

PRETREATMENT PROGRAM

ANNUAL REPORT

JANUARY 1, 2022 - DECEMBER 31, 2022



ATTACHMENT VOLUME I

NBC AND PRETREATMENT PROGRAM
SPECIFIC INFORMATION

ATTACHMENT VOLUME I

NARRAGANSETT BAY COMMISSION

AND

PRETREATMENT PROGRAM

SPECIFIC INFORMATION

LISTING OF ATTACHMENT SECTIONS ATTACHMENT VOLUME I

NBC AND PRETREATMENT PROGRAM SPECIFIC INFORMATION

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

ATTACHMENT VOLUME I

SECTION 1

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

***INFORMATIONAL LETTERS TO
USERS***



January 11, 2022

PFAS MASS MAILING LETTER
Categories 11 through 59 and 97 - Both Districts
List Attached

Dear _____ :

Per- and poly-fluoroalkyl substances, commonly referred to as PFAS compounds, pose a threat to human health and the environment. These compounds have been in use since the 1940s. They have been used in a wide variety of products including but not limited to non-stick cookware, flame retardant and stain resistant materials, and fire-fighting foam. PFAS compounds have also been used in industrial applications as well. Specifically for fume suppression in chromium plating operations.

PFAS compounds have properties that prevent their complete breakdown in the environment. This means these compounds can be found in the drinking water supply, water bodies such as rivers, lakes and oceans, ground water and soil. They enter the environment through landfills, septage systems, wastewater treatment plants and runoff. The US Environmental Protection Agency (EPA) has developed a strategy to mitigate the impacts of PFAS on the environment and human health in the "PFAS Strategic Roadmap: EPA's Commitments to Action 2021 – 2024". The roadmap can be found on the EPA website at the following link:

https://www.epa.gov/system/files/documents/2021-10/pfas-roadmap_final-508.pdf

The roadmap outlines a number of key actions to be taken. One of the actions is to reduce PFAS discharges to surface waters by imposing monitoring requirements on dischargers through their National Pollutant Discharge Elimination System (NPDES) permits. While monitoring requirements have not yet been imposed, the Narragansett Bay Commission (NBC) has taken a proactive approach to determine the quantity of PFAS received at each treatment plant and what is discharged in the effluent of each plant. Beginning 2020, the NBC has been monitoring PFAS concentrations in the influent, effluent and biosolids at each plant.

Another key action proposed in the EPA Roadmap is to restrict PFAS discharges from industrial sources through a multi-faceted Effluent Limitations Guideline (ELG) program. In September 2021, EPA published Preliminary Effluent Guidelines Program Plan 15 (https://www.epa.gov/system/files/documents/2021-09/ow-prelim-elg-plan-15_508.pdf). The ELG proposes to study and establish PFAS categorical limits for the metal finishing industry, specifically chromium platers, textile and carpet manufacturers, and landfills. Along with

wastewater treatment plant monitoring, the NBC has conducted PFAS sampling of the effluent at a number of industrial user facilities. This sampling was conducted along with the usual NBC sampling of industrial facilities. Enclosed with this letter is a table of the average results of PFAS compounds for categories of users that were sampled by the NBC. If the NBC sampled your facility for these compounds, you will also find a table showing the PFAS results from that sampling event enclosed. It is important for you to investigate the chemicals that are used in your facility to determine if they contain any of the compounds on the list. If you use any chemicals or solutions that contain PFAS compounds, it is recommended that you begin the process of substituting these chemicals or solutions with ones that do not contain these compounds. By proactively evaluating your discharges for PFAS compounds and seeking alternative materials, you will be well prepared for the future PFAS regulations that are on the horizon.

If you have any questions regarding PFAS compounds or how the NBC can assist you with this issue, please contact James Kelly, Technical Analysis & Compliance Manager, at 401.461.8848, ext. 252 or myself at 401.461.8848, ext. 490.

Sincerely,

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

Kerry M. Britt
Pretreatment Manager

Enclosures



February 24, 2022

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

Dear :

The Narragansett Bay Commission (NBC) is proud to announce its twenty-seventh 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 18, 2022 to:

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

Page 2

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

Sincerely,

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

Kerry M. Britt
Pretreatment Manager

cc: Jim Kelly



March 2, 2022

**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 2021, 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.

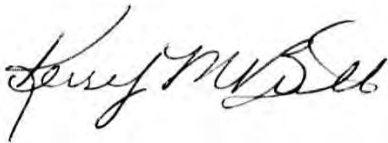
In accordance with EPA and NBC regulations and the terms of NBC Wastewater Discharge Permits, SIUs must comply with various site specific requirements and must also comply with the EPA reporting requirements outlined in 40§CFR part 403.12. Site specific requirements may include (1) development, implementation, 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 2022. 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 black ink, appearing to read "Kerry M. Britt". The signature is written in a cursive style with a large, stylized initial "K".

Kerry M. Britt
Pretreatment Manager

KMB:smb

cc: Pretreatment Engineers/Technicians



March 8, 2022

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.

Godfrey & Wing, Inc. d/b/a Impco
Induplate, LLC
John H. Collins & Sons Company
Manchester Street, LLC
Prov. Journal Co. - Production Facility
Rhode Island Resource Recovery Corporation

Stackbin Corporation
Tanury Industries PVD, Inc.
Technodic, Inc.
Tedor Pharma, Inc.
Tiffany and Company
Univar Solutions USA, Inc.

An advertisement recognizing the achievements of these companies was published in the Providence Journal on February 28, 2022. 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 2021

The Narragansett Bay Commission recognizes these Significant Industrial User companies for perfect regulatory compliance with Pretreatment Program regulations during 2021:

Godfrey & Wing, Inc.	Induplate, LLC
dba Impco, Inc.	Manchester Street, LLC
John H. Collins & Sons Co.	Rhode Island
Providence Journal Co.	Resource Recovery Corporation
- Production Facility	Tanury Industries, PVD, Inc.
Stackbin Corporation	Technodic, Inc.
Tedor Pharma, Inc.	Tiffany & Company
Univar Solutions 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.narrsabay.com.

Vincent J. Mesolella, Chairman • Laurie A. Horridge, Executive Director
 One Service Road, Providence, RI 02905



March 10, 2022

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 NBC determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of Commission personnel or the general public);
- D. Any discharges of a pollutant that has caused imminent endangerment to human health, welfare or the environment or has resulted in the NBC exercise of its emergency authority to halt or prevent such a discharge;

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

The EPA requires that the NBC must review each industrial user file every three (3) months for SNC criteria A and B 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. 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. 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 28, 2022, the names of twenty-one (21) 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 2022.

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 BOD, TSS, and 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.

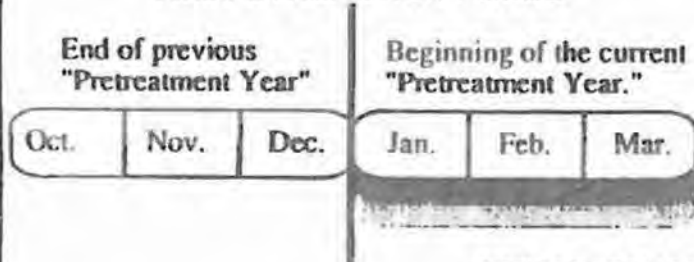
SNC Criteria H Any violation that adversely effects the operation or implementation of the pretreatment program.

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.

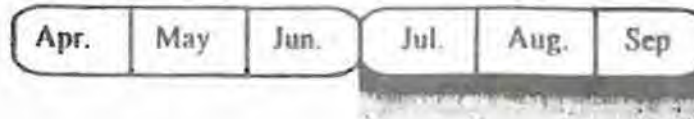
FIRST EVALAUTION PERIOD



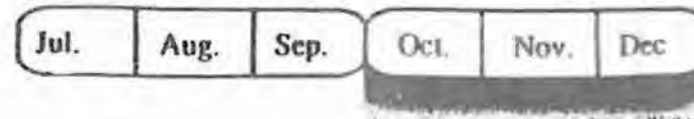
SECOND EVALUATION PERIOD



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."



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, 2020 through December 31, 2021. 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. •

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 98.9% respectively. Similar toxic loading reductions have been observed at the NBC Bucklin Point facility. **The Narragansett Bay Commission will continue to lead in wastewater treatment, environmental protection, and environmental education to ensure a cleaner Narragansett Bay for all to enjoy.**

Bucklin Point Service Area

Pawtucket

Company Name	Violations Cited	Present Status
Bliss Manufacturing Company, Inc.	Cu (1, 2)	Firm is now in compliance
Bootblack Brand, LLC	Failure to submit report on time (6)	Report has been received
Ecological Fibers, Inc.	Zn (1, 2)	Firm is now in compliance
Kitchen & Countertop Center of New England	Failure to submit report on time (6)	Report has not been received
North East Knitting, Inc.	Failure to submit report on time (6)	Report has been received

Lincoln

Barentz NA LLC	Failure to submit report on time (6)	Report has been received
Finlay Extracts & Ingredients USA, Inc.	Failure to submit reports on time (6)	Reports have not been received
JAR Bakers Supply	Failure to submit report on time (6)	Report has been received
Palate Pack	Failure to submit report on time (6)	Report has been received

Cumberland

Hindley Manufacturing Company	Ni (1, 2)	Firm is still experiencing compliance issues
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East Providence

Aspen Aerogels Rhode Island, LLC	BOD (1, 2)	Firm is now in compliance
Rand Whitney Southeast Container, LLC	Cu (2), Zn (2)	Firm is now in compliance
The Evans Findings Company, Inc.	O&G	Firm is now in compliance

Field's Point Service Area

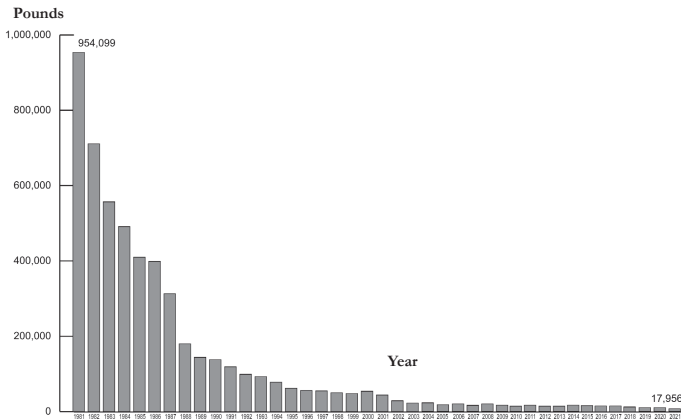
Providence

Company Name	Violations Cited	Present Status
271 Tockwotten Partners, LLC	BOD (1, 2)	Firm is in compliance
AS220 (Print Shop)	Failure to submit reports on time (6)	Reports have been received
Fed-Rick Veal Company, Inc.	Failure to submit report on time (6)	Report has not been received
Providence Specialty Products, LLC	O&G (1, 2)	Firm is still experiencing compliance issues
The Providence Mint, Inc.	BOD (1, 2)	Firm is now in compliance
	Failure to submit report on time (6)	Report has been received

Johnston

Granitec	Failure to submit report on time (6)	Report has been received
Orbit Energy Rhode Island, LLC	Total Nitrogen (1, 2)	Firm is out of business
R.I. Beef & Veal, Inc.	Failure to submit reports on time (6)	Reports have been received

Total Metals Influent to Field's Point WWTF, 1981-2021



March 31, 2022

2021 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 28, 2022 as being in SNC with NBC or EPA regulations for the reporting period of October 1, 2020 through December 31, 2021. 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, 2022 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 \$139.00 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, 2022. (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.

June 1, 2022

MASS MAILING
Summer Shutdown Letter
Both Districts - Categories 11 through 59
List Attached

Dear _____ :

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

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

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

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

Sincerely



Kerry M. Britt
Pretreatment Manager

Enclosure



Narragansett Bay Commission

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

Vacation Shutdown Prohibited Sewer Discharges

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

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

Other wastes are also regulated specifically by type of waste and concentration by the NBC's Rules and Regulations. Copies of these regulations may be obtained at the NBC's Pretreatment office. In addition, it is illegal to discharge any non-sanitary wastewaters into the NBC sewer system prior to being issued a discharge permit. Please dispose of spent solutions properly. It is less costly than being caught illegally disposing of these wastes. Industries found to be in violation of the NBC's Rules and Regulations may be subject to a fine of up to \$25,000 per violation per day and/or up to thirty (30) days of imprisonment. In general, industries located in the NBC service area are to be commended for the fine job to date at reducing toxic discharges to the sewer. In 1981, local industries discharged 954,099 pounds of heavy metals such as copper, nickel, and zinc, and 80,440 pounds of cyanide to the Field's Point Treatment Facility. A portion of these toxics would eventually pass through the treatment plant and enter Narragansett Bay. There has been a 96.8% reduction in heavy metal discharges to the Field's Point Facility since 1981. The cyanide loadings to this treatment facility were also reduced by 95.3% over this same period. This impressive reduction in toxic discharges by industry has also been noted at the Bucklin Point Wastewater Treatment Facility. The level of toxics entering Narragansett Bay from the NBC facilities have been similarly reduced.

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

Vincent J. Mesolella, *Chairman*

Laurie A. Horridge, *Executive Director*

October 5, 2022

2022 OIL MASS MAILING

Dear «Title» «LastName»:

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



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

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

Sincerely,

Kerry M. Britt
Pretreatment Manager

cc: Pretreatment Staff

November 23, 2022

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

Dear «Title» «Last_Name»:

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

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

Sincerely,



Kerry M. Britt
Pretreatment Manager

KMB:sm

Enclosure

cc: Pretreatment Engineers and Technicians



Narragansett Bay Commission

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

Vacation Shutdown Prohibited Sewer Discharges

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- 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).

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

Vincent J. Mesolella, *Chairman*

Laurie A. Horridge, *Executive Director*

December 29, 2022

2023 FEE PAID LETTER STICKER
SEPTAGE HAULERS

Permit Number: «PERMIT_NUMBER»

Dear «TITLE» «LASTNAME»:

Enclosed please find «NUMBER» 2023 Narragansett Bay Commission (NBC) permitted Septage Hauler Identification Sticker(s). Effective January 1, 2023, 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***

Pawtucket's Remediated Brownfields Improve River, Community Health

By Rob Smith / ecoRI News staff

January 10, 2022

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Overlooking the revived Seekonk River, Pawtucket's Festival Pier remains a scenic observation point to enjoy the river, and as a former brownfield site, a symbol of the city's efforts to clean up its polluted properties. (Rob Smith/ecoRI News)

PAWTUCKET, R.I. — The future of a city is built directly on its past. In another lifetime, Pawtucket was Rhode Island's beehive of industrial activity, and as a result, has some of the highest concentrations of highly polluted brownfield sites in the state.

The Blackstone and Seekonk rivers, once known as some of the most impaired rivers nationwide, have made [impressive recoveries \(https://www.ecori.org/public-safety/2020/10/4/long-abused-seekonk-river-in-midst-of-resurgence\)](https://www.ecori.org/public-safety/2020/10/4/long-abused-seekonk-river-in-midst-of-resurgence) over the past few decades, and the city has aggressively remediated and redeveloped its polluted landscape.

“If a brownfield site has been identified and the right steps have been taken to cap and close it ... then they're relatively safe, especially for things like canoe or kayak access,” Kate McPherson, riverkeeper at Save The Bay, said.

Pawtucket has 22 known brownfield sites along its riverfront, according to the Rhode Island Department of Environmental Management (DEM). The state agency lists only three as unremediated. One is [Tidewater Landing \(https://www.ecori.org/government/2021/10/21/crmc-approves-first-stages-of-construction-for-waterfront-pawtucket-project\)](https://www.ecori.org/government/2021/10/21/crmc-approves-first-stages-of-construction-for-waterfront-pawtucket-project), the future home of a \$284 million,

mixed-use soccer stadium, and another is an industrial mill at the end of Blackstone Avenue. DEM officials said final capping activities at another property on Blackstone Avenue were recently completed and the site should be delisted as an active brownfield later this year.

Since 1996 the Environmental Protection Agency (EPA) has sent \$46 million to Rhode Island for brownfield remediation and related activities, and to date Pawtucket has received \$3,423,921 of those funds. DEM has provided the Pawtucket brownfield sites with another \$1,121,365 in assessment grants, used to investigate what toxic materials reside within these properties.

A total of \$1 million in EPA cleanup grants were split among nine brownfield sites along Branch Street. First developed as a residential area as far back as the late 1800s, the old mill properties gradually became abandoned starting in the 1970s. Investigations have since found arsenic, lead, polycyclic aromatic hydrocarbons (PAHS), and petroleum products in the soil and groundwater.

But today, instead of being blighted lots overgrown with invasive plants, the remediated Branch Street parcels are home to affordable housing. Pawtucket Central Falls Development (<https://www.pcfdevelopment.org>) obtained five EPA cleanup grants in two years to prepare the parcels for construction. The nonprofit spent \$10.8 million to build 29 affordable housing units across four buildings on Branch Street overlooking the Blackstone River.

The units are rented to households earning up to 60 percent of the area's median income, and rents range from \$650 to \$1,000.

Further downstream, another \$600,000 in EPA cleanup grants was awarded to two properties on Front Street. The brownfields at 164 and 182 Front St. were historically the site of industrial manufacturers of clothing and soap. A state investigation showed

the sites contained asbestos, lead, PAHS, and petroleum products in the groundwater and soil.

The properties were redeveloped into green open space, with grass, trees, benches, and links to the Blackstone Valley Bikeway.

All of the city's remediated sites have land-use restrictions attached, limiting the kind of development that can be built. The sites are inspected by DEM every one to two years to ensure the contamination controls remain operational. But the agency has limited staff. Only seven full-time employees work in its remediation department, and they are responsible for thousands of brownfield sites statewide.

The aggressive remediation of Pawtucket brownfields has meant dividends for its urban rivers. Thirty years ago the Seekonk River was known as one of the most impaired waterways in the entire country, and observers say it is coming back to life.

“We’ve got bald eagles... there’s river otters, there’s osprey, there’s deer, coyotes, skunks, raccoons, a whole world of wildlife,” said Alex Hornstein, the local resident who initially reported both of the recent Tidewater oil spills (<https://www.ecori.org/pollution-contamination/2021/12/2/oil-spilled-into-seekonk-river-from-pawtucket-brownfield-project>) to state and federal officials.

But stormwater runoff remains a concern. Nitrogen loads primarily from fertilizers spread on lawns are routinely washed into the river whenever it rains, leading to hypoxia — low-oxygen conditions — and fish kills. Since 2018 there have been six recorded fish kills, and DEM is investigating a seventh possibly connected to last year’s Tidewater oil spills, although its experts likely say its a case of cold shock.

Excessive nutrients, such as nitrogen, stimulate the growth of algae, leading to a domino effect that damages the river’s health and impacts life on, in, and around it. Algae prevents the penetration of sunlight, which kills aquatic plants, and any animals

that rely on the vegetation will either leave or die. As algae decays, it siphons oxygen from the water, causing fish and shellfish to die and opening space for harmful invasive species to take root.

With the Tidewater site being the final brownfield to be remediated, and the Narragansett Bay Commission working on the third phase of its [Combined Sewer Overflow Abatement Program](https://www.narrabay.com/programs-and-initiatives/combined-sewer-overflow/) (<https://www.narrabay.com/programs-and-initiatives/combined-sewer-overflow/>), the Seekonk River's future looks healthier.

Categories

PUBLIC HEALTH & RECREATION

Join the Discussion

VIEW COMMENTS

POLITICS

After 45 years, wind energy might finally give this East Providence site a purpose



Patrick Anderson

The Providence Journal

Published 5:00 a.m. ET Jan. 9, 2022

EAST PROVIDENCE — Unlike most of the Rhode Island shoreline, this vacant stretch of grass and gravel jutting into the Providence River wasn't formed by receding glaciers.

The South Quay (pronounced "key") was created by the Providence and Worcester Railroad in the 1970s, a 33-acre riverfront boondoggle never used in nearly a half century.

Now, East Providence, a Boston developer and state commerce officials want to use this white elephant to capture a big piece of the coming offshore wind power construction boom for Rhode Island.

More: U.S. Energy Secretary praises Rhode Island for role in offshore wind power

They've teamed up on a plan to build a \$100-million wind port on the Quay where turbine pieces would be delivered, assembled and sent out into the Atlantic.

What they've been missing is money. Now, flush with federal COVID-19 cash, that might not be as much of a problem.

Gov. Dan McKee is expected to include a chunk of money for offshore wind port expansion in his upcoming budget, including for the South Quay. When he talks about investing in the "blue economy," this is a big part of what he means.

More: RI buys \$7.5M in land to begin expansion of Port of Providence

McKee "has expressed that the blue economy is a priority for the state ... and has indicated that creating additional port facilities in East Providence is an idea we ought to pursue," state Commerce Secretary Stefan Pryor said Thursday. "It would be premature to offer a specific

figure, but I would not be surprised if in one way or another, the East Providence project is included in the governor's budget submission."

East Providence Mayor Roberto DaSilva has asked McKee to put \$35 million for the South Quay in his budget and sounds confident that money is coming. The state has already committed \$15 million in "Rebuild" tax credits and another \$200,000 in two Commerce Corporation grants to the project.

With the state money and an unspecified contribution from RI Waterfront Enterprises LLC, which owns the South Quay, project proponents hope to be able to secure federal funding from one of a number of grant programs. (Last year the city applied for a federal Department of Transportation grant for the wind port but didn't get it.)

A few months ago, U.S. Rep. David Cicilline singled out the South Quay as a worthy recipient of funding from the infrastructure bill passed by Congress last year.

"I see this as a huge financial benefit to my community, but also, I don't want to see Rhode Island fall behind in offshore wind to Massachusetts, Connecticut and New Jersey when we are positioned to be a leader," DaSilva told The Journal.

1976: Plans for container port go nowhere

Today, if industrialists wanted to fill in 30 acres of the harbor on a speculative venture, they'd have their work cut out for them.

But when the Providence and Worcester Railroad got the green light to build the South Quay in 1976, coal was still king in much of the country and environmental regulations were comparatively lax.

Providence and Worcester's original plan was to build a container port at South Quay that would take advantage of the deep-water channel in the river and the rail lines running by the site.

But after the area was cordoned off from the rest of the river with an earthen berm in 1979, the project stalled, held back by legal challenges, financial problems and shifting market conditions.

By 1987, the railroad had proposed building a coal terminal to supply a proposed power plant in Woonsocket, but that idea never went anywhere.

The railroad finally filled in the Quay with silt and gravel in the early 1990s, but by the turn of the millennium, East Providence was looking away from heavy industry on the waterfront toward homes, amenities and recreation.

Where a rail line once passed the South Quay, the East Bay Bike Path now sits in the old right of way. Outdoor concerts are held next door at Bold Point Park.

After the site sat fallow for decades, the city nearly lost the opportunity to use the South Quay for offshore wind two years ago when the Narragansett Bay Commission attempted to seize it as a dumping site for "tunnel muck" from the ongoing sewer overflow project.

DaSilva and East Providence lawmakers moved to block the Bay Commission move just before the COVID pandemic arrived.

The site: 'Laydown' space for turbine components

The city sees an offshore wind terminal as an industrial job-producer that would take advantage of the site's unique location without causing any new environmental problems or bothering nearby residents.

Wind turbine segments would arrive at the port by water, be unloaded and assembled there and then shipped out to wind farms by water.

The Port of Providence and Quonset's Davisville port are also offshore wind staging areas (you can see the outline of ProvPort's new turbine fabrication building from South Quay), but there's great demand for flat, empty "laydown" space to store giant turbine blades and towers.

Grant applications from last year for the South Quay say it would have 28 acres of laydown space, compared with 35 acres at ProvPort, 58 acres ("terminal/laydown") at Quonset and 21 acres in New Bedford.

For the trucks that do need to get to the South Quay, the state is in the process of building a new highway ramp that will connect from Route 195 to Waterfront Drive, which leads directly to the property.

The developer: Planning outdoor concert venue in addition to port

RI Waterfront Enterprises bought the South Quay and a bow-tie-shaped property to the north in 2019 for \$4.5 million. It also owns the hillside land to the south, formerly belonging to Chevron, where plans to build apartments have gone unrealized.

The company is an investment partnership of Boston-based Mugar Enterprises, a family real-estate firm that has developed several shopping centers in suburban Massachusetts, and Live Nation concert promoter Donald Law.

Although offshore wind is the headliner, Waterfront Enterprises' plans for East Providence don't stop there.

The developer still wants to build a 5,000-seat amphitheater concert venue — similar to the Leader Bank Pavilion in Boston's Seaport — on the "bow-tie" property between the South Quay and city-owned Bold Point Park. Concerts at the venue would replace the Bold Point outdoor music series.

In the longer term, Waterfront Enterprises hopes to develop the ex-Chevron property south of the Quay but doesn't have any immediate plans for it, company COO Seth Grady said.

Grady declined to say how much upfront money Waterfront Enterprises is willing to put into the port project.

The owners of the South Quay aren't port operators, so they plan to emulate the management model used across the river at ProvPort, where a city-controlled nonprofit oversees a private operator, Grady said.

In the case of the South Quay, Waterfront Enterprises would likely lease the land to the public nonprofit and enter a revenue-sharing agreement with the state and the city.

Waterson Terminal Services operates ProvPort, and there's a good chance the company would be employed to run South Quay. The city's unsuccessful U.S. DOT grant application listed Waterson as the prospective terminal operator.

Having Waterson run both ports could make it easier to coordinate shipping and avoid taking business from each other, Grady said.

At one point, developers were looking at building apartments, shops or a hotel on the South Quay, taking advantage of its great waterfront views

But the land is outside the Providence hurricane barrier, only a few feet above the high-tide line on most days and is as flat as a billiard table, making it especially vulnerable to sea-level

rise and big tropical storms.

As for the music venue, Grady said they hope to get it up and running by the summer of 2023.

Will RI lose out amid competition from neighboring states?

Rhode Island leaders have been talking about making the state a hub for the offshore wind industry for at least a decade, but so have politicians in other states.

With several offshore wind farms in various stages of development off the Southern New England coast, ports throughout the region are maneuvering to host staging or support facilities for the massive projects.

In Massachusetts, officials in New Bedford last summer announced plans for a second offshore wind facility in the city, and a 42-acre staging area is being planned in Salem.

Officials in Somerset hope to repurpose the former Brayton Point power plant property for the wind industry.

Connecticut has planned a \$235-million pier construction project to create an offshore wind port in New London.

Is Rhode Island in danger of being left out?

Not really, according to Pryor.

"There is not an adequate amount of port acreage to launch the wind projects planned as things stand," Pryor said Thursday. "It is less a competition than a collective need — even with New London on one hand and New Bedford on the other."

The real competition between states might not be for turbine leases, but for federal money to build out the ports.

A Rhode Island "blue economy" cluster is one of 60 finalists for a federal "Build Back Better Regional Challenge" grant. Winners of the grants could get up to \$100 million.

Save The Bay's thoughts on environment impact

Environmental group Save The Bay considers the original filling of the river to build the South Quay a big mistake.

But given the Quay's existence, using it to build wind farms is a decent option, said Save The Bay Baykeeper Michael Jarbeau.

"This development has been the least objectionable of the uses we have heard," he said Thursday. "It is at least good to see a water-dependent use."

When would construction begin, and how would the project be paid for?

If project developers can secure enough money from the state and the federal government, construction of a South Quay port could begin by the end of this summer, Grady said.

Work will involve building out a new bulkhead for the shipping berths, paving the laydown area, building an access road, erecting support buildings and installing utilities.

A Commerce RI presentation from last year estimated construction would take up to two years.

Meanwhile, the developer, the city and the state would need to negotiate how they would divide revenue and who would manage the facility.

DaSilva said the project could be paid for using Tax Increment Financing, where future taxes and revenue pay off the borrowing used to fund construction.

He said one condition would be that if offshore wind for some reason doesn't pan out, the port won't turn toward less desirable heavy industry.

"We don't want this to be used for scrap metal or coal, salt and anything that would cause an environmental issue," DaSilva said.

panderson@providencejournal.com

On Twitter: @PatrickAnderso_

GOLOCAL^{Prov} News



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TRENDING **NEW:** U.S. Added 517,000 Jobs in

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Narragansett Bay Commission Offers Free “Sunset on the Bay” Tours

Wednesday, April 20, 2022

GoLocalProv News Team

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In celebration of Rhode Island Clean Water Week and the 50th anniversary of the federal Clean Water Act, the Narragansett Bay Commission (NBC) will offer free public tours of its award-winning Field’s Point Wastewater Treatment Facility in Providence on Wednesday, April 27.

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

The tour will include a trip to NBC’s state-of-the-science Water Quality Laboratory, complete with a look under the microscope with NBC’s scientists.



PHOTO: NBC

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“I am confident that anyone who experiences this tour will be amazed and in our community,” Mesolella added.

Members of the public can book a tour at 5:00 or 6:00 PM by emailing nbc@narragansettbay.com. The experience will take approximately one hour.



Sign Up for the Daily Eblast

I want to follow on Twitter

I want to Like on Facebook

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

Related Articles

- [More Shellfishing Areas Opened Means More Revenue for RI, Says NBC's Mesolella](#)
- [Narragansett Bay Commission Honors 20 for Environmental Achievement](#)
- [Narragansett Bay Commission's CSO Phase III Will Cost \\$800M and Create 500+ Jobs, Says Mesolella](#)
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'CLEAN WATER WEEK' TOURS OF SEWAGE TREATMENT PLANTS OFFER GLIMPSES INTO WORK LIVES OF 'EVERYDAY ENVIRONMENTAL HEROES'



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CHRISTIAN WINTHROP <https://www.thenewportbuzz.com/author/christianwinthropgmail-com> - APRIL 25, 2022

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The Rhode Island Department of Environmental Management and Rhode Island Clean Water Association will be sponsoring open houses and tours at seven of the state's wastewater treatment facilities during Clean Water Week April 24-30 as part of a statewide effort calling attention to how wastewater infrastructure protects public health and the environment in Rhode Island.

The first open house and tour will be held at the [Narragansett Bay Commission's Field Point facility](https://www.warribo.com/programs-to-know-the-men-and-women-who-run-them), Wednesday, April 27, from 5 PM to 7 PM. The tours will offer a firsthand look at these multimillion-dollar municipal facilities and the opportunity to get to know the men and women who run them. In total, Rhode Island's 19 municipal wastewater treatment facilities collect and treat about 120 million gallons of residential, commercial, and industrial wastewater every day. (<https://www.warribo.com/programs-to-know-the-men-and-women-who-run-them>)

"The men and women who operate Rhode Island's wastewater treatment facilities are everyday environmental heroes whose efforts protect public health and the environment and are critical to our quality of life," said DEM Acting Director Terry Gray. "Next week is Clean Water Week. Take the opportunity to take a tour and learn how much thinking and hard work go into treating wastewater."

The tour schedule is as following:

Wednesday, April 27, 5-7 PM

- o NBC Fields Point Facility, Providence (2 Ernest Street)

Saturday, April 30, 10 AM-1 PM

- o Block Island / New Shoreham (20 Spring Street)
- o East Providence (1 Crest Avenue, Riverside)
- o South Kingstown (275 Westmoreland Street)
- o Warwick (125 Arthur W. Devine Boulevard)
- o West Warwick (1 Pontiac Avenue)

People of all ages are welcome on the family friendly tours. Please be advised that due to infrastructure of the facilities, no open-toed shoes, high heels, or flip-flops will be allowed.

