) list enclosed.

- d. During the months of April and October, during the same batch discharge that samples in Section E(2)(a) are collected, one grab sample is to be collected in a 1000 ml (minimum) glass amber bottle with a Teflon lined cap. The grab sample must be preserved immediately upon sample collection according to EPA Regulations. The sample must be tested for residual chlorine with potassium iodide paper. If chlorine residual is present in the sample, 0.008% by volume of sodium thiosulfate must be added (i.e., 80 mg per liter of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate shall be repeated. Once chlorine residual has been eliminated from the sample, the pH of the sample must be adjusted to between 6.0 and 9.0 standard units and the sample must be stored in the dark until analysis. The sample must be extracted within seven (7) days of collection and must be analyzed within forty (40) days of extraction for the **Acid, Base and Neutral fraction** of the Total Toxic Organics (TTO) list enclosed.
- e. During the months of January, April, July, and October, until the expiration date of this permit, one grab sample must be collected in a glass bottle. The samples collected during April and October must be collected from the same batch discharge that is being sampled in Section E(2)(a). The sample must be collected and preserved according to EPA protocols and must be analyzed for the following parameter:

Total Oil and Grease (fats, oils, and grease)

- f. During the months of January, April, July, and October, until the expiration date of this permit, the permittee must collect one grab sample. The samples collected during April and October must be collected from the same batch discharge that is being sampled in Section E(2)(a). The grab sample is to be collected, preserved, and analyzed according to EPA protocols for the following parameters:

Copper (Total) Zinc (Total)

- g. During the months of January, April, July, and October, until the expiration date of this permit, the permittee must collect one grab sample. The samples collected during April and October must be collected from the same batch discharge that is being sampled in Section E(2)(a). The grab sample is to be collected, preserved, and analyzed according to EPA protocols for the following parameter:

Biochemical Oxygen Demand (BOD)
Total Suspended Solids (TSS)

Table 3 attached hereto summarizes the sampling requirements for this facility.

3. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of 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. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred;
 - e. The amount of chemicals added to provide pretreatment of batch discharges;
 - f. pH and chlorine residual readings taken during the course of providing batch treatment of any process wastewater and the amount of sludge generated, where applicable;
 - g. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration and other maintenance requests specified by inspectors of the NBC.
2. Records which substantiate any information supplied in permit applications, Self--Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

G. Spill and Slug Prevention Control Plan:

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

H. Toxic Organic/Solvent Management Plan:

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

I. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350. Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC 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. Denison Pharmaceuticals, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Denison Pharmaceuticals, LLC has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Denison Pharmaceuticals, LLC is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Denison Pharmaceuticals, LLC shall be subject to the terms and conditions of the permit as if named herein.

M. Closing, Selling, Moving the Business:

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

N. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

O. Permit Violations:

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC 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
- List of Toxic Organic Compounds
- 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

Denison Pharmaceuticals, LLC

Pharmaceutical Manufacturing
Pretreatment Standards for New Sources (PSNS)
40 CFR §439.47

Subpart D		
PSNS for Mixing, Compounding, and Formulating Subcategory D		
Pollutant or Pollutant Property	Maximum for Any One Day (mg/L)	Maximum for Monthly Average (mg/L)
n-Amyl acetate	20.7	8.2
Ethyl acetate	20.7	8.2
Isopropyl acetate	20.7	8.2
Acetone*	20.7	8.2
Methylene Chloride*	3.0	0.7

*Must meet the combined total TTO discharge limit of 2.13 mg/L.

Table 3

Denison Pharmaceuticals, LLC
Sampling Requirements

Sample Location #1		
Effluent Monitoring Station		
Month	Grab Sample	Parameters
January	X	Cu, Zn, O&G, Acetone, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Methylene Chloride, BOD, TSS
February		
March		
April	X	Cu, Zn, O&G, VOC, EXT, Acetone, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Methylene Chloride, BOD, TSS
May		
June		
July	X	Cu, Zn, O&G, Acetone, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Methylene Chloride, BOD, TSS
August		
September		
October	X	Cu, Zn, O&G, VOC, EXT, Acetone, n-Amyl Acetate, Ethyl Acetate, Isopropyl Acetate, Methylene Chloride, BOD, TSS
November		
December		

Legend

Cd - Cadmium Pb - Lead BOD - Biochemical Oxygen Demand
Cr - Chromium Ni - Nickel TSS - Total Suspended Solids
Cu - Copper Ag - Silver O&G - Total Oil and Grease (fats, oils, and grease)
CN - Cyanide Zn - Zinc VOC - Volatile Organic compounds Portion of TTO List
EXT - Extractable Portion of TTO List

CERTIFICATE TO DISCHARGE

the following types of process water:

TREATED PROCESS TANK WASHWATER, LABORATORY GLASSWARE WASHWATER, REVERSE OSMOSIS WASTEWATER, AIR COMPRESSOR CONDENSATE, NON-CONTACT COOLING WATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Denison Pharmaceuticals, LLC

1 Powder Hill Road

Lincoln, RI 02865

PERMIT NUMBER: B1404-020-0426

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 26, 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: B1506-017-0423

Company Name: **TIFFANY AND COMPANY**

Facility Address: 300 Maple Ridge Drive, Cumberland, RI 02864

Mailing Address: 300 Maple Ridge Drive, Cumberland, RI 02864

Facility President: Mr. Alessandro Bogliolo

Facility Authorized Agents: Mr. Christopher Lepore, Mr. Timothy LaLonde, Mr. Daniel Brouillard,
Mr. Luc DeSmet

User Classification: Non-Ferrous Precious Metal Forming Operations

Categorical Standards Applicable: 40 CFR §471.45, Pretreatment Standards for New Sources

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with the Rules And Regulations For The Use Of Wastewater Facilities Within The Narragansett Bay Water Quality Management District (Rules and Regulations), **Mr. Alessandro Bogliolo and Tiffany and Company**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 19 pages with conditions A - W and Attachment A.

**This permit is effective on May 1, 2018
and expires on April 30, 2023.**

Noncompliance with any term or condition of this permit shall constitute a violation of the NBC's Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

April 27, 2018
Date

NOTE: The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Effluent Discharge Limitations:

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 17, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Article 5 of the NBC's Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC's facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC's facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee is classified as a non-ferrous precious metal former and, therefore, must at all times comply with EPA Categorical Regulations 40 CFR §471.45, Pretreatment Standards for New Sources. EPA regulations require that non-ferrous precious metal formers maintain production and flow data to ensure full compliance with categorical limitations for cadmium, copper, cyanide, and silver. Table 2 attached to the permit provides concentration based limits calculated from EPA production based limitations and facility production and flow data. The calculations are outlined in Attachment A. Since the EPA limitations in Table 2 are more stringent than the NBC limitations in Table 1, the EPA limitations will be enforced at the final discharge location. Local limitations will be enforced for all other parameters as categorical limitations do not apply.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC's facilities:
 - a. Treated Pickling Rinsewaters;
 - b. Treated Backwash from Filters;
 - c. Treated Investing Wastewaters;
 - d. Treated Divesting Wastewaters;
 - e. Treated Sanding and Grinding Area Floor Spills;
 - f. Treated Wastewater Treatment Room Floor Spills;
 - g. Treated Hand Wash Sink Wastewaters;
 - h. Treated Annealing Quench Contact Cooling Water;
 - i. Treated Shot Casting Contact Cooling Water;

- j. Non-Contact Cooling Water;
 - k. Air Compressor Condensate;
 - l. Eye Wash Station Discharge.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

C. Prohibitions:

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations of the Narragansett Bay Commission. Prohibited discharges include, but are not limited to, the following:
- a. Concentrated Pickling Solutions;
 - b. Mass Finishing Wastewaters;
 - c. Soak Cleaner Solutions;
 - d. Soak Cleaner Rinsewaters;
 - e. Ultrasonic Cleaner Solutions;
 - f. Ultrasonic Cleaner Rinsewaters;
 - g. Wet Air Scrubber Wastewater;
 - h. Casting Department Chiller Unit Solutions;
 - i. Stamp & Strike Annealing Oven Non-Contact Cooling Water;
 - j. Wet Grinding/Sanding Wastewaters;
 - k. Filtered Polishing Wastewaters;
 - l. Cooling Tower Discharges;
 - m. Electroplating Solutions;
 - n. Acetone Dip Tank Solutions;
 - o. Isopropyl Alcohol;
 - p. Isopropyl Alcohol-Castor Oil Solutions;
 - q. Cyanide Solutions;
 - r. Acidic Solutions with a pH less than 5.0 standard units;
 - s. Caustic Solutions with a pH greater than 11.0 standard units;
 - t. Degreasing Solutions;
 - u. Solvents;
 - v. Sludges;
 - w. Fuel or Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 17, attached hereto and incorporated herein.

3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans received by the NBC from the permittee on August 15, 2000, April 24, 2002, June 2, 2003, January 29, 2004, October 20, 2009, March 25, 2010, August 16, 2010, December 15, 2010, March 5, 2012, May 31, 2012, July 16, 2012, December 12, 2012, April 12, 2013, May 1, 2013, September 5, 2013, June 16, 2014, January 13, 2015, August 14, 2015, November 30, 2015, December 3, 2015, April 11, 2016, August 4, 2016 and February 27, 2017. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals, or materials, including all prohibited substances as defined in the Rules and Regulations of the Narragansett Bay Commission, without written approval from the NBC.
4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

D. Pretreatment Requirements:

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of two (2) sample locations must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the final pH adjustment tank, collecting all process discharges specified in Section B(1) (a through j) of this permit.

Sample Location #2 - Sample port on the discharge line of the oil/water separator in the Mechanical Room, collecting all process discharges specified in Section B(1)(i) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Locations #1 and #2 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit. The discharge through Sample Location #1 must be in compliance with the EPA Non-Ferrous Precious Metal Former Standards referenced in Section A(4) and Table 2 of this permit.

2. The permittee shall operate and maintain a pretreatment system in conformance with plans received by the NBC on April 24, 2002, January 29, 2004, October 19, 2006, July 16, 2012 and February 27, 2017. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.

3. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

E. Zero Discharge/Recycle Operation Requirements:

1. The permittee shall operate and maintain a zero process wastewater recycle system as illustrated in the plans that have been received by the NBC on January 29, 2004, October 12, 2004, October 19, 2006, March 18, 2008, July 10, 2009, August 31, 2009, March 23, 2010, December 15, 2010, July 11, 2011, December 2, 2011, July 2, 2012, May 1 2013, September 5, 2013, June 16, 2014, January 13, 2015, December 3, 2015, April 11, 2016 and February 27, 2017. This system shall be used specifically for the purpose of recycling wastewater or eliminating discharges from the following operations:
 - a. Ultrasonic Cleaner Rinsing Operations;
 - b. Soak Cleaner Rinsewaters;
 - c. Mass Finishing Wastewaters;
 - d. Casting Department Chiller Units;
 - e. Wet Grinding/Sanding Operations;
 - f. Filtered Polishing Operations;
 - g. Polishing Department Cleaning Lines;
 - h. Solvent Cleaning Unit Operations;
 - i. Annealing Oven Non-Contact Cooling Water;
 - j. Castor Oil-Isopropyl Alcohol Operations;
 - k. Acetone Dip Tank Operations;
 - l. CNC Cooling Oils.
2. The permittee shall make no changes to the process tanks or zero discharge system without first submitting plans to the NBC for approval. Only those solutions indicated as being discharged to the zero discharge system on the plans received by the NBC on dates referenced in section E(1) above may be treated on-site in the pretreatment equipment.
3. If any problems with the zero discharge systems arise, or if the permittee would like to connect to the sewer for the purpose of discharging wastestreams referenced in Section E(1) above, the permittee must notify the NBC, in writing, and obtain written approval from the NBC before resuming discharge or making any physical changes to the process tanks, recycle systems, evaporation systems, or associated piping.
4. The permittee has capped off and sealed all sewer drain lines associated with the process operations identified in Section E(1) above. They must remain capped off and sealed so that no process wastewater may be discharged to the sewer through sanitary or any other sewer connections from the zero discharge operations.

5. The permittee shall post signs at all sanitary sewer connections stating the following: "Discharge of Chemicals Prohibited by Rhode Island Law".
6. Failure to notify NBC personnel prior to resuming process wastewater discharges to the sewer from the process operations listed in Section E(1) above may be considered an intentional violation of the NBC's Rules and Regulations and may subject the permittee to civil and/or criminal penalties as defined in R.I.G.L. §46-25-25.2 and §46-25-25.3.

F. Monitoring Requirements:

1. The permittee shall monitor the pH of the effluent discharge and record it continuously. The permittee shall report the results monthly in a summary report giving the maximum, minimum and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The permittee must submit the pH Monitoring Report within thirty (30) days from the end of the month in which the data is recorded. The original recording chart must be maintained on site for a period of at least three (3) years.
2. The permittee shall conduct sampling over one (1) full normal operating day during the months of February, April, June, August, October, and December until the expiration date of this permit.
 - a. A composite sample is to be collected which must consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the sample port on the discharge line of the final pH adjustment tank, Sample Location #1. The composite samples collected in April and October are to be preserved and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Lead (Total)	Silver (Total)
Chromium (Total)	Nickel (Total)	Zinc (Total)
Copper (Total)		

The composite samples collected during all other sampling months are to be preserved and analyzed in accordance with EPA protocols for the following parameters:

Copper (Total)	Silver (Total)
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- b. During the months of April and October, on the same day that the composite samples listed in Section F(2)(a) above are being collected, the permittee shall collect a minimum of four (4) grab samples at equidistant time intervals over the entire operating day from the sample port on the discharge line of the final pH adjustment tank, Sample Location #1 (i.e., one (1) grab sample collected every two (2) hours over an eight (8) hour operating day). Each grab sample must be

preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.6 grams of ascorbic acid must be added. The sample should then be retested for chlorine residual, and if it is present, the addition of ascorbic acid should be repeated. Once residual chlorine has been eliminated from the sample, the pH of the sample must be checked and elevated to greater than 12.0 standard units by the addition of sodium hydroxide, if necessary. Once the grab sample has been preserved to a pH greater than 12.0 standard units and no chlorine residual is detected, it may be composited with the other grab samples collected on that operating day. The composite of preserved grab samples must be refrigerated until analysis and must be analyzed within fourteen (14) days of collection for **Total Cyanide**.