Since the adoption of the Clean Water Act in 1972, billions of federal, state, and local funds have helped design, build, upgrade, and operate sewage collection and treatment systems throughout Rhode Island. Since the 1990s, state discharge permits for these facilities have become more stringent as DEM and its partners learned more about the impacts of pollution on state waters. These treatment facilities operate all day, every day, 365 days a year. DEM's work with wastewater facility operations and maintenance staff include cooperative efforts to protect these critical systems from the impacts and threats of issues such as climate change and cyberattacks.



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DEM ANNOUNCES THAT SEASONAL SHELLFISH AREA CLOSURES TAKE EFFECT ON SATURDAY, MAY 28

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CHRISTIAN WINTHROP (<https://www.thenewportbuzz.com/author/christianwinthropgmail-com>) · MAY 19, 2022

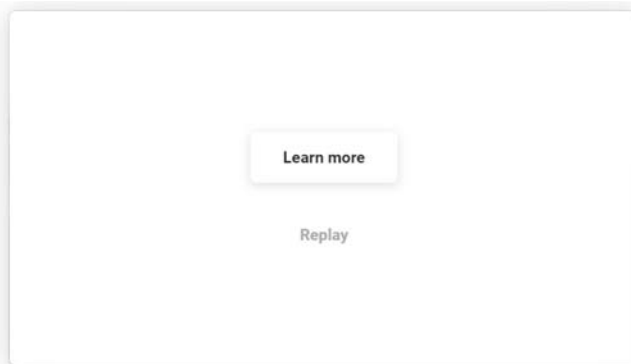
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The Rhode Island Department of Environmental Management (DEM) announces that seasonal shellfish area closures will take effect at sunrise on Saturday, May 28, and will remain in place until Tuesday, Oct. 11. Consistent with federal requirements, DEM announces changes in shellfish harvest area closures in local waters every year at this time due to potential water quality impacts associated with marinas and mooring fields. The seasonal closure areas are within:

- o Bristol Harbor
- o Dutch Harbor Area, Jamestown
- o Fishing Cove, Wickford Harbor
- o Great Salt Pond and Trims Pond, Block Island
- o Potter Cove, Prudence Island
- o Sakonnet Harbor, Little Compton



In addition, small seasonal marina closures in the southern coastal ponds, Fort Wetherill/Jamestown, and the Kickimuit River in Warren also will go into effect on May 28.

No 2022 Shellfish Classification Changes

DEM scientists evaluate shellfish harvest area water quality in May of each year. This year they are recommending no changes in shellfish water quality classification. In recent years, improvements in water quality have allowed for increased shellfish harvest opportunities and the reclassification of areas from prohibited to conditionally approved for shellfish harvest. Decades of investment in wastewater treatment plant upgrades and the capture of combined sewer overflows (CSOs) have allowed for increased shellfish harvest opportunities in the upper Narragansett Bay. Most notably, in 2021 and for the first time in 75 years (since records are available), a 1,900-acre portion of the lower Providence River was opened to shellfish harvesting. The May 2022 shellfish water quality assessment showed that improved water quality in these areas continues to support safe shellfish harvest.

"A cleaner bay means more shellfishing," said DEM Director Terry Gray. "This supports our economy, diggers, seafood dealers, restaurants, and markets who help increase consumer demand for local shellfish and seafood. This week is Quahog Week when we celebrate the cultural and economic importance of the local quahog and raise awareness of local seafood and the RI Seafood brand. Decades of actions and investments at all levels of government, including implementation of permitting and compliance programs to address Rhode Island's industrial history, reduction of bacteria levels from projects like the combined sewer overflow systems built and operated by the Narragansett Bay Commission, the elimination of thousands of household cesspools, and many other actions have resulted in a Narragansett Bay that is cleaner and healthier than in generations."

Quahogs are the most economically important fishery resource harvested from Narragansett Bay. More than 14 million quahogs were landed in 2021. Among all inshore

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DEM: Seasonal Shellfish Area closures take effect on May 28

Will remain in place until Tuesday, Oct. 11.

by **Community Submission**
May 19, 2022 Updated May 30, 2022



PROVIDENCE, RI – The Rhode Island Department of Environmental Management (DEM) announces that seasonal shellfish area closures will take effect at sunrise on Saturday, May 28, and will remain in place until Tuesday, Oct. 11.

Consistent with federal requirements, DEM announces changes in shellfish harvest area closures in local waters every year at this time due to potential water quality impacts associated with marinas and mooring fields. The seasonal closure areas are within:

- o Bristol Harbor
- o Dutch Harbor Area, Jamestown
- o Fishing Cove, Wickford Harbor

Great Salt Pond and Trims Pond, Block Island

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“A cleaner bay means more shellfishing,” said DEM Director Terry Gray. “This supports our economy, diggers, seafood dealers, restaurants, and markets who help increase consumer demand for local shellfish and seafood. This week is Quahog Week when we celebrate the cultural and economic importance of the local quahog and raise awareness of local seafood and the RI Seafood brand. Decades of actions and investments at all levels of government, including implementation of permitting and compliance programs to address Rhode Island’s industrial history, reduction of bacteria levels from projects like the combined sewer overflow systems built and operated by the Narragansett Bay Commission, the elimination of thousands of household cesspools, and many other actions have resulted in a Narragansett Bay that is cleaner and healthier than in generations.”

Quahogs are the most economically important fishery resource harvested from Narragansett Bay. More than 14 million quahogs were landed in 2021. Among all inshore and offshore marine fisheries, quahogs are the state’s fifth-most valuable, following squid, scallops, lobster, and summer flounder (based on 2021 ex-vessel values).

Nearly 40 participating restaurants and markets are featuring quahog-inspired menu items and deals this week. Tonight, DEM will be holding its second public event to allow Rhode Islanders to meet hardworking quahoggers from the RI Shellfishermen’s Association. Diggers will be shucking and serving complimentary littlenecks at Quahog Night Providence, 5-8 PM, at Narragansett Beer Providence Brewery, 271 Tockwotten St., Providence. The event is free and open to the public.

For more information on seasonal closures and shellfish harvest classification, review the annual notice available at RIDEM – Shellfish. An interactive shellfishing map also is available.

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This block contains a large, empty rectangular area, likely a placeholder for an interactive shellfishing map. The URL 'enculturess.com' is visible in the bottom left corner of the placeholder. There are small navigation icons in the top right and bottom left corners of the placeholder area.

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Central Falls, NBC team up for green stormwater and new athletic field build

By ZACK DELUCA Valley Breeze Staff Writer zack@valleybreeze.com
Jun 1, 2022



Preliminary work is underway on **High Street** to install new green stormwater infrastructure at Pierce Park, replacing the High Street ball field with a refurbished baseball field, and adding a new basketball court.

Breeze photo by Zack DeLuca

CENTRAL FALLS – Preliminary work is underway on High Street installing new green stormwater infrastructure at Pierce Park, replacing the High Street ball field with a refurbished baseball field, and adding a new basketball court.

According to Central Falls Planning and Economic Director Thomas Deller, the project is a “win-win” for the city and the Narragansett Bay Commission, and is supported by a \$380,000 grant from the Department of Environmental Management. The city has a combined sewer system, Deller says, and the commission has the responsibility of addressing stormwater separation. The bay commission will conduct the project without cost to Central Falls.

The city will still own the property and new athletic areas upon completion. As part of the project, the Narragansett Bay Commission will refurbish the baseball field at the site, and they will also install a brand-new basketball court.

The commission will install a geo-textile fabric and a foot of clean fill on the baseball field. They will replace existing facilities and install new fencing. The basketball court will be built with porous pavement to allow rainwater to pass through it and absorb into the groundwater table.

“We’ve teamed up with Central Falls to help remediate the fields,” Narragansett Bay Commission CSO Program Manager Kathryn Kelly said. “A couple of years ago it was discovered there was contamination at the site, at the baseball field, and it’s been a number of years since I think the city has been able to use the field...”

A combined sewer system is essentially one pipe underground that collects both sanitary wastewater from homes and businesses, as well as stormwater run-off from catch basins, Narragansett Bay Commission CSO Program Manager Kathryn Kelly and Engineer Manager David Bowen explained. This system directs all the water to one pipe and conveys it to the Bucklin Point wastewater treatment facility for full treatment before it’s discharged into the Seekonk River, which then leads into the Narragansett Bay.

“In very intense rainstorms, the volume of stormwater that’s directed to this single pipe overwhelms the pipe, exceeds the capacity, and it overflows at various points along the Blackstone River,” Kelly said of Central Falls’ sewer system.

This is called a combined sewer overflow event and is prohibited by federal law. NBC has a consent agreement with the Rhode Island Department of Environmental Management to construct facilities, in a phased approach, that will significantly reduce occurrences of these overflow events along urban rivers. Phase one and two, which mainly address combined sewer overflows in the city of Providence, were completed in 2008 and 2015. The total work for Phase three, which is beginning now, will extend over the next 20 years or so, Kelly estimates.

The work in Central Falls, as well as work planned in Pawtucket, is included in the first stages of Phase Three and will connect to “the centerpiece of a Phase Three” – a 30-ft diameter, 2.2 mile-long deep rock tunnel designed to capture and store storm-related sewage overflows. The project at Pierce Park is the third of three GSI projects planned by the bay commission in Central Falls. The first was completed at the Louis C. Yip Soccer Field, and the second was at the Macomber Stadium. Narragansett Bay Commission will be installing infiltration chambers under the planned basketball court at Pierce Park. This will extend under the High Street ballfield, too.

“And when we’re done, we’ll have a project that has really helped NBC achieve our objective of conducting green stormwater infrastructure – while also remediating an athletic field that’s available for use by the residents of Central Falls,” Kelly said.

The overflow captured by this improved infrastructure will be transported to the NBC’s Bucklin Point Wastewater Treatment Facility for full treatment. According to the commission, the project will protect the water quality in Narragansett Bay, contributing to reducing annual combined sewer overflow volumes by 98 percent and achieving an 80-percent reduction in shellfish bed enclosures.

Preliminary work at Pierce Park began last week. If the project sticks to the projected timeline, Deller said it will be completed by the end of September 2022. While the new basketball court will be ready to play on almost immediately, the Saul Tarlow Little League Baseball Field will not be open for use until Spring 2023 so the new grass can grow back.

This project is part of NBC’s Combined Sewer Overflow (CSO) Abatement Program, which is supported by a roughly \$268 million loan from the US Environmental Protection Agency’s WIFIA (Water Infrastructure Finance and Innovation Act) Program. This loan will help to finance Phase III of the Commission’s federally-mandated CSO project, estimated at \$760 million. The tunnel under Pawtucket will be the largest single piece of Phase Three and represents roughly two-thirds of the total cost.

Cyber Sessions: No more hiding from cybersecurity

By **Jason Albuquerque** - 08/16/2022



Jason Albuquerque

(Editor's note: This is the first installment of a monthly guest column on the growing number of cyberthreats facing businesses of all sizes and what they can do about it.)

As the speed of business and the rate of technology adoption increases, so do the risks to businesses of all sizes, their clients and employees.

Yet many business leaders still have not taken desperately needed steps to protect against modern-day cyber risk.

Why is that? Because criminals mostly target only big companies based in major cities?

Right here in Rhode Island, our very own Narragansett Bay Commission reportedly paid a

\$250,000 ransom to end a cyberattack.

And the R.I. Public Transit Authority paid cybercriminals a reported \$170,000 in ransom in a 2021 data breach that affected 22,000 Rhode Islanders.

A single data breach can cost a company millions of dollars in financial loss – not to mention the damage that a breach causes to a business's reputation.

The reality is that every company that uses even a single computer to do business is at risk, including yours.

There was a reported 1,070% increase in ransomware attacks nationwide in 2021, when many enterprises moved to hybrid workplaces. And now, it takes 68% longer to respond to a security breach, when more than 50% of your workforce is remote.

Cybercrime is consistently listed as one of the major business risks keeping in-the-know CEOs and board members up at night.

Many more business leaders, however, don't even know where to begin to protect themselves.

But in a day where directors and officers are facing civil and criminal lawsuits stemming from cyber incidents, you must ask yourselves: Do you know the current cyber risks your business faces?

How are you handling the responsibilities and due diligence necessary to manage cyber risk and the responsibilities that you have to your clients, shareholders, investors and employees? Is your organization handling information security oversight and its budget appropriately and up to today's standards?

Can you readily articulate the awareness of where your risks are, your plan to remediate those risks or when an incident has happened? Are you in a targeted industry, or having trouble getting cyber liability insurance?

If you don't know the answers to some or all of these questions, then you may be flying blind to your current cybersecurity risks.

But take heart: Recognizing the cause of a problem is the first step to solving it.

As a seasoned leader in the cybersecurity, risk management, and information technology industries, I am partnering with Providence Business News to offer some guidance each month.

This column will seek to educate readers on key strategies to shape your business resilience, organizational risk and cybersecurity plans to bring your company in line with today's needs.

These core strategies will help ensure that your organization is positioned to be prepared and resilient from these risks, even as

our business environments rapidly change, and the threat landscape broadens.

The days of ignoring cyber risks are over. Leaders can no longer hide behind the cover of cybersecurity being “just a technology issue.”

In today’s world, turning a blind eye to this major business risk is viewed as negligence and this has been proven out time and time again.

Each month I’ll discuss critical topics that executive teams need to be considering.

We will talk about the most up-to-date cyber threats and how to evaluate what risks your business currently faces.

We will cover cybersecurity risk management strategies and how to assess your existing cyber capabilities to mitigate those risks.

Most importantly, we will cover cyber risk tolerance, and the desired business outcomes that executives should be discussing – and designing strategies around building a resilient business.

While cybersecurity is a very complex topic that lives in the crossroads of information technology, corporate risk, legal, compliance, human resources and more, we aim to help demystify these subjects, so you can build resilient organizations that can withstand the intense levels of

cyber threats that we all face today.

Cybersecurity is a team sport. It requires everyone, at every level of the business to be involved, starting with the people at the top.

Next month: Why cybersecurity is not best when left only to the technologists!

(Jason Albuquerque is chief operating officer of Pawtucket-based Envision Technology Advisors LLC. You can reach him through www.envisionsuccess.net.)



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New England Tackles Complex Sewer and Stormwater Challenges

By Johanna Knapschaefer



Several combined sewer overflow projects are underway in New England, including the Cemetery Brook Tunnel Project in Manchester, N.H.

Photo Courtesy of the City of Manchester Dept. of Public Works

August 16, 2022

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As New England communities face more frequent and intensifying storms, several combined sewer overflow (CSO) projects across the region are moving into the construction phase, and one has passed a major milestone.

CSO systems handle untreated or partially treated human and industrial waste, toxic material, debris and stormwater, according to the Environmental Protection Agency, and are subject to Clean Water Act regulation. With concerns about protecting community health and the environment in the wake of these storms, here's a look at how some of these critical projects in the region are progressing:

Project: Narragansett Bay Combined Sewer Overflow Program Phase III (Pawtucket Tunnel Construction)

Location: Pawtucket and Central Falls Rhode Island

Cost: \$450 million



Aerial view of a 600-lb crawler crane lowering the TBM cutter head into the launch shaft at the main site in Pawtucket.

Photo courtesy of Matt Thurber

A year since the boring of a massive tunnel near the Seekonk River in Pawtucket Rhode Island began, crews are currently sinking shafts, producing tunnel liner segments and assembling the tunnel boring machine (TBM) on site as part of the Narragansett Bay Commission CSO “Big Dig” project. **This website is designed to help you understand the project in Rhode Island and to have the best experience by visiting it.**

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Crews have mobilized six mobile cranes and a 600-ton crawler crane to assemble and lower the heavy sections of the TBM, says Stephane Polycarpe, engineering manager at CB3a joint venture, design-builder for the project. The crews are working 120-ft below ground in a 60-ft dia shaft, The heaviest pick weighs 750,000 lbs.

The TBM is set for completion by the end of August with tunnel mining scheduled to start in September and end September 2024, says Melissa Carter, vice president at Stantec, which has been involved in the project since 2014.

The work involves constructing the 2.2-mile long, 30-ft dia tunnel beneath the cities of Pawtucket and Central Falls, R.I. At depth ranges of 115-ft to 160-ft below grade, the tunnel is designed to store a minimum of 58.5 million gallons of combined sewer overflow.

Currently underway, Phase III—which started 18 months after the award of the contract to the joint venture of CBNA-Barletta in December 2020—includes “construction of the Pawtucket Tunnel, a deep rock tunnel in the Rhode Island formation with four connections to the main sewers on both banks of the Black Stone River,” Polycarpe says.

Crews are reconfiguring the main site to accommodate the TBM excavation expected to progress at an average rate of 40 ft to 50 ft per day, Polycarpe says. The TBM will excavate and line the tunnel with precast concrete segments manufactured by the JV at a facility it built in Cranston, R.I. The precast yard is producing 56 precast concrete segments, each weighing 15,500-lb, daily for TBM installation to form the final lining of the tunnel, Polycarpe says. To ensure watertightness of the completed tunnel, all segments are fitted with compressible gaskets, he says. A full ring comprises seven segments which line 6.7 ft of final tunnel.

“In the cities of Pawtucket and Central Falls, all five sites are open with work progressing on schedule,” Polycarpe says.

The excavation lateral support systems are complete for all shafts. Drilling of the drop shafts and vent shafts ranging between 8 ft dia to 2 ft dia. to 90 ft deep is currently underway. The proximity of existing buildings and utilities at two Pawtucket sites where blasting operations were transferred from the main site requires “even finer control of the effect of the explosions,” Polycarpe says.

The first blast tests occurred in late June and “no adverse effects were recorded,” Polycarpe added.

In related Phase III work, Narraganset Bay Commission CSO work, excavation is underway for a \$4.7 million green stormwater infrastructure project at Pierce Park in Central Falls to refurbish a

baseball field and build a new basketball court, says Brandon Blanchard, managing engineer for the Pare Corp. The project that began in June and is set to end by November, is the third green stormwater project in Central Falls designed by the Sandwich, Mass.-based Horsely Witten Group. They’ll be constructing it with plastic infiltration chambers, bedding stone and sand, says Blanchard.

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Project: Manchester CSO Mitigation Program Phase II

Location: Manchester, N.H.

Cost: \$231 million



Drilling to set explosives inside trench box to blast granite ledge on Christian Brook main drain project.

Courtesy of the City of Manchester Department of Public Works

Since the Phase II consent decree was finalized on Sept. 28, 2020, four open-cut projects have been combined into the singular \$85 million Cemetery Brook Tunnel Project. AECOM is designing the two-mile-long, 12-ft-dia tunnel that will sink up to 80 ft deep.

As the city's largest 4,500-acre drainage basin, Cemetery Brook contributes 70% of the city's CSO discharges and 3.2 million gallons per day of dry weather flow to the wastewater treatment plant, according to a recent report on Manchester's Ongoing CSO Mitigation Program. Final design is set for completion by November 2023, with construction scheduled to begin in fall 2024. **X**

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“This was the most cost effective and minimized disruption to our community businesses and sister utilities,” without “replacing every single utility” on Queen City Ave., a heavily traveled thoroughfare into the city, says Fred McNeill, chief engineer for the Manchester Dept. of Public Works Environmental Protection Division.

The tunnel will follow beneath Queen City Avenue for 25% of the tunnel length before running under an abandoned railroad bed for which the city received an easement, says McNeill.

To assist with making connections, the team is designing wide diameter drop shafts to allow water into the pipe and correspondingly let air out of the pipe, McNeill explains. “They’re going to be big and require a significant footprint for construction and future ownership and operation.”

Meanwhile, the \$15 million Christian Brook main drain construction, the city’s first phase II CSO construction project, began on April 1 for separation of the 25-acre drainage basin. Completion is tentatively set for May 2024 and will be followed by a \$31 million lateral pipe construction project from 2024 to 2026.

In mid-July, crews connected to the existing storm drain junction chamber in the city’s north end, installed a 72-in.-by-50-in. RCB-reducer pipe, and proceeded eastward with new RCB-pipe storm drain, says Peter Jandrisevits, project manager for the Boston-based contractor, J. Gioioso & Sons.

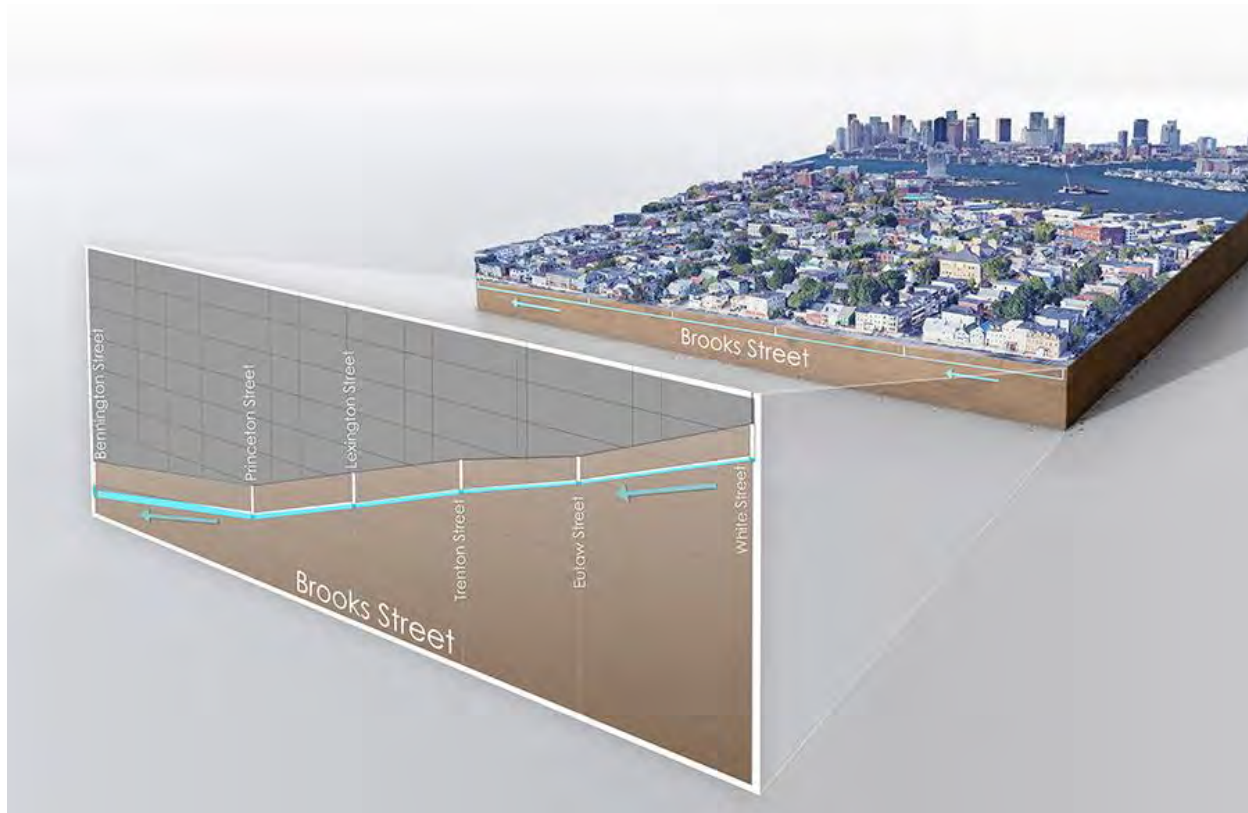
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Project: Boston Water and Sewer Commission East Boston Phase IV Sewer Separation/South Boston Sewer Separation

Location: Boston, Massachusetts

Cost: \$143 million/\$150 million



Stantec is using the BWSC's PCSWMM computer model to design and evaluate performance of a new storm drain collection system to serve a 200-acre service area in East Boston.

Courtesy of Stantec

In late June, Stantec was chosen as lead designer for the \$150 million East Boston Sewer Separation project as part of a 30-year program to reduce pollution in Boston Harbor and modernize the area's water infrastructure.

Stantec is designing the proposed new storm drain collection system for 230-acres in East Boston using the commission's PCSWMM (Soil and Water Integrated Model) hydrologic/ hydraulic (HH) model of its sewer system. The model is a computerized simulation of the sewer system, says Mike Carroll, senior project manager for the project. "It allows us to see how the system will perform under various conditions," he says. "By using this model, we can identify potential problems before they occur and make adjustments to the design to prevent them. It also helps us to understand the system's capacity and how it will perform under different conditions, such as heavy rain or snowmelt. This is a critical tool for us to ensure that the system is designed to handle the most challenging conditions and to prevent any potential issues from occurring. We are confident that the system will be a success and will help to improve the water quality in Boston Harbor." Carroll says.

Preliminary design began in late February and will extend until spring 2023, he says. Final design will involve five separate construction contracts with one package executed every 12 months. The project is estimated to finish by 2031.

The team is designing the new storm drain collection system for a 10-year return period storm for current sea level high tide. For future assessments, BWSC will use data from either a 2050 or 2070 time horizon. “Our final decision will come within two months,” says John Sullivan, chief engineer for the BWSC.

Near the coast it is not possible to gravity-drain into the sea during an intense rainstorm when the sea level exceeds our design level of 13 ft. based on Boston city-wide elevation datum, Stantec's Carroll says. “We expect the sea level to increase by 1.5 ft by 2050 and perhaps as high as 4.5 ft by 2070.”

Meanwhile, in South Boston, a \$143.2 million, 402-acres separation project is 30% complete. Stantec is the designer with Dedham, Mass.-based Fed Corp serving as the general contractor for the first in a series of five CSO contracts.

KEYWORDS: [Combined Sewer Overflow construction](#) [East Boston](#) [Manchester](#) [New England](#) [pawtucket](#)

Share This Story



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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LIVE

18°

16°

46°

ADVERTISEMENT

Gallery: Community paddle brings new colors to WaterFire

by NBC 10 NEWS

Sunday, August 28th 2022



Search Site



Illuminated Japanese koi fish on kayaks bring new colors to WaterFire in Providence, Saturday, August 27, 2022. (WJAR)

Nearly 80 decorative boats cruised down the river with illuminated Japanese koi mounted on kayaks.

It was a part of the city's Clear Currents Paddling Event.

Sponsored Links

Price Alert: These Leftover SUVs Are Now Under \$10k (Deal Of The Day)

CarsGenius

Search Now

The organization celebrates years of clean water provided by the Narragansett Bay Commission.

MORE TO EXPLORE

Former OBGYN accused of sexually assaulting patients faces new charge

Search Site

Decomposed body found in clothing drop-off bin identified, cause of death pending

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This New CPAP Can Do What...

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Providence Drivers Are Fuming Over This New Rule

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

NARRAGANSETT BAY COMMISSION

Perfect Compliance

in recognition of Significant Industrial User Perfect Compliance in 2021

The Narragansett Bay Commission recognizes these Significant Industrial User companies for perfect regulatory compliance with Pretreatment Program regulations during 2021:



Godfrey & Wing, Inc.
dba Impco, Inc.
John H. Collins & Sons Co.
Providence Journal Co.
- Production Facility
Stackbin Corporation
Tedor Pharma, Inc.
Univar Solutions USA, Inc.

Induplicate, LLC
Manchester Street, LLC
Rhode Island
Resource Recovery Corporation
Tanury Industries, PVD, Inc.
Technodic, Inc.
Tiffany & Company

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. Mesoella, *Chairman* • Laurie A. Horridge, *Executive Director*
One Service Road, Providence, RI 02905



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, 2020 through December 31, 2021. 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. •

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 98.9% respectively. Similar toxic loading reductions have been observed at the NBC Bucklin Point facility. **The Narragansett Bay Commission will continue to lead in wastewater treatment, environmental protection, and environmental education to ensure a cleaner Narragansett Bay for all to enjoy.**

Bucklin Point Service Area

Pawtucket		
Company Name	Violations Cited	Present Status
Bliss Manufacturing Company, Inc.	Cu (1, 2)	Firm is now in compliance
Bootblack Brand, LLC	Failure to submit report on time (6)	Report has been received
Ecological Fibers, Inc.	Zn (1, 2)	Firm is now in compliance
Kitchen & Countertop Center of New England	Failure to submit report on time (6)	Report has not been received
North East Knitting, Inc.	Failure to submit report on time (6)	Report has been received
Lincoln		
Barentz NA LLC	Failure to submit report on time (6)	Report has been received
Finlay Extracts & Ingredients USA, Inc.	Failure to submit reports on time (6)	Reports have not been received
JAR Bakers Supply	Failure to submit report on time (6)	Report has been received
Palate Pack	Failure to submit report on time (6)	Report has been received

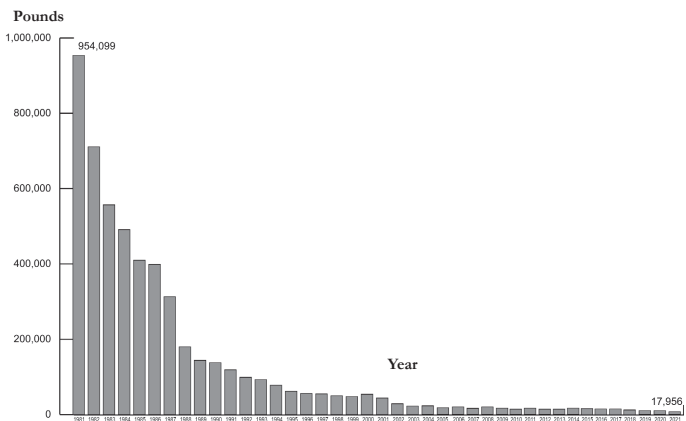
Cumberland

Hindley Manufacturing Company	Ni (1, 2)	Firm is still experiencing compliance issues
East Providence		
Aspen Aerogels Rhode Island, LLC	BOD (1, 2)	Firm is now in compliance
Rand Whitney Southeast Container, LLC	Cu (2), Zn (2)	Firm is now in compliance
The Evans Findings Company, Inc.	O&G	Firm is now in compliance

Field's Point Service Area

Providence		
Company Name	Violations Cited	Present Status
271 Tockwotten Partners, LLC	BOD (1, 2)	Firm is in compliance
AS220 (Print Shop)	Failure to submit reports on time (6)	Reports have been received
Fed-Rick Veal Company, Inc.	Failure to submit report on time (6)	Report has been received
Providence Specialty Products, LLC	O&G (1, 2)	Report has not been received
The Providence Mint, Inc.	BOD (1, 2)	Firm is still experiencing compliance issues
	Failure to submit report on time (6)	Report has been received
Johnston		
Granitec	Failure to submit report on time (6)	Report has been received
Orbit Energy Rhode Island, LLC	Total Nitrogen (1, 2)	Firm is out of business
R.I. Beef & Veal, Inc.	Failure to submit reports on time (6)	Reports have been received

Total Metals Influent to Field's Point WWTF, 1981-2021





RestoredWaters RI

A Narragansett Bay Commission Project

We will be performing tunnel construction activities in your area.

Tunnel construction work related to the RestoredWaters RI project will be conducted in your neighborhood. Rock excavation through controlled blasting is necessary to build the 2.2 mile tunnel that will run 125 feet below the surface to capture stormwater runoff to improve water quality in the Bay and local tributaries.

A series of HORN signals will be used to alert personnel at the site and nearby residents prior to each blast.

All blasting operations will be conducted during daylight hours Monday thru Saturday between 7AM and 5PM.

To sign up for blasting notifications (sent approximately 24 hours prior to planned blasting activity), please send an email to notifications@cb3a.com requesting to be added to the list.

Learn more at

RestoredWatersRI.com/blasting

Para leer esta información en español, por favor visite RestoredWatersRI.com/blasting


Para ler esta informação em português, visite RestoredWatersRI.com/blasting


What is the schedule for blasting?


The following is our current blasting schedule. Please note that these dates are anticipated and are subject to change based on project progress, resource supplies, etc. We will update this schedule as needed.

BLASTING ADDRESS: PAWTUCKET	PROJECT COMPONENT	START DATE	FINISH DATE
804 School Street	Main Site	<i>Ongoing</i>	6/3/2022
660 Roosevelt Avenue	Tunnel Receiving Shaft	5/3/2022	9/21/2022
50 Pleasant Street	Drop Shaft 213	5/3/2022	8/15/2022
250 Front Street	Drop Shaft 205	6/24/2022	8/29/2022

Questions? Contact us through one of the channels listed below:

 info@restoredwatersri.com

 **401-305-2350**

 **@RestoredWaters**

Notice of Data Security Incident

The Narragansett Bay Commission (“NBC”) recognizes the importance of protecting the information we maintain. NBC is in the process of notifying individuals of a data security incident that may have involved some of their information. This notice describes the incident, the populations of individuals potentially involved, measures we have taken, and some steps that individuals may consider taking in response.

On July 3, 2022, NBC experienced a data security incident that involved unauthorized access to certain computer systems in our network. Upon identifying the incident, we immediately secured the systems involved, commenced an investigation, and notified law enforcement. Through our investigation, we determined that between July 2, 2022 and July 3, 2022, an unauthorized actor accessed and/or acquired certain files on our servers. We reviewed those files and on August 18, 2022, determined that they contained the names, dates of birth, Social Security numbers, financial account numbers, and/or NBC employee health plan enrollment status of current and former NBC employee health plan members.

On September 1, 2022, NBC began mailing notification letters to individuals whose information was potentially subject to unauthorized access and/or acquisition. NBC is offering notified individuals complimentary two-year subscriptions to credit monitoring, fraud consultation, and identity restoration services through Experian® IdentityWorksSM.

NBC has established a dedicated, toll-free call center to answer questions that individuals may have. If you believe your information was involved and have any questions about this incident, please call 866-240-5440, Monday through Friday, from 9:00 AM through 7:00 PM, Eastern Time.

To reduce the risk of something like this from happening in the future, NBC has implemented additional safeguards and technical security measures.



DOCKET NO: 22-47-WW: GENERAL RATE FILING

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

IN RE: NARRAGANSETT BAY COMMISSION DOCKET NO: 22-47-WW

APPLICATION TO CHANGE RATE SCHEDULES

NOTICE OF FILING AND CHANGE IN RATE SCHEDULES On November 4, 2022, pursuant to Rhode Island General Laws § 39-3-11 and Part 5 of the Rhode Island Public Utilities Commission's Rules of Practice and Procedure, the Narragansett Bay Commission ("NBC") hereby gives notice that it has filed an application to increase its rates with the Rhode Island Public Utilities Commission ("Commission"). In its filing, NBC seeks to implement a multi-year rate plan that would increase rates in five phases. In the first phase of the increase, proposed to take effect on December 5, 2022, NBC's proposed rates are designed to collect additional operating revenue in the amount of \$11,257,959 to support a total revenue requirement of \$115,574,327. The impact of the proposal will be an across-the-board increase of 11.11% on all residential and non-residential rates. For an average residential customer, using 150 gallons of water per day, the request will result in an increase of \$57.69 in their annual bill from \$519.17 to \$576.86. The impact of the rate increase on all other customers will vary depending upon the customer's classification and consumption. In the second phase of the increase, proposed to take effect on July 1 2024, NBC's proposed rates are designed to collect additional operating revenue in the amount of \$8,735,691 to support a total revenue requirement of \$124,310,018. The impact of the proposal will be an across-the-board increase of 7.76% on all residential and non-residential rates. For an average residential customer, using 150 gallons of water per day, the request will result in an increase of \$44.77 in their annual bill from \$576.86 to \$621.63. The impact of the rate increase on all other customers will vary depending upon the customer's classification and consumption. In the third phase of the increase, proposed to take effect on July 1 2025, NBC's proposed rates are designed to collect additional operating revenue in the amount of \$3,103,269 to support a total revenue requirement of \$127,413,287. The impact of

the proposal will be an across-the-board increase of 2.56% on all residential and non-residential rates. For an average residential customer, using 150 gallons of water per day, the request will result in an increase of \$15.90 in their annual bill from \$621.63 to \$637.53. The impact of the rate increase on all other customers will vary depending upon the customer's classification and consumption. In the fourth phase of the increase, proposed to take effect on July 1 2026, NBC's proposed rates are designed to collect additional operating revenue in the amount of \$2,112,378 to support a total revenue requirement of \$129,525,665. The impact of the proposal will be an across-the-board increase of 1.70% on all residential and non-residential rates. For an average residential customer, using 150 gallons of water per day, the request will result in an increase of \$10.83 in their annual bill from \$637.53 to \$648.36. The impact of the rate increase on all other customers will vary depending upon the customer's classification and consumption. In the fifth phase of the increase, proposed to take effect on July 1 2027, NBC's proposed rates are designed to collect additional operating revenue in the amount of \$5,776,999 to support a total revenue requirement of \$135,302,663. The impact of the proposal will be an across-the-board increase of 4.57% on all residential and non-residential rates. For an average residential customer, using 150 gallons of water per day, the request will result in an increase of \$29.60 in their annual bill from \$648.36 to \$677.96. The impact of the rate increase on all other customers will vary depending upon the customer's classification and consumption. Please note that while NBC is requesting this revenue increase, the Commission, after full investigation and hearings, may order a different revenue increase and rates.

While the new rates in the first phase of the increase are proposed to become effective December 5, 2022, the Commission can suspend the rates for up to eight months from the proposed effective date. No rate change will take effect until the Commission has conducted a full investigation and hearing on the proposal. The Commission will publish a notice of the hearing dates when they are scheduled. Ratepayers may comment on the proposed rate increases at that time.

A copy of the application is on file for examination at the NBC's office One Service Road, Providence, Rhode Island and at the offices of the Public Utilities Commission, 89 Jefferson Boulevard, Warwick, Rhode Island, and can be accessed at <https://ripuc.ri.gov/Docket-22-47-WW>. A copy of the filing was also provided to the Rhode Island Attorney General's Department, Consumer Division.

Narragansett Bay Commission

One Service Road

Providence, Rhode Island 02905

NBC NEWSLETTERS



NBC Pipeline

January 2022

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
					Payday	
9	10	11	12	13	14	15
16	17 Full Moon Martin Luther King Jr. Day Observed	18	19	20	21	22
					Payday	
23	24	25	26	27	28	29
30	31					

News Briefs...

Welcome...



Meet Marus Brown!

Marcus started on December 5th at Bucklin Point as an Operator I. Marcus is from the Providence area and has a background in business. He has 6 children, 2 boys and 4 girls and enjoys working out and playing basketball.



Meet Steven Carvalho!

Steven started on December 5th at Bucklin Point as an Operator I. Steven played college basketball and played 2 years international. He has a daughter and is from the Providence area.



Meet Russell Cote!

Russel started on December 19th as an Operator I at Field's Point. Russell is from Warwick, RI.

Tunnel Boring Machine Set to Arrive in RI in Spring 2022

CSO Phase III Update:

Pictured to the left is the tunnel boring machine, expected to arrive in RI this spring. Right now it's currently being manufactured in Germany by [Herrenknecht Tunneling Systems](#).



NBC's CSO Phase III involves construction of a 30 feet in diameter deep rock tunnel that will be mined for approximately two miles by this machine along the Seekonk and Blackstone Rivers in Pawtucket, making way for cleaner water and better stormwater management in RI.

-- Submitted by Greg Waugh

Casual Day Fund

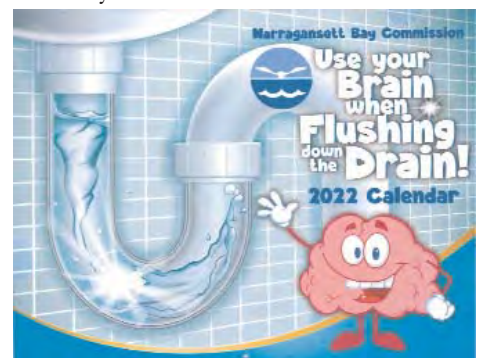
In December, the NBC Casual Day Fund Committee conducted a raffle virtually to choose a winner to pick a 501(c)(3) charitable organization of their choice to make a donation. All employees who participate in Casual Day were automatically entered and our lucky winner is **Kayla Bessette!** Kayla chose for NBC to donate to the the Women's Fund of Rhode Island. They will receive a \$500 check from the NBC.



2022 Poster Contest Calendars are Here!

The 2022 calendar highlights the winners from the 28th annual poster contest, *Use your Brain When Flushing down the Drain*. This theme brings awareness about what should and shouldn't be flushed down the toilet or put down a drain. Certain items such as grease, oil, chemicals and even food can cause blockages and are difficult to remove. Other products, such as wipes and hygiene products can be extremely harmful to wastewater treatment systems.

If you would like a copy, please contact **Talia Cheshier** by email or ext. 394. We hope you enjoy the beautiful artwork created by these talented students!



Avoiding Slips, Trips and Falls



The winter season officially arrived on December 21st. As temperatures drop and snow/ice accumulation is imminent, all NBC employees are reminded of the importance of remaining vigilant while walking around NBC property, as well as at home.

According to the National Safety Council, slips, trips, and falls was the third leading cause of injury involving days away from work in 2020, accounting for 18% of all work-related injuries. Last year, a total of 211,640 slip, trip and fall incidents resulted in an average of 14 days lost per employee. Slips, trips, and falls continue to account for 1 in 6 lost-time injuries and cost employers an average of \$47,000 per incident. All slips, trips and falls are caused by three main issues: human factors, wet surfaces, and housekeeping issues.

Most slips, trips and falls are preventable. Here are some useful tips all employees can apply throughout the workplace and at home:

- Parking Lots & Building Entrances - Look down when exiting a vehicle. There may be ice in the parking lot. Watch for uneven surfaces and slippery floors caused by wet shoes. Walk slowly up and down stairways.
- Breakrooms - Watch for drips from sinks, melted ice on floors, leaking trash cans and spilled coffee or drinks.
- Walkways - Beware of wet floors that have recently been cleaned, drips from pipes or downspouts on buildings, uneven flooring/unexpected steps, and misplaced pieces of equipment.
- Throughout NBC Facilities - Look for leaks or drips around machinery, spills from drums or containers, uncovered cords, hoses and wires, unsafe ladders, poor lighting, and stairways that may need a non-slip finish. Remember to always wear the appropriate footwear for your work environment!

A slippery or obstructed walking surface should always be considered a hazardous area. Remember to always report any unsafe work conditions immediately to your supervisor.

Where Can I Learn More?

All employees are encouraged to obtain supervisor permission, login to their Bay Academy accounts and take the brief 13-minute "Slips, Trips and Falls 2.0" interactive course. Your co-workers and family members will thank you!

-- Submitted by Dave Aucoin

COVID-19 Update

Just a reminder, with RI's increase in the number of COVID-19 cases we encourage employees to self-screen and to wear your mask properly, covering the nose and mouth throughout the work day unless the employee has a separate office with a door.

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.

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 December 31st...

Tests administered: 1292
Negative Tests: 1279
Positive Tests: 9
Invalid Tests: 4







NBC Pipeline

February 2022

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 Payday	5
6	7	8	9  National Pizza Day	10	11	12
13 Super Bowl	14  Valentine's Day	15	16 Full Moon	17 Random Acts of Kindness Day	18 Payday	19
20	21  President's Day HOLIDAY	22	23	24	25	26
27	28					

News Briefs...

Welcome...



Meet Madlin Severino!

Madlin started on January 18th as a **Paralegal** for NBC. She has previously worked for many years in a law firm. Madlin has two children and two fur babies. She enjoys reading and watching her favorite shows, Modern Family and Moms. Her favorite travel destination is the Dominican Republic, but she dreams of visiting Brazil and Greece one day!



Meet Casandra Bennett!

Casandra started on January 31st as NBC's **HR Manager**. She is from RI, born and raised! Before joining the NBC team she worked as an HR Manager for the town of Middletown. She has a 9 year old son, 2 dogs and 3 cats. Casandra's hobbies include traveling, beach combing for shells and sea treasures and watching any medical drama show on tv.



Meet Alexandra Farrell!

Alex started on January 31st as a **Customer Service Representative**. She is from Providence, RI and previously worked for XRA Medical Imaging.

Charitable Initiative Extended...

NBC will be extending January's Charitable Initiative to



Big Brother Big Sister of RI until **Monday, February 7th.**

Donation bins are located in each building where you can drop off any of the following items...

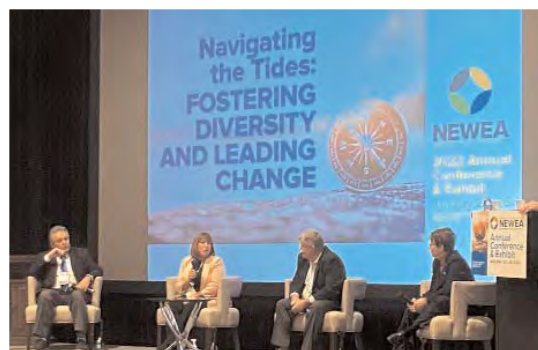
- Clothes of any size or gender
- Cloth/fabric
- Blankets/sheets
- Handbags/backpacks
- Shoes
- Stuffed animals
- Household items such as plates, pots, pans, etc..
- Trinkets, etc.

Please make sure that any items donated are clean and if you're donating any household items that are fragile, they are packed appropriately.

If you have any questions please contact Sophia Andrade at ext. 327.

NEWEA Celebrates the 50th Anniversary of the Clean Water Act at the Annual Conference & Exhibit in Boston

On January 25th, NBC's Executive Director Laurie Horridge participated as a panelist at the 2022 Annual NEWEA Conference & Exhibit during the keynote presentation on *The Future of the Clean Water Act*. Laurie expressed her unique perspective on challenges and opportunities we face and will encounter as we navigate the future of the next 50 years of improvement and advancement of the clean water industry. Her inspiring words highlighted NBC's great work and aim for continual development and improvement.



--Submitted by Nora Lough

COVID-19 Update

Just a reminder, with RI's increase in the number of COVID-19 cases we encourage employees to self-screen and to wear your mask properly, covering the nose and mouth

NBC Test Data as of January 31st...

Tests administered: 1535
Negative Tests: 1515
Positive Tests: 16
Invalid Tests: 4

throughout the work day unless the employee has a separate office with a door.

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.

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.

January Employee Promotions & Retirements

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

- **Walter Palm** promoted to Director of Environmental Science & Compliance
- **Angelina Glater** promoted to Laboratory Manager
- **Michael Caruolo** promoted to Principal Environmental Engineer
- **John Motta II** promoted to System Design Programmer

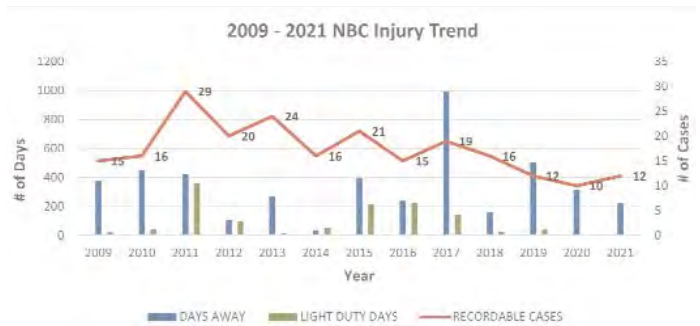
NBC would like to wish two long-time NBC employees, **Tom Uva** and **Steve Fascitelli** a happy and healthy retirement!

NBC Injuries Continue to Decline

NBC's TAC Section is pleased to announce that the number of OSHA-recordable injuries throughout NBC have declined significantly over the past several years.



In particular, the total number of days away from work for all injuries has decreased for the second consecutive year! This is a huge testament to the dedication to safety exhibited by all NBC employees on a daily basis. The number of OSHA-recordable injuries varies year to year, but has generally been in decline since a peak in 2011. Every NBC employee should feel proud of this continuing trend, which is shown in the graph below:



2020 - 2021 Statistics:

- # Of Days Away from Work decreased by 29%.
- # Of Light Duty Days remained at 0.
- # Of Recordable Cases increased by 20%.

What is an OSHA-Recordable Injury?

Any workplace injury is undesirable and unfortunate, but 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
- Loss of consciousness
- Days Away from Work
- Medical treatment beyond first aid
- Returning to work on Light/Restricted Duty
- Illness diagnosed by a medical professional

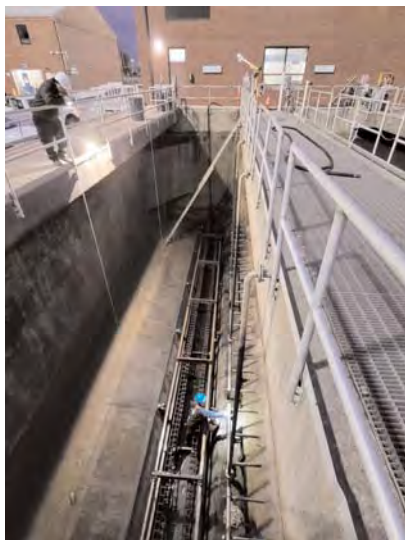
Through continued, effective safety training, on-the-job awareness and management commitment, NBC employees can work together to make 2022 the safest year on record.

-- Submitted by Dave Aucoin



On January 25th, FP Process Monitor **Sean O'Keefe** and FP Operator **Richard Hoppman** took on multiple tasks throughout their 3 -11 PM shift, going above and beyond.

With an extreme cold front on the way and a blizzard forecasted for later that week, Sean and Rich were assigned to enter an offline Grit Tank to remove a great deal of rags and debris off the air diffuser before it would freeze in the upcoming weather. Once finished, Sean and Rich moved on to Final Clarifier #2 which was recently de-watered and needed cleaning before the sludge would start to freeze. Sean and Rich pushed their lunch breaks back in order to complete these tasks in a timely manner before the cold moved



in. They completed their usual front rounds, collecting and recording data along with these extra tasks. These two worked their tails off that evening showing great work ethic, team work, dedication and care for the facility. Great job Sean and Rich, thank you!

-- Submitted by Mike Starnino

The NBC would like to give a BIG thank you to those who helped NBC weather through the Blizzard of 2022.



IM Operator Steve Abbate on duty at the COB.

A lot of coordination and effort was involved before the blizzard even took place. The weekend consisted of a lot of hard work and long shifts during the event, and then a lot of clean up required after the event into Sunday and Monday. Suffice it to say that a large percentage of NBC employees left on Friday and showed up again on Monday without missing a beat, all thanks to those involved with preparing, managing and doing the physical clean up. Very few issues were reported over the weekend, all really pulled through with flying colors. Operations and Maintenance did a great job working through almost impossible conditions, some working two or three consecutive shifts. Bucklin Point was prepared with an electrician on site for 24 hours in case power was lost. Environmental Monitoring was able collect the necessary samples they needed without any hiccups. Thank you for doing such a great job everyone!

-- Submitted by Meg Goulet



NBC Pipeline

March 2022

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

Calendar of Events *for March*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		1 Board of Commissioners Meeting 11 AM	2 Ash Wednesday	3	4 Payday	5
6	7	8	9	10	11	12
		Spare a Pair Sock & Underwear Drive March 7th - 11th				
13  Daylight Saving Time Begins	14	15	16	17  St. Patrick's Day	18 Full Moon Payday	19 St. Joseph's Day
20 First Day of Spring	21	22	23	24	25	26
27	28	29	30	31		

February Employee Promotions

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

- **Anthony DiIorio** promoted to IM Manager.

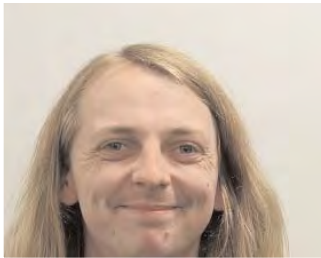
News Briefs...

Welcome...



Meet Brian Thomas!

Brian started on February 13th as an Operator I at Bucklin Point. He resides in East Providence with his wife and daughter. His hobbies include sports.



Meet William Todd!

Bill started on February 27th as an Operator I at Field's Point. He is from Rehoboth, Massachusetts and previously worked for Island Creek Oyster Company before coming to NBC.

Progress on Bucklin Point Upgrades

Construction is moving along at Bucklin Point. This photo shows one of two new structures being constructed at Bucklin Point that will replace several obsolete buildings.

This new state of the art building is part of \$36 million design build project being performed by Daniel O'Connell's Sons, Holyoke, MA, in conjunction with local design partner LLB Architects Pawtucket, RI. The project is on schedule and will be complete in May of 2023.



--Submitted by Greg Waugh

Spare a Pair



NBC will be participating in Spare a Pair Sock and Underwear Drive run by the RI Coat Exchange for NBC's March Charitable Initiative.

Donation bins will be set up in the same locations as the previous collection starting on **Monday, March 7th through Friday, March 11th.**

Unopened, new packages of socks or underwear for adults of all sizes and genders will be accepted. These two items are the most requested/needed by the unhoused community.

For more information about Spare a Pair and the RI Coat Exchange please visit: [RI Coat Exchange](#).

If you have any questions please contact Sophia Andrade at ext. 327.

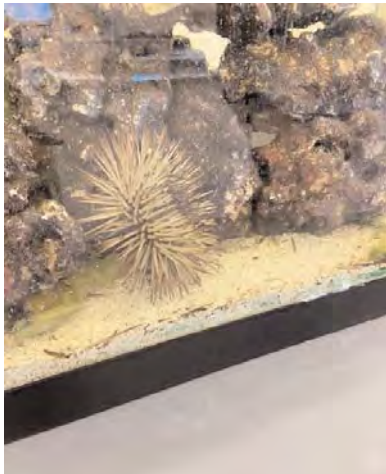
COVID Testing Update

NBC Test Data as of February 28th...

Tests Administered: 1616
Negative Tests: 1594
Positive Tests: 18
Invalid Tests: 4

NBC Performs Sea Urchin Fertilization Toxicity Tests in House

The NBC has been housing some cool creatures in the Water Quality Science Building since April of 2021. Purple sea urchins are being kept in saltwater tanks in the NBC biology laboratory space in order to conduct sea urchin fertilization toxicity



tests that are required quarterly. This test is an EPA requirement and falls under the National Pollutant Discharge Elimination System (NPDES) and the Clean Water Act. EPA uses these toxicity tests to evaluate effluents, monitor and evaluate their impact on receiving waters, and to determine whether a facility's permit and discharge complies with the permit requirements or limits. A "good" or "passing" test for EPA requirements is determined when there is little to no effect on fertilization rates between the receiving waters and effluents.

How is this done?

Nora Lough, Biologist II has two tanks, one for females and one for males and they are fed a diet of romaine lettuce and seaweed. Nora examines the effects of NBC's effluent on sea urchins' reproductive cells after exposure. Sperm cells from a male are exposed to various effluent concentrations and then the eggs from females are introduced to the sperm cells that were previously exposed to the effluent concentrations. Once completed the effects on exposed reproductive cells are compared to determine if the effluents had any effect on fertilization.



The test itself takes 1.5 hours but the preparation stage takes about 3-4 hours. All cells are counted under the phase contrast microscope and about 500 cells are monitored.



Nora just received a new batch of Floridians in February. On average the sea urchins can survive about four months depending on how many times they are used for testing. The current struggle is the tanks are running a little warm, temps need to be between 15-18 degrees celsius, the lab hopes to have a chiller installed in the next fiscal year to solve that problem but otherwise the testing has been successful!

2022-2023 PROVIDENCE BRUINS

GROUP OUTING

With Narragansett Bay Commission
March Group Offer



SATURDAY
MAR 12
7:05 vs BRI
I-SHIRT GIVEAWAY



SUNDAY
MAR 13
3:05 vs BRI

March Game Dates

- Sun, March 6th @ 3:05pm
Sports Bottle Giveaway*
- Sat, March 12th @ 7:05
I-Shirt Giveaway*
- Sun, March 13th @ 3:05

*Giveaway is for First 2000 fans in the arena

Tickets Only \$24 Per Person!

Free P-Bruins Hat included with every ticket!

PURCHASE ONLINE NOW AT:
www.ProvidenceBruins.com/GroupTickets

Then Enter Promo Code:
NARRABAY



PURCHASE 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) 880-4713 or anthony@providencebruins.com.
Purchase by 1 week prior to game date to ensure 100 level seating



NBC Pipeline

April 2022

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 April*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1	2
					April Fool's Day	
					Payday	
3	4	5	6	7	8	9
	Blood Drive 9 AM - 1 PM COB Main Conference					
10	11	12	13	14	15	16
Palm Sunday		Board of Commissioners Meeting 11 AM			Good Friday Passover Begins	Full Moon
					Payday	
17	18	19	20	21	22	23
 Easter					 Earth Day	
24	25	26	27	28	29	30
			Administrative Professionals Day		Payday	

Wellness Incentive Credits

If you have not already taken advantage of the \$500 offered to you through NBC's wellness incentives, click the link below for a list of programs that you may still have time to complete. All wellness appointments must be complete by June 30, 2022.



Click Here: [Wellness Incentive Credits](#)

News Briefs...

Welcome...



Meet Ian Wenskowicz!

Ian, previously an NBC Intern started his position in IT as an Applications Systems Administrator on March 13th. Ian graduated with a BS in Computer Science with a minor in Math & Cyber Security. Ian is from Smithfield, RI and

has a cat named Joline who enjoys hunting his mother!



Meet Lucille Panzitta!

Goes by Lucy or Lu started on March 13th as NBC's Purchasing Support Specialist. She is from Cranston, RI and previously worked for Southwest Airlines before joining NBC. She has a

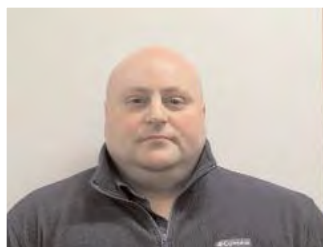
son and enjoys shopping, outdoor activities and loves to travel.



Meet Rhonda Wheaton!

Rhonda started on March 27th as NBC's Retirement Benefits Specialist. She is from RI and received her MBA in HR from Johnson & Wales University. She has a daughter named

Chloe and a cat named Snoopy.



Meet Christopher DeCesare!

Christopher started on March 27th as NBC's Helpdesk Technician II.

March Employee Promotions & Changes

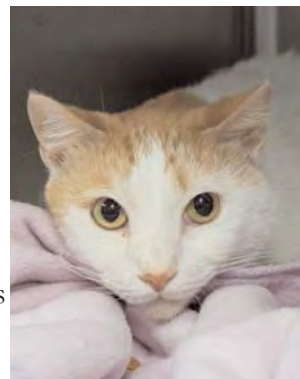
Wishing the following NBC employee success in their new positions...

- **Lindsey Hazard** promoted to General Counsel Assistant
- **Junel Grande** transferred to Environmental Administrative Assistant

April Donation Drive

April's donation drive will be going to the Exeter Animal Shelter.

Donations can be dropped off in the black bins in each building from **Monday, April 4th through Friday, April 8th.**



Chloe, a 10-year old female cat available for adoption.

Items in need:

- non-clumping cat litter
- canned dog and cat food
- kitten food
- bleach
- paper towels
- laundry detergent
- dawn dish soap
- blankets
- toys



Rosie, a young pup about 2-3 years old available for adoption.

For more information and to see the available animals for adoption please visit: www.exeterri.gov and if you have any questions you can contact **Sophia Andrade** at ext. 327.

Stretch for Safety Program Launched at the WQSB

In mid-March, employees at NBC's Water Quality Science Building (WQSB) began participating in a morning stretch program. Led by a Certified Ergonomic Specialist from The Beacon Mutual Loss Prevention Department, employees on both floors received guided instruction on a variety of stretching techniques. Rotating sessions were offered for employees at 7:00 AM and 8:00 AM throughout the week of March 14th.

During "Phase I" of this three-part stretching program, WQSB employees have been introduced to eight different stretches, each of which benefits a different part of the body. From shoulder pinches, to low back stretches, to hamstring stretches, employees are now led by their peers during the morning routine. Afternoon stretching will begin soon. Beacon Mutual will return in April to introduce employees to a different series of stretches in "Phase II." The stretching program has been a good team building exercise within the ES&C Division.



Stretching at work is an important way to control the onset of soft tissue injuries, which account for high workers' compensation and healthcare costs throughout the country. Integrating physical conditioning and health activity into a daily stretch routine can help reverse this trend and increase overall employee wellness.

Whenever stretching on your own, remember to never hold your breath, move slowly through each movement - do not bounce, and stop immediately if you experience dizziness or discomfort.

For more information on the Stretch for Safety Program offered by Beacon Mutual, please contact **Dave Aucoin at x 418**.

For more information click [HERE](#).

Beacon Mutual Insurance Co.

STRETCH

For Safety in the Office

- Extended Arm Circles:** Slowly swing arms forward in large circles 10 times. Repeat 10 times going backward.
- Shoulder Pinch:** Gently pull elbows back, "pinching" shoulder blades together. Hold for 10 count and relax.
- Arm Across Stretch:** Cross arm in front of body at chest level with elbows bent. Pull elbow. Hold for 10 count. Repeat opposite side.
- Biceps:** Take your arms out to the sides, slightly behind you, with the thumbs up. Rotate your thumbs down and back until they are pointing behind you. Hold for 10 count.
- Shoulder Shrug:** Raise your shoulders towards your ears until you feel slight tension in your neck and shoulders. Hold this feeling for five seconds, then relax your shoulders downward into their normal position. Repeat three times.
- Side Neck Stretch:** Stand with back straight. Tilt your head slowly to the left trying to touch your ear to your shoulder. Bring head back to center and repeat on the right.
- Finger Fan:** Hold hands out with palms down. Spread fingers apart, hold for five seconds. Make a fist, hold for five count. Release. Repeat three times.
- Hand Stretch:** Grasp hand and hold fingers with the other hand. Slowly bend the wrist down until you feel a stretch. Hold for five count. Then slowly bend your wrist up until you feel the stretch. Hold for five count. Repeat on other side.
- Back Side Stretch:** Interlock your fingers and lift arms overhead, keeping elbows straight. Press arms as far back as you can. To stretch your sides, slowly lean to the left and then to the right. Hold for 10 count. Repeat other side.
- Upper Back Stretch:** Stand tall with your back straight. Interlock your fingers, palms up, stretch arms above your head until arms are straight. Keep your stomach muscles tight and tucked in, and DO NOT arch your back. Hold for 10 count.
- Low Back Stretch:** While standing, feet shoulder width apart, place hands at lower back. Slowly arch back while looking up. Hold for 10 count.
- Hamstring Stretch:** Put one leg forward and pull toes upward. Lean forward at the hips keeping front leg straight. Hold for 10 count then change sides.


This material is being provided to you as a service of The Beacon Mutual Insurance Company for informational purposes only. It is not intended to constitute an offer of insurance or any other financial product. Please contact your agent for more information. The Beacon Mutual Insurance Company is not responsible for development and implementation of your loss prevention policies. You should consult your agent for specific information to inform and appropriate advice.

The Beacon Mutual Insurance Company, One Beacon Centre, Warwick, RI 02891 | (401) 925-2667 | www.beaconmutual.com/safety

-- Submitted by Dave Aucoin

Thank You!

For Helping Someone Else



Narragansett Bay Commission

Your blood drive had **15** presenting donors. Resulting in **13** donations. Helping to save **39** lives!