3. During the month of October, until the expiration date of this permit, the permittee shall collect one (1) grab sample from the sample port on the discharge line of the oil/water separator in the Mechanical Room, Sample Location #2. The grab sample for each month is to be collected in a glass bottle and must be preserved and analyzed in accordance with EPA protocols for the following parameter:

Total Oil and Grease (fats, oils, and grease)

Table 3 attached hereto summarizes the sampling requirements for this facility.

4. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of sampling and at the end of sampling. These readings and the resultant total flow are to be submitted with the sampling results.
5. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
6. The permittee must compare the analytical report results with the NBC's effluent discharge limitations listed in Table 1. If there are any violations of the NBC's standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC's standards, excluding BOD, TSS and pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.

7. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
 - a. Failure to meet effluent limitations;
 - b. Change in production processes;
 - c. Expansion or reduction of production;
 - d. Change in water usage;
 - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

G. Record Keeping Requirements:

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
 - a. Amount of chemicals used on a monthly basis to provide pretreatment;
 - b. Amount of sludge generated on a monthly basis;
 - c. Completed manifest forms for hazardous materials;
 - d. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration and other maintenance requests specified by inspectors of the NBC.
2. The permittee shall be responsible for maintaining production and flow data for all categorical processes, as defined in 40 CFR §471.45 which discharge to the sewer. These records must be maintained at the facility and be available at all times for NBC review. The permittee shall report the production and flow data monthly to the NBC within thirty (30) days from the end of the month in which the data is recorded.
3. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

H. Spill and Slug Prevention Control Plan:

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

I. Toxic Organic/Solvent Management Plan:

The permittee must maintain an approved Toxic Organic/Solvent Management Plan to ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

J. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR §403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350. Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility.

The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC's Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

K. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

L. Permit Fee:

The permittee agrees to pay an annual permit fee and all sewer user fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G. L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

M. Authorization To Do Business:

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Tiffany and Company shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Tiffany and Company has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Tiffany and Company is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Tiffany and Company shall be subject to the terms and conditions of the permit as if named herein.

N. Closing, Selling, Moving the Business:

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

O. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

P. Permit Violations:

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC's Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC's NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Article 10 of the NBC's Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

Q. Revocation/Suspension of Permit:

1. Violations of the conditions of this permit, the NBC's Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the NBC's Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
 - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
 - b. Failure to report changes in operations or wastewater constituents;
 - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;

- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

R. Civil and Criminal Liability:

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the NBC's Rules and Regulations or State or Federal laws or regulations.

S. Duty to Comply:

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

T. Removed Substances:

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

U. Permit Modification/Renewal:

1. This permit may be modified for various reasons, including but not limited to the following:
 - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
 - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
 - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
 - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
 - e. Violation of any terms or conditions of the permit;
 - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
 - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
 - h. To correct typographical or other errors in the permit;
 - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
 - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Article 8 of the NBC's Rules and Regulations a minimum of ninety (90) days prior to the expiration date.

V. Integration:

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Article 8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Article 2 of the Rules and Regulations.

W. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

AE:NJD:ad

Attachments:

- Self Monitoring Compliance Report Form
- Continuous pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-Four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- List of Toxic Organic Compounds

Table 1

NBC Effluent Discharge Limitations
Bucklin Point District

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)	0.07	0.05
Copper (Total)	0.80	0.79
Cyanide (Total)	0.33	0.33
Silver (Total)	0.26	0.13

EPA discharge limits are based upon average production and flow data for the facility and the Non-Ferrous Precious Metal Forming Pretreatment Standards for New Sources 40CFR §471.45 and combined wastestream formula detailed below. See Attachment A of this permit for more details.

The US EPA Categorical Discharge Limitations are more stringent than NBC Effluent Discharge Limitations listed in Table 1. These categorical discharge limitations may be revised as a result of periodic reviews of production and flow data. Permittee will be periodically reviewed and discharge limitations may change as production and water usage change.

Combined Wastestream Formula (CWF)

Alternative Mass Limit Formula

$$M_{cwf} = (\sum M_i) * ((F_t - F_d) / (\sum F_i))$$

M_{cwf} = alternate mass limit for pollutant

M_i = categorical pretreatment standard mass limit for pollutant in stream i

F_i = average daily flow of stream i (minimum 30 day average)

F_d = average daily flow of dilute wastestream (minimum 30 day average)

F_t = average daily flow through the combined treatment facility (minimum 30 day average)

Categorical Discharge Limitation in mg/L

$$C = M_{cwf} / F_t$$

F = Average monthly flow through the combined treatment facility

Table 3

Tiffany and Company
Sampling Requirements

Month	Sample Location #1 Sample Port on the Discharge Line of the Final pH Adjustment Tank		Sample Location #2 Sample Port on the Discharge Line of the Oil/Water Separator in the Mechanical Room	
	Composite Sample	Parameters	Grab Sample	Parameters
January				
February	X	Cu, Ag		
March				
April	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN		
May				
June	X	Cu, Ag		
July				
August	X	Cu, Ag		
September				
October	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN	X	O&G
November				
December	X	Cu, Ag		

Legend

Cd - Cadmium Pb - Lead O&G - Total Oil and Grease (fats, oils, and grease)
Cr - Chromium Ni - Nickel
Cu - Copper Ag - Silver
CN - Cyanide Zn - Zinc

Attachment A

Tiffany and Company Basis for EPA Discharge Limitations

Production Based Standards

Subpart D PSNS for Surface Treatment Rinse		
Pollutant or Pollutant Property	Maximum for Any One (1) Day	Maximum for Monthly Average
	mg/off-kg (pounds per million off-pounds) of precious metals surface treated	
Cadmium	0.21	0.093
Copper	1.17	0.616
Cyanide	0.179	0.074
Silver	0.253	0.105

Subpart D PSNS for Heat Treatment Contact Cooling Water		
Pollutant or Pollutant Property	Maximum for Any One (1) Day	Maximum for Monthly Average
	mg/off-kg (pounds per million off-pounds) of precious metals surface treated	
Cadmium	0.142	0.063
Copper	0.793	0.417
Cyanide	0.121	0.050
Silver	0.171	0.071

Subpart D PSNS for Shot Casting Contact Cooling Water		
Pollutant or Pollutant Property	Maximum for Any One (1) Day	Maximum for Monthly Average
	mg/off-kg (pounds per million off-pounds) of precious metals surface treated	
Cadmium	0.125	0.055
Copper	0.698	0.367
Cyanide	0.107	0.044
Silver	0.151	0.0631

Attachment A
(continued)

Tiffany and Company
Basis for EPA Discharge Limitations

Combined Wastestream Formula (CWF)

Alternative Mass Limit Formula

$$M_{cwf} = (\sum M_i) * ((F_t - F_d) / (\sum F_i))$$

M_{cwf} = alternate mass limit for pollutant

M_i = categorical pretreatment standard mass limit for pollutant in stream i

F_i = average daily flow of stream i (minimum 30 day average)

F_d = average daily flow of dilute wastestream (minimum 30 day average)

F_t = average daily flow through the combined treatment facility (minimum 30 day average)

Categorical Discharge Limitation in mg/L

$$C = M_{cwf} / F_t$$

F = Average monthly flow through the combined treatment facility

CERTIFICATE TO DISCHARGE

the following types of process water:

TREATED NON-FERROUS PRECIOUS METAL FORMING WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Tiffany and Company

300 Maple Ridge Drive

Cumberland, RI 02964

PERMIT NUMBER: B1506-017-0423

PERMIT EXPIRATION DATE: 04/30/2023

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

April 27, 2018

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL 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.

5. The permittee is responsible for properly operating and maintaining the pretreatment systems to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

E. Monitoring Requirements:

1. The permittee shall monitor the pH of the effluent discharge and record it continuously. The permittee shall report the results monthly in a summary report giving the maximum, minimum, and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The permittee shall record the volume of landfill leachate discharged to the NBC sewer system on a daily basis on the pH Monitoring Report. The pH Monitoring Report must be received by the NBC within thirty (30) days from the end of the month in which the data is recorded. The original recording chart must be maintained on site for a period of at least three (3) years.
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. 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 - 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 WHOLESALE FOOD
PROCESSING OPERATIONS WITH
HIGH CONVENTIONAL
POLLUTANT LOADS
WASTEWATER DISCHARGE
PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: P3304-010-1023

Company Name: **PROVIDENCE SPECIALTY PRODUCTS, LLC**

Facility Address: 33 Dearborn Street, Providence, RI 02909

Mailing Address: 33 Dearborn Street, Providence, RI 02909

Facility President: Mark Federico, Sr.

Facility Authorized Agents: Mark Federico, Sr., Mr. Ronald Pozo

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), **Mark Federico, Sr. and Providence Specialty Products, 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 17 pages with conditions A - U.

**This permit becomes effective on June 1, 2021
and expires on October 31, 2023.**

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 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 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 agrees that the discharge per calendar day of food processing wastewater is greater than or equal to 10,000 gallons, but less than 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. Process equipment wash water;
 - b. Process equipment rinse water;
 - 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. Concentrated milk products;
 - b. Solids greater than 1/2 inch in diameter;
 - 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 16, 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 - The 400-gallon wastewater sampling tank, collecting all process discharges specified in Section B(1)(a and b) of this permit.
 - Sample Location #2 - The sampling tee on the discharge pipe from the outdoor in-ground grease interceptor, 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 Locations #1 and #2 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee 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 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 grease removal pretreatment system 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 grease removal pretreatment system including, but not limited to, the following:
 - a. The permittee must inspect the CWT pretreatment system on a weekly basis to determine the amount of grease collected in the system;
 - b. The permittee must conduct weekly inspections of the in-ground grease interceptor to determine the amount of grease collected in the unit;
 - c. The in-ground grease interceptor must be pumped-out at least once each year. The NBC may require more frequent cleaning of the grease interceptor based on inspection and sampling performed by NBC personnel.
5. The permittee must install additional pretreatment equipment 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.
6. 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 from the outdoor in-ground grease interceptor, Sample Location #2, 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 final pH, and volume of each treated batch discharge from the 400-gallon wastewater sampling tank, Sample Location #1, and shall record the data in the pretreatment system logbook referenced in Section F of this permit. The final pH, and volume of each batch discharge, is to be reported to the NBC monthly on a summary report within thirty (30) days from the end of the month in which the data was recorded. (See sample copy enclosed).
3. The permittee shall conduct sampling over one (1) full normal operating day during the months of January, April, July, and October, until the expiration date of this permit.
 - 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 sampling tee on the discharge pipe from the outdoor in-ground grease interceptor, Sample Location #2. The composite samples collected in January, April, July, and October are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand
Total Suspended Solids

The composite samples collected during July and October are also to 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 samples listed in Section E(3)(a) above 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 sampling tee on the discharge pipe from the outdoor in-ground grease interceptor, Sample Location #2. The grab samples are 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)

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.

4. During the months of January, April, July, and October, until the expiration date of this permit, the permittee must collect two (2) grab samples from the 400-gallon wastewater sampling tank, 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 months of July and October, 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.

5. 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.
6. 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.
7. 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.

8. 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. Boiler and water softener system maintenance and discharges;
 - f. 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 must inspect and maintain the grease removal system, including the CWT system, outdoor, in-ground grease interceptor, and centrifuges, at least once per week and record in a logbook the time and date of the inspection (month, day, and year), each activity, and the name of the individual conducting the activity. Maintenance activities which must be documented in a logbook include the following:
 - a. Quantity of solids removed from the CWT system;
 - b. Maintenance and cleaning of the CWT system;
 - c. The thickness of the grease layer in the outdoor in-ground grease interceptor must be recorded in the logbook. The grease interceptor must be maintained according to manufacturer's specifications and pumped out accordingly. If grease is observed in the final discharge pipe, the grease interceptor must be pumped out immediately;
 - d. 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;

- e. 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;
 - f. Maintenance and cleaning on the centrifuges used to remove butterfat.
3. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

G. Spill and Slug Prevention Control Plan:

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.

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. Providence Specialty Products, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Providence Specialty Products, 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 Providence Specialty Products, 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 Providence Specialty Products, LLC 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.

KMB:smb

Attachments:

Self-Monitoring Compliance Report Form
Continuous pH Monitoring 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
Logsheet for Outdoor In-Ground Grease Interceptor

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 3

Providence Specialty Products, LLC
Sampling Requirements

Month	Sample Location #1 400-Gallon Wastewater Sampling Tank		Sample Location #2 Sampling Tee on the Discharge Pipe from the Outdoor In-Ground Grease Interceptor	
	Grab Sample	Parameters	Composite Sample	Parameters
January	X	BOD, TSS, O&G	X	BOD, TSS, O&G*
February				
March				
April	X	BOD, TSS, O&G	X	BOD, TSS, O&G*
May				
June				
July	X	BOD, TSS, O&G, NH ₃ , TN	X	BOD, TSS, O&G*, NH ₃ , TN
August				
September				
October	X	BOD, TSS, O&G, NH ₃ , TN	X	BOD, TSS, O&G*, NH ₃ , TN
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

*The O&G sample is to consist of four (4) grab samples collected over the course of the operating day. The mathematical average of the results from the four samples is to be compared to the NBC discharge limitation for Total Oil and Grease (fats, oils, and grease) to determine compliance.

CERTIFICATE TO DISCHARGE

the following types of process water:

CHEESE MANUFACTURING WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Providence Specialty Products, LLC

33 Dearborn Street

Providence, RI 02909

PERMIT NUMBER: P3304-010-1023

PERMIT EXPIRATION DATE: 10/31/2023

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

May 25, 2021

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL BREWERY OPERATIONS
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B3604-005-0426
Company Name: **ISLE BREWERS GUILD, LLC**
Facility Address: 461 Main Street, Pawtucket, RI 02860
Mailing Address: 461 Main Street, Pawtucket, RI 02860
Facility President: Mr. Devin Kelly
Facility Authorized Agents: Mr. Devin Kelly, Mr. Jack Streich
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. Devin Kelly and Isle Brewers Guild, 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 - 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

June 3, 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 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 brewery 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 36 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 brewery wastewater is greater than or equal to 10,000 gallons, but less than 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. Brew Kettle Wash Water;
 - b. Fermenting Tank Wash Water;
 - c. Ageing Tank Wash Water;
 - d. Brite Beer Tank Wash Water;
 - e. Canning Line 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 - Final wastewater collection sump, collecting all process discharges specified in Section B(1)(a, b, c, d, and e) 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 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 submit a copy of the Department of the Treasury - Alcohol and Tobacco Tax and Trade Bureau (TTB) Form 5130.9, Brewer's Report of Operations monthly to the NBC. The report must be submitted by the first of the month following the reporting month. The permittee shall record a reading of the incoming water meter from the last day of the reporting month. This reading must be submitted on the first day of each month.
2. 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.
3. The permittee shall conduct sampling over one (1) full normal operating day during the months of January, April, July, and October, until the expiration date of this permit. A composite sample must be collected from the final wastewater collection sump, Sample Location #1, and consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. The composite samples collected in January, April, July, 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.