See you soon!



Help Us Name the Tunnel Boring Machine

Do you have a child in grades K-12?

If so, we need their help! Help the NBC name the Tunnel Boring Machine (TBM) that will help bring cleaner water to our state. NBC needs a fun and powerful name for this machine!

The TBM will dig a 2.2 mile tunnel approximately 125 feet below ground to create a system that will capture stormwater runoff and keep our water clean. The RestoredWaters RI project is designed to capture the stormwater runoff that has been dirtying our local waters for many years and send it to the NBC for treatment.

This machine is incredibly big and weighs about 1,000 tons and can be more than 400 feet long. Click the link to watch a quick video of this machine in action - <https://youtu.be/H95wFgwtqpE>.

The photo below gives you a sense of how big the machine is and the size of the massive cutting blades that lead the TBM through the tunnel.

Submissions can be sent to info@restoredwatersri.com

Deadline for entries is May 30, 2022.



2022 Earth Day River Clean Up Grant Winners

NBC would like to announce the grantees for the 2022 Earth Day River Clean Up Grant Program.



Grantees for this year are:

The Squantum Association, Neutaconkanut Hill Conservancy, Inc., Woonasquatucket River Watershed Council, Riverside Renaissance Movement, Edgewood Waterfront Preservation Association, City of East Providence Public Works Refuse & Recycling, Blackstone River Valley National Heritage Corridor, Partnership for Providence Parks, BVTC/Keep Blackstone Valley Beautiful, Town of Smithfield, Save the Bay, Blackstone River Watershed Council/Friends of the Blackstone, Lincoln Conservation Commission, City of Central Falls Parks & Recreation and Community Services Department, The Empowerment Factory, and Waterman Street Dog Park Association.

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

COVID Testing Update

NBC Test Data as of March 31st ...

Tests Administered: 1679

Negative Tests: 1655

Positive Tests: 20

Invalid Tests: 4



NBC Pipeline

May 2022

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Calendar of Events *for May*

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

Wellness Incentive Credits

If you have not already taken advantage of the \$500 offered to you through NBC's wellness incentives, click the link below for a list of programs that you may still have time to complete. All wellness appointments must be complete by June 30, 2022.



Click Here: [Wellness Incentive Credits](#)

News Briefs...

Welcome...



Meet Robert Capron!

Robert started on April 10th as an Operator I at Field's Point



Meet Luciana DiBiasio!

Luciana started on April 10th as a Pretreatment Technician.



Meet John Zuba!

John started on April 10th as a Pretreatment Technician. He is from Smithfield, RI and has two children, Jacob and Emma.



Meet Stefanie Howell!

Stefanie started on April 10th as Legal Counsel. She has two children and her hobbies include photography and video games.



Meet Cynthia McQueen!

Goes by Cindy, started on April 10th as the Assistant Laboratory Manager. She is from Tiverton, RI and previously worked as a

Chemist at Alpha Analytical before coming to NBC. She has 3 children, 1 dog and 2 cats and enjoys the beach.



Meet Liam Walsh!

Liam started on April 24th as an Operator I at Field's Point. He is from Coventry, RI.



Meet Ryan Porter!

Started as on April 24th as an Operator I at Bucklin Point.

COVID Testing Update

NBC Test Data as of April 30th ...

Tests Administered: 1798

Negative Tests: 1772

Positive Tests: 22

Invalid Tests: 4

April Employee Promotions & Changes

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

Christopher Dracoules - Assistant IM Manager

Troy Zillich - Mechanic II

Sophia Andrade - Assistant Permits Coordinator

Michelle Asels - Financial Analyst

Dan Barlow - Inventory Control Clerk

Esther Leiva - FP Clerk

Two sets of Ducklings Call BP Home

BP has two new families of geese calling the grounds home. The adorable families, have been spotted near the primary and blower buildings at BP.



RICWA Presents Four Prestigious Awards to BP & Two NBC Employees

The Rhode Island Clean Water Association (RICWA) announced that four awards will be presented to NBC, two to the BP WWTF and two others to two staff members, Mark Healy and David Weisman for 2021. An awards banquet will be held to honor to BP, Mark & Dave at the Cranston Country Club on May 13th. **Awards are as follows...**

BP Receives RICWA Gold Award: 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. The facility has about 250-300 opportunities to violate permit requirements every-month. Exceedance of just one parameter takes you out of the running from receiving this award.

The RICWA Gold Award is a true testament to the excellent work done by the staff at Bucklin Point who make sure they are monitoring and treating the wastewater 24/7 to stay in compliance.

BP Receives A. Joseph Mattera Safety Award: 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.



Bucklin Point Aerial Shot.

BP Maintenance Supervisor, Mark Healy Receives Robert J. Markelewicz Award: This award is given to an individual whose outstanding contributions in wastewater treatment system main-

tenance. Mark has been an employee for 29 years, working various shifts in Operations and Maintenance. Due to his tenure and operating and maintenance training courses under his belt, he is a great asset to training new employees on process control topics and mechanical maintenance.

IM Operator III, David Weisman Received Collections Systems Operator of the Year: is given to an individual whose outstanding contributions in advancing collections systems and knowledge. The IM section of NBC is critically responsible for maintaining NBC's combined sewer collection system throughout the 10 cities in the NBC service area. David successfully operates all of the IM sewer cleaning equipment, including the Vector trucks and diggers. David had also been the chairman of the IM Safety Committee for the last four years and has been very dedicated to making sure work place injuries decrease. IM has had no days-away-from-work from 2019-2021 under David's watch.

Congratulations to all!

Easter Bunny Makes a Special Appearance at IM

On April 14th the IM crew had an Easter egg hunt and a surprise visit from the Easter Bunny right before the holiday weekend. Any guesses who the Easter Bunny is?



--Submitted by Nicole Klebauskas

NBC Honors Twelve Companies for Perfect Compliance

This year marks the NBC's 27th Annual Merit Award celebration honoring twelve companies in the NBC service area for perfect compliance, a Stormwater Management Award and a Environmental Merit 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. Awards were mailed to the recipients instead of holding our annual awards breakfast due to COVID-19 restrictions.



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: Godfrey & Wing, Inc. dba Impco, Inc., Induplate LLC, John H. Collins & Sons, Manchester Street LLC, Providence Journal Co. - Production Facility, Rhode Island Resource Recovery Corporation, Stackbin Corporation, Tanury Industries, PVD, Inc., Technodic, Inc., Tedor Pharma, Inc., Tiffany & Company, and Univar USA, Inc.

NBC awarded Farm Fresh RI the 2021 **Stormwater Management Award** for the second year in a row. 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.

Lastly, the **Environmental Merit Award** was awarded to Teknor Apex Company for their "Operation Clean Sweep" initiative, which aims to dramatically reduce plastic pollution from their manufacturing facility by reducing powder, pellet, and flake loss to the environment through a system of auditing, risk ranking, and corrective actions. They identified 59 areas of potential loss at their campus and have implemented dozens of improvements targeted where they would have the most impact including building berms in tank farms, paving projects, installing piping systems, replacing dust collectors, and upgrading valving systems.

Retirement Benefits Specialist

We have a new Retirement Benefits Specialist here at NBC! Rhonda Wheaton comes to NBC with a background in Human Resources. She holds an MBA from Johnson & Wales University and SHRM-CP certification from the Society for Human Resource Management.



You may have noticed that many informational guides on SharePoint are beginning to be updated with her contact info. Rhonda is currently expanding the services and support of NBC's retirement plans and is putting together informational guides and educations for the benefit of all NBC employees.

In the coming months our advisement partner, Strategic Retirement Partners (SRP), will be conducting onsite training regarding our retirement plans, investments strategies, and planning for your future. Be on the lookout for further communications!

If you have any questions about your retirement plans, upcoming retirement, or planning for your future retirement please don't hesitate to reach out to Rhonda or stop by and introduce yourself! She is located on the 2nd floor in the Finance department.

Tunnel Boring Machine Makes its Arrival

The TBM started its spring arrival in many pieces on April 21st. The transport to the jobsite took place overnight, starting around midnight with police escorts and went off without a hitch. Stay tuned for more updates...





NBC Pipeline

June 2022

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Calendar of Events *for June*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	Payday 17	18
19	20	Flag Day Full Moon	22	Fun Run Roger Williams Park 5-9 PM	24	25
 Father's Day	20	 First Day of Summer	22	23	Payday	25
26	27	Board of Commissioners Meeting 11 AM	29	30		

Wellness Incentive Credits

Reminder: All wellness appointments must be complete by June 30, 2022. In addition, the NBC has added the Corporate 5k Fun Run at Roger Williams Park as an incentive. If you are participating please send proof of registration to **Crystine Marandola** to earn \$100.



Click here to see the list: [Wellness Incentive Credits](#)

News Briefs...

Welcome...



Meet Jahanna Burke!

Jahanna started on May 22nd as NBC's Environmental Monitoring Clerk. She is from the Providence area and is a graduate of URI. She loves to read and write.



Meet Alisha Grandin!

Alisha started as a Principal Budget Analyst on May 22nd. Alisha is from Narragansett and has three children. She enjoys art, sailing and watching Criminal Minds. Alisha has her masters degree in Investment Analysis.



Meet Eileen McNeil!

Eileen started on May 8th as an Operations Supervisor for FP. Eileen is from San Diego, previously working for the city's WWTF and has an Associates Degree in Civil Engineering. She loves mosaics, Mexican food, cars and New England so far! Her dream is to one day own a 1971 Monte Carlo.

NBC Tuition Reimbursement

Applications for summer tuition reimbursement for Local 1033, Council 94 and Non-Union Employees must be submitted to **Karen Musumeci** by **Friday, June 10th.**

Each application must be accompanied by a short course description taken from the college catalog. Blank application forms may be obtained from Human Resources or by going on Baynet to General Information > Benefits > Tuition Reimbursement Programs.

If you have any questions about the program, you may contact **Karen Musumeci** at ext. 322.



COVID Testing Update

NBC Test Data as of May 31st ...

Tests Administered: 1938
Negative Tests: 1904
Positive Tests: 28
Invalid Tests: 6

May Employee Update

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


Joe Guerreiro promoted to Lab Sample Compliance Coordinator

Pedro Sanders promoted to IM Inspector

Deb Burchfield, Customer Service Representative, retired.

Thank You!

For Helping Someone Else

 Rhode Island Blood Center

Narragansett Bay Commission

Your blood drive had **16** presenting donors.
Resulting in **11** donations.
Helping to save 33 lives!

Next Blood Drive will be
Wednesday, August 10, 2022
Hope to see you then!



Congratulations...

To NBC for another **AA-rating** from Standard & Poors!



To NBC on receiving **The Pawtucket Foundation's Heritage Award** for outstanding long-term commitment to the quality of economic and community life in the City of Pawtucket. NBC is currently working on Phase III of the CSO Project in Pawtucket, the construction of the Pawtucket Tunnel. The tunnel will help reduce storm-related sewer discharges by 93% in the Blackstone River. Executive Director Laurie Horridge and Chairman Vincent Mesolessa accepted the award at the May 4th event on behalf of NBC.



The Water Environment Federation (WEF) has presented NBC with an **Nsmart (Nutrient Smart) Silver Partner Award**.



The award recognizes water utilities that are leaders and innovators in reducing nutrient loadings in waterways. The Silver Partner recognition of this award is for choosing to focus on reducing nitrogen, phosphorus, or both. NBC received the silver tier for having reduction between 70-85%.

In addition NBC was also awarded the **Innovator Treatment Technology Award** for large utilities. NBC's application showcased an innovative approach to implementing a technology that significantly enhanced nutrient management.

NBC was awarded during a virtual ceremony on May 19th. NBC will also be recognized at WEFTEC for these awards in New Orleans October 10th-12th.

The RICWA recently awarded NBC four prestigious awards as mentioned in the May Pipeline. Bucklin Point received the **Gold Award** and the **A. Joseph**

Mattera Safety Award, IM Operator III David Weisman received Collections Systems Operator of the Year, and BP Maintenance Supervisor Mark Healy received the Robert J. Markelewicz Award. Recipients received their awards on Friday May 13th at the Cranston Country Club. For more information on these awards visit the May Pipeline.



NBC staff at RICWA Awards Ceremony. Photo Credit: Mike Spring. From left to right: Tony DiIorio, Kerry Houghton, Kim Sandbach, TJ Harrington, Dave Weisman, Laurie Horridge, Fred Diez, Mark Healy, Jim McCaughey, Nora Lough & Marc Pariseault.

BP Construction Update

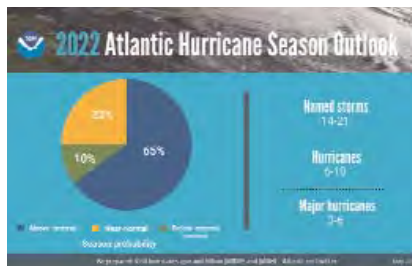
Construction is moving along at Bucklin Point. Below is an aerial image taken of the new maintenance building, expected to be complete in May of 2023.



-- Submitted by Greg Waugh

2022 Hurricane Season Forecast

The National Oceanic and Atmospheric Administration (NOAA) has released its forecast for the Atlantic Hurricane



Season, which runs from June 1st through November 30th each year. Forecasters predict an above-normal season with an estimated total of 14-21 named storms compared to the 30-year average of 14, 3-6 of which are predicated to develop into major hurricanes (Category 3, 4 or 5). Although this season is not expected to be as severe as the record-breaking series of storms that slammed the U.S. in 2020, NBC employees and their families are still encouraged to begin planning now for potential storm impacts. 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

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 reacclimated to the warmer temperatures. Heat related illnesses such as heat exhaustion and heat stroke are directly related to such risk factors as high temperature and humidity, direct sun exposure, physical exertion, medications and not drinking enough fluids.



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

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

Employees are encouraged to view the following OSHA video that reinforces the importance of working safely in the heat: Remembering Tim: A Life Lost to Heat Illness at Work

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

-- Submitted by Dave Aucoin

Rainy but Successful Shellfishing Transplant

NBC hosted another successful shellfishing transplant on Thursday, May 19th. There were 44 Shellfishermen that participated in the Providence River; 1,307 bags were collected and 65,350 lbs were transplanted.



Clean water is essential to this multi-million dollar industry. Thanks to the success of NBC's CSO Phase I tunnel, shellfishermen see an extra 65 days on average per year for shellfishing in Area A and about 45 days in Area B.

Great job to all those who helped make this another successful shellfishing transplant event, especially during the rainy weather!

NBC in the News

Central Falls and the NBC have teamed up again for green stormwater and a new athletic field.

Preliminary work for the project began

the end of May at Pierce Park on High Street. The baseball field has not been used for several years due to contamination. The NBC will address the stormwater separation problem and refurbish the current baseball field as well as installing a new basketball court, built of porous pavement to allow rainwater to pass through it and absorb into the groundwater table.

The project is part of the CSO Abatement Program and is expected to be completed by September 2022, with the baseball field ready for spring 2023. Read the full article [HERE](#).



Photo Credit: Valley Breeze, Pierce Park.

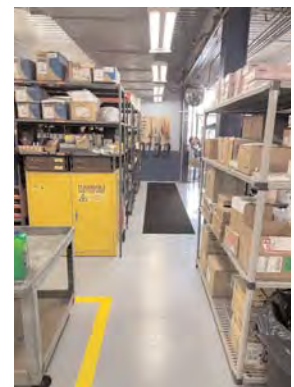


To EVERYONE who assisted FP with the RAS leak that occurred on Wednesday, May 25th. FP had a pipe break in the RAS vault that completely filled the vault and almost overflowed. A Godwin pump was set up right away, Maintenance worked their magic and within a few hours the plant was back to normal with the exception of the clean-up and ordering parts.

This was truly a team effort and NBC is grateful for all your hardwork and dedication. Thank you to **O&M staff** for providing supplies and equipment, to **Operations** for isolating the issue, to the **Electricians** for isolating power for a safe working environment, to **Maintenance** for getting down and dirty to fix the leak and **BP** for the back-up Godwin pump and the offered manpower if FP needed it. Each section did an amazing job turning a disaster into a manageable situation!

--Submitted by Nathan Boiros & Eric Bogosian

.....
A big shout out to **Inventory Control Clerks Dan Barlow and Joe Devitt** and **Asset Management Administrator Frank Rodrigues** for all their effort with cleaning and re-organizing the FP O&M Inventory shop. While not complete, there have already been so many improvements such as found items, consolidation, organization, not to mention the overall cleanliness of the place. Such a pleasure to see these improvements, keep up the good work!



--Submitted by Meg Goulet




NBC Pipeline

July 2022

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Calendar of Events *for July*

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

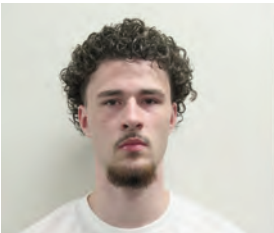
News Briefs...

Welcome...



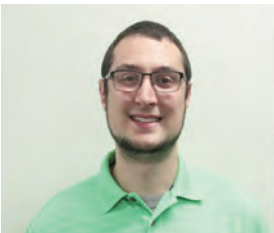
Meet Erika Loredo!

Erika started on June 19th as NBC's Control Systems Associate. She was born in Columbia and currently lives in Lincoln, RI. Erika is married and has a son, daughter and a pug named Baxter. She loves picnics and watching her favorite show, Modern Family.



Meet Jaiden Alvarado!

Jaiden started on July 3rd as a Field's Point Operator I.



Meet CJ Spellman!

CJ started as an Environmental Engineer on July 3rd. He is from Rocky Hill, CT and received his PhD from URI in Civil Engineering. CJ coaches ice hockey, enjoys watching CSI and spending time with his dog Otis.



Meet Teddy Lopez!

Teddy started on July 3rd as a IM Operator II.

Photos Wanted!

The NBC Budget Team wants to feature your photos in the upcoming FY 2024 Budget! We are looking for photos taken by NBC staff of the happenings on NBC campuses, staff in the field (both posed or candid) and of course, Narragansett Bay!



Please be sure to include dates, locations, descriptions, and/or names with each photo. All photos can be sent to **Budget_Inquiries@narrabay.com** for a chance to be featured in the FY 2024 Budget.

We look forward to seeing your submissions!

COVID-19 Testing Update

COVID-19 rapid test data, as of Wednesday June 29th...

Negative Tests: 1950

Positive Tests: 28

Invalid Tests: 6

Tests Administered: 1984

June Employee Promotions

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

Amy Chabot promoted to Finance Administrator

Jae Pezullo promoted to Purchasing Coordinator

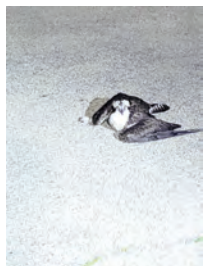
Carolina Diaz promoted to Assistant Fiscal Services Supervisor

Wildlife at NBC

A groundhog has made himself home on the NBC grounds. He has been spotted for weeks now traveling back and forth between the COB, Gravity Thickeners, WQSB and storage building. Most recently he has been spotted right outside Brenda Smith's window.



An injured osprey was found at FP on June 29th. RI Wildlife Rehab was contacted and the osprey was transported there by Operator John Colson. Unfortunately the bird did not make it after all our efforts.



Cooling Towels Supplied to all NBC Employees

NBC's TAC Section launched a Safety Awareness Program in 2015. The goal of the program is to promote employee awareness of and involvement in safety-related activities, such as hazard identification and correction throughout the course of daily work activities at NBC. As most will recall, travel-sized first aid kits, portable power chargers and multi-tool flashlights have been purchased and distributed to all employees in recent years, as a means to further promote the program.



New for 2022, customized cooling towels have been purchased for all employees. Note that these towels should never be worn around moving pieces of machinery and should not be shared among co-workers.

These towels are activated with cool water, are machine washable, and have been provided to all employees to help you stay cool and comfortable this summer.

With a national program that is targeting workplace temperature safety indoors and outdoors, the Occupational Safety & Health Administration (OSHA) will be enforcing the program this summer and into the fall, with the goal of implementing a permanent Heat Illness Prevention Standard. By continuing to provide employees with adequate hydration, shade and job breaks while working in excessive heat, NBC continues to serve as a model employer in the eyes of state and federal regulators. These cooling towels are simply another “tool in the toolbox” of NBC's Safety Program.

Special thanks to TAC Interns **Georgia Bernard** and **Casey Wallace** for helping organize and pack all of this year's items!

The TAC Section would like to wish all NBC employees a safe and healthy summer season.

— Submitted by Dave Aucoin

Kent Heights Teacher, Laurie Reid, Receives NBC Watershed Explorers Environmental Educator of the Year Award

The NBC has selected Laurie Reid, a second-grade teacher at Kent Heights Elementary, as its 2021-2022 NBC Watershed Explorer Environmental Educator of the Year.

NBC Environmental Education Coordinator, **Cynthia Morissette** presented Reid with the award during a Watershed Explorer field trip to the Ten Mile River.

Reid has been an educator in the East Providence school system for 33 years, has taught in grades 2-6 and served as a guidance counselor for 15. Reid has participated in the NBC Watershed Explorers Program for 10 years. The program was a big part of her curriculum. This year her students were Morissette Cadets, learning as much about watersheds and the Narragansett Bay Commission as they could. Her class also decided to try to meet a goal of erasing waste and reuse as many materials in their classroom as they could.

Reid retired at the end of this academic school year. Her presence and participation in the Watershed Explorers program will truly be missed.



What Plastic Item are YOU Willing to Live Without?

Plastic Free July is a global movement that helps millions of people be part of the solution to plastic pollution. *What plastic item would you be willing to go without forever?*



One small change in your daily routine can make a huge difference. Visit their website and take on the challenge! If you're undecided on what plastic item to do away with take their pesky plastics quiz.

NBC Staff Attend PBN Best Places to Work Celebration

The NBC was selected as one of the Best Places to Work in RI for 2022 by the Providence Business News for the 12th consecutive year! Awards are based on HR policies and employee surveys, NBC was one of twelve companies chosen in the large company category. Sixty-nine companies were honored at the Crowne Plaza on June 8th, the first in-person celebration since 2019.

Thank you all for completing surveys and making this award possible!



Top left to right: Talia Cheshier, Junel Grande, Holly Ialongo, & Eric Tift. Bottom, left to right: Bob Baglini, Mike Starnino, Dionne Bigotti, Patty Pinilla, & Michelle Grossi.

TBM Cutterhead is Lowered into the Shaft

On June 22, Chloe the Clean Water Cruncher's cutter head was lowered into the tunnel shaft, in part of continuing construction of TBM. Unfortunately, the cutterhead became wobbly due to the support underneath and had to be pulled out. The plan is to lower it back in sometime mid-July. Stay tuned for more CSO Phase III construction updates...



THANK YOU

A big thank you to IM staff for the great work they did on the landscaping on the NBC grounds. NBC unfortunately still does not have a landscaper to do the work and were in desperate need of some sprucing up! IM cleaned up the beds around the buildings and parking lots, spreading 60 yards of mulch throughout.

What a difference their work has made! Thank you IM, you guys rock!



NBC Staff Participate in Corporate 5K Fun Run

NBC staff participated in the Corporate 5K Fun Run on June 16th at Roger Williams Park. Staff from Operations, Engineering, Accounting and ESC groups participated in the fun event and even earned a wellness incentive while doing it. It was a great way to hang out with co-workers, get some exercise and celebrate afterwards with food, beer, music and entertainment. Thank you all for representing NBC!



Left to right: Nora Lough, Eliza Moore, David Buckner, Meg Goulet, Kim Sandbach, Tony Dalmazzi, Amy Chabot, Joe Moniz, and Joe Medina.

Special thanks to **Nora Lough** for organizing!



NBC Pipeline

August 2022

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Calendar of Events *for August*

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

COVID-19 Testing Update

COVID-19 rapid test data, as of Thursday, July 28th...

Negative Tests: 2005

Positive Tests: 28

Invalid Tests: 7

Tests Administered: 2040

News Briefs...

Welcome...



Meet Evan Matz!

Evan started on July 31st as NBC's Laboratory Technician. He is from Seattle, Washington and has a background in Environmental Science. He enjoys rock climbing and kayaking in his free time.



Meet Amanda Musumeci!

Amanda started on July 31st as NBC's Assistant Permits Coordinator. She is from the Providence area and has a bachelors degree from Rhode Island College.



Meet Rupert Campos!

Rupert started on July 31st as a Operator I at Bucklin Point.

Join us to ZAP the Blackstone: August 27th!

In September 1972, 10,000 volunteers lined the banks of the Blackstone River to remove tons of trash, appliances, furniture, even cars and a school bus from its banks. ZAP The Blackstone became the largest one-day regional environmental clean-up in American history!



NBC will join thousands of others in celebration of the 50th anniversary of ZAP at a volunteer clean-up in Pawtucket on Saturday, August 27. Join us for a hour or more to show the Blackstone River some love! Equipment, snacks and an NBC RestoredWaters RI t-shirt will be provided to all volunteers.

Contact **Jamie Samons** to volunteer or for more information. Check out <https://www.zaptheblackstone.com/> for the lowdown on this exciting day of clean water advocacy in action.

August Blood Drive

GIVE BLOOD

Narragansett Bay Commission

Wednesday, August 10, 2022
9:00 am - 1:00 pm
COB Main Conference Room
1 Service Road, Providence

DONATIONS BY APPOINTMENT!
(walk-ins will be welcomed if availability permits at time of arrival)
www.ribc.org/drives to book
Sponsor Code 0665

PINT FOR A PINT Give blood and get a free pint from a participating brewery or pub. This is yours to give to your community!
All donations receive \$1000 in tax credits. Must be 17 years of age or older and a resident of Rhode Island. Visit www.ribc.org for complete COVID-19 safety protocols. Your time is appreciated for heart donors.

TAP ROOT **WHALERS** **LINE SIDER**

Appointments are preferred however walk-ins will be welcomed if space permits. Please remember to eat, drink, and bring your ID with your name and photo. Mask requirements may change depending on CDC guidelines. Visit www.ribc.org for complete COVID-19 safety protocols.

Rhode Island Blood Center 800.283.8385 • ribc.org [Facebook](https://www.facebook.com/ribc.org) [Instagram](https://www.instagram.com/ribc.org)

The Landscaping Continues...

We weren't kidding last month when we said NBC needed some sprucing up! The landscaping project is still on going. **FP Operations** staff have been weeding the beds at the WQSB, along Ernest Street and throughout the plant, and finishing off with some mulch.

A big thank you to FP Operations and IM for being able to fit this into their busy schedules!



Did You Know?

NBC reuses treated effluent to irrigate 8300 sq ft of lawn at the Field's Point Plant. This saves over 80,000 gallons of potable water per season. A person could shower eight minutes every day for 10 years with that amount of water!



July Employee Promotions & Retirements

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

Promotions:

Richard Hoppman was promoted to Mechanic I at FP.

William Todd was promoted to Process Monitor at FP.

John Cavanagh was promoted to Process Monitor at FP.

John Fascitelli was promoted to Operations Support Supervisor at FP.

James McCaughey was promoted to Deputy Director within the Administration section.

Ashley Petteruto was promoted to Collections Paralegal within the Legal Section.

Karina Taveras was promoted to Assistant Payroll Supervisor within the Accounting section.

Michael Murphy was promoted to Customer Care Manager within the Customer Care section.

Transfers:

Madlin Severino transferred to Assistant Administrative Coordinator within the Administrative section.

Lucille Panzitta transferred to Customer Care Representative within the Customer Care section.

Kayomie Polanco transferred to Customer Care Systems Analyst within the Customer Care section.

Retirements:

Sandra Brown, Pretreatment Clerk, retired on July 29th after 23 years with NBC.

Intern Spotlight

NBC has 11 interns this summer working in various departments, some are repeat interns from last year.

THANK YOU for all your help throughout this summer! Best of luck to and you all on the upcoming school year and thank you for being such awesome NBC interns!



From L. to R: Mackenzie Payne, Jacob Golenia, Kiley Marandola, Morgan Plouffe, Justin Galego, Eric Mitigny, Georgia Bernard & Casey Wallace. Missing: Allyson Stenovich, Jessica Galego, & Gabrielle Bucci.

Commissioners visit BP Tunnel Construction Site

On a very hot, July 14th, NBC commissioners visited the the BP tunnel construction site to check out “Chloe the Clean Water Cruncher” for the first time and see the progress that's been made 125 feet below ground.



Garden Showcase

NBC has some very avid gardeners throughout the organization and we'd love to see them! Send us a picture to be featured in September's Pipeline! Pictures can be sent to **Jamie Samons**.





NBC Pipeline

September 2022

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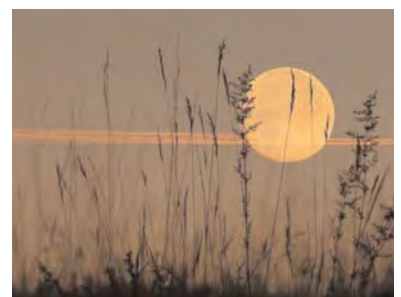
Calendar of Events *for September*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1	2	3
					Payday	
4	5	6	7	8	9	10
	 Labor Day HOLIDAY					ZAP Revival Celebration Full Harvest Moon
11	12	13	14	15	16	17
					Payday	
18	19	20	21	22	23	24
				 First Day of Fall		
25	26	27	28	29	30	
					Payday	

Harvest Moon: September 10

The full moon that happens nearest to the fall equinox (September 22 or 23) always takes on the name “Harvest Moon.” Unlike other full moons, this full moon rises at nearly the same time—around sunset—for several evenings in a row, giving farmers several extra evenings of moonlight and allowing them to finish their harvests before the frosts of fall arrive.

Speaking of harvests, check out page 4 to see some awesome gardens from NBC staff!



News Briefs...

Photos Wanted!



The NBC Budget Team wants to feature your photos in the upcoming FY 2024 Budget! We are looking for photos taken by NBC staff of the happenings on NBC campuses, staff in the field (both posed or candid) and of course, Narragansett Bay!

Please be sure to include dates, locations, descriptions, and/or names with each photo. All photos can be sent to Budget_Inquiries@narrabay.com for a chance to be featured in the FY 2024 Budget. We look forward to seeing your submissions!

NBC in the News



Recognize this face? On August 8, IM's **Anthony Ciacciarelli** was interviewed for Channel 12 regarding working outdoors in the extreme heat. At the time, Anthony was with National Water Main's crews cleaning siphons at Charles & Mill Street in Providence. You can view the entire clip here.

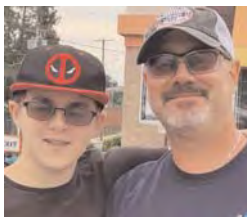
On August 24, CSO Project Manager Kathryn Kelly spoke with Dante Bellini on WPRO regarding NBC's Phase III CSO Project, RestoredWaters RI. Listen to the entire interview here.

Congratulations!!



To **Jared Urban** and his wife Chelsea on the birth of baby Maxwell Anthony Urban on August 5!

To Ethan Ciacciarelli, son of **Anthony Ciacciarelli**, on getting his driver's license on August 17 and driving to school for the first day of his senior year!



A Benthic Bonanza

From Eliza Moore Senior Environmental Scientist:

I just came across this really great Story Map about recovery of the benthic communities of Narragansett Bay, created by our friends over at the Narragansett Bay Estuary Program. A highlight-reel of benthic video footage from our monitoring is included, and the NBC is acknowledged as a partner studying these benthic conditions. Please enjoy and share!



Welcome

Nicole Skyleson
Environmental Scientist



Nicole is originally from Quincy, MA and now lives in Rehobeth. She has a BS in Environmental Geology and a Masters in Public Administration. In her free time, she enjoys hiking, gardening, and cooking.

Jerome Harris
Operator I, FPWWTF



Jerome is a PVD native. He trades stocks in his free time (he has multiple certifications on trading strategies) and he is a poet! Jerome's 9-year old son plays for the 10U Cowboys tackle football team.

Yhojana Henao
Customer Care Fiscal Clerk



Yhojana is originally from Colombia. She has a BA in Psychology and previously worked as Treatment Coordinator at Seven Hills RI. She lives with her partner and two daughters.

Christopher Watson
Operator I, BPWWTF



Chris was born and raised in Providence. His hobbies include 3-D printing and drone flying. He has two children; their favorite travel destination is Florida.



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 2022 is “A Lasting Legacy. The life you’ve built is worth protecting. Prepare for disasters to create a lasting legacy for you and your family.” Click on this graphic to view a list of planning tools that NBC employees and their families can explore and implement.



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 fireproof safe or a safety deposit box
- Ensure that at least one family member is trained in first aid and CPR

Submitted by Dave Aucoin

COVID Rapid Test Data

As of Wednesday, 08/31/2022

Negative Tests:	2032
Positive Tests:	29
Invalid Tests:	7
Tests Administered:	2068

CSO Phase III Update

Work on CSO Phase III, also known as RestoredWaters RI, is moving along rapidly!

- Tunnel boring machine (TBM) assembly continues at 804 School Street and will launch later this month.
- Drilling and casing installation continues for the future drop shaft at 555 Roosevelt Avenue.
- Drill excavation of the future drop shaft at 250 Front Street is substantially complete.
- Construction work continues for the Green Stormwater Infrastructure (GSI) at River Street, Samoset Avenue, and High Street in Central Falls. Underground infiltration chambers, tree trenches, and porous pavement will help capture runoff from rain storms.



TBM cutterhead being lowered into the main drop shaft at 804 School Street, Pawtucket. Photo courtesy of Stantec.

NBC Receives \$55M WIFIA Loan

On July 27, the USEPA announced a \$55 million Water Infrastructure Finance and Innovation Act (WIFIA) loan to the NBC. This is the NBC's third WIFIA loan; it will help finance upgrades to increase climate resiliency at the Field's Point WWTF.

The project replaces the odor control system, implements improvements to disinfection and de-chlorination systems, and constructs a new septage receiving station. Additionally, the project will support the installation of a solar carport that will contribute to NBC's green energy portfolio.

A big thank you to **Karen Giebink, Mike Cook**, and Finance staff for their efforts to close on this loan!



GREAT GARDENS!

NBC staff have many talents, including some very impressive gardening skills. Thanks to everyone for sharing these wonderful photos!



Bob Baglini and his wife **Jenni** are masters at pepper growing, and the air-fried stuffed peppers look delicious!



Eugene Sorkin credits his wife with this fantastic harvest.



Eliza Moore calls her garden her "happy place" and it's easy to see why!



Gail Degnan's impressive garden makeover repurposes hostas from her mother's garden.

NBC Joins 10,000 Volunteers to ZAP The Blackstone!

On Saturday, July 27, NBC staff, along with representatives from our CSO Phase III contractors Stantec, CB3A, AECOM, MWH, and Pare, joined 10,000 other volunteers across the Blackstone Valley to participate in the 50th anniversary of ZAP The Blackstone. The original ZAP, held in September 1972, was the largest single day river-clean up

in Rhode Island and Massachusetts history and this year's celebration lived up to its historic precedence.

Special thanks to **Rich Bernier** and his wife **Audrey**, **Kathryn Kelly**, **Dave Bowen**, **Walter Palm**, and **Evan Matz** and his girlfriend **Marie** for pitching in to clean the riverbanks. YOU PEOPLE ROCK!



Mark Your Calendars!
Saturday, September 10, 11 AM - 6PM
at the Old Slater Mill
a ZAP Celebration
Live music, food trucks, informational vendors, and loads of family fun
AND IT'S FREE!





NBC Pipeline

October 2022

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Calendar of Events *for October*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
2	3	4	5	6 NBC Golf Tournament 	7	8
9	10  Columbus Day HOLIDAY	11  Flu Shots: BP	12	13 Flu Shots: COB	14 Payday	15
16	17	18	19	20	21	22
23	24	25	26	27  Pumpkin Decorating Contest	28 Payday	29
30	31  Halloween!					

Shout Out!

Big thanks to the following Bucklin Point staff who have stepped up to fill **52** overtime events totalling **369.68 hours**:



Joe Garganese 9 times
 Jesse Gomez 7 times
 Sonia Sanchez 6 times
 Bernard Harwood 5 times
 Ed Midgeley 5 times

Mike Reilly 5 times
 Domingos Fontes 4 times
 Robert Arraial 3 times
 Cole Paolo 3 times
 Andre Dixon 2 times

Marcus Brown 1 time
 Gus Padilla 1 time

News Briefs...

Happy Anniversary, Sam Celone!

On September 20, 2022 Purchasing Manager Sam Celone officially became the longest-serving employee in the history of the NBC!

Sam joined the Commission in 1982 as a staff accountant---one of only a handful of staff of the newly-formed organization. Over the years, he has seen the organization grow in size and international reputation.

Thank you, Sam, for 40 years of service to Narragansett Bay, NBC ratepayers, and your fellow employees!



SAM CELONE
40 Year Anniversary at NBC!
September 20, 2022

Flu Shot Clinics

Getting an annual flu shot protects you, your family, and your community against the ever-changing influenza virus, according to the Centers for Disease Control.

NBC's annual flu shot clinics will take place on **Thursday, October 6** at the COB and **Tuesday, October 11** at Bucklin Point. Registration is required for both dates as there will be very limited resources available for walk-ins. COVID precautions remain in place: stay home if you feel sick and mask up if you are unvaccinated.

To register:

- Visit www.thewellcomp.com/pathlogin.aspx
- Enter login ID **NarrBay1006** for October 6 or **NarrBay 1011** for October 11, or scan the QR codes at right.

OCTOBER 6



OCTOBER 11



PUC Visits NBC Facilities

On Tuesday, September 20, all three Commissioners from the Rhode Island Public Utilities Commission and other staff from the PUC and the RI Division of Public Utilities visited Field's Point, Bucklin Point, the Water Quality Sciences Building, and the CSO Phase III

Facilities to gain a greater insight on the scope of NBC's operations and environmental impact. The PUC regulates NBC's rates, so their understanding of NBC's activities is very important.

Congratulations to **Karen Giebink** and **Finance staff** for coordinating a very successful day!



Welcome

Ariel Castillo

Senior Accountant



Ariel is originally from the Philippines. he has a Bachelor's degree in Accounting and previously worked for Citizens Bank as a Financial Analyst. Ariel has two sons and enjoys fishing.

Jayna "Jay" McCarville

Pretreatment Technician

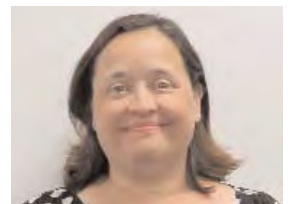


Jay attended New England Tech for Automotive studies and was previously an Automotive

Technician specializing in foreign cars. She has one sister and is very close with her grandparents; her late father was her greatest inspiration. She writes music and plays the guitar and was a member of All State Chorus for 5 years. In her free time, she enjoys watching episodes of *The Office* or planning trips to Jaws in Hawaii.

Aelene Dee Natale

Accounting Assistant



Dee has just returned to Rhode Island after ten years in Phoenix, where she worked for the State of Arizona Department of Transportation. She has two sons, one grandson, and two mini-doxies. She's a big sports fan, and loves to cheer on the Yankees and the Raiders.

David Miller

Operator I, FPWWIF



David started as an Operator I at Field's Point on September 11.

Congratulations!!



To **Talia Cheshier** and husband Brandon on the birth of baby Nico Anthony Cheshier on September 7! Big brother Cole, big sister Ryleigh, and fur-siblings Jett and Wendy were happy to welcome 9 lb 8 oz Nico home.

To **Jim Kelly** on his appointment as a Commissioner of NEIWPCCE, a regional nonprofit commission dedicated to advancing water quality in the Northeast. Jim is one of six commissioners representing Rhode Island.



To **Leah Foster** and her staff for once again receiving a clean audit with no management letter! To accomplish this task once is rare, but Leah and her staff have done it more than 20 times. Great job!



Casual Day Fund Update

October is Breast Cancer Awareness Month and NBC's Casual Day Fund is once again supporting the Gloria Gemma Breast Cancer Research Foundation with a contribution.

If you are a Fund participant and would like to request a donation to a qualifying charity, please contact Jamie Samons. Qualifying charities must be a recognized 501 (c)(3) and cannot be political or religious in nature.

**MARK YOUR CALENDARS:
OPEN ENROLLMENT IS
NOVEMBER 8-17**

Buy Nothing Day Coat Drive

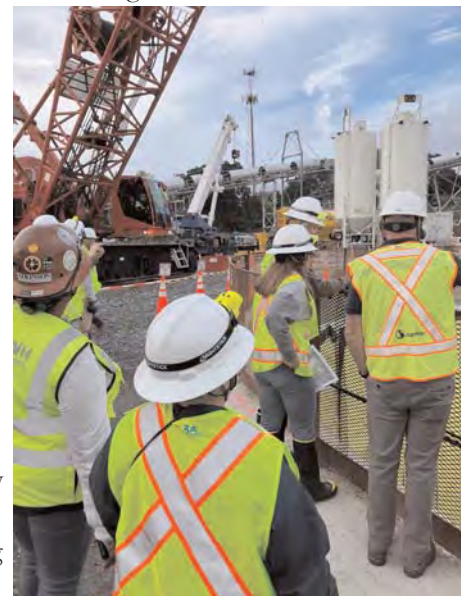


Buy Nothing Day Coat Exchange (BNCDE) is a twenty-year-old organization that puts on the state's largest annual coat drive. The drive culminates on Buy Nothing Day, the day after Thanksgiving also known as Black Friday.

This year the NBC will collect cold-weather clothing to contribute to the BNCDE. To donate, place new or gently-used coats, hats, gloves, mittens, sweaters, or sweatshirts in the marked bins at each NBC location between **October 17 and November 18**. All sizes of kid and adult items are greatly appreciated!

Pawtucket Neighbors Visit CSO Site

On Tuesday, September 20, NBC hosted a Neighborhood Information Session at the site of the CSO tunnel drop shaft. Residents from the immediate vicinity of the main construction site for RestoredWaters RI had the opportunity to learn about the project and get a first hand look at the construction happening in their own backyards. We're very grateful to our partners CB3A, Stantec, and MWH for ensuring that all visitors had proper safety gear and training and for hosting the neighbors on the site. All who attended were very excited about the water quality improvements the project will bring to their community.



Chairman Celebrates ZAP 50

On Saturday, September 10, Chairman Mesolella represented the NBC at the ZAP 50 Celebration at the Slater Mill Historic Site on the Blackstone River. He joined Senators Reed and Whitehouse and Pawtucket Mayor Grebien at the festivities.

As reported last month, NBC sponsored and participated in this year's ZAP clean-up. NBC's CSO project RestoredWaters RI is a key component of future improved water quality in the Blackstone River.

RICWA Awards Honor Former NBC Employees

At the Rhode Island Clean Water Association Annual Luncheon on September 9, several operators throughout the state were given awards named in honor of two former NBC employees and true #H2OHeroes.

Five operators received the **Steve Kruwell Award**, in recognition of exceptional dedication and effort throughout the 2021-2022 Wastewater Operator Leadership Boot Camp.



Seven operators received the **Carminé Goneconte Award**, in recognition of exceptional dedication to the service of the people of Rhode Island and all those who rely on the highest degree of water quality.

Photos courtesy of Mike Spring



Important Retirement Plan Info

Recently Empower purchased MassMutual, NBC's Retirement Plan Administrator, and has been taking steps to migrate our plans fully to the Empower platform. The final steps will take place over the weekend of **October 29, 2022**.

In the coming weeks you will receive communications from Empower notifying you of the upcoming Migration Weekend. You will also receive information for the new App and website. In preparation for the change, you should log in to your current account at www.retiresmart.com to be sure your personal information and email address are up to date.

After the transition, you will be able to set up your new username and password and access your accounts on the new platform and make changes to your investments and contributions as normal.

Please do not disregard the emails from Empower as they will contain information regarding the new website, details about the migration weekend, and a "quiet period" for account transactions.

If you have any questions about these upcoming changes please contact **Rhonda Wheaton** at ext. 579 or rwheaton@narrabay.com.

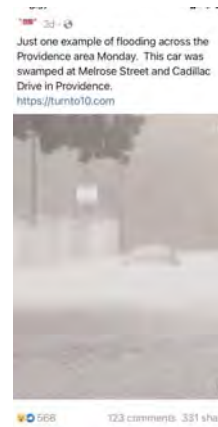
COVID Rapid Test Data

As of Wednesday, 09/30/2022

Negative Tests:	2058
Positive Tests:	30
Invalid Tests:	7
Tests Administered:	2095

NBC Facilities Weather Record Storm

Over the Labor day weekend, Rhode Island, and the Providence metropolitan area particularly, saw record rainfalls bringing a deluge of water and storm-related debris to the WWTFs. The Field's Point rain gauge recorded 6.37 inches of rain in the 24 hours between September 5 and 6.



Thankfully, FP Operations, Maintenance and IM did an amazing job cleaning up the grit/debris left in the wet weather tank after the storm. All the grit/debris had to be moved to piles at the outer rim of the tank for IM to vacuum it up for disposal. The amount of material clogged the sump and built up around the rake arms. This material had to be cleared and removed to restore the tank function. All the remaining debris is a soupy material that can be hosed into the sump after the sump drain has been snaked. Everyone coordinated well and helped each other out for this challenging and dirty job. Great job done by all!

Submitted by Meg Goulet

Let's Decorate Some Pumpkins!

It's time for NBC annual Pumpkin Decorating Contest! Mark your calendars for **Thursday, October 27**.

Following up on last year's successful Monsters & Villains theme, the 2022 theme is **Superheroes**. Carve or decorate your favorite hero or anti-hero from a book, movie or TV show.

Each section is welcome to decorate or carve a pumpkin for the contest. To keep everything fair, you will not be allowed to vote for your own pumpkin.

Pumpkins can be set up in the Field's Point Education Room 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.

Treats will be provided to all voters and carvers. Thanks to **Iziarh Roberts** for the awesome theme idea!



Bucklin Point Construction Update

Construction on the new Operations and Maintenance Buildings at Bucklin Point is progressing well! Roof installation on both buildings is complete, and work on the building interiors--including interior walls, electrical, and plumbing--is ongoing.

Ultimately the Operations Building will contain additional office space, training and locker rooms, and the SCADA Control Room. The Maintenance/Storage Building will improve the efficiency of plant maintenance services and address additional storage needs.

The project will be complete in 2024.

Concurrently, other improvements are underway at Bucklin Point, including upgrades to the secondary clarifiers, UV Disinfection and Sludge Digestion Facilities, modifications to the HVAC system, and improvements related to climate resiliency. These improvements will go on-line in May 2023.

Photo credits: Daniel O'Connell's Sons



100 Years of Fire Prevention Week!

Every year, the National Fire Protection Association (NFPA) designates the week of October 9th - 15th as Fire Prevention Week. Now in its one hundredth year, it has officially become the longest-running US public health observance on record. NFPA's goal is to increase awareness at home and within the workplace on the prevention of situations that may cause a fire. 74% of all U.S. fire deaths occur in homes. In addition to general everyday good housekeeping, here are some helpful tips that all NBC employees should know:



- Smoke alarms should be installed on every floor in a house, in addition to inside every bedroom.
- Smoke alarms should be replaced every 10 years and the batteries should be replaced twice/year.
- Working smoke alarms can double your chances of survival in a fire.
- Know at least two ways out of every room, if possible.
- Have an outside meeting place a safe distance from your home where everyone can meet.
- Have working fire extinguishers on every level of your home and know how to use them to put out small fires or to clear a path to safety.

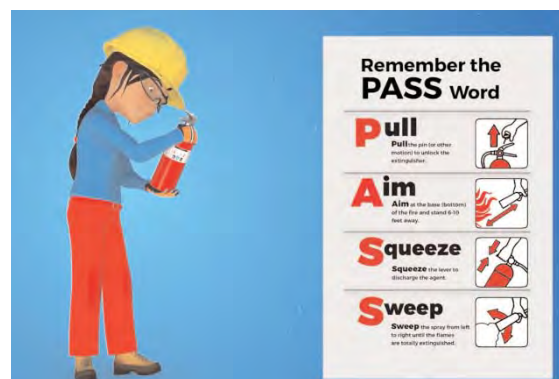
Click [HERE](#) to watch a video and learn more about the official theme for this year's campaign, "Fire Won't Wait. Plan Your Escape."

Submitted by Dave Aucoin

Featured Bay Academy Course for October

This month's featured online safety training course is "Portable Fire Extinguishers 2.0"

All NBC employees should login to their Bay Academy accounts and complete this 30-minute training, given its relevance to the workplace and home environment.





NBC Pipeline

November 2022

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

Calendar of Events *for November*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		1	2	3	4	5
6 Fall back! DST ends	7	8 Election Day	9	10	11 Veterans Day HOLIDAY Payday	12
13	14	15	16	17	18	19
20	21	22	23	24 Thanksgiving HOLIDAY	25 Payday	26
27	28	29	30			



Mark Your Calendars!

As hard as it is to believe, end of the year holidays are right around the corner! This year, the NBC will return to our tradition of hosting in-person Holiday Employee Appreciation event. Dust off your Jenga-stacking skills and brush up on your cornhole aim! Other traditions to continue this year include a holiday toy drive and the charitable giving raffle.

Mark those calendars for **Thursday, December 15**. Look for more details in next month's Pipeline.

News Briefs...

We Miss You Already!



In October, both IM Supervisor **Tony Calenda** and Purchasing Manager **Sam Celone** officially retired from the NBC. We'll miss them both for their smiles and spirits, but wish them only joy in the days ahead!

Show Us Your Costumes!

Your Friendly Neighborhood IT Department knows a thing or two about holiday spirit, but we want to see your spirit, too! Send pictures of you, your family, or your pets in your Halloween regalia to Jamie Samons for publication in next month's Pipeline.



COVID Rapid Test Data

As of Monday, 10/31/2022

Negative Tests:	2091
Positive Tests:	30
Invalid Tests:	7
Tests Administered:	2128

Welcome

Rosa Nazario
Accounting Assistant



Rosa hails from Puerto Rico, and that is still her favorite place to visit. She has two children, a wonderful husband, and a much-loved Basset Hound. When she's not working, she enjoys baking and cartoons.

A graphic for a 'COAT DRIVE'. It features a large black glove icon with a light blue heart inside. Text includes: 'REMINDER COAT DRIVE', 'COLLECTING: COATS, HATS, GLOVES, MITTENS, SWEATERS, SWEATSHIRTS', 'NEW & USED (IN GOOD CONDITION)', 'KIDS & XXL+ SIZES NEEDED!', and 'Collecting until 11/18!' at the bottom.

All in a Day's Work

Anthony Ciacciarelli went deep to inspect the 68-inch interceptor under Promenade Street in Providence. This brick sewer (now lined with concrete) dates back to the 1890s! IM's regular inspection and maintenance of the NBC's pipes is a critical component of meeting our clean water goals.



Open Enrollment:
11/8 - 17

Congratulations!!

To **Ron Goodinson** on his 35th anniversary at the NBC! Ron started at NBC on October 24, 1987 as an Operator I. His dedication and work ethic moved him up to Operator II, Mechanical Storekeeper, Mechanic I, Mechanic II, O&M Coordinator and now his current position as the Maintenance Manager. We are grateful for his 35 years of service.



To **Dave Aucoin** for leading the NBC to the award of a safety grant from Beacon Mutual Insurance. The grant funds will be used to purchase safety equipment or provide training programs aimed at promoting safer workplaces. The NBC was one of 26 Rhode Island businesses receiving a grant.

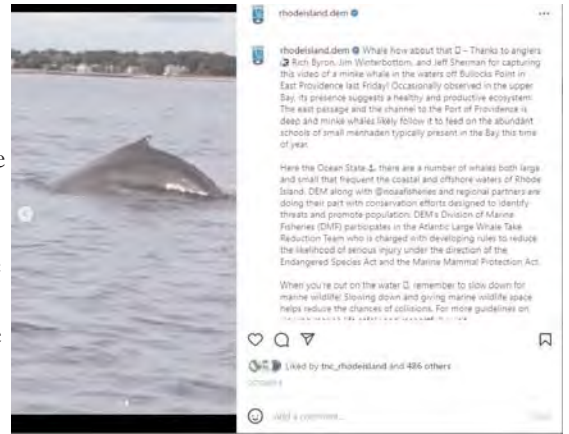


To Assistant IM Manager **Chris Dracoules** on his presentation “The Impact of Plastic Debris on the Narragansett Bay Commission Sewer System” the Narragansett Bay Estuary Program’s conference: *Macro to Microplastic in Narragansett Bay*. Chris’s presentation covered an overview of NBC operations, how plastic enters the sewer system and negatively impacts the conveyance of sewage from our customers to the wastewater treatment plants. Chris also highlighted the methods NBC uses to remove plastic and other debris for the system and what can happen during wet weather events.



A Minke Whale in the Providence River

Special thanks to **Tyler Bissonette** and **Eliza Moore** for sharing the RIDEM’s Instagram post about a minke whale in the Providence River. Occasionally observed in the upper Bay, its presence suggests a healthy and productive ecosystem. The east passage and the channel to the Port of Providence is deep and minke whales likely follow it to feed on the abundant schools of small menhaden typically present in the Bay this time of year.



Water quality improvements from the NBC’s infrastructure and clean water work are what create an inviting environment for marine life of all sizes: from menhaden to minkes, and we will likely see more improvements as CSO Phase III comes on-line. #H2OHeroes

NBC in the News



The NBC’s CSO Phase III project, **RestoredWaters RI**, made the cover of Tunnel Business Magazine. The article explores the design for the pre-cast concrete segments that line the tunnel, the start-up and launch of the Tunnel Boring Machine (TBM), and the conveyor system that will remove crushed rock from the tunnel as the TBM moves forward.

The Pawtucket Tunnel will be 2.2 miles long and have a finished diameter of 30-ft. The TBM will remove approximately 1.2 million cubic yards of rock during the boring process.

OS Jeepsters Raise \$1.1K for Project Comeback

Anthony Ciacciarelli and the Ocean State Jeepsters raised over \$1100 during their third annual Soldiers and Saddles charity run for Project Comeback. The Soldiers and Saddles event brings together Jeep lovers for a rough and tumble run through the woods. The proceeds benefit Project Comeback, whose mission is to unite rescue horses and military veterans. Awesome stuff!





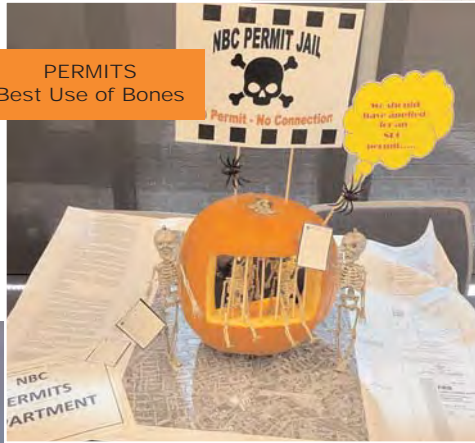
NBC creativity was out in full force for the 2022 Pumpkin Decorating Contest! The carvers and painters did not disappoint with their takes on the theme **Superheroes (and Antiheroes)**. It was a close race, with TAC's depiction of The Dark Knight as the top vote-getter, but it was obvious that more awards were due. Thanks to all who participated!



TAC
Most Votes and Best Use of Black



FP O&M
Truest Superheroes:
#H2OHeroes!



PERMITS
Best Use of Bones



EMDA
Best Galactic Killer



IT
Hitting Closest to Home

HR
Best Use of Fake Mucus



CS
Scariest and Snarliest Grin





NBC Pipeline

December 2022

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

Calendar of Events *for December*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1	2	3
4	5	6	7	8	9	10
					Payday	
11	12	13	14	15	16	17
		11:00 AM Board of Commissioners Meeting		Holiday Employee Appreciation Events BP, COB, IM, EM, TAC, LAB, PT		Last day for Use-or-Lose Vacation & Personal Time
18	19	20	21	22	23	24
 Hanukkah Begins		Holiday Employee Appreciation Events FP			Payday	
25	26	27	28	29	30	31
 Christmas	Hanukkah Ends Christmas observed HOLIDAY					 New Years Eve



Holiday Employee Appreciation Events

- Thursday, December 15, 1:00 - 3:00 PM at Field's Point
COB, IM, EM, TAC, Lab, Pretreatment
- Thursday, December 15, various times
Bucklin Point, all shifts
- Tuesday, December 20, various times
Field's Point, all shifts

Read on for more holiday happenings!



News Briefs...



Big kudos to **PJ Letizia**, son of **Peter Letizia**, who won the silver medal with his bowling team during the Special Olympics Bowling Tournament on November 13. Great job!!

Let's Work Together to End Distracted Driving



Auto accidents remain the #1 cause of workplace deaths, with distracted driving continuing to be a leading factor. The National Highway Traffic Administration defines distracted driving as a specific type of inattention that occurs when drivers divert their attention away

from the task of driving to focus on another activity. Distracting tasks can impact drivers in different ways and can be categorized into the following types:

- **Visual distraction:** Tasks that require the driver to look away from the roadway to visually obtain information.
- **Manual distraction:** Tasks that require the driver to take a hand off the steering wheel and manipulate a device.
- **Cognitive Distraction:** The mental workload associated with a task that involves thinking about something other than driving.

NBC employees are reminded that RI law prohibits cell phone use while driving, unless a hands-free option is used. Review the guidelines for vehicle cell phone usage at NBC, as outlined in NBC's *Policy on Vehicle Safety Procedures*. You can also brush-up on defensive driving techniques by taking a brief 15-minute training on Bay Academy entitled "Defensive Driving 2.0." A defensive driver is safer than a distracted driver!

Need more help staying focused while driving? Consider downloading one of the many free apps available for smart phones, such as Drivemode or LifeSaver.

submitted by Dave Aucoin

Welcome

Veronica Amaral
Customer Care
Representative



Veronica is a Providence native; she still lives in the capitol city with her son and two cats. Veronica's favorite TV show is *The Orville*.

Paola Jordan
Customer Care
Representative



Paola ("Pao") is originally from Bolivia. She is one of four sisters in her family and they are all five years apart! She enjoys hiking and the show *Love is Blind*.

Parker Meashaw
Financial Analyst



Hailing from Potsdam, NY, Parker studied Finance as an undergraduate at Clarkson University and received his MBA from Norwich University. In his spare time, he volunteers as a youth hockey coach. He enjoys golf and travelling through Europe.

Krystine Severino
Financial Analyst



Krystine joined the NBC on November 20. In her spare time, she enjoys watching movies.

Never Too Much Halloween!



Do you recognize Maleficent and the schoolgirl? Those Finance folks know how to do Halloween right! Epic costumes from **Gail Degnan** and **Patti Pinilla**!

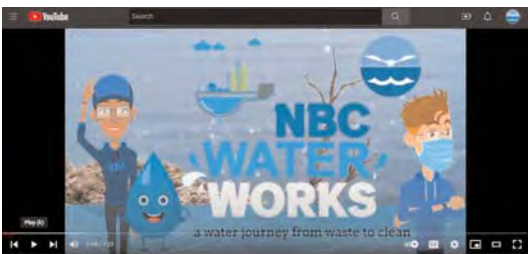
Congratulations!!



To Ethan Ciacciarelli, son of **Anthony Ciacciarelli**, on learning to drive a standard transmission! He's shown here driving dad's beloved Jeep before a trail maintenance day for the Ocean State Jeepsters.

NBC on YouTube

Have you checked out NBC's YouTube Channel lately? Head over to @BayCommission on YouTube to view some very cool benthic videos, get the lowdown on RestoredWatersRI, or watch the award-winning virtual tour *NBC Water Works!*



COVID Rapid Test Data As of Wednesday, November 30

Negative Tests:	2116
Positive Tests:	32
Invalid Tests:	7
Tests Administered:	2155

Holiday Donations to Boys & Girls Club

This year, the NBC will collect toys, clothing, and other wishlist items for the **Boys & Girls Club of Pawtucket** (BGCP). Since 1900, the BGCP has been changing and saving the lives of youth in the community. The Club precedes the national organization, which was formed in 1906.

Today, thousands of area children and teenagers are served through BGCP programs in academics, sports, and the arts, as well as basic needs like warm clothes and free meals.

Because of the ongoing pressures of COVID and inflation, the Club's needs are even greater this year.

Although the Winter Drive is focused on warm clothes, the Club has a **wishlist** of other items to support their programs:

- NEW art supplies (glue, paint, brushes, paper, markers, crayons, colored pencils, etc.)
- NEW school supplies (notebooks, binders, loose-leaf paper, folders, pencils, pens, backpacks, etc.)
- Playing cards
- Legos
- Wooden or plastic blocks
- Beads/jewelry making kits
- NEW underwear & socks for boys & girls sizes 6-12
- NEW sweatpants for boys & girls sizes 6-12
- Tickets to sporting events or cultural experiences

If you'd like to make a donation, place it in one of the donation bins (FP, BP, WQSB, COB) by **Tuesday, December 13**.



Casual Day Fund Giving & Raffle



In November, the Casual Day Fund made a \$500 donation to Boston Children's Hospital in support of **Michelle Asels**'s family's No Shave November fundraiser. The donation will support breakthrough research, family support, and vital services not covered by insurance for children battling serious and complex diseases.

Again this year, the NBC will conduct a **Charitable Giving Raffle**. If you currently contribute to the Casual Day Fund, you will automatically be entered into the raffle. If your name is chosen, the Casual Day Fund will make a \$500 donation to the 501(c)(3) charity of your choice.* Win-win!

Not a participant? It's not too late! Contact Payroll to sign up.

(*religious and political organizations do not qualify)

Bucklin Point Construction Update



Work at Bucklin Point continues on schedule. The Maintenance Building (above left) is 90% complete with only the finish work remaining. Occupancy is anticipated on or about February 1st, 2023.

The Operations Building (above right) is approximately 60% complete and the envelope is now weather tight. Interior framing, drywall, and plumbing and electrical rough-in is ongoing. Occupancy is expected on or about June 1st 2023.

Site work grading, curb, sidewalk, and paving is expected to be completed in early December.

Also, in January, tunnel rock from the CSO tunnel will begin to migrate to Bucklin Point from the CSO construction site; the rock will be used to regrade Bucklin Point's old landfills. In order to safely and efficiently move the rock, Nassau Street between the CSO construction site and Bucklin Point will be shut down.

Thanks to **Greg Waugh** for the awesome photos and the construction update!