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. 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;
 - 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. Isle Brewers Guild, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Isle Brewers Guild, 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 Isle Brewers Guild, 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 Isle Brewers Guild, 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.

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
- 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

Isle Brewers Guild, LLC
Sampling Requirements

Sample Location #1		
Final wastewater collection sump		
Month	Composite Sample	Parameters
January	X	BOD, TSS
February		
March		
April	X	BOD, TSS
May		
June		
July	X	BOD, TSS
August		
September		
October	X	BOD, TSS
November		
December		

Legend

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

CERTIFICATE TO DISCHARGE

the following types of process water:

BREWERY OPERATIONS WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Isle Brewers Guild, LLC

461 Main Street

Pawtucket, RI 02860

PERMIT NUMBER: B3604-005-0426

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.

June 3, 2021
Initial Date of Issuance

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager

***TYPICAL ZERO PROCESS
WASTEWATER-SANITARY
DISCHARGE PERMIT***



ZERO PROCESS WASTEWATER - SANITARY DISCHARGE PERMIT

Permit Number: P4200-181-0426
Company Name: **ALUMINUM & COPPER RECYCLING, INC.**
Facility Address: 68 Salem Street, Providence, RI 02907
Mailing Address: 68 Salem Street, Providence, RI 02907
Facility President: Walter Behm, Jr.
Facility Authorized Agent: Walter Behm III
User Classification: Zero Discharge Oil Recycling 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 **Walter Behm, Jr. and Aluminum & Copper Recycling, Inc.**, 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 12 pages with conditions A - S and Attachment A.

**This permit becomes effective on May 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

April 20, 2021
Date

Walter Behm, Jr. and Aluminum & Copper Recycling, Inc. hereby consent to this Zero Process Wastewater-Sanitary Discharge Permit. In so consenting, appropriate officers of **Aluminum & Copper Recycling, Inc.** have personally read and understood each of the numbered provisions in this Zero Discharge Permit. This permit allows **Aluminum & Copper Recycling, Inc.** 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 approved by the NBC. This pretreatment system shall be used specifically for the use of recycling wastewater or eliminating discharges from the following operations:

Engine Block Oil Recycling

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. Oils and Greases;
 - b. Metal Cleaning Solutions;
 - c. Degreasing Solutions;

- d. Solvents;
 - e. Sludges;
 - f. Solids/Grit;
 - g. Antifreeze Solutions.
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 12, 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 oil 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:

During the months of April and October, the permittee shall submit written certification biannually stating that the permittee has made no process wastewater discharges to the sewer during the previous six (6) month period. This certification must be received by the NBC within thirty (30) days from the end of the required reporting month. This certification must contain a biannual water meter reading 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. 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.

G. 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.

H. Permit Fee:

The permittee agrees to pay an annual permit fee and all sewer user fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

I. 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. Aluminum & Copper Recycling, Inc. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Aluminum & Copper Recycling, 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 Aluminum & Copper Recycling, 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 Aluminum & Copper Recycling, Inc. shall be subject to the terms and conditions of the permit as if named herein.

J. 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.

K. 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.

L. 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.

M. 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.

N. 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.

O. 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.

P. 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.

Q. 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.

R. 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.

S. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

EJS:NJD:smb

Attachments:

- Designation of Authorized Agent Form
- RCRA Handbook
- Bi-Annual 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 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

***TYPICAL SEPTAGE HAULER
WASTEWATER DISCHARGE PERMIT***



NARRAGANSETT BAY COMMISSION SEPTAGE DISCHARGE PERMIT

Permit Number: B8000-149-0426
Company Name: **ECHO SEPTIC SERVICES, LLC**
Company President: Vincent Lepore, Jr.
Facility Address: 481 Chestnut Hill Road, Chepachet, RI 02814
Mailing Address: 481 Chestnut Hill Road, Chepachet, RI 02814
DEM License Number: RI-912

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 **Vincent Lepore, Jr. and Echo Septic Services, LLC**, hereinafter jointly referred to as **Permittee**, to discharge residential quality septage to the NBC Lincoln Septage Receiving Station. The Permittee must adhere to the terms, conditions, and procedures of this permit, the Rules and Regulations, and all other applicable federal, state, and local regulations. Any changes to the information initially provided to the NBC by the Permittee in the permit application must immediately be reported to the NBC. This permit is not transferable without the written consent of the NBC. If the Permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

The permittee is authorized to discharge residential quality septage to the NBC Lincoln Septage Receiving Station from the vehicles listed in Attachment A of this permit. This permit consists of two pages with Conditions 1 through 15 and Septage Permit Attachment A.

The permittee shall at all times follow the procedures specified in Attachment A of this permit for adding new septage vehicles and for discharging at the NBC Lincoln Septage Receiving Station.

**This permit becomes effective on May 1, 2021
and expires on April 30, 2026.**

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**:

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

April 27, 2021
Date

CONDITIONS

All terms used herein unless otherwise indicated shall be construed as defined under Section 1.14 of the Rules and Regulations.

1. Location of Discharge: Septage may be discharged only at the NBC Lincoln Septage Receiving Station or other authorized location as the Commission may designate.

2. Origins of Septage: Septage to be discharged to the Commission's facilities must originate from domestic sources within the geographic boundaries of the State of Rhode Island.

3. Prohibitions: The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. The discharge of grease or septage loads containing grease is strictly prohibited by this permit. Mixing or blending of grease with septage loads is strictly prohibited. The permittee is strictly responsible for ensuring that loads containing grease are not taken to the NBC Lincoln Septage Receiving Station or enforcement action may result against the permittee.

4. Procedures for Discharging Septage: The permittee agrees to adhere to the NBC Septage Discharge Procedures, as detailed in Septage Discharge Permit Attachment A.

5. Permit Fee: The permittee agrees to pay an annual permit fee if applicable and all other fees assessed by the Commission in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I. General Law 39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

6. Records Retention: Records which substantiate any information supplied in permit applications, load manifest forms and any other informational requirements of the Rules and Regulations, or any applicable state or federal law, are to be kept by the permittee for a period of three (3) years, unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of three (3) years following resolution of such litigation or dispute.

7. Jurisdiction: This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

8. Integration: This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of the Rules and Regulations.

9. Transfer of Permit Prohibited: Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred, or sold to a new owner, new user, or different vehicle without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said business referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property. The new owner must apply for and be issued a new permit before discharges will be allowed.

10. Enforcement Costs: The permittee agrees to reimburse the Commission for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a Court of competent jurisdiction.

11. Damage to the Facilities: The permittee agrees to indemnify and hold harmless the Commission from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the Commission and caused by discharges from the permittee, either singly or by interaction with other wastes. If, after the discharge, further analysis of the waste shows it to be in violation of the Commission's wastewater discharge limitations, the Commission may impose fines, pursuant to R.I. General Laws 46-25.

12. Violation of the Commission's Permit: The permittee agrees to reimburse the Commission for any penalty and additional operating expense incurred by the Commission for violations of the Commission's NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes. Violations of this permit include but are not limited to the following: unauthorized discharge into Commission facilities, discharge without a load ticket or properly completed manifest form, failure to pay fees, and violation of any other applicable laws or regulations.

13. Penalties for Violations: Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

14. Revocation of Permit: Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, discharging or dumping grease, discharging septage into unauthorized locations, falsification of documents, including permit applications or manifest, etc.

15. Duty to Comply/Civil and Criminal Liability: The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements. Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

Septage Discharge Permit Number B8000-149-0426
Attachment A
Echo Septic Services, LLC

PERMITTED VEHICLES:

VEHICLE TYPE	REGISTRATION NUMBER	TRUCK VIN NUMBER	CAPACITY (GALLONS)
PETERBILT TANK TRUCK	RI - 103869	2NP2H56X1GM334717	2,477

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.
4. The difference in weight will be used to determine the volume of the vehicle in gallons.
4. The permittee will be responsible to pay any costs associated with weighing the vehicle(s).
5. NBC personnel will affix a computer chip and volume sticker to the vehicle(s).
6. The Wastewater Discharge Permit will then be revised to include the additional vehicle(s).
7. The permittee may not discharge septage to the NBC receiving station from the new vehicle(s) until the revised permit is issued.

Septage Facility Discharge Procedures

1. The permittee must establish and maintain an account with a positive cash balance with the NBC Customer Service Section.
2. The permittee must ensure each vehicle permitted to discharge must have a computer chip, permitted vehicle decal and volume decal affixed to it.
3. The permittee must ensure the manifest form is completed in its entirety prior to proceeding to the septage facility and submitted to the NBC operator when the vehicle is checked in.
4. The permittee must ensure the volume of the vehicle meets NBC volume/time restrictions.
5. The NBC operator must scan the computer chip affixed to the vehicle.
6. Activate the gate and enter the facility.
7. Obtain a sample of the load from the discharge line of the vehicle.
8. The NBC operator will test the sample and may approve truck for discharge or may reject the load.
9. After NBC approval is granted, the permittee must connect the hose to the station receiving port and may begin discharge.
10. After the discharge is complete, disconnect the hose.
11. The permittee must wash any drippage and/or spillage into drains.
12. The permittee must exit the station.

***TYPICAL RESTAURANT
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: P8500-743-0426
Company Name: **ANGKOR RESTAURANT**
Facility Address: 10 Traverse Street, Providence, RI 02903
Mailing Address: 10 Traverse Street, Providence, RI 02903
Facility Owner/President: Mr. Chutekma Am
Facility Authorized Agent: Mr. Chutekma Am
User Classification: Restaurant/Food Preparation
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. Chutekma Am and Angkor Restaurant**, 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 11 pages and conditions A - T.

**This permit becomes effective on May 1, 2021
and expires on April 30, 2026.**

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:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

April 27, 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 11, 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 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 Commission's facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
 - a. Dish, Pot, and Equipment Washwater;
 - b. Food Preparation Wastewater.
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 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 solutions or chemicals which may cause a violation of the Rules and Regulations.
4. The use of garbage grinders, food macerators or other equipment for the purpose of discharging solid waste to the sewer system is strictly prohibited.

D. Pretreatment Requirements:

1. Installation of a grease removal unit that conforms with the grease removal unit specifications detailed in Section 1.4.15 of the Rules and Regulations is not required by this permit. This does not relieve the permittee from the responsibility to strictly adhere to all pertinent Building Officials & Code Administrators International, Inc. (BOCA), State of Rhode Island and local building codes with regard to the installation of a grease removal system. The NBC may, at any time, change the pretreatment requirements specified in this permit should the menu, facility operations or Rules and Regulations change.
2. The permittee shall install a grease removal system that conforms to Section 1.4.15 of the Rules and Regulations if determined necessary by the NBC to ensure that effluent limitations are met at all times. Plans of the pretreatment system must be submitted to the NBC for approval before beginning construction, should installation of a 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. Discovery of additional information unavailable to the NBC at the time this permit was prepared;
- d. Failure to meet NBC effluent limitations.

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

The permittee must maintain all associated facilities to ensure that incidental/accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system. Operational changes that may affect the quality or quantity of the process wastestream include, but are not limited to, the following:

- a. Restaurant expansion;
- b. Removal of equipment or installation of additional equipment;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the

NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream 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. In this case, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

H. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

I. Permit Fee:

The permittee agrees to pay an annual permit fee and all sewer user fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

J. Authorization To Do Business:

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Angkor Restaurant shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Angkor Restaurant 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 Angkor Restaurant 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 Angkor Restaurant 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.

THC:NJD:smb

Attachments:

Designation of Authorized Agent
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 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.

CERTIFICATE TO DISCHARGE

the following types of process water:

FOOD PREPARATION WASHING WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Angkor Restaurant

10 Traverse Street

Providence, RI 02903

PERMIT NUMBER: P8500-743-0426

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.

April 27, 2021
Initial Date of Issuance

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager

***TYPICAL DENTAL OPERATIONS
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B9400-197-1225
Company Name: **CUMBERLAND DENTAL**
Facility Address: 2300 Diamond Hill Road, Cumberland, RI 02864
Mailing Address: 2300 Diamond Hill Road, Cumberland, RI 02864
Facility Owner: Dr. Anthony Santare
Facility Authorized Agent: Dr. Anthony Santare
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. Anthony Santare and Cumberland Dental**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 15 pages with conditions A - U and Attachment A.

**This permit becomes effective upon receipt
and expires on December 31, 2025.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

January 14, 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 14, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee is classified as a dentist and therefore, must at all times comply with 40 CFR §441.40, 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. Concentrated Developer and/or Fixer Solutions;
 - f. Acidic Solutions with a pH less than 5.0 standard units;
 - g. Caustic Solutions with a pH greater than 11.0 standard units;
 - h. Solvents;
 - i. Sludges.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
 3. Non-sanitary discharges other than those specified in Section B of this permit are prohibited unless specifically approved by the NBC in writing.
 4. No chemicals, oils, solutions and/or materials including solid substances such as towels, casts, etc. in quantities or of such size capable of causing obstruction to the flow in sewers may be discharged to the sewer unless specifically approved by the NBC in writing.
 5. Discharging of chemicals or solutions containing materials listed in the attached List of Toxic Pollutants (Table 2) is strictly prohibited if said discharge would result in violation of NBC limitations in Table 1.