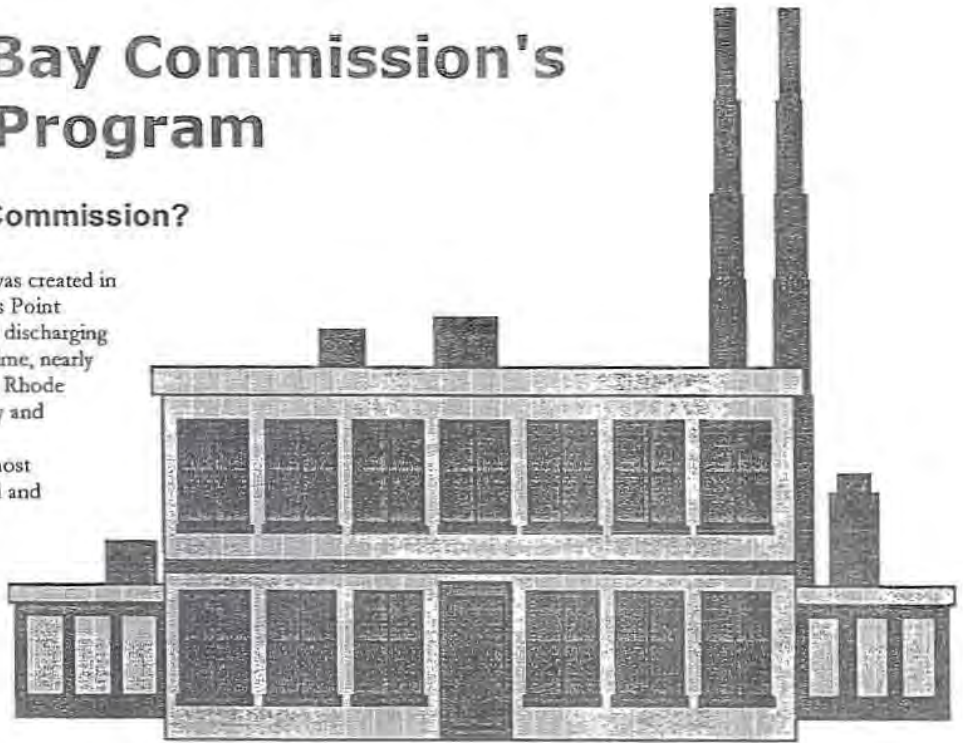
EDUCATIONAL DOCUMENTS

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.

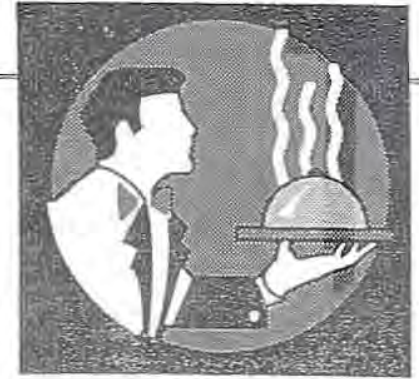
What if I need technical assistance?

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 jsmons@nartabay.com.

Narragansett Bay Commission's Restaurant & Food Preparation Facility Grease Removal Program



What is the Narragansett Bay Commission?

The NBC owns and operates the State's two largest wastewater treatment facilities and provides quality wastewater collection and treatment services to about 300,000 persons and 8,000 commercial and industrial customers in Providence, North Providence, Johnston, Pawtucket, Central Falls, Cumberland, Lincoln, the northern portion of East Providence and small sections of Cranston and Smithfield.

What is the purpose of a Pretreatment Program?

Since wastewater treatment facilities are not designed to remove heavy metals, toxic chemicals, grease, etc., the federal Environmental Protection Agency (EPA) requires that wastewater agencies implement Pretreatment Programs to control toxic discharges. The NBC's Pretreatment Program staff is responsible for protecting its treatment facilities and Narragansett Bay from the discharge of such contaminants. To satisfy EPA requirements, the Pretreatment Program was put in place by the NBC to monitor and regulate the many electroplaters, metal finishers, chemical manufacturers, laboratories, hospitals, laundromats, restaurants and other firms that are tied into the NBC's sewer system.

What is a Grease Removal Program?

The Grease Removal Program was initiated by the NBC's Pretreatment Section to control the discharge of grease and animal fats from restaurants and food preparation facilities into the sewer system.

Why is the discharge of grease and animal fats a problem?

The presence of grease, fats, and oils in wastewater results in major operational problems both in the NBC sewers and at the wastewater treatment facilities. Grease from food preparation operations solidifies on the inside of sewers restricting the flow of sewage, similar to the way that cholesterol restricts the flow of blood through arteries and veins. Sewer blockages have resulted from this grease build up, causing raw sewage to back up into the basements of homes and businesses. Further, grease has fouled equipment and controls at treatment facilities, and high concentrations of grease and oils in wastewater inhibits the biological processes used to treat domestic sewage.

What kitchen operations are responsible for grease entering the sewer system?

Grease discharges are predominantly generated from washing and cleaning operations and not from fryolators or deep frying units as most people might think. The pot washing sink, dishwasher pre-rinse station, and garbage grinder are the major sources of grease discharges to the sewer system.

How can grease discharges be controlled and minimized?

There is only one way -- by installing and maintaining a grease removal or recovery unit (GRU).

What is a GRU?

A GRU is a device designed to collect

and remove grease from wastewater discharged from restaurants and food preparation facilities. Most GRU's separate grease from water by gravity. Since grease weighs less than water, the grease floats and can be skimmed from the surface of the wastewater.

What types of Grease Removal Units are acceptable to the NBC?

There are two (2) types of GRU's that are acceptable for installation in the NBC districts. One type of GRU is the automatic electrical/mechanical grease removal unit. This type of GRU is small, which allows installation in the kitchen under a sink or elsewhere. This type of GRU removes grease daily, collecting it neatly in a bucket from which it can be disposed in a dumpster or recycled through a rendering firm. Maintenance must be performed daily consisting of checking the grease collection bucket and cleaning a solids removal strainer.

Another acceptable GRU is the large in-ground passive type grease interceptor. This type of GRU must have a capacity of at least 15 gallons per seat in the restaurant with a minimum capacity of 500 gallons. This type of GRU is so large that it must be installed underground outside the facility. Maintenance requirements include weekly inspections to determine grease layer thickness and regular pumping of the grease by a certified

waste hauler. Pumped-out grease must be hauled to special facilities for processing or incineration.

Is the small, under the sink passive type grease interceptor acceptable to the NBC?

No, the NBC has found that these small, passive grease traps are not effective at removing grease because these units are considerably undersized, resulting in insufficient time for oil/ water separation. In addition, the small size of these passive units allows hot water from the pot wash sink to dissolve trapped grease in the unit and flush it into the sewer system. This type of grease trap is also maintenance intensive, requiring time consuming effort to perform system inspections or remove collected grease. Due to these intensive maintenance requirements this type of GRU is often neglected and does not perform properly. Therefore, the NBC does not allow installation of this type of GRU.

Can a garbage grinder or garbage disposal unit be used in the restaurant or food preparation facility?

Only if the garbage disposal unit discharges to a large in-ground passive type grease interceptor that has been properly sized for removal of settleable solids. Garbage disposal units may not be used in facilities with automatic under the sink type grease interceptors.

Should a restaurant just go ahead and install a grease interceptor?

Definitely not. Anyone proposing to install a grease interceptor must contact the NBC pretreatment staff at 461-8848 prior to purchasing or installing a grease interceptor. NBC staff will provide the guidance necessary to ensure that the GRU chosen meets all NBC criteria. Contacting the NBC in advance may prevent your company from purchasing expensive GRU retrofits should the initial installation not satisfy NBC criteria.

Is there anything else that is required of restaurants or food preparation facilities?

Yes. All restaurants and food preparation establishments must obtain a wastewater discharge permit from the NBC. A permit application can be obtained by contacting the pretreatment staff at 461-8848 or by visiting the Pretreatment Office at 2 Ernest Street in Providence.

What is required by the Wastewater Discharge Permit?

The restaurant discharge permit requires the restaurant or food preparation facility to maintain the GRU in a proper operating condition. A log book must also be maintained at the facility documenting the date of each GRU inspection and each GRU maintenance activity.

What if I have more questions?

Just ask us. The NBC has well trained and capable engineers, technicians, and others who would be happy to answer any question or concerns you may have regarding the Grease Removal Program, the permitting process, or the NBC in general. Feel free to call us! ■

NARRAGANSETT BAY COMMISSION



ENVIRONMENTAL

BEST

MANAGEMENT
PRACTICES

for

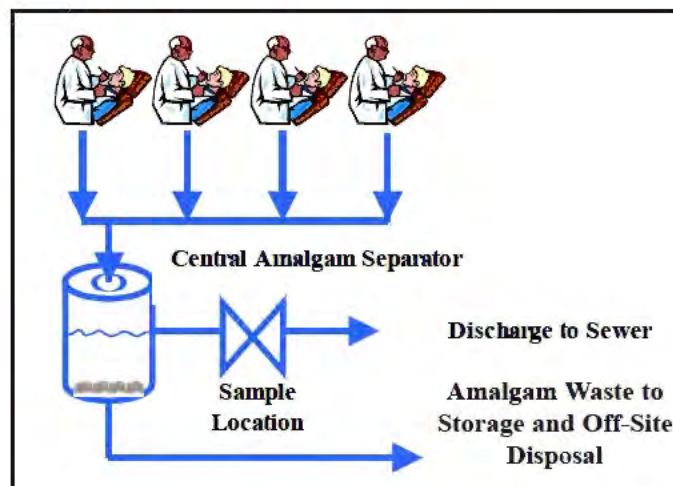
the Management of Waste Dental Amalgam

The Narragansett Bay Commission (NBC) has developed the following set of Environmental Best Management Practices (BMPs) for the Management of Waste Dental Amalgam to help the dental community safely and economically reduce the amount of mercury released into the environment. Dental facilities serviced by the NBC must install, use, and maintain an amalgam separator with a separation efficiency of 99% when tested according to ISO 11143 standards and must demonstrate compliance with the BMPs. These separators help to remove most mercury from dental wastewater without being overly burdensome to operate or maintain. Based on NBC's current discharge limit for mercury, as little as 1/10,000 of a gram of amalgam in one gallon of wastewater would place your office in non-compliance resulting in additional sampling and monitoring costs. Continued non-compliance with NBC discharge limits can result in having your name published in the newspaper as being in significant non-compliance and/or the issuance of fines and penalties.



NBC BMP Implementation with the Installation of an Amalgam Separator

The installation and operation of an amalgam separator and implementation of the attached NBC BMPs is required. All amalgam-contaminated wastewater, including wastewaters from cuspidors and vacuum systems, must flow through an amalgam separator and through a sample location prior to sewer discharge.



Typical wastewater plumbing diagram for dental office with an amalgam separator

Specific Requirements for NBC Dental BMP Option

Amalgam Separators must be ISO 11143 certified and capable of handling flow from vacuum pumps and chair side cuspidors. Separators vary in complexity, capabilities and cost. Here are some criteria that should be considered when selecting an amalgam separator:

1. The vendor of the equipment must be able to provide ISO 11143 documentation certifying that the equipment has been proven capable of removing at least 99% of amalgam during certification tests.
2. There should be minimal loss of suction power within the vacuum system.
3. A system that is low maintenance is preferred over one that requires manual operation and frequent cleaning and/or servicing.
4. The unit should operate quietly.
5. The unit should be centrally installed so as to service a whole office or a series of chairs in order to minimize the cost and maintenance associated with individual units that service only one chair.
6. The unit or units must be capable of handling flow from:
 - a. Vacuum Systems,
 - b. Cuspidors and
 - c. Sinks if applicable.
7. Plans of the dental office and amalgam separator must be approved by NBC prior to installation.

Maintenance of Amalgam Separator

1. Amalgam separators must be installed and maintained such that all flow from vacuum systems; cuspidors and applicable sinks receive proper treatment.
2. Amalgam separators must be operational at all times.
3. Follow the manufacturer's specification for maintenance of the separator.
4. Inspect the separator weekly to ensure proper operation.

Certification and Record Keeping

1. The dental office must document all separator and trap inspections, cleaning and maintenance activities in a bound logbook.
2. Information in the logbooks must include:
 - Date (mm/dd/yy) of each trap/separator inspection/service activity;
 - A clear indication of which trap/separator is being serviced;
 - All routine and non-routine activities conducted (i.e., cleaning, maintenance, repairs, etc.);
 - Signature of person conducting activity.

Best Management Practices

Dental offices must adhere to all of the required BMPs detailed in this brochure.

1. While regular sampling of wastewater effluent, on the part of the dental facility, is not required as part of Option 1 of the NBC BMP Program, installation of a sampling location is required.

Best Management Practices

Chair Side Traps

1. Equip all dental chairs with chair side traps to capture large amalgam particles from cuspidors and vacuum systems.
2. Use traps with the smallest screen size that your vendor says will work.
3. While not required as a condition for participation in this program, disposable chair side traps are preferred to reusable traps due to the difficulty of cleaning traps for reuse without releasing captured amalgam particles to the sewer system during the cleaning process.

Maintenance of Chair Side Traps

1. Check to make sure all chair-side traps are in place when chair is in use.
2. Inspect chair-side traps on a daily basis and clean or replace as necessary.
3. If using disposable chair side traps, place spent traps directly into a labeled amalgam waste storage container. Never rinse a used trap over a sink that is directly connected to the sewer or place in trash.
4. If using a reusable trap remove all visible amalgam particles from the trap by emptying the contents into a labeled storage container.
5. Never dispose of the collected amalgam down the drain, in the trash or with sharps and/or biohazard waste.
6. Rinse reusable traps only if necessary and only in sinks plumbed into an amalgam separator using a minimum amount of water.

Maintenance of Vacuum Pump Filters

1. Check to make sure your vacuum pumps are equipped with filters. Talk to your equipment vendor to upgrade all such equipment not equipped with filters.
2. Talk to your equipment vendor to make sure you are using the smallest available vacuum filter screen that will not compromise the efficiency of the vacuum system.
3. Dry-turbine vacuums - Check to make sure the air/water separator is free of built-up sludge. Manage collected sludge as you would a mercury containing waste - do not wash down drain.
4. Change vacuum pump filters at least once per month or more frequently in accordance with the manufacturer's recommendations.
5. After removing the filter hold it over a spill tray or other type of container that can catch any water that has collected in the trap. Carefully decant the water without losing any visible amalgam. The decanted water, if it contains no visible amalgam, may be discharged to the sewer through an amalgam separator.
6. Place spent filters in their original container or in another sealed container and properly store prior to disposal/recycling as a mercury-containing waste.

Storage, Management and Disposal of Scrap Amalgam

1. Collect and store all contact and non-contact amalgam in separate appropriate labeled and closed containers.
2. Label all containers used to store waste amalgam with the words "Hazardous Waste" and "Waste Mercury/Amalgam."
3. Wastes containing mercury are regulated as hazardous waste by the RIDEM and EPA - comply with all state and federal hazardous waste management regulations (see section on Hazardous Waste Management).
4. Do not mix waste streams, including contact and non-contact amalgam waste, without checking with your waste hauler and disposal/recycling facility first. Mixing of waste streams may limit disposal and/or recycling options and increase waste management costs.
5. Do not put mercury-containing waste in medical waste containers. Disposal methods used for medical waste, such as incineration, will release mercury into the environment.

Please note: "empty" prepackaged amalgam capsules may contain enough residual amalgam to be classified as a hazardous waste. While not a BMP, it is recommended that empty capsules be collected and stored separate from other amalgam waste. This will allow for testing of the spent capsules in order to determine an ultimate disposal method.

Line Cleaners

Dental clinics may regularly use a liquid cleaner to disinfect the pipes in their vacuum system. Certain brands of line cleaners that are corrosive or oxidizers must be avoided because they dissolve solid mercury. Never use bleach (sodium hypochlorite) or a bleach-containing product to clean vacuum lines, instruments or equipment that may be contaminated with mercury or amalgam. Mercury that is mobilized in this way is very difficult to trap and can easily travel to the sewer plant or into the receiving waters. The following brands of cleaners and disinfectants are acceptable:

- Green and Clean (Metasys)
- GC Spray-Cide (GC America)
- Sani-Treet Plus (Enzyme Industries, Inc.)
- VacuCleanse Evacuation (Infection Control Tech)

The above list is not all-inclusive and NBC may give written approval to use other cleaners. The NBC will review requests to use other cleaners upon receipt of a Material Safety Data Sheet (MSDS) for the proposed cleaner.

Best Management Practices

Clean Plumbing and Sink Traps

Due to the potential past use of sinks as disposal outlets for contact and non-contact scrap amalgam, all sink traps in the vicinity of mercury use (past or present) must be removed, inspected and cleaned.

1. Remove sink traps/elbows and inspect for sludge build-up.
2. Collect any sludge in a container separate from scrap amalgam waste.
3. Install new traps/elbows or replace the existing traps/elbows after cleaning with an appropriate line cleaner .
4. Dispose of the sludge as a mercury containing waste or have samples of each waste stream tested by a licensed analytical laboratory prior to ultimate disposal. Guidance on testing waste samples can be obtained through NBC's Pollution Prevention Program.



Sinks Located in Operatories

Sinks located in operatories have the potential to discharge amalgam waste to the sewer from the cleaning and rinsing of dental instruments, chair side traps and other equipment or devices that may come into contact with amalgam. Two Sink Use Alternatives are available to dental offices participating in these Best Management Practices.

Sink Use Alternative A: Designate all sinks for "Sanitary Use Only" by eliminating the cleaning of amalgam contaminated instruments, traps and other equipment in all sinks.

For sinks designated for "Sanitary Use Only" the following conditions and procedures will apply:

1. Washing of instruments, filters from chair-side traps and used amalgam capsules will be strictly prohibited.
2. Sign stating: "Sinks to Be Used for Sanitary Purposes Only - No Chemical or Amalgam Disposal" must be clearly posted at each sink.
3. All employees must be trained on this policy and certification of training maintained on site.

Sink Use Alternative B: Designate certain sinks for "Sanitary Use Only" and other sinks for "Equipment Cleaning Only ." This alternative requires sinks in which equipment cleaning will take place be plumbed into an amalgam separator - if you choose to not install an amalgam separator you will have to comply with Alternative A. If you choose to install an amalgam separator, please note that some separators may not allow for the connection of sinks. Discuss this with your separator equipment vendor before purchasing a separator.

For sinks designated for "Sanitary Use Only" all conditions and procedures noted above will apply.

For sinks used for "Equipment Cleaning Only" the following conditions and procedures will apply:

1. Plumb each of these sinks into to the amalgam separator.
2. Install flow restricting orifices in each sink discharge line in order to limit and control the flow rate to the separator and prevent washout of the amalgam separator
3. Submit plans of each of these sinks and the amalgam separator to NBC for approval prior to installation.
4. Manage all debris removed from these sinks and drain lines as mercury contaminated waste.
5. Post signs stating: "Washing of Instruments and Filters Contaminated with Amalgam only - Sanitary Use Prohibited" at each sink.
6. Train all employees on these policies and procedures and maintain certification of training on site.

Please note: if flow can not be adequately controlled using flow constrictors a surge tank capable of handling peak flow from these sinks may need to be installed up stream of the amalgam separator .

Wastewater Discharge Permit Requirements

Annual Certification and Record Keeping

1. Document all separator (if applicable) and trap inspections, cleaning and maintenance activities in a bound logbook.
2. Include the following information in the logbooks:
 - a. Date (mm/dd/yy) of each trap/separator inspection/service activity,
 - b. A clear indication of which trap/separator is being serviced,
 - c. All routine and non-routine activities conducted (i.e., cleaning, maintenance, etc.)
 - d. Signature of person conducting activity.
3. Maintain all Hazardous Waste Manifest documents and/or shipping papers of mercury waste sent off-site for disposal or recycling on-site and have them immediately available for inspection by NBC.
4. Submit an annual certification statement to NBC attesting to compliance with all BMPs.

Personnel Training Requirements

All personnel associated with the handling and management of amalgam and/or mercury containing materials/ wastes must be trained with respect to:

- the hazards associated with mercury
- hazardous waste management regulations
- procedures to follow in the event of a spill or an accident including spill-reporting requirements.

Waste Management and Spill Response

If any elemental mercury is used or is present in the dental office, including mercury from historical use and mercury in any medical instruments such as thermometers, a mercury spill kit must be maintained on site and all appropriate staff trained in its use.

Please note: even very small amounts of metallic mercury (for example, a few drops) can raise air concentrations of mercury to levels that may be harmful to human health. The longer people breathe the contaminated air, the greater the risk to their health. Metallic mercury and its vapors are extremely difficult to remove from clothes, furniture, carpets, floors, walls, and other such items. If these items are not properly cleaned, the mercury can remain for months or years, and continue to be a source of exposure.

Steps to take in case of a spill:

- Contact your local poison control center, fire department, the RIDEM or the RIDOH for advice on cleanup the spill.
- Ask everyone to leave the area.
- Close-off the area while unoccupied.
- Shut off conditioning and air circulation to the room
- Open windows and doors in the area of the spill to ventilate the area while clean-up activities are taking place.
- Wear rubber or latex gloves to prevent skin contact with metallic mercury.
- Use a dry sponge, paper towel or paper to clean up the spill.
- Place all collected mercury in a sealed glass jar .
- In the event of a large mercury spill (more than a broken thermometer's worth), immediately evacuate everyone from the area, seal off the area as well as possible, and call local and state authorities for assistance.

What Not to do when there is a spill:

Do NOT use a vacuum cleaner to clean up a mercury spill. A vacuum cleaner will spread the mercury vapors throughout the area, thereby increasing the chance of exposure. Do NOT attempt to sweep the spill with a broom. Never dispose of mercury down the drain. Never throw materials used to clean up a spill in the trash - contact the RIDEM for guidance.

Emergency Contacts

Rhode Island Department of Environmental Management: (401) 222-6822

Narragansett Bay Commission: (401) 461-8848

Rhode Island Poison Control Center: (401) 444-5727

National Response Center: (800) 424-8802

Rhode Island Emergency Management Agency: (401) 946-9996

Local Hospital: _____

Fire Department: _____

Useful Web Sites

www.narrabay.com
www.epa.gov/mercury/index.html
www.state.ri.us/dem
www.newmoa.org

Pollution Prevention

The goal of pollution prevention is to reduce or eliminate the use of toxic substances at the source. This minimizes the release of toxic compounds and serves to protect human health by ultimately reducing exposure to solid, dissolved or gaseous toxic compounds. Although source reduction is most efficient, it is often combined with control-based approaches such as end-of-pipe treatment to achieve desired results. Pollution Prevention activities and recycling in dental offices are essential in order to minimize releases of polluting substances into the sewer system, medical waste, ordinary trash or environment. Recommended activities include the use of the following materials, processes or practices:

1. Use non-amalgam substitutes where appropriate as determined by general dental practice procedures.
2. Utilize prepackaged, single-use amalgam capsules to eliminate larger bulk quantities of elemental mercury (also referred to as free, bulk, or raw mercury).
3. Stock amalgam materials in a range of capsule sizes. Use the smallest capsule required for the job at hand to minimize the amount of scrap non-contact amalgam produced.
4. Properly seal all amalgam capsules before amalgamation. Reassemble capsules immediately after dispensing amalgam. Disassemble and clean the amalgamator on a regular basis.
5. If a small amount of elemental mercury is to be disposed of, initiate a reaction with amalgam alloy to form scrap amalgam, which can then be recycled through your amalgam recycler.
6. When removing an existing amalgam, attempt to remove it in chunks so that it is more likely to be caught in the chair - side trap.
7. Consider using techniques that eliminate the need for cuspidors in the operatory when possible.
8. Do not mix different types of wastes, such as contact and non-contact amalgam, when it impacts wastewater treatment or waste disposal. Whenever possible, collect waste amalgam solids for proper storage before they mix with wastewater.
9. Do not discharge solutions that mobilize mercury such as certain vacuum line cleaners that are corrosive or contain bleach or other oxidizing compounds. Neutral, enzymatic cleaners are preferred.
10. During office renovations, alert renovators to the possibility of historical mercury spills that may have resulted in the presence of mercury in carpets, floor cracks, behind moldings and other areas where amalgam capsules may have been spilled. A waste is considered hazardous if TCLP tests indicate a mercury concentration over 0.2 mg/l. Seamless and impermeable floors are easiest to keep clean.

Hazardous Waste Management

Mercury is one of eight "heavy metals" regulated by EPA and the Rhode Island Department of Environmental Management (RIDEM) as a "Characteristically Toxic" Hazardous Waste.

This means wastes containing mercury, over established Regulatory Levels (0.2 mg/l for mercury using the Toxicity Characteristic Leaching Procedure), must be handled in strict compliance with federal and state hazardous waste regulatory requirements. A detailed overview of these regulations is outside the scope of this BMP document and the reader is referred to the document "Hazardous Waste Compliance Workbook for Rhode Island Generators" at <http://www.state.ri.us> for a comprehensive description of Rhode Island's hazardous waste management regulations. The following general guidelines, however, should be followed as part of generating and managing wastes containing amalgam:

Waste Generation

1. Apply for an EPA Identification Number through the RIDEM,
2. Inform all employees of the hazards associated with handling waste amalgam, and
3. Write a brief procedure to be followed in case of a spill of waste amalgam and familiarize all applicable employees with these procedures.

Waste Storage

1. Keep all containers closed except when adding or removing waste amalgam,
2. Label containers with the words "Waste Mercury Amalgam",
3. Inspect containers on a weekly basis, and
4. Store containers in a safe and secure location away from office traffic.

Waste Shipment

1. Become familiar with hazardous waste manifesting requirements,
2. Utilize only properly licensed/permitted waste haulers, and
3. Utilize only properly licensed/permitted waste recycling/disposal firms.
4. Contact the state environmental regulatory agency from which a waste hauler, recycler and/or disposal company resides in order to assure they are in compliance with all applicable regulations. A list of contacts for all state environmental agencies can be found at www.epa.gov.

Record-keeping

1. Maintain a readily accessible file on employee training with respect to hazardous waste management, and
2. Maintain a readily assessable file with all copies of Hazardous Waste Manifests.

Note: EPA regulations allow for certain exemptions from strict hazardous waste management regulations when a waste is being sent off-site for recycling. These exemptions, however, are not always adopted by individual state environmental agencies and are often open to interpretation. It is a good idea to comply with all hazardous waste management regulatory requirements even if the waste is being recycled.

THE GREASE BUSTING ADVENTURES OF MR. CAN!

Quick guide to proper grease disposal



Meanwhile in Providence, RI...

There seems to be a problem downtown. I'm afraid it's the Grease Beasts!

This is a CODE ICKY. I repeat: a CODE ICKY!

Pouring grease down the drain can cause costly, icky, and even dangerous effects on our neighborhoods and environment. Grease hardens and clogs our pipes causing messy backups into homes and city streets. When pipes are clogged, dirty water can't make it to the Narragansett Bay Commission facilities to be cleaned.

How about that, Icky Ike? They poured us down the drain! Let's clog this baby up and wreak havoc on the streets! Nothing like a nice backup to throw Mother Nature into a tizzy!

This is great Boss! And the best part is it tastes like french fries! We'll be oozing out in no time! No WWTF for us!

WHAT WAS THAT?!

WHAM!

Not today
Grease Beasts!
It's me: Mr. Can!

Get a load of
my cooling
wand!

ZAP!

FOR PROPER GREASE
DISPOSAL,
COOL IT & CAN IT!

Together we can keep
the grease beasts off the
streets!



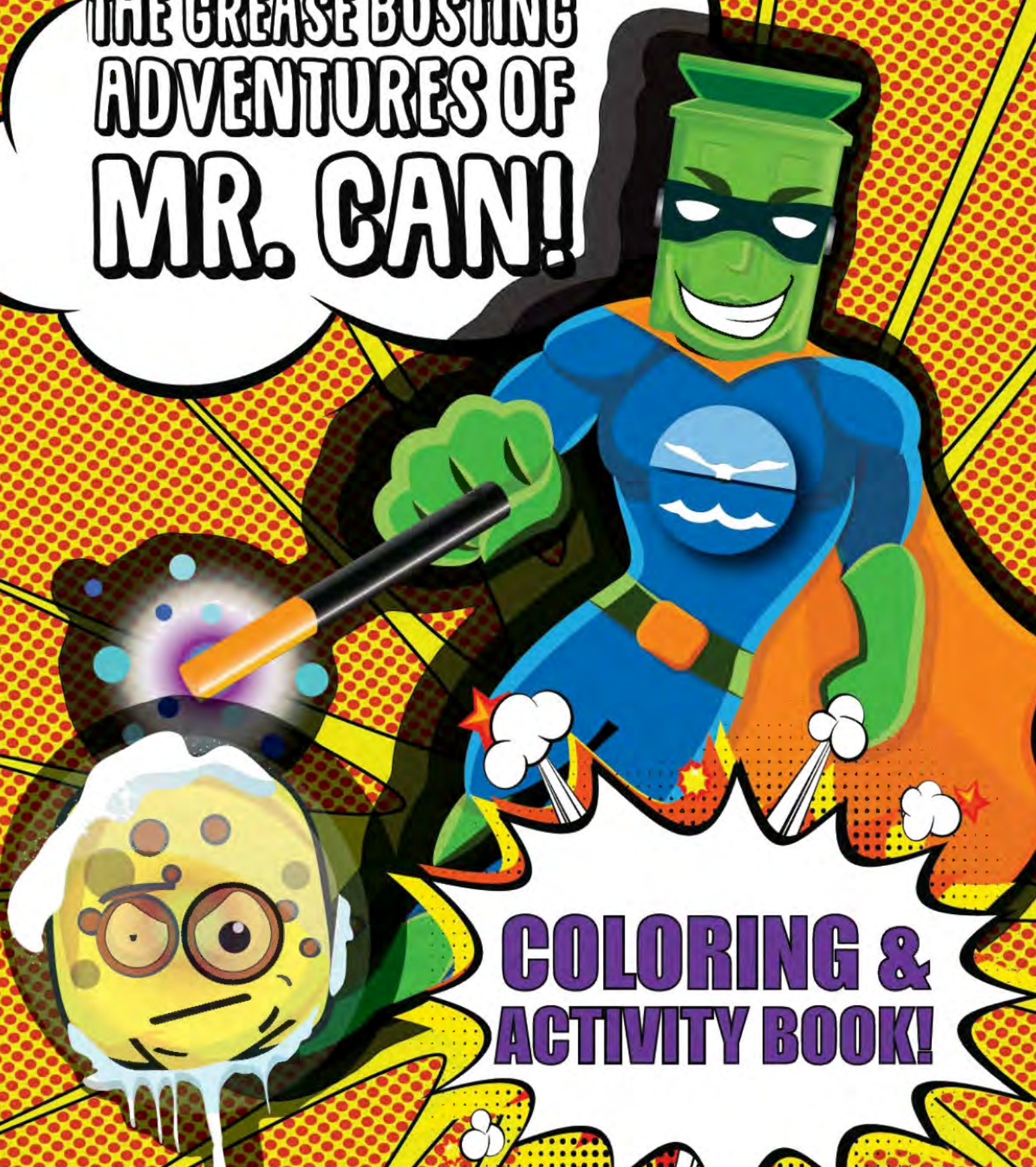
Narragansett Bay Commission

One Service Road, Providence, RI 02905

www.narrabay.com



**THE GREASE BUSTING
ADVENTURES OF
MR. CAN!**



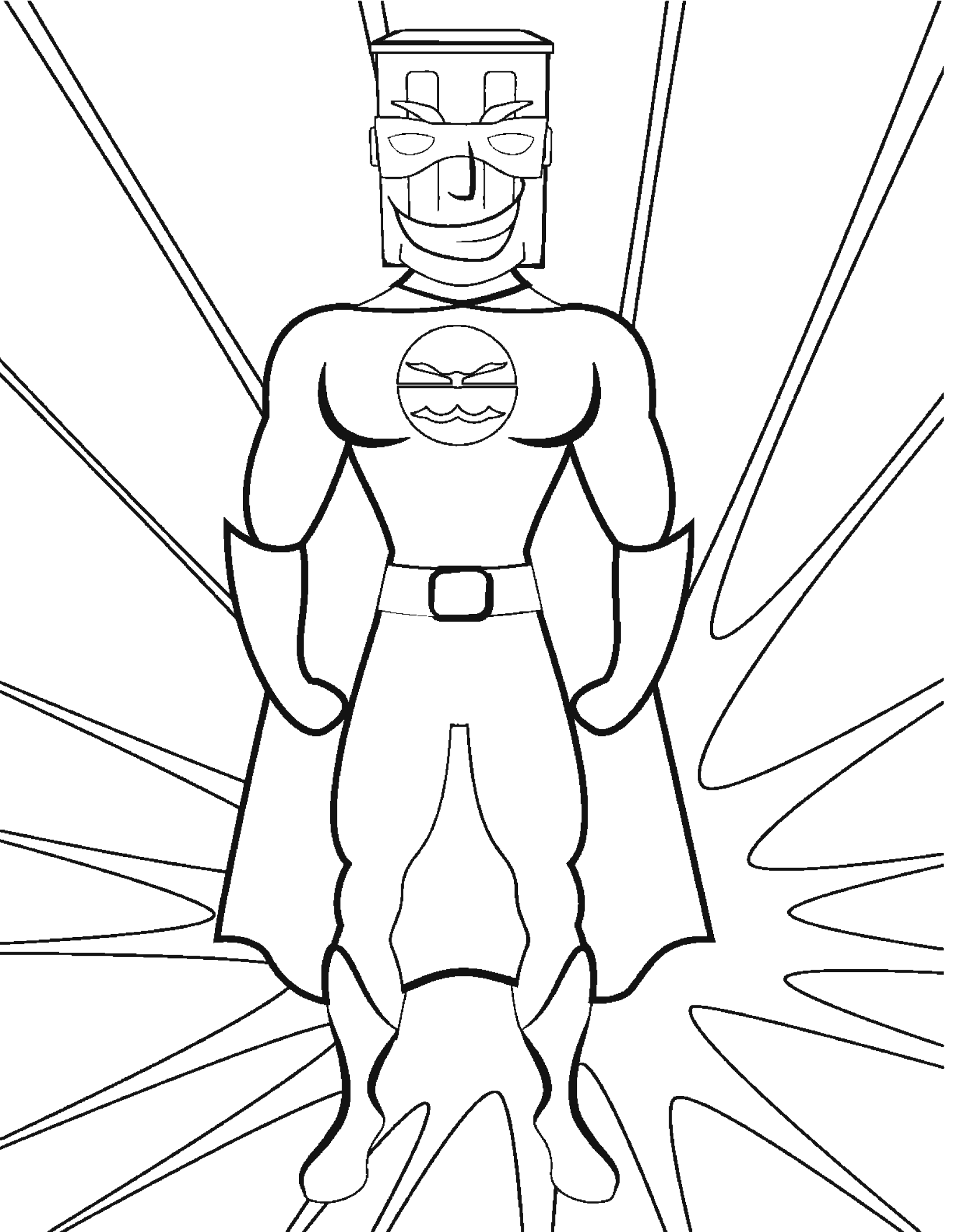
**COLORING &
ACTIVITY BOOK!**

**COOL IT
& CAN IT!**



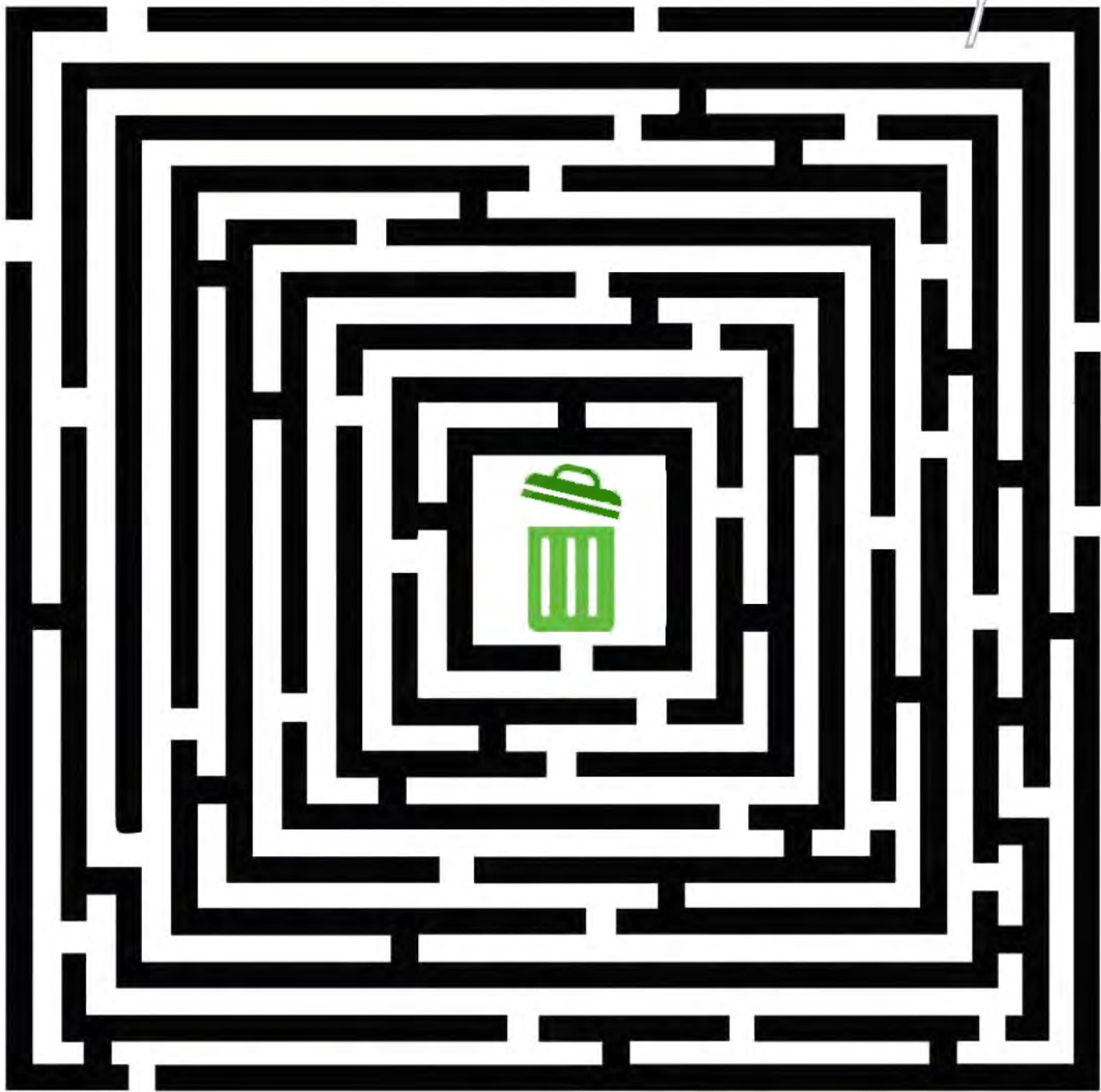
**Pledge to COOL IT & CAN IT and
help Mr. Can share the message
of proper grease disposal!**



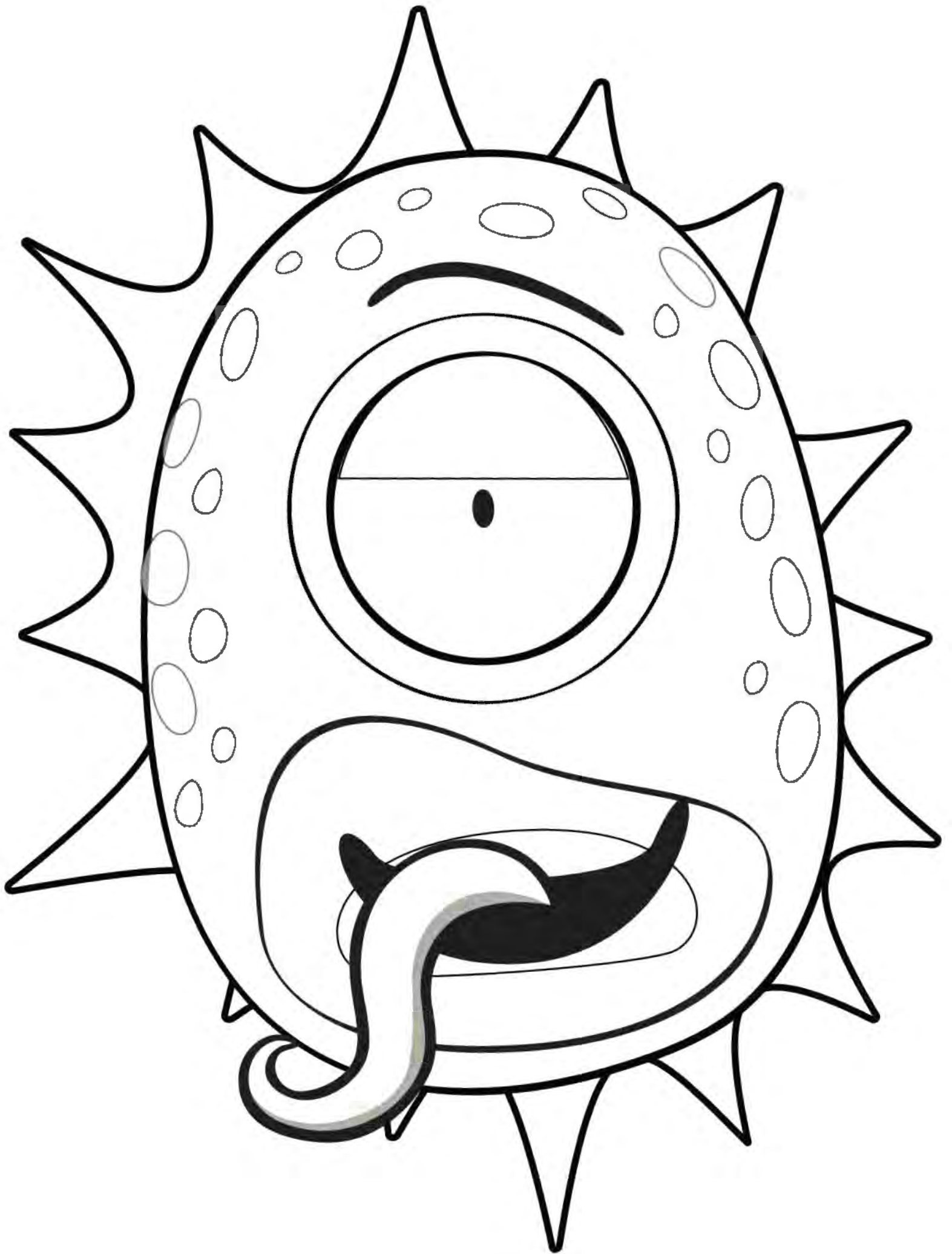


GUIDE THE GREASE!

Get this cooled off grease beast to the trash can in the center!



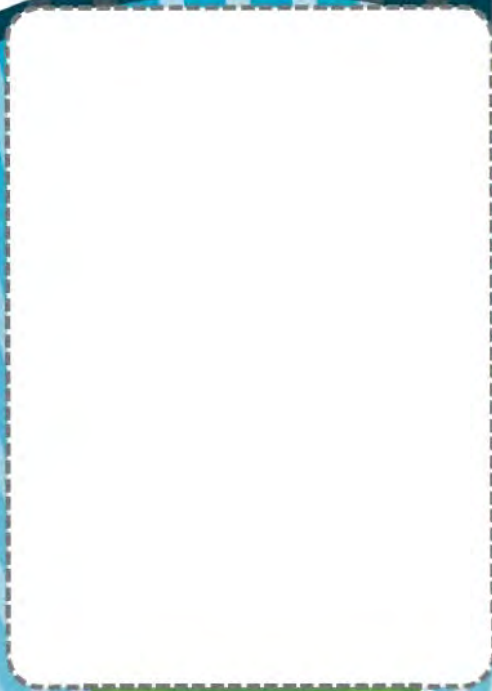






SUPER HERO FACE SWAP!

Want to be a Mr. Can double?!
Carefully cut and paste a photo
of your face in the area provided.
Using a marker draw a mask
over your eyes!

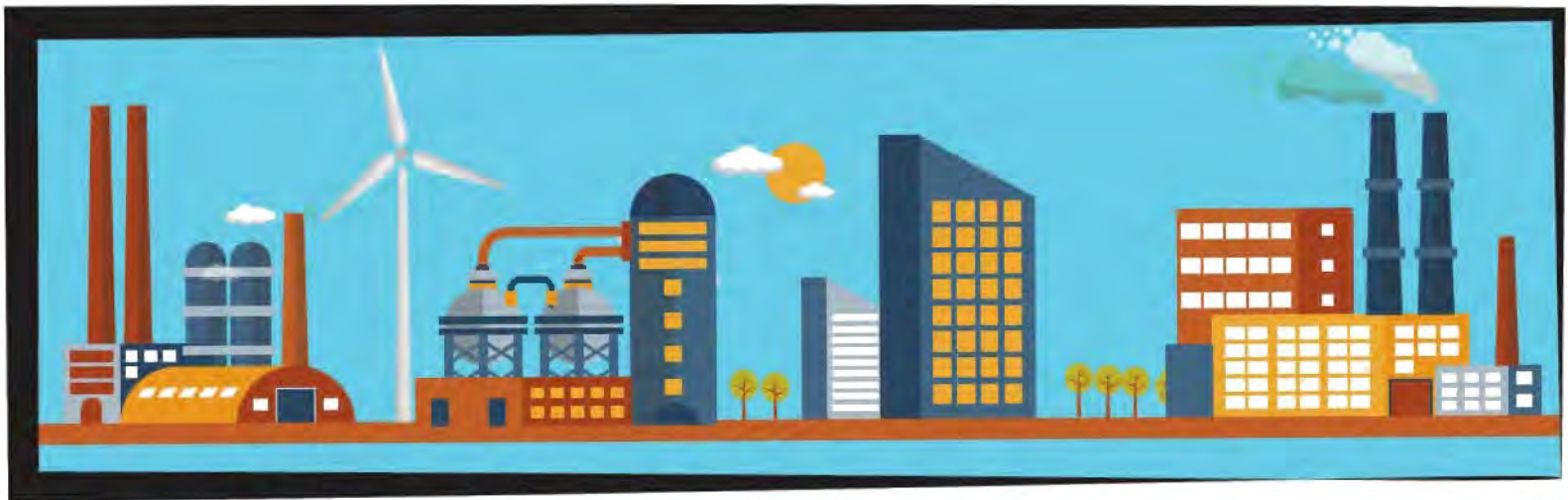






WASTEWATER TREATMENT FACILITY IMAGE 1

Compare wastewater treatment facility images 1 and 2.
Can you spot what's missing in image 2?
Draw a circle around those items!



WASTEWATER TREATMENT FACILITY IMAGE 2





ZAP!!



LARD
VEGETABLE OIL

DRIPPINGS
GREASE

MR. CAN
NBC

WATER
COOL IT

CAN IT
NARRAGANSETT BAY

LGNMXIARCANITTSNAAT
LRKBGNVEGETABLEOILA
LEDECBLIWIWATEROETS I
AACOOLITVDRIPPINGSM
RSTIVNADSNXMRCA NPH
DET NARRAGANSETT BAY





DRAW COMIC STYLE!

STEP 1

Sketch perspective lines to help you draw a super hero flying in the sky! Keep things simple at this stage. Just use a few lines and shapes to help you think about the pose.



STEP 2

Draw the rough shape of your super hero within your guides, paying attention to your perspective lines. The fists are near to us, so they need to look very big. The legs and feet are farther away so should appear smaller.



DRAW COMIC STYLE!

STEP 3

Add more detail. Sketch in the shapes of the hair and fingers, and give your super hero a simple, silly comic expression. To add movement, draw a flowing cape using curved lines.

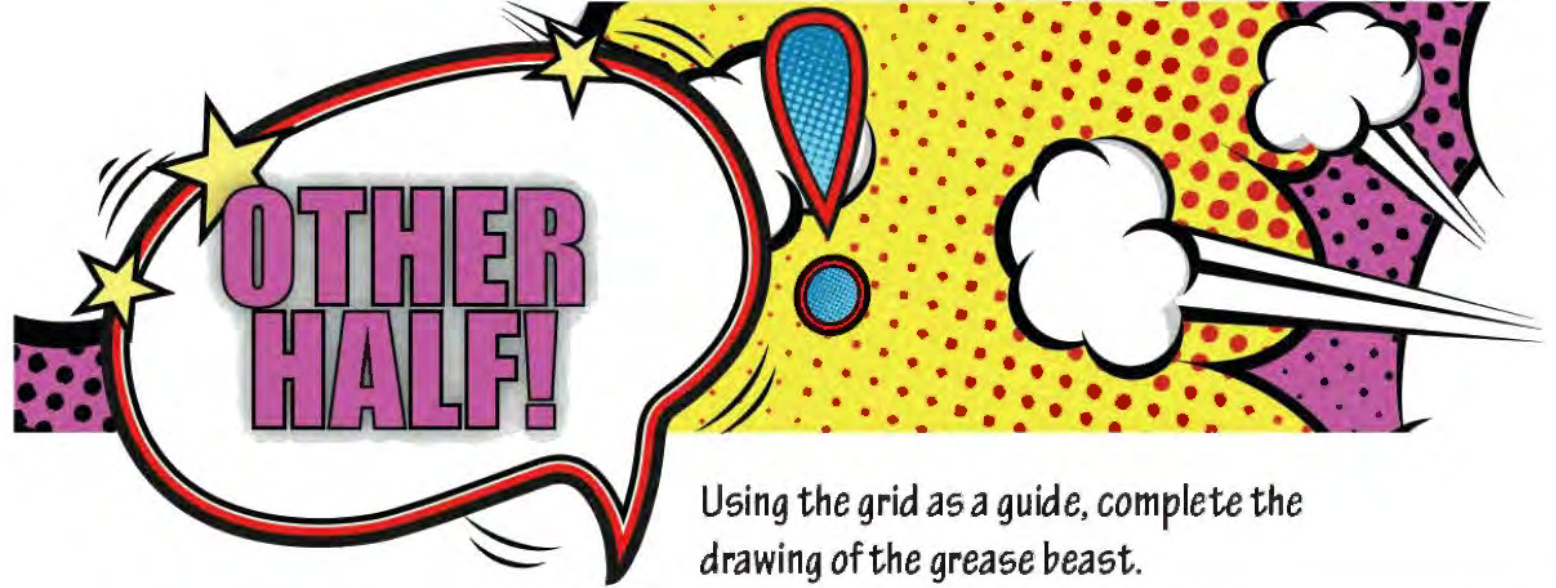


STEP 3

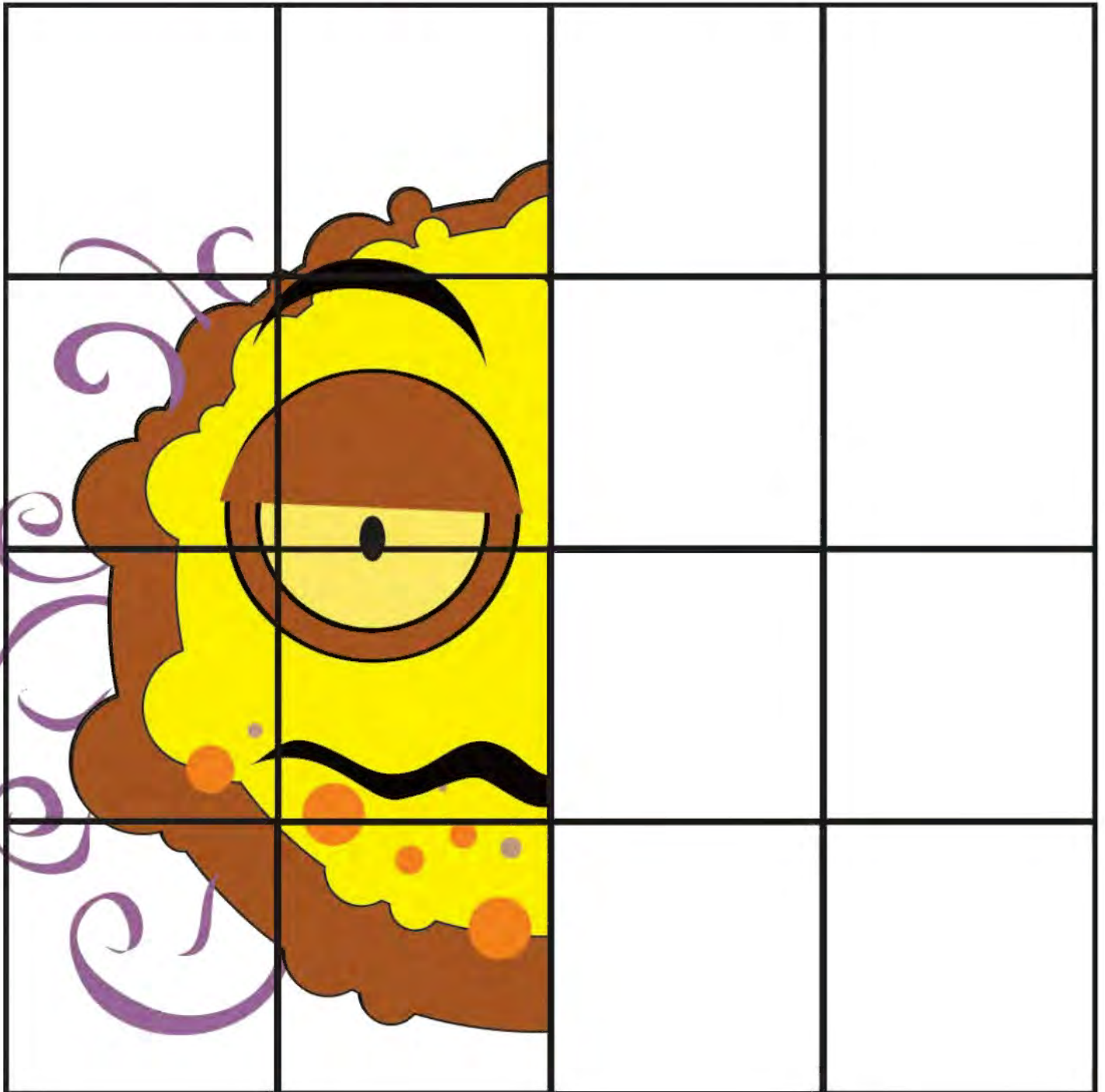
Use a heavier pencil to add more detail and shadow. Go over the drawing in black ink pen or marker, then color your super hero in bright, comic-book colors!

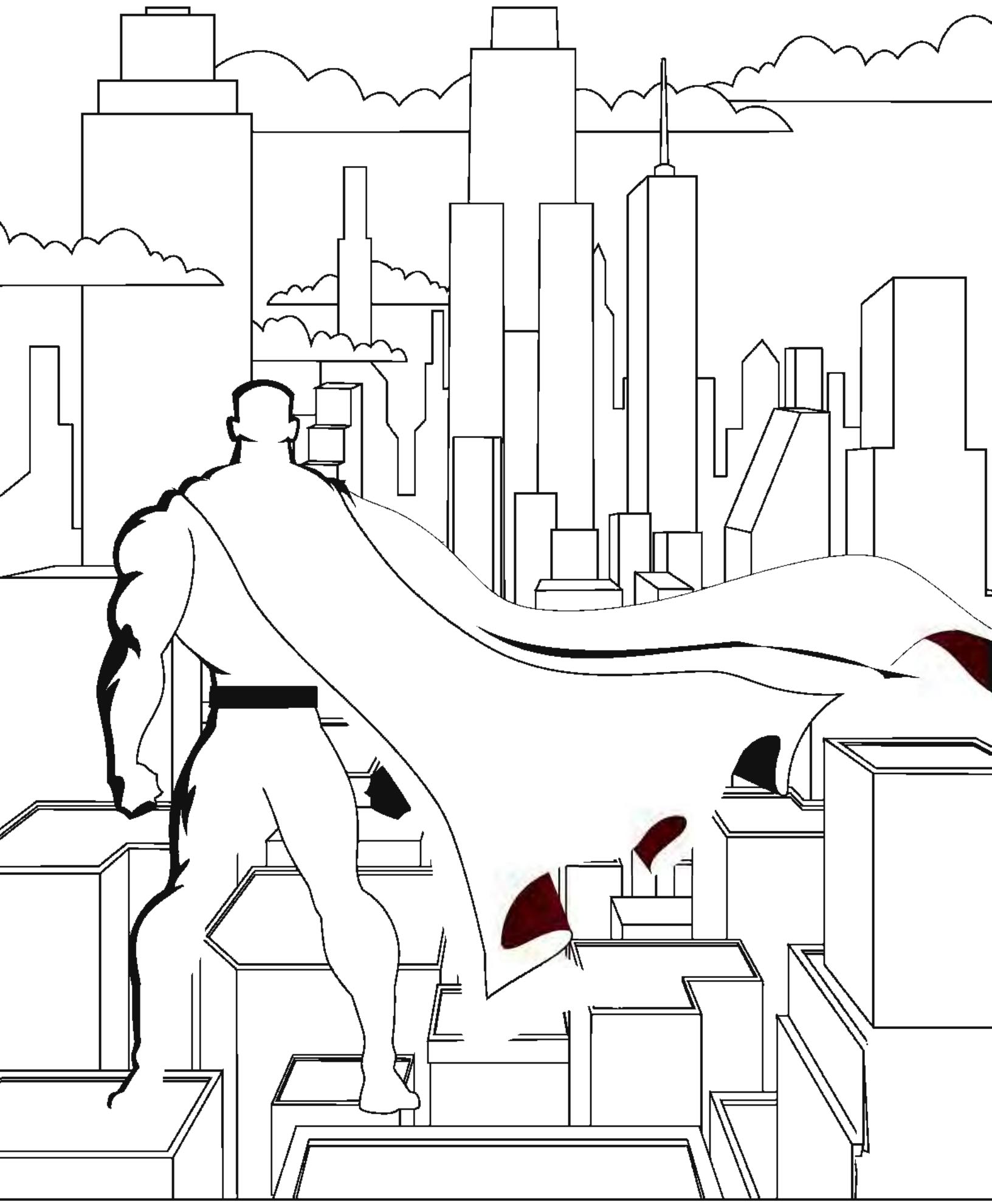


Comic style is about exaggerated elements and simple features. Once you've mastered your super hero, try drawing a whole comic strip!



Using the grid as a guide, complete the drawing of the grease beast.

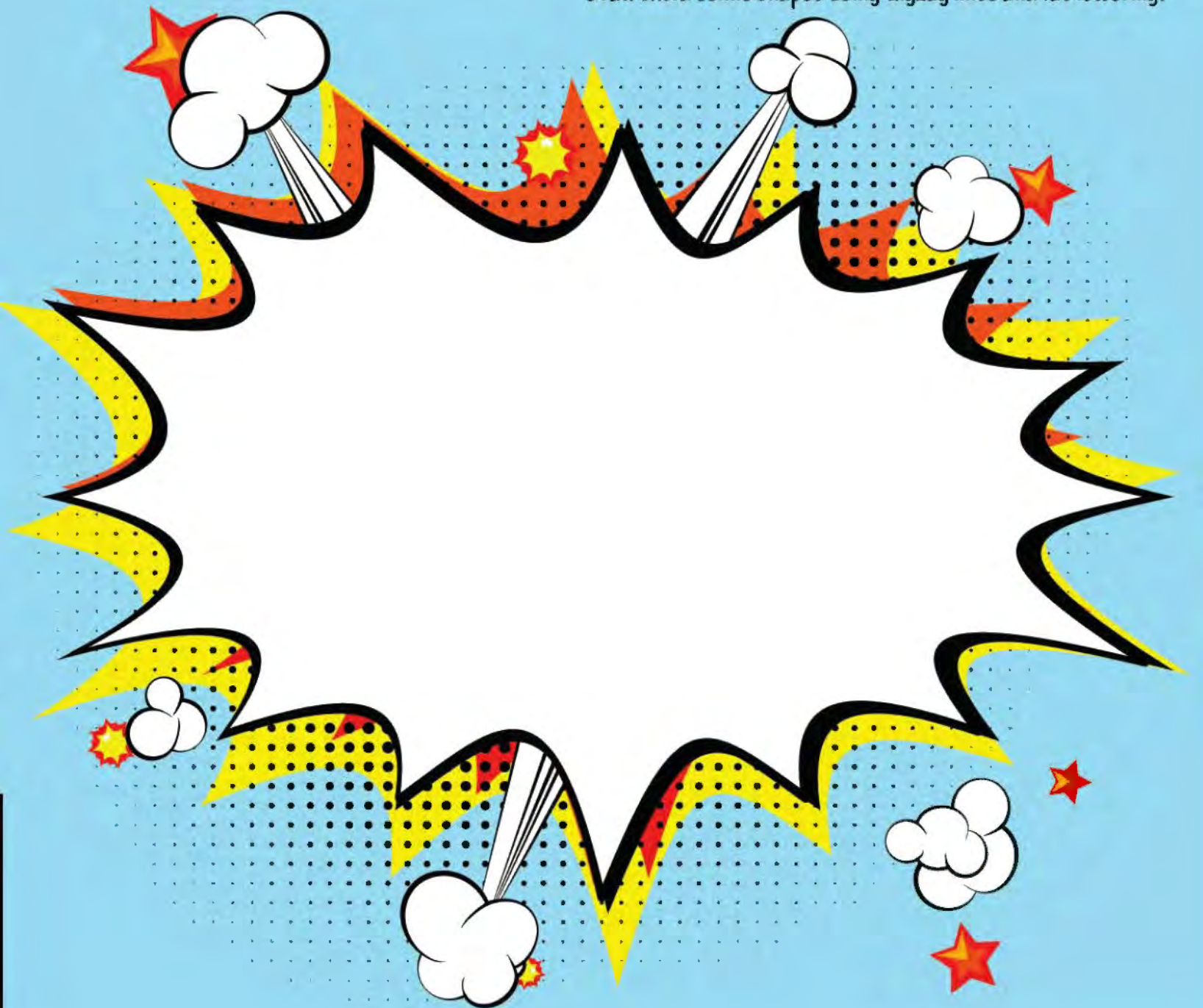






COMIC STRIP ADVENTURE!

In the next few pages draw your very own comic strip!
Every good comic strip has a super hero and one or two villains!
Start with a cool title below and let your imagination go wild!
Remember draw exaggerated elements and simple features.
Draw extra comic shapes using zigzag lines and fat lettering!





**COOL IT
& CAN IT!**

www.narrabay.com

Narragansett Bay Commission

One Service Road, Providence, RI 02905

**FATS, OILS, & GREASE
COMPLIANCE AND BEST MANAGEMENT
PRACTICES WORKBOOK
for
RESTAURANTS**

In an effort to address fats, oils and grease (FOG) management problems the Narragansett Bay Commission (NBC), in cooperation with the University of Rhode Island, the RI Department of Environmental Management and EPA Region I have established the NBC FOG-Environmental Results Program (ERP) to help the local food service industry keep FOG out of the sewer.