D. Pretreatment Requirements:

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the amalgam separator, collecting all process discharges specified in Section B(1) (a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.
3. The permittee shall adhere to all mandatory best management practices of the NBC Best Management Practices on the management of Waste Dental Amalgam.
4. In accordance with 40 CFR §441.40, 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 submitted to the NBC on November 19, 2020. The amalgam separator shall be fully operational whenever discharges from dental procedures are occurring.
5. The permittee shall maintain the amalgam separator. Maintenance activities include but are not limited to the following:
 - a. The permittee must inspect the separator weekly to ensure proper operation;
 - b. The permittee must adhere to all manufacturers specifications for maintenance of the separator;
 - c. The maintenance activities must be documented in a logbook as required by Section G(1) of this permit.
6. The permittee has installed chair side traps on all dental chairs to capture large amalgam particles from cuspidors and vacuum systems. Chair side traps must be inspected daily and cleaned or replaced as necessary. Disposable traps or material from reusable traps must be placed in a labeled storage container. The permittee may only rinse a trap if necessary and only in a designated sink that is plumbed with appropriate flow restriction to an NBC approved amalgam separator.
7. The permittee shall ensure that all vacuum pumps are equipped with filters. The permittee shall replace the filter at least once per month or more frequently if necessary. Removed filters should be held over a spill tray to capture any accumulated water from the trap. The water should be carefully decanted without losing any visible amalgam. The decant water, if free of visible amalgam, may be discharged to the sewer through an NBC approved amalgam separator. Dry-turbine vacuums must be inspected to ensure there is no built up sludge in the air/water separator. Collected sludge must be disposed of properly as a mercury containing waste.
8. The permittee shall use a NBC approved cleaner for disinfection of amalgam and/or mercury contaminated vacuum lines, instruments, or equipment. The use oxidizing or acidic cleaners, including but not limited to bleach, chlorine, iodine and peroxide that have pH lower than 6 or greater than 8 is prohibited.

9. The permittee has designated one (1) sink for equipment washing. This sink must be plumbed to the amalgam separator through a sample location. Signs stating "Equipment Washing Only" must be posted at this sink. Flow restrictors must be installed on the discharge pipes of this sink to prevent overwhelming the amalgam separator.
10. The permittee has designated six (6) 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. Monitoring Requirements:

No regularly scheduled monitoring reports are required by this permit. 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. Failure to meet effluent limitations;
- b. Change in production processes;
- c. Expansion or reduction of production;
- d. Change in water usage;
- e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

G. Record Keeping Requirements:

1. The permittee shall be responsible for maintaining onsite physically or electronically the manufacturers operating manual for the amalgam separator. In addition, a logbook documenting all records pertaining to the amalgam separator including, but not limited to, the following:
 - a. Date (month, day and year) of each trap and separator inspection and service activity;
 - b. The location of each trap and separator being serviced;
 - c. All routine and non-routine activities conducted (i.e. cleaning, maintenance, filter replacement);

- d. Date of amalgam retaining container or equivalent container replacement;
 - e. Date when amalgam is picked up or shipped for proper disposal, including name of the permitted or licensed treatment, storage or disposal facility receiving the amalgam retaining containers;
 - f. Signature of person conducting activity.
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. 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, 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:

Amalgam Separator Failure

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

I. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

J. Permit Fee:

The permittee agrees to pay an annual permit fee and all sewer user fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

K. Authorization To Do Business:

The permittee is an individual doing business as Cumberland Dental. As such the permittee shall be personally responsible for compliance with the terms and conditions in this permit. In the event the permittee subsequently incorporates or changes ownership to an entity created by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of the change.

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.

BES:NJD:smb

Attachments:

Designation of Authorized Agent Form
RCRA Handbook

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

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 *	chlordane
chlorodibromomethane	3,4-benzofluoranthene *	4,4'-DDT
chloroethane	benzo (ghi) perylene *	4,4'-DDE
2-chloroethylvinyl ether	benzo (k) fluoranthene	4,4'-DDD
chloroform	bis (2-chloroethoxy) methane	dieldrin
dichlorobromomethane	bis (2-chloroethyl) ether	alpha-endosulfan
1,1-dichloroethane	bis (2-chloroisopropyl) ether	beta-endosulfan
1,2-dichloroethane	bis (2-ethylhexyl) phthalate	endosulfan sulfate
1,1-dichloroethylene	4-bromophenyl phenyl ether	endrin
1,2-dichloropropane	butylbenzyl phthalate	endrin aldehyde
1,3-dichloropropylene	2-chloronaphthalene	heptachlor
ethylbenzene	4-chlorophenyl phenyl ether	heptachlor epoxide
methyl bromide	chrysene *	PCB-1242
methyl chloride	dibenzo (a,h) anthracene *	PCB-1254
methylene chloride	1,2-dichlorobenzene	PCB-1221
1,1,2,2-tetrachloroethane	1,3-dichlorobenzene	PCB-1232
tetrachloroethylene	1,4-dichlorobenzene	PCB-1248
toluene	3,3'-dichlorobenzidine	PCB-1260
1,2-trans-dichloroethylene	diethyl phthalate	PCB-1016
1,1,1-trichloroethane	dimethyl phthalate	toxaphene
1,1,2-trichloroethane	di-n-butyl phthalate	
trichloroethylene	2,4-dinitrotoluene	
vinyl chloride	2,6-dinitrotoluene	
	di-n-octyl phthalate	
	1,2-diphenylhydrazine	
	(as asobenzene)	
	fluoranthene *	
	fluorene *	
	hexachlorobenzene	
	hexachlorobutadiene	
	hexachlorocyclopentadiene	
	hexachloroethane	
	indeno (1,2,3-cd) pyrene *	
	isophorone	
	naphthalene *	
	nitrobenzene	
	N-nitrodimethylamine	
	N-nitrosodi-n-propylamine	
	N-nitrosodiphenylamine	
	phenanthrene *	
	pyrene *	
	1,2,4-trichlorobenzene	
	* = Polynuclear Aromatic Hydrocarbons	
		OTHER TOXIC POLLUTANTS AND TOTAL PHENOL
		Antimony, Total
		Arsenic, Total
		Beryllium, Total
		Cadmium, Total
		Chromium, Total
		Chromium, Hexavalent
		Copper, Total
		Lead, Total
		Mercury, Total
		Nickel, Total
		Selenium, Total
		Silver, Total
		Thallium, Total
		Zinc, Total
		Asbestos
		Cyanide, Total
		Phenols, Total
		TCDD (Dioxin)

Attachment A

Best Management Practice Certification

For the 12-month period from _____, 20__ to _____, 20__

Company Name: _____

Address: _____

RETURN TO:
Narragansett Bay Commission
Pretreatment Program
2 Ernest Street
Providence, RI 02905-5502

I, _____, as authorized representative of
_____, do hereby decree that the Narragansett Bay
Commission Best Management Practices for the Management of Waste Dental Amalgam have
been fully complied with for the past twelve month period.

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

Authorized Representative Signature

Date

CERTIFICATE TO DISCHARGE

the following types of process water:

TREATED DENTAL PROCESS WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Cumberland Dental

2300 Diamond Hill Road

Cumberland, RI 02864

PERMIT NUMBER: B9400-197-1225

PERMIT EXPIRATION DATE: 12/31/2025

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

January 14, 2021

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's (NBC) Rules and Regulations for the Use of Wastewater Facilities (Article 8.9) require each user to provide protection from accidental discharge of prohibited materials and substances to the sewer. The user is required to provide detailed plans showing equipment and a brief description of operating procedures utilized to prevent these discharges.

This document was developed to assist you in determining what measures you need to implement and to properly document the spill prevention control procedures utilized at your facility; therefore, you must complete this document.

Section A: Description of Discharge Practices and Storage Areas

1. List all sources of routine sewer discharges and describe the method of discharge:

Source of Discharge	Method of Discharge
Example: Electroplating Discharges	Pumped to sewer via pretreatment system

2. List all sources of non-routine sewer discharges of an infrequent nature such as batch discharges, which may occur only once per year:

Source of Discharge	Method of Discharge
Example: Annual Power Washing of Plating Room Floors	Gravity flow to pretreatment system

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 7.2 of the Narragansett Bay Commission's (NBC) Rules and Regulations for the Use of Wastewater Facilities, the NBC may require any user who discharges into the facilities to provide information relating to discharges into the facilities to ensure compliance with prescribed pretreatment methods and regulations. Federal pretreatment standards, including those for metal finishers and electroplaters (40 CFR 413.03 and 433.12), require many industrial users to periodically monitor their wastestream for Total Toxic Organics (TTO's). Federal law allows the Industrial User to develop, implement and maintain a Toxic Organic/Solvent

Management Plan, which once approved by the NBC, allows the Industrial User a waiver from performing the expensive and routine TTO monitoring.

In order to provide for the control of solvents and toxic organics which are not permitted to be discharged to the NBC sewerage facilities, the NBC is requiring, as a condition of the industrial sewer user's Wastewater Discharge Permit, that a Toxic Organic/Solvent Management Plan be prepared and submitted to the NBC in lieu of the regular monitoring for toxic organic compounds and solvents.

This form has been developed as a guidance document by the NBC Pretreatment Section to assist sewer users who must prepare a Toxic Organic/Solvent Management Plan. When completed, submitted and approved by the NBC this document will constitute the facility's Toxic Organic/Solvent Management Plan. The user will then be responsible to maintain all items indicated in this plan to ensure that solvents and toxic organic compounds are not discharged into the NBC sewerage system.

Section A – Estimated Annual Solvent Purchases and Usages:

Does your firm use any solvents, chemicals or compounds containing any of the toxic organic compounds listed on the EPA table of toxic organics attached to this document, or any other solvents, such as xylene, acetone, etc., not listed on the attached table? _____

If yes, you must complete all sections of this Toxic Organic/Solvent Management Plan. If no, you must sign the certification Section F of this plan.

List the type and estimated amount of solvents or toxic organic chemicals purchased and used yearly at this facility and provide a brief description detailing the usage of the chemical. A list of EPA toxic organic compounds is attached for your information. In addition to the compounds on this list, any other solvents purchased or used on the premises must be included (i.e. Acetone, 100 gallons/yr., used for paint removal).

Solvent	Use of Solvent	Estimated Gallons Annually Purchased

Section B – Estimate of Solvents Stored and Annually Disposed:

You must account for the total gallons of each solvent or toxic organic chemical listed in Section A. Indicate the estimated volume of each chemical presently stored on site and the estimated volume disposed of annually by

each method of disposal (e.g. reclamation, contract hauler, consumption in product, evaporation, sewer discharge or other) and the total estimated gallons on site and disposed of annually. **The total gallons listed here for each chemical must equal the total gallons listed in Section A for the same chemical.**

Solvent	Gallons Typically Stored On Site	GALLONS DISPOSED ANNUALLY						Total Gallons Stored, Used, or Disposed Annually
		Discharged In Wastewater	Evaporated During Usage	Reclaimed On-site	Shipped Off-site	Consumed or Retained In Product	Other (Indicate Gallons & Disposal Method)	

Section C – Wastewater Analysis:

Has your process wastewater ever been analyzed for any or all of the toxic organic compounds or solvents listed in Section A?

_____ Yes _____ No

If yes, please attach a copy of the analysis. If no, this monitoring must be conducted and the analytical results for each toxic organic compound and solvent listed in Section A must be attached to the plan.

Section D – Solvent Process Operations:

1. For each of the toxic organic compounds or solvents listed in Section A, provide a brief description of the process in which the chemical is used and describe in detail the work methods used to prevent and prohibit toxic organic and solvent dragout, drippage and spillage from entering the wastewater discharged from the facility.

2. For any solvent listed in Section B as being discharged in the wastewater, please provide a brief description detailing the discharge method, practice, procedure, or process operation resulting in each solvent discharge.

Section E – Spill Control Procedures:

Describe the spill control procedures in effect for the toxic organic compounds and solvent on the premises. This would include measures taken in both the chemical storage area and in the work area to prevent incidental and accidental spillage from entering the NBC sewerage system. Measures to prevent and control spillage may include berms, sealed floor drains, absorbent material, etc. Indicate the volume of the largest vessel within each storage area and the capacity of the storage area itself. Please note that a storage area is required to contain a minimum of 110% the capacity of the largest vessel stored within it.

Section F – Certification Statement:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry or the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, 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

Pesticides

EPA Method 625

aldrin
alpha – BHC
beta – BHC
gamma – BHC
delta – BHC
chlordane
4,4' – DDT
4,4' – DDE
4,4' – DDD
dieldrin
alpha-endosulfan
beta-endosulfan
endosulfan sulfate
endrin
endrin aldehyde
heptachlor
heptachlor epoxide
PCB-1242
PCB-1254
PCB-1221
PCB-1232
PCB-1248
PCB-1260
PCB-1016
toxaphene

Other Toxic Pollutants and Total Phenol

Antimony, Total
Arsenic, Total
Beryllium, Total
Cadmium, Total
Chromium, Total
Chromium, Hexavalent
Copper, Total
Lead, Total
Mercury, Total
Nickel, Total
Selenium, Total
Silver, Total
Thallium, Total
Zinc, Total
Asbestos
Cyanide, Total
Phenols, Total
TCDD (Dioxin)

*= Polynuclear Aromatic Hydrocarbons

***NBC SIGNIFICANT INDUSTRIAL USER
ANNUAL INSPECTION CHECKLIST***

NARRAGANSETT BAY COMMISSION



Annual Inspection Checklist
For Significant Industrial Sewer Users

Company Name: _____ Engineer: _____
Contact Person(s): _____ Date: _____
Other Person(s) in Attendance: _____
Company Classification: Electroplater _____ Metalfinisher _____
Other (specify): _____

Part I - Outstanding Requirements/Progress Since Last Inspection

(a) What progress was required of the firm since the last annual inspection? _____

(b) Has required work been completed? Yes No
If no, when will it be completed? _____

(c) What work has facility initiated on its own to improve wastewater discharge?

(d) Has facility expanded/scaled down operations? Yes No
If yes, describe. _____

- (e) Have all monitoring reports been submitted on time? Yes No
 If no, discuss ramifications of late submittals/SNC with user. _____

- (f) Has firm been in compliance for the past twelve (12) month period? Yes No
 If no, list problem parameter(s) and discuss with user. _____

- (g) Are samples being taken at the frequency required in the permit (i.e., monthly, bimonthly), analyzed for all parameters required, and all resampling results submitted? Yes No N/A
 If no, explain. _____

Part II - Pretreatment Equipment and Process Operations

- (a) List all water using process operations and describe each process operation.

- (b) Is there a pretreatment system in operation? Yes No
 Describe, in full, the pretreatment technology presently being provided for each treated wastestream. _____

(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.

Engineers Comments: _____

What will be required of firm? _____

***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-DISTILLARY
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 (3) Have all required reports (BMP Certification, SMCRs) been submitted on time? Yes No (4) Has the firm been in compliance for the past 12 month period? Yes No

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? [] "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
(401) 461-0170

Company Name: _____

Facility Address: _____

This is to notify the Narragansett Bay Commission (NBC) that the above-referenced facility violated the NBC discharge limitations for the following parameter(s):

<u>Sampling Date of Violation</u>	<u>Parameter</u>	<u>Concentration</u>

I certify that I have just become aware of the above-referenced violation(s) within the past twenty-four (24) hours and will immediately resample this wastestream for the parameter(s) exceeding the NBC discharge limitations.* I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Initial sampling and all resampling results must be submitted within 30 days of the sample date. Please note, resampling must continue until four consecutive samples show compliance with NBC discharge limitations.

Signature of Authorized Agent

* Resampling is not required for exceeding BOD or TSS limits.

**CONTINUOUS DISCHARGE
PH MONITORING REPORT**
MONTH OF: _____ 20 ____



Company Name: _____
Address: _____

Return to: **Narragansett Bay Commission**
Pretreatment Section
2 Ernest Street
Providence, RI 02905

Date	MAXIMUM pH	MINIMUM pH	AVERAGE pH (VISUAL)	VOLUME/WATER METER READING IF REQUIRED*	COMMENTS
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations. I certify the above data has been reported directly from the recording chart of the final pH recorder and is reported to an accuracy of 0.1 standard units.

Signature

Date

Name (Print)

Title

*INDICATE IF GALLONS OR CUBIC FEET

**BATCH DISCHARGE
Ph MONITORING REPORT**
MONTH OF: _____ 20 ____



Company Name: _____
Address: _____

Return to: **Narragansett Bay Commission**
Pretreatment Section
2 Ernest Street
Providence, RI 02905

Date	Batch Discharge I		Batch Discharge II		Batch Discharge III		Batch Discharge IV		COMMENTS
	Final pH	Vol.	Final pH	Vol.	Final pH	Vol.	Final pH	Vol.	
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
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18									
19									
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22									
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25									
26									
27									
28									
29									
30									
31									

Please indicate the method used to measure pH: _____

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Signature

Date

Name (Print)

Title

Zero Process Wastewater Discharge Certification

For the Month of _____, 20__

Company Name: _____

Address: _____

RETURN TO:

Narragansett Bay Commission

Pretreatment Program

2 Ernest Street

Providence, RI 02905

I, _____, as authorized representative of

_____, do hereby decree that no process wastewater was discharged into

the Narragansett Bay Commission sewer system for the past six (6) month period.

Date of Meter Readings: _____

<u>Meter Number</u>	<u>Water Meter Readings</u>	<u>Units (cf, gal.)</u>
Meter #1	_____	_____
Meter #2	_____	_____
Meter #3	_____	_____

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Signature

Date

Attachment A

Zero Process Wastewater Discharge Certification

For the Six (6) Month Period from

_____ to _____

Company Name: _____

Address: _____

RETURN TO:
Narragansett Bay Commission
Pretreatment Program
2 Ernest Street
Providence, RI 02905-5502

I, _____, as authorized representative of _____, do hereby decree that no process wastewater was discharged into the Narragansett Bay Commission sewer system for the past six (6) month period.

Date of Meter Readings: _____

<u>Meter Number</u>	<u>Water Meter Readings</u>	<u>Units (cf, gal.)</u>
Meter #1	_____	_____
Meter #2	_____	_____
Meter #3	_____	_____

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

Authorized Representative Signature

Date

Attachment A

Best Management Practice Certification

For the 12-month period from _____, 20__ to _____, 20__

Company Name: _____

Address: _____

RETURN TO:
Narragansett Bay Commission
Pretreatment Program
2 Ernest Street
Providence, RI 02905-5502

I, _____, as authorized representative of
_____, do hereby decree that the Narragansett Bay
Commission Best Management Practices for the Management of Waste Dental Amalgam have been
fully complied with for the past twelve month period.

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

Authorized Representative Signature

Date

NARRAGANSETT BAY COMMISSION SAMPLE SUBMISSION SHEET

SOURCE: _____ EMDA# _____ DATE: _____
 STREET: _____ SAMPLER # _____ TIME: _____
 CITY/STATE: _____ COLLECTED BY: _____
 SAMPLE LOCATION: _____ FACILITY CONTACT: _____
 INSTRUCTIONS: _____

PARAMETERS FOR ANALYSIS*

Cd _____	Ag _____	BOD (5 day) _____
Cr (Total) _____	Zn _____	TSS _____
Cr (Hex.) _____	Hg _____	FOG _____
Cu _____	CN (Total) _____	TPH _____
Pb _____	VOC _____	() _____
Ni _____	Ext _____	() _____

*All analyses done according to 40 CFR part 136. Results reported in mg/l unless specified otherwise.

FIELD AND PRESERVATION DATA

Sample Information					Preservation Chemicals Added								
Sample No.	Sample Time Start/Stop	Analyze For	Sample Type (G) or (C)	Initial pH	Nitric Acid (ml)	Hydro-Chloric Acid (ml)	Res. Cl (+) or (-)	Lead Acetate (+) or (-)	NaOH (ml)	Ascorbic Acid (g)	Other	Final pH	Sealed By
A													
B													
C													
D													
E													
F													
G													
H													
I													
J													
K													
L													
M													

Did user accept a split or replicate sample?

Sample	A	B	C	D	E	F	G	H	I	J	K	L	M	Signature
Yes														
No														

Meter Readings	Meter #1	Meter #2	Meter #3	Meter #4
Close				
Open				
Total	(c.f., gals)	(c.f., gals)	(c.f., gals)	(c.f., gals)

REMARKS _____

CHAIN OF CUSTODY

Samples transferred by: _____
 Samples received by: _____
 DATE: _____ TIME: _____

Samples transferred by: _____
 Samples received by: _____
 DATE: _____ TIME: _____

Samples transferred by: _____
 Samples received by: _____
 DATE: _____ TIME: _____

RESULTS REPORTED BY: _____

RESULTS REPORTED ON: _____

DEFINITION OF AN AUTHORIZED AGENT



An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the company's by-laws or per a vote of the directors if the company is a corporation; a general partner or proprietor if the company is a partnership or sole proprietorship respectively; or a duly authorized representative, the individual designated on the permit application or permit cover page, if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the company. Please complete the Designation Of Authorized Agent section below if you wish to designate additional authorized agents. The Narragansett Bay Commission will not accept documents signed by persons other than the company's authorized agent(s) or authorized representative(s).

DESIGNATION OF AUTHORIZED AGENT

I, _____ certify that I am the _____ of
_____ and that _____
is authorized to make submittals to the Narragansett Bay Commission on behalf of _____
_____ and that said submittals are duly signed for and
in behalf of said corporation by authority of its governing body, and are within the scope of
its corporate powers.

Corporate Seal

Signature of Corporation Official

Date

***NBC ONE-TIME COMPLIANCE
REPORT FOR DENTAL FACILITIES***



Narragansett Bay Commission
One-Time Compliance Report for Dental Facilities
40CFR441.50 Dental Point Source Category

The United States Environmental Protection Agency (EPA) finalized the Dental Point Source Category (40CFR441) on July 14, 2017. This form must be completed under 40CFR441.50, which requires all dental facilities to complete and submit a one-time compliance report to the local Pretreatment Program.

Practice Name: _____

Premise Address: _____

Mailing Address: _____

List all dentists affiliated with this practice:

Name:	Email address:
_____	_____
_____	_____
_____	_____
_____	_____

Primary Contact for Practice: Name: _____
Email Address: _____
Phone Number: _____

Type(s) of Dentistry Performed:

General Dentistry	Yes	_____	No	_____
Orthodontics	Yes	_____	No	_____
Periodontics	Yes	_____	No	_____
Endodontics	Yes	_____	No	_____
Prosthodontics	Yes	_____	No	_____
Oral and Maxillofacial Surgery	Yes	_____	No	_____
Other (please detail)		_____		

This practice began operations prior to July 14, 2017 Yes _____ No _____

This practice places and/or removes dental amalgam on a regular or an infrequent basis:
Yes _____ No _____

An ISO 11143 (or ANSI/ADA 108-2009) certified amalgam separator (or equivalent device) has been installed to capture amalgam bearing waste streams. Yes _____ No _____

Please provide the make and model of the amalgam separator:

Make: _____ Model: _____

Date the amalgam separator was installed: _____

An equivalent device has been installed at the facility: Yes _____ No _____

Please provide the make and model of the equivalent device:

Make: _____ Model: _____

Date the device was installed: _____

How many chairs are at this facility? _____

How many chairs are connected to the amalgam separator or equivalent device? _____

How many sinks (used for instrument washing) are connected to the amalgam separator or equivalent device? _____

I certify the amalgam separator or equivalent device is designed and is being properly maintained and operated in accordance with NBC Best Management Practices. Yes _____ No _____

Maintenance is performed by onsite personnel: Yes _____ No _____

If yes, describe operation and maintenance procedures:

A vendor has been contracted to operate and maintain the amalgam separator or equivalent: Yes _____ No _____

If yes, provide the contact person, company name, address and phone number of your vendor:

If the amalgam separator or equivalent device that is presently installed needs to be replaced, an amalgam separator or equivalent device meeting the requirements of the NBC Best Management Practices for the Management of Waste Dental Amalgam (NBC BMP) as well as 40CFR441.30(a)(1) or 40CFR441.30(a)(2) must be installed. The amalgam separator must be ISO 11143 certified with a 99% removal rate or equivalent device must be installed.

The dental practice complies with the best management practices outlined in the NBC BMP and 40CFR441.30(b) or 40CFR441.40. These best management practices include but are not limited to:

- Waste amalgam including but not limited to dental amalgam from chair side traps, screen, vacuum pumps, filters, dental tools, cuspidors, or collection devices is strictly prohibited from being discharged to the sewer system.
- Elemental mercury is strictly prohibited from being discharged to the sewer system.
- All equipment that comes in contact with amalgam must be operated and maintained in accordance with manufacturers specifications.
- Equipment coming in contact with amalgam, including piping, must not be cleaned with oxidizing or acidic cleaners, including but not limited to bleach, chlorine, iodine, and peroxide that have a pH lower than 6.0 standard units (su) or greater than 8.0 su. These types of cleaners may increase the dissolution of mercury.

Certification Statement

As per 40CFR441.50(a)(2) this one-time compliance report must be signed and certified by a responsible corporate officer, a general partner or proprietor if the dental practice is a partnership or sole proprietorship, or a duly authorized representative in accordance with 40CFR403.12(l).

I am a responsible corporate officer, a general partner or proprietor (if the dental practice is a partnership or sole proprietorship), or a duly authorized representative in accordance with 40CFR403.12(l) of the above named dental practice, and certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Agent:

Print Name

Signature

Phone Number

Email Address

Date: _____

This One-Time Compliance Report must be maintained onsite and be available for review, either in physical or electronic form, during inspections as long as this dental practice is in operation or until there is a change in ownership.

ATTACHMENT VOLUME I

SECTION 4

***SAMPLE NBC ENFORCEMENT
LETTERS, NOTICES, AND ORDERS***

**NOTICE OF VIOLATION
FAILURE TO MEET STANDARDS (USER SAMPLE)**

December 16, 2021

Mr. Hector Bueno
Marotta Food Corporation
d/b/a Bravo Supermarket
300 Barton Street
Pawtucket, RI 02860-2918



Dear Mr. Bueno

The sample results for November which were received by this office on December 15, 2021 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
11/10/2021	OIL & GREASE-T	Grab	192.00	LOCAL	125.00 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. 391.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael McBurney", is written over a light blue horizontal line.

Michael McBurney
Pretreatment Technician

NOTICE OF VIOLATION
FAILURE TO MEET STANDARDS (NBC SAMPLE)

October 04, 2021

Mr. Mark Federico
Providence Specialty Products, LLC
33 Dearborn Street
Providence, RI 02909



Dear Mr. Federico

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 September 20, 2021. These results indicate that you are in violation of Narragansett Bay Commission (NBC) discharge limitations for the following:

Sample Location # 2

Sample Date	Parameter	Sample Type	Sample Result	Standard Type	Max. Limit
9/20/2021	OIL & GREASE-T	Composite	585.00	LOCAL	125.00 mg/L
9/20/2021	BOD	Composite	156.29	LOCAL	75.00 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,

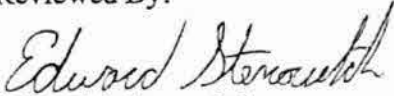
Edward J. Stenovitch
Pretreatment Engineer

WASTEWATER SAMPLE ANALYSIS

Company Name: Providence Specialty
Products, LLC
Company Address: 33 Dearborn Street
Providence, RI 02909
Location Name: Sample Location # 2
Type of Sample: Composite
Date of Sample: September 20, 2021

Parameter	Concentration (mg/l)
BOD	18755.26
OIL & GREASE-T	585
TSS	4157.1

Reviewed By:


Edward J. Stenovitch
Pretreatment Engineer

NOTICE OF VIOLATION
AVERAGE LIMIT VIOLATION



January 04, 2021

Mr. Michael O'Keefe
Ecological Fibers, Inc.
730 York Avenue
Pawtucket, RI 02861

Dear Mr. O'Keefe:

The results of sampling conducted at your firm for the month of November-2020 show that you are in violation of average discharge limitations for the following:


Sample Location # 1

Parameter	# of Analyses	Standard Type	Avg. Conc.	Avg. Limit	Type
ZINC	11	LOCAL	3.34	1.39	NBC MONTHLY

As a condition of your Wastewater Discharge Permit and as required by U.S. EPA regulations, monthly average discharge limitations must be met at all times. Failure to meet the monthly average standards may result in the NBC initiating enforcement action against your firm and the possible publication of your company's name in the NBC annual list of firms in Significant Non-Compliance which is published each year in the PROVIDENCE JOURNAL. Therefore it is important to always be in compliance with the monthly average discharge concentration, in addition to the maximum discharge limit. It is strongly recommended that you sample early each required sampling month to allow adequate time to resample in that month, should the initial result indicate that the monthly average limit was exceeded.

Please note the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact the NBC at 401.461.8848 ext. 391. If you have any questions regarding this letter, please contact me at 401.461.8848 ext. 490.

Sincerely,


Edward J. Stenovitch
Pretreatment Engineer

Notice of Violation
Failure to Meet Standards (Manhole)



January 25, 2022

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 located up and down stream of a company, effectively isolating that company. The samplers are programmed to collect composite samples of the wastewater discharging through the manhole.

On November 23, 2021 and December 22, 2021, the NBC conducted surveillance manhole sampling of Tanury Industries and Tanury Industries PVD, Inc. The analytical results from the upstream manhole indicate compliance with NBC discharge limitations, however, on November 23, 2021 the results from the downstream manhole indicate noncompliance with the following parameters:

<u>Parameter</u>	<u>Sampling Type</u>	<u>Results</u> <u>(mg/L)</u>	<u>Daily Maximum</u> <u>(mg/L)</u>
Copper	Composite	3.47	1.20
Nickel	Composite	1.99	1.62

On December 22, 2021 the results from the downstream manhole indicate noncompliance with the following parameters:


<u>Parameter</u>	<u>Sampling Type</u>	<u>Results</u> <u>(mg/L)</u>	<u>Daily Maximum</u> <u>(mg/L)</u>
Nickel	Composite	3.53	1.62

It has been determined that your firms are the sole sources of the high concentrations of metals in the sewer line. You must submit a report to this office by February 28, 2022 for each facility. The reports must provide an explanation for the high concentrations of metals downstream and a proposal to ensure that wastewater from your facilities is in compliance at all times.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help firm achieve and maintain compliance, contact the NBC at 461-8848 ext. 262.

If you have any questions regarding this letter, please contact me at 461-8848 ext. 490.

Sincerely,



Edward J. Stenovitch
Pretreatment Engineer

Enclosure

Cc: Tanury Industries PVD, Inc. - File



Manhole Sample Analysis

Company: Tanury Industries Tanury Industries PVD, Inc.
Address: 6 New England Way 7 New England Way
 Lincoln, RI 02865 Lincoln, RI 02865
Date of Sample: November 23, 2021
Type of Sample: Composite

<u>Parameter</u>	<u>Upstream Manhole Concentration (mg/L)</u>	<u>Downstream Manhole Concentration (mg/L)</u>
Cadmium	<0.015	<0.015
Chromium	0.078	0.5737
Copper	0.02557	3.474
Cyanide	0.004	0.025
Lead	<0.075	<0.075
Nickel	<0.05	1.997
Silver	<0.025	0.184
Zinc	<0.060	0.1952
pH (standard units)	8.1	8.5

Reviewed by:

Nathan J. Dean
Assistant Pretreatment Manager



Manhole Sample Analysis

Company: Tanury Industries Tanury Industries PVD, Inc.
Address: 6 New England Way 7 New England Way
 Lincoln, RI 02865 Lincoln, RI 02865
Date of Sample: December 22, 2021
Type of Sample: Composite

<u>Parameter</u>	<u>Upstream Manhole Concentration (mg/L)</u>	<u>Downstream Manhole Concentration (mg/L)</u>
Cadmium	<0.015	<0.015
Chromium	<0.075	<0.075
Copper	0.06142	0.6117
Cyanide	<0.004	0.0122
Lead	<0.075	<0.075
Nickel	<0.05	3.535
Silver	<0.025	0.1626
Zinc	0.2351	0.0122
pH (standard units)	7.4	7.2

Reviewed by:

Nathan J. Dean
Assistant Pretreatment Manager

**Notice of Violation
Failure to Immediately Report Violation**

December 16, 2021



Mr. Hector Bueno
Marotta Food Corporation
d/b/a Bravo Supermarket
300 Barton Street
Pawtucket, RI 02860-2918

Dear Mr. Bueno:

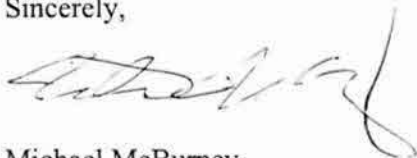
The Self-Monitoring Compliance report which was received by this office on December 15, 2021 indicated non-compliance with the NBC discharge limitations. EPA regulations, 40CFR. 403.12g(2), require that you notify the Narragansett Bay Commission (NBC) within 24 hours of becoming aware of this violation.

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,



Michael McBurney
Pretreatment Technician

NOTICE OF VIOLATION
NOTICE OF PH VIOLATIONS



November 30, 2021

Mr. Robert Raeburn
International Insignia Corporation
1280 Eddy Street
Providence, RI 02905

Dear Mr. Raeburn

I have reviewed the October pH Monitoring Report submitted on November 22, 2021. Based upon this report, your facility has exceeded the pH discharge limitation as follows:

LOW LIMIT VIOLATIONS

1

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. 391.

Please feel free to contact me at 461-8848 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Caitlyn L. Vallee'.

Caitlyn L. Vallee
Pretreatment Engineer

NOTICE OF VIOLATION
FAILURE TO SUBMIT COMPLIANCE REPORT



December 01, 2021

Mr. Juan Jimenez
Chalkstone Supermarket
1050 Chalkstone Avenue
Providence, RI 02908

Dear Mr. Jimenez:

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-2021

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 "Caitlyn L. Vallee".

Caitlyn L. Vallee
Pretreatment Engineer

NOTICE OF VIOLATION
FAILURE TO SUBMIT pH MONITORING REPORT



December 2, 2021

Mr. Edward A. Johnson, III
Universal Plating Company, Inc.
P.O. Box 28579
Providence, RI 02908

Dear Mr. Johnson, III:

In accordance with your Wastewater Discharge Permit, it is necessary for you to submit pH results for the month(s) of:

Sample Location #1
October 2021

To date, the Narragansett Bay Commission (NBC) has not received a copy of the above referenced pH monitoring report(s). Until a signed copy of the above referenced pH report(s) are received, you are in violation of the terms of your permit. Failure to submit pH monitoring results within thirty (30) days from 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 "Caitlyn L. Vallee".

Caitlyn L. Vallee
Pretreatment Engineer

CLV:rcf

**NOTICE OF VIOLATION
FAILURE TO SUBMIT CERTIFICATION**



December 01, 2021

Dr. Charles M. Riotto
Angell Street Dental Associate
425 Angell Street
Providence, RI 02906

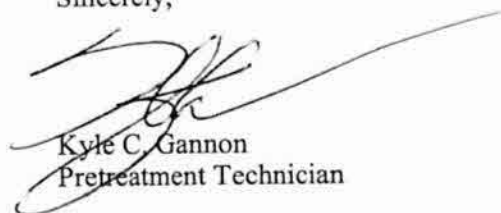
Dear Dr. Riotto:

In accordance with your permit issued by the Narragansett Bay Commission (NBC), it is necessary for you to submit a Certification for the month of:

October-2021

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,



Kyle C. Gannon
Pretreatment Technician

NOTICE OF VIOLATION
FAILURE TO SATISFY NBC REQUIREMENTS



December 01, 2021

Mr. Alfred Castiglioni
The 579, LLC
d/b/a 579 Benefit Street Restaurant
5454 Post Road
East Greenwich, RI 02818

Dear Mr. Castiglioni:

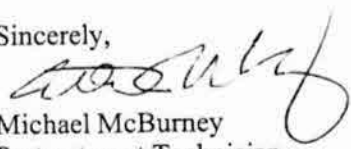
Per the requirements of letter(s) from this office, the following item was required to be completed and/or submitted by the due date indicated below:

Required Submittal	Notice	Issue Date	Due Date
Permit Application	Letter	9/14/2021	10/14/2021
Permit Application Fee	Letter	9/14/2021	10/14/2021

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,


Michael McBurney
Pretreatment Technician

NOTICE OF VIOLATION
LETTER OF DEFICIENCY



December 6, 2021

Mr. Peter Crowley
271 Tockwotten Partners, LLC d/b/a
Narragansett Brewery
132 George M. Cohan Blvd.
Providence, RI 02903-4410

Certified Mail
Return Receipt Requested

91 7108 2133 3937 9776 0800

Dear Mr. Crowley:

This letter serves to summarize the Narragansett Bay Commission (NBC) annual inspection of your facility conducted on November 10, 2021. During the inspection, the following deficiencies were noted:

1. It was noted that pH recording data was missing and, therefore, could not be compared to the reported values on your pH Monitoring Reports. One of the conditions the NBC has for electronic pH recording is that measures are in place to ensure pH data is not impaired or lost. Therefore, your firm must resolve the issues of data being lost when transferred from the recorder to storage. Please note, Section F(2) of your permit requires records to be maintained for a period of at least three (3) years.
2. During the inspection, it was noted that kitchen operations have begun at your facility without prior NBC notification and approval in violation of your Wastewater Discharge Permit as you are not permitted to discharge food preparation wastewater.

It is the NBC's experience, based on inspections and analytical data, that grease laden wastewater is generated from food preparation and washing operations. Presently, wastewater from the pot, dish, and utensil washing operations discharges untreated to the NBC sewer system. This is not acceptable. It has been determined that your firm must install a grease removal unit (GRU) which satisfies all requirements of Section 1.8.8 of the NBC Rules and Regulations (copy enclosed). The GRU must receive wastewater from equipment such as the three (3) bay dish and pot washing sink, any wok stations or soup kettles, and the pre-rinse station of the dishwasher. Please note that wash water from the automatic dishwashers may not discharge into the GRU.

Enclosed you will find an information sheet to make you aware of the NBC grease removal program, along with a copy of the National BOCA Plumbing Codes. The State of Rhode Island has adopted the National BOCA Plumbing Codes with regard to its GRU installation requirements. Also enclosed is a list of GRU equipment manufacturers which details each of the above types of systems and where inquiries can be directed. Please note the NBC will allow the installation of other types of GRUs providing that the unit satisfies all requirements of Section 1.8.8 of the NBC Rules and Regulations. However, choosing this option may require routine self-monitoring analysis which must demonstrate compliance with NBC discharge limitations.

Please note that it is your responsibility to ensure that the GRU is installed by properly licensed professionals in accordance with all federal, state, and local laws, rules, regulations, and building codes. In addition, it is your responsibility to contact the city/town inspector to obtain a plumbing permit prior to installing a GRU or making plumbing modifications within your establishment.

You must decide which type of GRU you will install and notify the NBC of your choice. This notification must include plans of your kitchen showing all food preparation process discharges, detailing all plumbing and connections to the GRU, including the size of all sinks. Please note that you must clearly depict the GRU and GRU sizing information on the plans. An example of a typical kitchen plan is attached for your reference. These plans must be submitted to the NBC for approval by January 15, 2022. A sampling port must be provided on the discharge pipe of the GRU chosen and must be clearly shown on the design plan. You must install the selected GRU and have it fully operational within thirty (30) days of approval of the plans by the NBC. You are also required to notify the NBC at least forty-eight (48) hours before actual installation of the GRU.

Failure to correct the above-mentioned deficiencies can result in the initiation of enforcement action against your firm. Please note that the NBC can assess administrative penalties of up to \$25,000 per violation per day. In addition to correcting the above-mentioned deficiencies, you must do the following:

Page 2

271 Tockwotten Partners, LLC

3. During the inspection, a copy of your firm's most recent water bill was not available for Commission review. Therefore, you must submit a copy of your most recent water bill by December 30, 2021. The NBC reviews your water bills in order to ensure your firm is properly classified for sampling requirements.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact Mr. James Kelly at 461-8848, ext. 262.

If you have any questions, please contact me at 461-8848, ext. 490.

Sincerely,



Edward J. Stenovitch
Pretreatment Engineer

EJS:smb

Enclosures

NARRAGANSETT BAY COMMISSION

ADMINISTRATIVE ORDER # FP-02-19

IN THE MATTER OF:

**PROVIDENCE SPECIALTY PRODUCTS, LLC
33 DEARBORN STREET
PROVIDENCE, RI 02909**

COMPLIANCE ORDER

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 prescribes that persons violating provisions §§ 46-25-25 through 46-25-25.3 of the Act or of any permit, rule, regulation or order issued pursuant thereto shall be subject to a civil penalty of not more than twenty-five thousand dollars (\$25,000) per day for each violation and authorizes the NBC to obtain actual costs and reasonable attorney's fees incurred by the NBC in seeking compliance, penalties or damages. Furthermore, R.I. Gen. Laws § 46-25-25.3 provides that any person found guilty of violating, willfully or with criminal negligence, any of the aforementioned provisions or of any permit, rule, or regulation issued pursuant thereto shall be punished by a fine of not more than twenty-five thousand dollars (\$25,000) and/or imprisonment of not more than one year for each enumerated violation.

Section 1.10.1 of the Rules and Regulations prescribes that NBC may implement administrative and/or judicial responses if a user is in violation of any provision of state or Federal requirements, the Act, the Rules and Regulations, a permit, or an order issued

by 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 that discharges process wastewater containing pollutants into the NBC's facilities.
2. Providence Specialty is a user of the NBC's facilities as defined in Section 1.2 of the Rules and Regulations that conducts cheese and dairy product manufacturing operations.
3. Mark Federico, Sr. is an individual who is an owner and manager of Providence Specialty.
4. In accordance with the Act and the Rules and Regulations, the NBC issued Wastewater Discharge Permit #P3404-006-1023 (the Permit) to Providence Specialty and Mark Federico, Sr. (collectively hereinafter the Permittee) on or about October 16, 2018 authorizing the Permittee to discharge into the NBC's facilities so long as the Permittee adhered to the conditions of the Permit and complied with the Rules and Regulations. Prior to October 16, 2018, discharges into the NBC's facilities were authorized by and subject to the terms of Permit #P3404-003-1018.
5. In accordance with the Permit, Permittee is prohibited from discharging effluent with a pH of less than five (5.0) standard units or more than eleven (11.0) standard units.
6. Numerous Notices of Violation (NOV) were issued to Permittee between March 3, 2016 and June 30, 2019 for exceeding the NBC's effluent discharge pH limits. (See Attachment I)
7. In accordance with the Permit, Permittee is prohibited from discharging effluent containing Oil and Grease in excess of NBC's discharge limitations for Total Oil and Grease (fats, oils, and grease).
8. Numerous Notices of Violation (NOV) were issued to Permittee between April 16, 2016 and December 12, 2019 for exceeding the NBC's effluent discharge limits for Total Oil and Grease (fats, oils, and grease). (See Attachment II)
9. 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 becoming aware of the violation. On numerous

occasions Permittee failed to notify NBC within twenty-four (24) hours of becoming aware of a violation.

10. Numerous Notices of Violation were issued to Permittee between March 2, 2016 and July 31, 2019 for failing to submit various plans and required compliance monitoring results on time. (See Attachment III, Attachment IV, and Attachment V)
11. Permittee is required to maintain a properly calibrated pH recorder to ensure accurate recording of the pH of its effluent. During several inspections of Permittee's facility, a calibrated NBC pen revealed that Permittee's effluent pH recorder was not properly calibrated. Specifically, inspections on or about April 12, 2017, October 17, 2017, June 27, 2017 and December 20, 2018 resulted in the issuance of Notices of Violation citing Permittee for failing to maintain a properly calibrated pH recorder and requiring Permittee to regularly clean and calibrate its pH probe on a monthly basis.
12. Permittee is required to maintain a logbook documenting said probe cleanings and calibrations. Inspections on or about October 17, 2017, August 22, 2018 and August 15, 2019 resulted in the issuance of Notices of Violation citing Permittee for failing to maintain a logbook documenting its probe cleanings and calibrations.
13. Permittee is required to accurately record and report the pH level of its effluent. During inspections on or about August 22, 2018 and August 15, 2019 a review of Permittee's pH charts revealed that Permittee was not accurately recording its high pH values.
14. During an inspection of Permittee's facility on or about August 22, 2018, NBC personnel discovered a hose leading from a boiler to an open drain in violation of the Permit. Permittee was required to remove the hose from the boiler. Permittee was also required to maintain a logbook documenting boiler and water softener discharges and maintenance. An inspection on or about August 15, 2019, however, again revealed a hose leading from the boiler to an open drain and also revealed that Permittee was not maintaining the required logbook.

THEREFORE, based on the above findings, Permittee is hereby notified of the following violations:

Violation A: Failure to comply with the NBC's effluent pH limitations.

Violation B: Failure to comply with the NBC's effluent discharge limitations for Total Oil and Grease (fats, oils, and grease).

Violation C: Failure to notify the NBC of discharge violations within twenty-four (24) hours of discovering the violations.

Violation D: Failure to submit Self-Monitoring Compliance Reports on time.

Violation E: Failure to submit pH Monitoring Compliance Reports on time.

Violation 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 log book of boiler and water softener discharges and maintenance, and failure to remove the discharge hose from the boiler as required.

**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, ...

(3) Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in Interference;

(4) Any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a Discharge at a flow rate and/or pollutant concentration which will cause Interference with the POTW.

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 ... 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. ...

(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 record keeping requirements, including an identification of the pollutants to be monitored ..., 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, ...

(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. ...

(viii) ...a Significant Industrial User ... is in significant noncompliance if its violation meets one or more of the following criteria:

(A) Chronic violations of wastewater discharge limits....

(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 the POTW determines will adversely affect the operation or implementation of the local Pretreatment program.

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),
- (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. ...

(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
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:

...

6. 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.
11. Total Oil and Grease (Fats, Oils and Grease) (FOG) of mineral, animal, vegetable and other origins is not to exceed 125 mg/l.

...

1.5.6 Specific Discharge Prohibitions

- A. Certain substances are specifically prohibited from being discharged into the NBC's facilities. These prohibited substances include, but are not limited to, the following:

...

10. Any solid or viscous pollutants in amounts which may cause obstruction to the flow in a sewer or may result in Interference with the operation of the waste treatment facilities such as, but not limited to: grease, garbage with particles greater than one-half inch (1/2") in any dimension, or any material which can be disposed of as trash, ashes, bones, cinders, sand, mud, straw, shavings, metal, glass, rags, feathers, tar, plastics, wood, underground garbage, whole blood, hair and fleshings, entrails, paper or Styrofoam dishes, cups, milk containers, lime slurries, and grease from deep-frying operations.

...

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.

SECTION 1.8 Wastewater Discharge Permit System

1.8.5 Permit Conditions

- A. Wastewater discharge permits shall be expressly subject to specific permit provisions contained therein as well as to provisions of this Part and all other regulations, user charges, and fees established by the NBC. Wastewater discharge permits may include such conditions as are reasonably deemed necessary by the NBC to prevent Pass Through or Interference, protect the quality of the water body receiving the treatment plant's effluent, protect worker health and safety, facilitate sludge management and disposal, protect ambient air quality, and protect against damage to the NBC's facilities. Such conditions may include, but are not limited to, the following:
 1. The average and maximum wastewater constituents and characteristics permitted in the process water discharges;

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;
- ...
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 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 Regulation.
- 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. Pretreatment Plans: The plans of pretreatment systems and process operations must be of professional quality. The NBC may require that said plans be stamped by a Professional Engineer registered in the state of Rhode Island. The NBC may require that said plans/drawings include, but not be limited to, the following:
 - a. All treatment tanks, their size, material of construction, and the projected daily flow(s) to each treatment tank;
 - b. All pumps, piping, valves, mixers, controls, probes, etc.;
 - c. A description of the treatment procedure for each treatment process;
 - d. Type, volume, and/or quantity of ion exchange resin or media. Manufacturer's specific data for all pretreatment process components (i.e. resins, membranes, etc.) for all pretreatment components utilized.
 - e. A process schematic of the pretreatment system;
 - f. A plant layout showing the pretreatment system, water using process tanks, and location of each tank in the facility;
 - g. All sumps, pumps, or effluent transfer stations;
 - h. The wastewater sampling location;
 - i. Side view or elevation drawings of all interconnected pretreatment tanks showing inlet and outlet connections; and
 - j. An original stamp and signature of a registered and licensed Rhode Island Professional Engineer.

2. Water Using Process Plans: The NBC may require that water using process plans/drawings include, but not be limited to, the following:
 - a. All tanks, their contents, and volume;
 - b. Identification and quantification of the wastewater discharge from each process tank or process operation, including:
 - (1) continuous discharges - flowrate (gpm or gpd);
 - (2) batch discharges - volume and frequency;
 - c. Where the tank discharges (if the discharge is to pretreatment, the specific pretreatment tank must be indicated);
 - d. All floor drains, trenches, and sumps, including their point of discharge and discharge destination;
 - e. The location of all sewer connections;
 - f. Original stamp and signature of a registered and licensed Rhode Island Professional Engineer.
- D. All process tanks with a batch or continuous discharge must be hard piped to the point of discharge.

1.8.13 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.

SECTION 1.9: Wastewater Monitoring and Reporting

1.9.1 Records and Monitoring

- A. All users who discharge or propose to discharge wastewater directly or indirectly to the facilities shall maintain records which substantiate any information supplied in permit applications. Such records shall include, but not be limited to, pH tapes, chemical usage data, log sheets, hazardous waste manifests, water meter readings, effluent monitoring reports, self-monitoring compliance reports and any other informational requirements of 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 pending a dispute of litigation involving the subject of these records, in which case these records are to be kept for a period of three (3) years following resolution of such litigation or dispute.

1.9.3 Monitoring And Analysis of Process Wastewater

- A. Sampling and analysis of industrial wastewater for the purpose of compliance determinations with respect to § 1.5 of this Part prohibitions and limitations shall be done through industry self-monitoring and through monitoring done by the NBC. All analyses, including sampling results submitted in support of any application reports, evidence or required by any permit or order shall be performed in accordance with the techniques prescribed in 40 C.F.R. Part 136 (2018, incorporated herein by reference, not including later amendments) or, if 40 C.F.R. Part 136 (2018) does not contain sampling or analytical techniques for the pollutant in question, in accordance with procedures approved by EPA. The NBC may, at its discretion, require an independent laboratory to conduct the sampling and analysis at the user's own cost.
 1. Self-Monitoring Requirements:
 - a. Self-monitoring results must be accompanied by a certified laboratory analysis sheet, indicating the EPA approved test procedure for each parameter analyzed. The user must also submit a self-monitoring report with the results on a form prescribed by the NBC.
 - b. All Self-Monitoring Reports must be signed and certified in accordance with § 1.9.10 of this Part.

- c. If any sampling performed by a user indicates any violation(s) of discharge limitations, the user shall notify the NBC within twenty-four (24) hours of becoming aware of the violation(s). The user shall repeat the analysis immediately for the parameters determined to be in violation and submit the resampling results to the NBC within thirty (30) days after becoming aware of the violation(s).
2. Sample Collection:
 - a. Except as indicated in § 1.9.3(A)(3) of this Part below, wastewater samples collected for purposes of determining user compliance with pretreatment standards and requirements must be obtained using flow proportional composite sample collection techniques. In the event that flow proportional sampling is not feasible, the NBC may authorize the use of a time proportional sampling.
 - b. For automatic samplers, the intake line hose must be at least 1/4 in. (0.6 cm) internal diameter and the velocity in the intake line must be maintained at least at 2 feet per second.
 - c. Samples for oil and grease, temperature, pH, cyanide, phenols, toxicity, sulfides, and volatile organic chemicals must be obtained using a grab sample.
3. Analysis of Wastewater Samples:
 - a. Laboratory analysis and sample preservation of industrial wastewater samples for user self-monitoring and compliance monitoring by the NBC shall be performed in accordance with EPA approved methods. Where applicable, the laboratory must be certified by the state in which it is located.

SECTION 1.10: Enforcement

1.10.1 Administrative Enforcement Options

- A. The NBC may implement any combination of the following administrative and/or judicial responses if a user is in violation of any provision of state or Federal requirements, the R.I. Gen. Laws Chapter 46-25, this Part, a permit, or an order issued by the NBC.
 1. Issue a Notice of Violation;
 2. Require the User to attend a mandatory compliance meeting at the NBC Corporate Office during business hours, or at any other reasonable time, to discuss its violations or alleged violations, the remedial actions that it might take, and the actions that the NBC might take under the Act and ...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, Permittee is hereby ORDERED to:

- 1. Submit all pH Reports and SMCRs to the NBC and take steps to ensure all future pH Reports and SMCRs are timely submitted.**
- 2. Immediately implement steps to ensure notification is given to the NBC of any discharge violation within twenty-four (24) hours of Permittee becoming aware of the violation.**
- 3. Develop and submit a plan to the NBC to attain and maintain compliance with NBC effluent pH discharge limitations and discharge limitations for Total Oil and Grease (fats, oils, and grease) within thirty (30) days from the date of this Compliance Order.**
- 4. Implement the approved plans within thirty (30) days from the date of NBC approval or by the due date specified by the NBC in its approval, whichever is later.**
- 5. Should Permittee fail to comply with Order #3 and Order #4 above, Permittee shall immediately pay an Administrative Penalty of Twenty Thousand Dollars (\$20,000.00) to the NBC.**

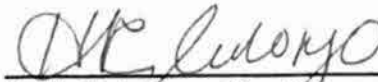
Pursuant to R.I.G.L. § 46-25-25(d) and § 42-17.1-2(21) and Section 1.10 of the Rules and Regulations, Permittee has the right to file a written request with the Executive Director for a hearing on said alleged violations within ten (10) days of service of this notice to show cause why it should not be found in violation of the Rules and Regulations and why enforcement action should not be taken against it. If a hearing is requested within the ten (10) day time period, the NBC shall provide written notice to Permittee of the date, time and place for the hearing. If Permittee fails to request a hearing within the aforementioned time frame, 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 TEN (10) 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 OF THE CONNECTION AT THE POINT OF PROVIDENCE SPECIALTY'S 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.G.L. § 46-25-25.2 AND § 46-25-25.3.

FOR THE NARRAGANSETT BAY
COMMISSION,

12/26/19

Date



Holly R. Ialongo, Esquire
Chief Legal Counsel

CERTIFICATION

I hereby certify that on the 26th of December 2019, true and accurate copies of the within COMPLIANCE ORDER 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.
33 Dearborn Street
Providence, RI 02909

12/26/19
Date



Jillian Mello
Legal Assistant

ATTACHMENT I

Failure to comply with NBC's effluent pH limitations:

Parameter	Month	Number of maximum discharge limitation violations	Number of minimum discharge limitation violations	NOV issued
pH	January 2016	0	8	3/3/2016
pH	February 2016	0	6	3/31/2016
pH	March 2016	0	5	5/4/2016
pH	April 2016	0	5	6/2/2016
pH	May 2016	0	2	7/11/2016
pH	June 2016	0	9	8/2/2016
pH	July 2016	1	3	9/1/2016
pH	August 2016	0	1	10/4/2016
pH	October 2016	3	1	12/7/2016
pH	November 2016	4	1	1/3/2017
pH	December 2016	4	3	2/2/2017
pH	February 2017	5	0	4/5/2017
pH	March 2017	7	0	4/28/2017
pH	April 2017	8	0	6/5/2017
pH	May 2017	5	0	7/3/2017
pH	June 2017	3	6	8/7/2017
pH	July 2017	5	0	9/5/2017
pH	September 2017	3	1	10/31/2017
pH	November 2017	2	4	1/3/2018
pH	October 2017	0	3	1/4/2018
pH	December 2017	3	0	1/10/2018
pH	January 2018	0	2	3/2/2018
pH	May 2018	0	9	6/29/2018
pH	July 2018	8	6	8/28/2018
pH	August 2018	4	28	9/26/2018
pH	September 2018	1	7	11/1/18
pH	October 2018	1	12	11/27/2018
pH	November 2018	1	7	1/2/2019
pH	December 2018	15	1	1/31/2019
pH	January 2019	15	2	3/5/2019
pH	February 2019	7	3	3/29/2019
pH	March 2019	2	3	5/1/2019
pH	April 2019	2	23	6/3/2019
pH	June 2019	3	1	6/30/2019

ATTACHMENT II

Failure to Meet the NBC'S Effluent Discharge Limitations:

Sample Location #2: Sample Port in Outdoor Grease Interceptor

Parameter	Discharge Limitations Maximum	Sampling Results	Sampling Date	NOV Issued
Total Oil & Grease	125 mg/l	977.5 mg/l	3/7/2016	4/16/2016
Total Oil & Grease	125 mg/l	207.5 mg/l	5/12/2016	5/27/2016
Total Oil & Grease	125 mg/l	245.5 mg/l	5/13/2016	5/27/2016
Total Oil & Grease	125 mg/l	224.2 mg/l	6/22/2016	7/15/2016
Total Oil & Grease	125 mg/l	3380.6 mg/l	6/23/2016	7/28/2016
Total Oil & Grease	125 mg/l	181.8 mg/l	6/27/2016	7/28/2016
Total Oil & Grease	125 mg/l	467.5 mg/l	6/28/2016	7/28/2016
Total Oil & Grease	125 mg/l	196.8 mg/l	6/29/2016	7/28/2016
Total Oil & Grease	125 mg/l	268.5 mg/l	6/30/2016	7/28/2016
Total Oil & Grease	125 mg/l	147.8 mg/l	7/6/2016	7/28/2016
Total Oil & Grease	125 mg/l	268.3 mg/l	7/29/2016	8/23/2016
Total Oil & Grease	125 mg/l	443.7 mg/l	10/27/2016	11/18/2016
Total Oil & Grease	125 mg/l	306.5 mg/l	10/28/2016	11/18/2016
Total Oil & Grease	125 mg/l	163.7 mg/l	12/15/2016	1/24/2017
Total Oil & Grease	125 mg/l	1262.5 mg/l	3/30/2017	5/26/2017
Total Oil & Grease	125 mg/l	798.3 mg/l	7/25/2017	8/18/2017
Total Oil & Grease	125 mg/l	1435.8 mg/l	7/26/2017	8/18/2017
Total Oil & Grease	125 mg/l	797.7 mg/l	7/27/2017	8/18/2017
Total Oil & Grease	125 mg/l	156.1 mg/l	7/28/2017	8/18/2017
Total Oil & Grease	125 mg/l	640 mg/l	7/31/2017	8/18/2017
Total Oil & Grease	125 mg/l	372.1 mg/l	9/11/2017	10/3/2017
Total Oil & Grease	125 mg/l	375.9 mg/l	9/14/2017	10/3/2017
Total Oil & Grease	125 mg/l	423.3 mg/l	11/28/2016	10/17/2017
Total Oil & Grease	125 mg/l	137.6 mg/l	10/19/2017	12/11/2017
Total Oil & Grease	125 mg/l	437.3 mg/l	11/13/2017	12/11/2017
Total Oil & Grease	125 mg/l	506 mg/l	11/14/2017	12/11/2017
Total Oil & Grease	125 mg/l	394 mg/l	11/15/2017	12/11/2017
Total Oil & Grease	125 mg/l	131.5 mg/l	11/16/2017	12/11/2017
Total Oil & Grease	125 mg/l	197 mg/l	11/15/2017	1/3/2018
Total Oil & Grease	125 mg/l	319 mg/l	1/9/2018	2/8/2018
Total Oil & Grease	125 mg/l	189.9 mg/l	1/10/2018	2/8/2018
Total Oil & Grease	125 mg/l	154.6 mg/l	1/11/2018	2/8/2018
Total Oil & Grease	125 mg/l	201.4 mg/l	1/12/2018	2/8/2018
Total Oil & Grease	125 mg/l	278.6 mg/l	2/21/2018	3/22/2018
Total Oil & Grease	125 mg/l	179.5 mg/l	2/23/2018	3/22/2018
Total Oil & Grease	125 mg/l	907.5 mg/l	2/26/2018	3/22/2018

Total Oil & Grease	125 mg/l	311.3 mg/l	4/9/2018	6/19/2018
Total Oil & Grease	125 mg/l	182 mg/l	4/10/2018	6/19/2018
Total Oil & Grease	125 mg/l	257.5 mg/l	4/11/2018	6/19/2018
Total Oil & Grease	125 mg/l	270.1 mg/l	4/12/2018	6/19/2018
Total Oil & Grease	125 mg/l	275.5 mg/l	5/16/2018	6/12/2018
Total Oil & Grease	125 mg/l	230.7 mg/l	5/16/2018	6/12/2018
Total Oil & Grease	125 mg/l	418 mg/l	7/20/2018	8/23/2018
Total Oil & Grease	125 mg/l	179 mg/l	8/28/2018	9/26/2018
Total Oil & Grease	125 mg/l	127.6 mg/l	8/29/2018	9/26/2018
Total Oil & Grease	125 mg/l	185.8 mg/l	8/30/2018	9/26/2018
Total Oil & Grease	125 mg/l	193.8 mg/l	8/31/2018	9/26/2018
Total Oil & Grease	125 mg/l	373.7 mg/l	11/27/2018	12/20/2018
Total Oil & Grease	125 mg/l	174.2 mg/l	10/17/2018	12/21/2018
Total Oil & Grease	125 mg/l	163.8 mg/l	12/17/2018	1/4/2019
Total Oil & Grease	125 mg/l	193.8 mg/l	12/18/2018	1/4/2019
Total Oil & Grease	125 mg/l	184.5 mg/l	1/10/2019	2/7/2019
Total Oil & Grease	125 mg/l	247.4 mg/l	1/11/2019	2/7/2019
Total Oil & Grease	125 mg/l	170.2 mg/l	3/12/2019	4/1/2019
Total Oil & Grease	125 mg/l	606 mg/l	7/24/2019	8/16/2019
Total Oil & Grease	125 mg/l	356 mg/l	7/29/2019	8/16/2019
Total Oil & Grease	125 mg/l	361 mg/l	7/30/2019	8/16/2019
Total Oil & Grease	125 mg/l	648 mg/l	7/31/2019	8/16/2019
Total Oil & Grease	125 mg/l	675 mg/l	8/1/2019	8/16/2019
Total Oil & Grease	125 mg/l	212 mg/l	11/25/2019	12/12/2019
Total Oil & Grease	125 mg/l	748 mg/l	11/26/2019	12/12/2019
Total Oil & Grease	125 mg/l	570 mg/l	11/27/2019	12/12/2019

ATTACHMENT III

Failure to submit pH compliance reports and results on time:

Month	Due Date	Date NOVs Issued	Status
March 2016	4/30/2016	5/2/2016	Received on 5/3/2016
May 2016	6/30/2016	7/1/2016	Received on 7/8/2016
June 2016	7/30/2016	8/3/2016	Received on 8/1/2016
July 2016	8/30/2016	8/31/2016	Received on 8/31/2016
September 2016	10/30/2016	10/31/2016	Received 11/3/2016
October 2016	11/30/2016	12/1/2016	Received on 12/5/2016
December 2016	1/30/2017	1/31/2017	Received on 2/1/2017
April 2017	5/30/2017	5/31/2017	Received on 5/31/2017
June 2017	7/30/2017	7/31/2017	Received on 8/4/2017
July 2017	8/30/2017	11/14/2017	Received on 8/31/2017
September 2018	10/30/2018	10/31/2018	Received 10/31/2018

ATTACHMENT IV

Failure to submit Self-Monitoring Compliance Reports and results on time:

Month	Due Date	Date NOVs Issued	Status
January 2016	3/1/2016	3/2/2016	Received 3/15/2016
October 2017	11/30/2017	12/1/2017	Received 12/6/2017
October 2018	11/30/2018	12/3/2018	Received 12/20/2018
April 2019	5/30/2019	5/31/2019 7/1/2019 7/31/2019	Received 8/14/2019

ATTACHMENT V

Failure to Satisfy NBC Requirements:

Required Submittal	Issue Date	Due Date	Date NOV Issued	Status
Resampling Results For Total Oil & Grease	5/26/2016	7/14/2016	8/3/2017	Received 7/14/2016
Resampling Results For Total Oil & Grease	5/27/2016	6/24/2016	7/7/2016	Received 7/14/2016
Resampling Results For Total Oil & Grease	5/27/2016	7/1/2016	7/7/2016	Received 7/14/2016
Resampling Results For Total Oil & Grease	8/23/2016	10/7/2016	11/2/2016	Received 10/7/2016
Resampling Results For Total Oil & Grease	12/11/2017	1/11/2018	2/5/2018 3/2/2018	Received 3/12/2018
Pretreatment Plans	2/26/2019	3/30/2019	4/1/2019	Received 4/29/2019

**NARRAGANSETT BAY COMMISSION
ADMINISTRATIVE ORDER # FP-02-19**

IN THE MATTER OF:	*	
Providence Specialty Products, LLC	*	COMPLIANCE ORDER
33 Dearborn Street	*	
Johnston, RI 02919	*	
AND	*	
Mark Federico, Sr.	*	

CONSENT ORDER

WHEREAS, the Narragansett Bay Commission Act (the “Act”), codified at Rhode Island General Laws (“RIGL”) Title 46, Chapter 25, established the Narragansett Bay Commission (the “NBC”) to acquire, plan, construct, improve, operate, and maintain the publicly owned sewage treatment facilities in the NBC district. The Act vests authority in the NBC to establish a sewage pretreatment program and to enforce any violations of the provisions of the Act, and any rule, regulation, permit or administrative order issued pursuant thereto; and

WHEREAS, Providence Specialty Products, LLC (“Providence Specialty”) is a Rhode Island limited liability company that conducts cheese and dairy product manufacturing operations at a facility located at 33 Dearborn Street in Providence, RI which said facility discharges process wastewater containing pollutants into the NBC facilities; and

WHEREAS, Mr. Mark Federico, Sr. (“Federico”) is the owner and manager of Providence Specialty; and

WHEREAS, on or about October 16, 2018, the NBC issued Wastewater Discharge Permit #P3404-006-1023 (the “Permit”) to Providence Specialty and Federico (collectively the “Permittee”) authorizing the discharge of process wastewater into the NBC’s facilities so long as the Permittee adhered to the conditions of the Permit and complied with NBC Rules and Regulations; and

WHEREAS, on or about December 26, 2019, the NBC issued Administrative Order #FP-02-19 against Permittee alleging that Permittee had violated the Act and the NBC’s Rules and Regulations promulgated thereunder, specifically 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.

WHEREAS, in lieu of proceeding to an administrative hearing, the NBC and Permittee by their duly authorized representatives, have determined that it is in the best interest of all the parties and in the public interest to resolve the claims alleged in Administrative Order #FP-02-19 by the terms of the agreement set forth herein; and

WHEREAS, the NBC finds that this Consent Order is a reasonable and fair settlement and adequately protects the public interest in accord with the Act.

NOW, THEREFORE, before the taking of any testimony, without any adjudication or admission of any issue of fact or law, and upon consent and agreement of the parties to this Consent Order it is hereby **ORDERED** that:

JURISDICTION

1. The NBC has jurisdiction over the subject matter of this Consent Order and the parties consenting hereto pursuant to RIGL § 46-25-25. In accordance with RIGL § 46-25-25.4 the Superior Court for Providence County has jurisdiction to enforce the provisions of this Consent Order.

APPLICATION

2. The provisions of this Consent Order shall be binding upon Permittee, its officers, agents, employees, successors and assigns.

TERMS AND CONDITIONS

3. SITE REQUIREMENTS

- A. **Pretreatment System:** On or before August 20, 2000, Permittee installed a Clean Water Technologies automated pretreatment system to effectively and permanently address and correct Permittee's pH and Total Oil and Grease permit violations. Plans for said pretreatment system were approved or about August 20, 2000.

B. Record Keeping:

- i. Permittee shall submit all pH Monitoring Compliance Reports on time as required by its Permit.
- ii. Permittee shall submit all Self-Monitoring Compliance Reports on time as required by its Permit.
- iii. Permittee shall notify the NBC of discharge violations within twenty-four (24) hours of discovering the violations.

4. TRAINING

A. Permittee shall conduct monthly internal staff training for all employees involved in its process wastewater and pretreatment operations regarding awareness of the impacts of process wastewater from the facility on the NBC facilities, pretreatment procedures and practices, standard operating procedures, and wastewater discharge permit compliance.

- i. Permittee shall submit a schedule and plan to the NBC for the aforementioned staff training. Topics must include, but need not be limited to the following:
 - Wastewater Discharge Permit Requirements
 - House Keeping/Standard Operating Procedures
 - Logbook Requirements
 - Reporting & Submittal Requirements
 - Pretreatment (maintenance and operation for pH and centrifuges)
 - Impact of wastewater on the sewer system
- ii. The date and topic of each training session shall be recorded in a logbook that is available for review by NBC personnel.
- iii. Permittee shall provide said monthly staff training for a period of one year or until satisfaction of all obligations under this Consent Order as determined by the NBC in writing, whichever is later.

5. FORCE MAJEURE

A. In the event there is any dispute as to whether all or a portion of Permittee's failure to comply with any of the requirements under this Consent Order was caused by circumstances beyond its reasonable control, Permittee shall have the burden of proof to show:

- i. that the noncompliance was caused solely by circumstances beyond Permittee's reasonable control; and
- ii. that each continued day of noncompliance that resulted was caused solely by circumstances beyond Permittee's reasonable control; and

- iii. that Permittee employed all reasonable mitigating measures to minimize the duration and impact of the noncompliance.
- B. The granting of relief from any obligations by the operation of Section 5.A. above shall have no effect on any other obligations enumerated under this Consent Order.
- C. The provisions in Section 5.A. above shall be inoperative unless Permittee notifies the Pretreatment Program Manager in writing, within fourteen (14) days from the start of any noncompliance, of its belief that all or any portion of the noncompliance is solely the result of circumstances beyond its reasonable control.

GENERAL PROVISIONS

- 6. This Consent Order is not a permit and in no way relieves Permittee of its responsibility to comply with any permit or any subsequent amendments thereto that may be issued by the NBC.
- 7. This Consent Order shall constitute full and final satisfaction for the violations alleged in Administrative Order #FP-02-19 and discharge any liability of Permittee to the NBC for all violations and claims arising from the factual allegations contained in Administrative Order #FP-02-19.
- 8. Permittee hereby consents to the issuance of this Consent Order as a final order by the NBC's Executive Director. In so consenting, appropriate officers of Permittee have personally read and understand all the terms and conditions of this Consent Order.
- 9. Permittee hereby waives its right to the hearing provided by Section 1.10 of the NBC's Rules and Regulations or judicial proceedings in this matter, other than a proceeding to enforce the terms of this Consent Order.
- 10. This Consent Order shall not constitute any admission of fact by Permittee or determination of liability of Permittee for the violations alleged in Administrative Order #FP-02-19 or this Consent Order.
- 11. By this Consent Order, the NBC does not waive any rights or remedies available to it for any violation by Permittee of Federal or State laws or regulations not contained in Administrative Order #FP-02-19 or this Consent Order.
- 12. Nothing herein shall be construed to limit the authority of the NBC to undertake any action against any person, including Permittee in response to conditions, which may present imminent and substantial endangerment to the public health, welfare, or the environment.

13. Permittee shall be responsible for all reasonable court costs and attorney's fees incurred by the NBC in enforcing this Consent Order.
14. Any modification of this Consent Order shall be in writing and shall not take effect unless approved in writing by NBC and Permittee.
15. This Consent Order shall terminate when Permittee has complied with all the terms and conditions of this Consent Order as set forth herein.

CONSENTED TO:

FOR PROVIDENCE SPECIALTY PRODUCTS, LLC:

Mark Federico, Sr.

Date

FOR MARK FEDERICO, SR.:

Mark Federico, Sr.

Date

FOR THE NARRAGANSETT BAY COMMISSION:

Laurie A. Horridge
Executive Director
Narragansett Bay Commission
Corporate Building
One Service Road
Providence, RI 02905

Date

Jennifer J. Harrington, Esquire
General Counsel
Narragansett Bay Commission
Corporate Building
One Service Road
Providence, RI 02905

Date