The goal of the NBC FOG-ERP is to improve the management of FOG at the source of generation through:

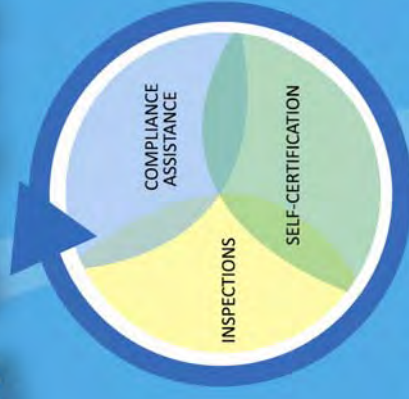
- On-site Technical Assistance
- Workshops
- Development and use of FOG Best Management Practices (BMPs)
- FOG management "Self-Evaluations"
- Compliance Inspections
- FOG data collection and analysis



1 Service Road
Providence, RI 02905
Phone: 401.461.8848
Fax: 401.461.6540
www.narrabay.com

NARRAGANSETT BAY COMMISSION

FATS, OILS, & GREASE



ENVIRONMENTAL RESULTS PROGRAM

One Service Road
Providence, RI 02905
Tel: 401.461.8848
Fax: 401.461.6540
www.narrabay.com

Fats, Oils and Grease

Fats, Oils and Grease (FOG) are by-products of the Food Service Industry (restaurants, cafeterias and other commercial food service establishments) as well as household kitchens. FOG is generated from the use of vegetable oils and animal fats in the preparation of food products.



Typical operations that produce FOG include washing of dishes, pots, and utensils; floor cleaning, equipment sanitation (collectively referred to as "Brown Grease") and the disposal of used fryolator cooking oils ("Yellow Grease").

When released into the environment, particularly into sewer systems, septic systems or water surface bodies, FOG causes serious environmental harm. FOG that is discharged into the sewer system or septic tanks will accumulate and cause blockages that often result in backups and overflows. FOG that enters municipal wastewater treatment facilities and/or

natural surface water bodies will form unsightly globular balls of grease that can foul equipment, impact beaches and deplete water oxygen levels.

Restaurants that release excess FOG to the sewer system can be closed down if grease blockages and backups occur and can be held financially responsible for any resulting damages.

The NBC FOG Environmental Results Program

The NBC FOG Environmental Results Program (ERP) has been designed to help improve the management of FOG by local restaurants through a combination of: 1) Compliance Assistance, 2) Voluntary Self Evaluation, 3) Regulatory Inspections, and 4) Certification.

1. Compliance Assistance

Pollution Prevention Engineers from the University of Rhode Island and the NBC are available to meet with participating restaurants owners and managers both one-on-one and in educational workshop settings to help implement sound and sustainable FOG Best Management Practices.

2. Self Evaluation

Participating restaurants will be trained to self evaluate their facility and will certify their FOG management practices utilizing the NBC Oil & Grease Compliance and Best Management Practices Workbook.

3. Regulatory Inspections

As required by NBC Pretreatment Program regulations, all restaurants will continue to be inspected on a regular basis. Participation in the FOG ERP will help firms prepare for regulatory FOG Inspections and help firm comply with FOG regulations.

4. Certification

Restaurants that demonstrate a superior FOG management performance level will be issued a Certification of Best Management Practices which may be displayed in their place of business.

Biodiesel Production

Yellow grease from fryolators can be converted into biodiesel which can be used in diesel engines and as a renewable home heating fuel. As part of the NBC FOG-ERP, participating restaurants are encouraged to send their waste yellow grease to a biodiesel production facility.



To participate in the NBC FOG-ERP, complete the self-evaluation checklist in the NBC Fats Oils & Grease Compliance and Best Management Practices Workbook and mail a copy to:
Narragansett Bay Commission
Pollution Prevention Program
One Service Road

valves on the truck, and hosing down the discharge area where spillage occurred.

- After cleaning up, the hauler is to proceed in a forward direction, since backing up is not allowed, and must be sure to exit the facility at a slow speed.

WHAT ELSE SHOULD I KNOW?

- The NBC runs the Septage facility as a service to Rhode Island's non-sewered residents. As such, only septage from within the state of Rhode Island may be brought to the facility. Any loads, or partial loads, from outside the state will not be accepted.

- The hauler must establish and maintain an account with a positive cash balance with the NBC Customer Service Section. The hauler will not be allowed to discharge without sufficient funds.

- Trucks with capacities less than 4,500 gallons are permitted to discharge between the hours of 8:00AM and 2:00PM, Monday through Friday and 8:00AM and 12:00 noon on Saturdays. Larger capacity trucks may discharge between the hours of 2:00PM and 4:00PM weekdays and 12:00 noon to 2:00PM on Saturdays.

- Once the NBC septage station receives 100,000 gallons of septage for any given day, only those trucks with full loads, all originating in the NBC primary service district, will be allowed to discharge. The NBC may only accept 116,000 gallons of septage daily, at which point the facility will close.

- Firms found to be falsifying paperwork submitted to the NBC and/or bringing non-residential quality septage to the facility may be subject to civil, criminal and/or administrative penalties. These penalties could include fines of up to \$25,000 per violation per day, revocation of permit and 30 days imprisonment for criminal violations.

- Haulers who discharge grease or other waste that causes the processing equipment to foul and/or breakdown will be immediately suspended from using the station for a minimum of a two-week period while NBC investigates the cause of the incident.

- Inquiries regarding permitting may be made to the NBC Pretreatment Section by calling (401) 461-8848 Ext. 483.



Narragansett Bay Commission
Corporate Headquarters:
1 Service Road, Providence, RI 02905
Phone (401) 461-8848
Fax (401) 461-6540

Pretreatment Office
2 Ernest Street
Providence, RI 02905
Phone (401) 461-8848
Fax (401) 461-0170

Lincoln Septage Receiving Facility:
692 Washington Highway
Lincoln, RI 02865
Phone (401) 333-5610
Fax (401) 333-5610



NARRAGANSETT BAY COMMISSION

LINCOLN SEPTAGE RECEIVING FACILITY

Septage Acceptance Policy Summary



OVERVIEW

The Narragansett Bay Commission (NBC) has upgraded the Lincoln Septage receiving station, installing new wastewater treatment equipment to reduce odors and remove solids contained in the septage. A six (6) inch hose connection has been installed to speed-up the discharge process and a computer tracking system has been installed for identification and billing streamlining purposes. This informational brochure provides an outline of procedures and practices which must be strictly followed to ensure the acceptance of your septage loads and the proper operation of the NBC facility.

PERMITTING REQUIREMENTS

- All trucks and/or trailers must be permitted with the NBC prior to bringing septage wastewater for disposal. Any changes, such as new or deleted vehicles, must be made known to the NBC Pretreatment office by submitting a new permit application with the correct information. It is the haulers' responsibility to ensure all registrations, insurance and DEM permits for vehicles are obtained and maintained in a valid state.
- Each permitted truck and/or trailer must be weighed empty and full to determine the capacity of the vehicle. This process must be overseen by NBC Pretreatment personnel. Appointments must be

scheduled in advance at 461-8848 Ext. 483 for this purpose.

- All trucks and/or trailers must have a NBC computer tracking chip programmed with identification and capacity information affixed to it.

- All trucks and/or trailers must have Permit Fee Paid and Permitted Volume stickers affixed.

MANIFEST REQUIREMENTS

- The manifest form must be completed in its entirety prior to arriving at the facility. The manifest requires the hauler to certify that only residential quality septage is contained in the truck that shall discharge.

- The manifest must clearly identify the origin of the load. The customer name, address and telephone number for that customer must be indicated for every load which is contained in the truck.

- A signature by the customer that your firm pumped must be on the manifest. If the customer was not home to sign the manifest, additional confirmation information regarding the customer is required in order to discharge the load. This could include a copy of the customer's signed check for the pump out or a photocopy of your company invoice to the customer. These documents must be attached to the manifest in lieu of a customer signature.

- Information provided on manifests is routinely checked by Pretreatment staff to verify the origin of the load. Pretreatment staff will routinely contact your customers.

PROCEDURES TO BE FOLLOWED AT THE STATION

- Upon arriving at the station, the driver is to wait in line to use the facility.
- When it is your turn, the facility operator will inspect the stickers on your vehicle, scan your computer chip and take your manifest and other associated information. If anything is not in order, the load will be refused.
- Prior to discharging you must take a sample under the perview of the station operator. This sample will be checked for pH and visual indications for grease or other suspected pollutants. The pH must be in the range of 5.5 to 12.0 standard units or the load will be refused. Detection of other suspected pollutants will also result in the load being refused.
- When given the OK to discharge, the hauler is to hook up to the six (6) inch discharge connection and proceed to empty the truck. Grease and/or gravel will foul the solids handling equipment and will be readily detected. **If your load contains grease and/or other dense solid material, such as gravel or rocks, do not bring it to the Lincoln facility.** It must be brought elsewhere for proper disposal.
- Upon completing the discharge, the hauler must properly clean up and make the station neat and safe for the next hauler. This includes putting away all hoses, shutting all



Narragansett Bay Commission

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

Vacation Shutdown Prohibited Sewer Discharges

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

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

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

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

Vincent J. Mesolella, *Chairman*

Raymond J. Marshall, P.E., *Executive Director*



RestoredWaters RI

A Narragansett Bay Commission Project



Controlled Blasting Information

RestoredWaters RI – formally known as the Narragansett Bay Commission's Combined Sewer Overflow (CSO) Project – is Rhode Island's largest and most important clean water project and will improve the health of the Seekonk River and Upper Narragansett Bay. The centerpiece, which marks the third and final phase of the RestoredWaters RI project, is a deep-rock tunnel that will capture and store storm-related sewage overflows. This tunnel, called the Pawtucket Tunnel, will be 2.2 miles long and 125-150 feet below ground.

A Tunnel Boring Machine (TBM) will horizontally excavate the tunnel by slowly grinding its way through deep bedrock, but in order to get the TBM below ground and to create the vertical shafts that bring the sewage overflows to the tunnel, the construction team will first need to remove the bedrock by blasting at a few specific locations along the tunnel route.

What is blasting?

Blasting is performed to fracture rock so it can be excavated for construction. The contractor drills holes in the underground rock; each hole is loaded with a carefully-calculated amount of explosives, which are then detonated. A typical blast will last approximately 3-5 seconds. Typically, there is no more than one blast per day at each location.

Neighbors may hear a warning horn just prior to the blast, a muffled blast noise, and may feel a slight vibration. The area will be monitored with seismographs to measure levels.

How can I find out when a blast will occur?

You can opt in to email notifications at RestoredWatersRI.com.

Will I feel the blast?

Most of the energy from a blast is used to break rock, but some energy will travel from the blast site in the form of groundwaves and airwaves. These can cause your house to mildly vibrate or shake. Humans and animals are very sensitive to all vibrations and it is possible that you will feel or hear your house shake from the blasting, even at very low levels. All the blasts related to the RestoredWaters RI project are designed far below levels known to cause property damage, but we encourage any interested homeowner within 500 feet of the blasting sites to consider allowing the project team to perform a preconstruction survey of their property.

Why do some blasts feel stronger than others?

How a blast feels depends on groundwaves or airwaves that reach your house. These are influenced by the type of blast, the distance from the blast, the amount of explosives, whether you are inside or outside your house, and even the weather.

Your pets may also sense blast vibrations. Pets, like humans, are sometimes startled by the sound of a blast or warning signals.

Blasting for RestoredWaters RI:

- Blasts can only occur between 7 AM and 5 PM
- Typically, no more than 1 blast/day
- Ground vibration limits set at 2.0 in/sec and air vibrations limits at 133 dBL
- Each blast monitored at 4 locations

Who sets the guidelines for safe and effective blasting?

In the United States, safe vibration standards are based on scientific studies conducted by the U.S. Bureau of Mines (USBM). In addition, the contractor for RestoredWaters RI follows guidelines established by the International Society of Explosive Engineers (ISEE) for monitoring vibrations and air overpressure.

Do you want to dig deeper into blasting?

Visit RestoredWatersRI.com/blasting

ATTACHMENT VOLUME I

SECTION 2

***TYPICAL NBC WASTEWATER
DISCHARGE PERMITS***

***TYPICAL METALFINISHER
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B1112-097-0627

Company Name: **CHEMART COMPANY**

Facility Address: 15 New England Way, Lincoln, RI 02865

Mailing Address: 11 New England Way, Lincoln, RI 02865

Facility President: Mr. David Beaupre

Facility Authorized Agents: Mr. Alfred Silva, Mr. Chijioke Njoku

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. David Beaupre and Chemart 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 - X.

**This permit becomes effective on July 1, 2022
and expires on June 30, 2027.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

June 20, 2022
Date

NOTE: The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Effluent Discharge Limitations:

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 18, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee agrees that the average discharge per calendar day of metal finishing process wastewater is greater than or equal to 10,000 but less than 50,000 gallons. Decreasing or increasing the average daily water usage may affect the monitoring frequency. The permittee must notify the NBC of any deviations from the aforementioned average flow range so that required permit modifications may be made.
5. The permittee is classified as a Metal Finisher and, therefore, must at all times comply with EPA Categorical Regulations 40 CFR §433.17, Pretreatment Standards for New Sources. EPA regulations require that Metal Finishers maintain full compliance with the EPA Total Cyanide Metal Finishing maximum limit of 1.20 ppm and the monthly average limitation of 0.65 ppm at the combined point of cyanide process discharge, prior to combining with non-cyanide bearing wastewater streams, and at the discharge from the cyanide treatment system. Upon conducting an engineering review of the facility, it has been determined that the discharges from the imitation rhodium plating area are the only waste streams contaminated with cyanide. The permittee must sample the inline cyanide batch treatment tank, Tank BN-104. The EPA Total Cyanide Metal Finishing limitations will be enforced at this sampling location. The NBC Total Cyanide limitations will be enforced at the final discharge location.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
 - a. Treated Metal Finishing Rinsewaters;
 - b. Treated Ultrasonic Solution;
 - c. Treated Electrocleaner Solution;
 - d. Treated Stripper Solution;
 - e. Treated Acid Dip Solution;
 - f. Treated Sprean 68 Solutions;
 - g. Treated Oxiban Solution;
 - h. Treated Soak Cleaners Solution;
 - i. Treated Ammonium and Sodium Persulfide Solutions;
 - j. Treated Screen Printing Wastewaters;
 - k. Boiler Blowdown/Steam Condensate;
 - l. Cooling Tower Purges Limited to 50 gallons per day;
 - m. Non-contact Cooling Water from Sodium Carbonate Developer.

2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

C. Prohibitions:

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
 - a. Concentrated Electroplating Solutions;
 - b. Concentrated Cyanide Solutions;
 - c. Acidic Solutions with a pH less than 5.0 standard units;
 - d. Caustic Solutions with a pH greater than 11.0 standard units;
 - e. Degreasing Solutions;
 - f. Solvents;
 - g. Sludges;
 - h. Fuel and Lubricating Oils;
 - i. Fixer/Developer Solutions;
 - j. Photo Finishing Rinsewaters;
 - k. Spent Ferric Chloride Solutions;
 - l. Caustic Monoethanolamine Solution;
 - m. Tarniban Solutions.

2. The permittee is strictly prohibited from batch discharging the contents of the cooling tower without first obtaining approval from the NBC. In order to obtain approval, the contents of the cooling tower must be sampled in accordance with Section G(3) of this permit.

3. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 18, attached hereto and incorporated herein.
4. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
5. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

D. Pretreatment Requirements:

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of three (3) sample location(s) must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - The upflow baffle located in the final pH adjustment tank TK-108, collecting all process discharges specified in Section B(1)(a through k) of this permit.

Sample Location #2 - Inline cyanide batch destruct tank BN-104, collecting all process discharges specified in Section B(1)(a) of this permit.

Sample Location #3 - Sample port located on the cooling tower discharge line, collecting all process discharges specified in Section B(1)(n) 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 #3 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit. The discharge through Sample Location #2 must be in compliance with the EPA Metal Finishing Standards referenced in Section A(5) of the permit.

2. The permittee has installed and shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.

3. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

E. Boiler Facility Requirements:

1. The permittee has hard plumbed all boiler blowdown and steam condensate discharges to the sewer. A sample port has been installed on each boiler room process water discharge line. The sample port has a minimum of an eight (8) inch clearance from the floor so that a sample bottle can be inserted. Daily visual inspections of steam condensate must be documented in the logbook as required in Section H of this permit.
2. The permittee has permanently sealed all open floor drains and any other open process wastewater and sewer discharge connections within the boiler facility so as to prevent an incidental or accidental discharge from the boiler room.

F. Zero Discharge/Recycle Operation Requirements:

1. The permittee has installed and shall operate a Zero Process Discharge Wastewater Recycle Pretreatment System as proposed in the plans that have been approved by the NBC. This pretreatment system shall be used specifically for the purpose of recycling wastewater or eliminating discharges from the following process operations:
 - a. Plating Ultrasonic Solutions;
 - b. Polishing Ultrasonic Solutions;
 - c. Gold Cyanide Rinsewater;
 - d. Copper Cyanide Rinsewater;
 - e. Nickel Dead Rinsewater;
 - f. Etching Trench Wastewaters;
 - g. Photo Finishing Fixer, Developer, and Rinsewaters.
2. The permittee shall make no changes to the process tanks or pretreatment system without first submitting plans to the NBC for approval. Only those solutions indicated as being discharged to the treatment system on the plans 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 the process tanks, the pretreatment recycle system, or associated piping.

4. The permittee has capped off and sealed all sewer drain lines in the facility and no process wastewater may be discharged to the sewer through sanitary or any other sewer connection.
5. The permittee shall post signs at all sanitary sewer connections stating the following: "Discharge of Chemicals Prohibited by Rhode Island Law".
6. Failure to notify NBC personnel prior to resuming 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.

G. Monitoring Requirements:

1. The permittee shall monitor the pH of the effluent discharge and record it continuously. The permittee shall report the results monthly in a summary report giving the maximum, minimum and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The pH Monitoring Report must be received by the NBC within thirty (30) days from the end of the month in which the data is recorded. The original recording chart must be maintained on site for a period of at least three (3) years.
2. The permittee shall conduct sampling over one (1) full normal operating day during the months of January, February, March, April, May, June, July, August, September, October, November, and December until the expiration date of this permit.
 - a. A composite sample is to be collected which must consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the upflow baffle located in the final pH adjustment tank TK-108, Sample Location #1. The composite samples collected in April and October are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Silver (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)
	Nickel (Total)	

The composite samples collected during all other sampling months are to be analyzed for the following parameters:

Chromium (Total)	Copper (Total)	Zinc (Total)
	Nickel (Total)	

- b. On the same day that the composite samples listed in Section G(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 upflow baffle located in the final pH adjustment tank TK-108, Sample Location #1 (i.e., one (1) grab sample collected every two (2) hours over an eight (8) hour operating day). Each grab sample must be preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.6 grams of ascorbic acid must be added. The sample should then be retested for chlorine residual, and if it is present, the addition of ascorbic acid should be repeated. Once residual chlorine has been eliminated from the sample, the pH of the sample must be checked and elevated to greater than 12.0 standard units by the addition of sodium hydroxide, if necessary. Once the grab sample has been preserved to a pH greater than 12.0 standard units and no chlorine residual is detected, it may be composited with the other grab samples collected on that operating day. The composite of preserved grab samples must be refrigerated until analysis and must be analyzed within fourteen (14) days of collection for **Total Cyanide**.
- c. Composite samples collected during the months of January, March, May, July, September, and November are to be collected while the inline cyanide batch treatment tank BN-104, Sample Location #2, is being discharged. In addition, on the days that these composite samples are collected, a grab sample must be collected from the inline cyanide oxidation batch treatment tank BN-104 after treatment has been provided and just before discharge of this tank. The grab sample from the inline cyanide treatment tank must be preserved immediately upon collection in accordance with EPA Regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.6 grams of ascorbic acid must be added. The sample must then be retested for chlorine residual, and if it is present, the addition of ascorbic acid must be repeated. Once residual chlorine has been eliminated from the sample, the pH of the sample must be checked and elevated to greater than 12.0 standard units by the addition of sodium hydroxide, if necessary. The preserved grab sample must be refrigerated until analysis and must be analyzed within fourteen (14) days from sample collection for **Total Cyanide**. This sample must be in compliance with the EPA Metal Finishing Total Cyanide Standards referenced in section A(5) of this permit.

If the inline cyanide treatment tank is not discharged during the required sampling month, the permittee must notify the NBC in writing and sample during the next discharge of the tank.

3. Prior to batch discharging the contents of the cooling tower, the permittee must collect one (1) grab sample from the sample port located on the cooling tower discharge line, Sample Location #3. The grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Chromium (Total)	Copper (Total)	Zinc (Total)
	Nickel (Total)	

Analytical results must be submitted to the NBC with a properly completed Self-Monitoring Compliance Report and chain of custody documentation requesting permission to discharge the contents of the cooling tower. The permittee may only batch discharge the contents of the cooling tower once approval is received from the NBC.

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.

H. 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. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the boiler operation including, but not limited to, the following:
 - a. A listing of each boiler facility blowdown visual inspection documenting the date, time, person conducting the blowdown and the appearance of the blowdown. This procedure ensures that a prohibited material is not discharged;
 - b. A listing of the date of each fuel tank filling.
3. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

I. 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.

J. 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.

K. 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.

L. 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.

M. 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.

N. 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. Chemart Company shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Chemart 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 Chemart 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 Chemart Company shall be subject to the terms and conditions of the permit as if named herein.

O. 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.

P. 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.

Q. 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.

R. 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.

S. 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.

T. 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.

U. 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.

V. 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.

W. 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.

X. 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

Chemart Company
Sampling Requirements

	Sample Location #1 The Upflow Baffle Located in the Final pH Adjustment Tank TK-108		Sample Location #2 Inline Cyanide Batch Destruct Tank BN-104	
Month	Composite Sample	Parameters	Grab Sample*	Parameters
January	X	Cr, Cu, Ni, Zn, CN	X	EPA-CN
February	X	Cr, Cu, Ni, Zn, CN		
March	X	Cr, Cu, Ni, Zn, CN	X	EPA-CN
April	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN		
May	X	Cr, Cu, Ni, Zn, CN	X	EPA-CN
June	X	Cr, Cu, Ni, Zn, CN		
July	X	Cr, Cu, Ni, Zn, CN	X	EPA-CN
August	X	Cr, Cu, Ni, Zn, CN		
September	X	Cr, Cu, Ni, Zn, CN	X	EPA-CN
October	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN		
November	X	Cr, Cu, Ni, Zn, CN	X	EPA-CN
December	X	Cr, Cu, Ni, Zn, CN		

Legend

Cd - Cadmium Pb - Lead *These grab samples are to be collected on the same day
Cr - Chromium Ni - Nickel that the composite sample is collected and tank is to be
Cu - Copper Ag - Silver discharged while composite sample is being collected
CN - Cyanide Zn - Zinc

CERTIFICATE TO DISCHARGE

the following types of process water:

**EQUIPMENT AND BOTTLE WASH WATER, PASTEURIZING AND
HOMOGENIZER NON-CONTACT COOLING WATER, BOILER BLOWDOWN**

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Chemart Company

11 New England Way

Lincoln, RI 02865

PERMIT NUMBER: B1112-097-0627

PERMIT EXPIRATION DATE: 06/30/2027

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

June 20, 2022

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 LEACHATE
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: P3304-019-0727

Company Name: **OCEAN STATE PEELED POTATO, INC.**

Facility Address: 1587 Plainfield Pike, Johnston, RI 02919

Mailing Address: 1587 Plainfield Pike, Johnston, RI 02919

Facility President: Mr. Emelio Cardillo

Facility Authorized Agent: Ms. Tammy Cardillo

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), **Mr. Emelio Cardillo and Ocean State Peeled Potato, Inc.**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 15 pages with conditions A - U.

**This permit becomes effective on August 1, 2022
and expires on July 31, 2027.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

July 15, 2022
Date

NOTE: The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Effluent Discharge Limitations:

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee conducts food operations and discharges wastewater with high concentrations of conventional pollutants. The permittee must comply with the Ammonia, Biochemical Oxygen Demand, Total Nitrogen, and Total Suspended Solids limitations for Category 33 specified in Table 1 on page 14, attached hereto and incorporated herein.
4. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
5. The permittee agrees that the discharge per calendar day of food processing wastewater is greater than or equal to 1,000 gallons, but less than 10,000 gallons. Decreasing or increasing the daily water usage may affect the monitoring frequency specified in this permit. The 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. Food processing wastewater;
 - b. Equipment wash water;
 - c. Processing area floor and walls wash water.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

C. Prohibitions:

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
 - a. Solids greater than ½ inch in diameter;
 - b. Acidic Solutions with a pH less than 5.0 standard units;
 - c. Caustic Solutions with a pH greater than 11.0 standard units;
 - d. Degreasing Solutions;
 - e. Solvents;
 - f. Sludges;
 - g. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

D. Pretreatment Requirements:

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 – Sample tee on the process wastewater discharge pipe, collecting all process discharges specified in Section B(1)(a, b, and c) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee shall install, operate, and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee must ensure that all floor drains are equipped with screens, filters, or some other solids retention device to ensure that solids larger than ½ inch are not discharged to the sewer system.
4. The permittee shall maintain pretreatment measures in conformance with plans approved by the NBC. All pretreatment measures shall be fully implemented whenever process discharges to the sewer occur. Pretreatment measures include the following:
 - a. All tanks which discharge process wastewater to the sewer must discharge through a screen or grate capable of retaining the smallest size potato prepared in the facility or must discharge to a properly designed settling tank;
 - b. All floor drains must be fitted with a screen or grate capable of retaining the smallest size potato prepared in the facility;
 - c. All potato peeling machines must discharge to a properly designed settling tank capable of removing both floatable and settleable solids.
5. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

E. Monitoring Requirements:

1. The permittee shall conduct sampling over one (1) full normal operating day during the months of January, April, July, and October, until the expiration date of this permit.
 - a. A composite sample is to be collected which must consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the sample tee on the process discharge pipe, Sample Location #1. The composite samples collected in January, July, April, and October are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand
Total Suspended Solids

The composite samples collected during the months of July and October are also to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Ammonia
Total Nitrogen

Table 2 attached hereto summarizes the sampling requirements for this facility.

2. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.
3. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
4. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
5. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
 - a. Failure to meet effluent limitations;
 - b. Change in production processes;
 - c. Expansion or reduction of production;
 - d. Change in water usage;
 - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

F. Record Keeping Requirements:

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
 - a. Cleaning and emptying of the settling tanks, floor drain screens and grates;
 - b. Amount of waste generated;
 - c. Completed manifest forms for hazardous materials;
 - d. Maintenance performed on the pretreatment 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. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781. Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
 - g. Change in the personnel responsible for the proper operation of pretreatment equipment.
3. Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

I. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

J. Fees:

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

K. Authorization To Do Business:

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Ocean State Peeled Potato, Inc. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Ocean State Peeled Potato, 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 Ocean State Peeled Potato, 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 Ocean State Peeled Potato, Inc. shall be subject to the terms and conditions of the permit as if named herein.

L. Closing, Selling, Moving the Business:

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

M. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

N. Permit Violations:

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

O. Revocation/Suspension of Permit:

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:

- a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
- b. Failure to report changes in operations or wastewater constituents;
- c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

P. Civil And Criminal Liability:

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

Q. Duty To Comply:

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

R. Removed Substances:

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

S. Permit Modification/Renewal:

1. This permit may be modified for various reasons, including but not limited to the following:
 - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
 - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
 - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
 - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
 - e. Violation of any terms or conditions of the permit;
 - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
 - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
 - h. To correct typographical or other errors in the permit;
 - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
 - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

T. Integration:

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

U. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

KCG:NJD:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- Mass-Based Limits Worksheet

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

Ocean State Peeled Potato, Inc.
Sampling Requirements

Sample Location #1		
Sample Tee on the Process Wastewater Discharge Pipe		
Month	Composite	Parameters
January	X	BOD, TSS
February		
March		
April	X	BOD, TSS
May		
June		
July	X	BOD, TSS, NH ₃ , TN
August		
September		
October	X	BOD, TSS, NH ₃ , TN
November		
December		

Legend

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

NH₃ - Ammonia

TN- Total Nitrogen

CERTIFICATE TO DISCHARGE

the following types of process water:

FOOD PROCESSING WASTEWATER, EQUIPMENT AND PROCESSING AREA WASH WATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Ocean State Peeled Potato, Inc.

1587 Plainfield Pike

Johnston, RI 02919

PERMIT NUMBER: P3304-019-0727

PERMIT EXPIRATION DATE: 07/31/2027

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

July 15, 2022

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL BREWERY
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: B3602-004-0127

Company Name: **RAVENOUS BREWING COMPANY**

Facility Address: 10 Industrial Road, Cumberland, RI 02864

Mailing Address: 10 Industrial Road, Cumberland, RI 02864

Facility President: Mr. Dorian Rave

Facility Authorized Agents: Mr. Dorian Rave, Mr. Patrick Reilly

User Classification: Brewing 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. Dorian Rave and Ravenous Brewing 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 15 pages with conditions A -U.

**This permit becomes effective upon receipt
and expires on January 31, 2027.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

February 28, 2022
Date

NOTE: The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Effluent Discharge Limitations:

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 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 less than 10,000 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. Mashtun Wash Water;
 - c. Fermenter Wash Water;
 - d. Brite Tank Wash Water;
 - e. Keg Washing Machine Wash Water;
 - f. Floor Wash Water;
 - g. Glassware Wash Water.

2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

C. Prohibitions:

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
 - a. Waste Beer and Off-Specification Product;
 - b. Spent Mash, Grains, and Yeast;
 - c. Tank Heels/Bottoms;
 - d. Solids greater than 1/2 inch in diameter;
 - e. Acidic Solutions with a pH less than 5.0 standard units;
 - f. Caustic Solutions with a pH greater than 11.0 standard units;
 - g. Degreasing Solutions;
 - h. Solvents;
 - i. Sludges;
 - j. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
4. The permittee may use portable pumps and flexible hose to transfer wash water through the clean-in-place system from the Fermenter, Mashtun, Keg Wash Station, Brite Tank, and Brew Kettle washing operations. The length of the flexible hose shall not exceed ten feet. Portable pumps and flexible hoses may not be used to transfer any other wastewater to the NBC sewer system.

D. Pretreatment Requirements:

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the wastewater collection and treatment tank, 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 shall provide pretreatment of the process wastewater discharges listed in Section B(1) above if determined necessary by the NBC to ensure that effluent limitations are met at all times. Plans of the pretreatment system must be submitted to the NBC for approval before beginning construction.
3. The permittee must ensure that all floor drains are equipped with screens, filters, or some other solids retention device to ensure that solids larger than 1/2 inch are not discharged to the sewer system.
4. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

E. Monitoring Requirements:

1. The permittee shall conduct sampling over one (1) full normal operating day during the months of April, and October, until the expiration date of this permit. A composite sample must be collected from the sample port on the discharge line of the wastewater collection and treatment tank, Sample Location #1, and consist of equal volume grab samples collected from each batch discharge of the wastewater collection and treatment tank. The composite samples collected in April, and October are to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand
Total Suspended Solids

Table 2 attached hereto summarizes the sampling requirements for this facility.

2. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.
3. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
4. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
5. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
 - a. Failure to meet effluent limitations;
 - b. Change in production processes;
 - c. Expansion or reduction of production;
 - d. Change in water usage;
 - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

F. Record Keeping Requirements:

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:

Date, volume, and pH of each batch discharge

2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

G. Spill and Slug Prevention Control Plan:

Within one (1) month from the effective date of this permit, the permittee must complete and submit the NBC guidance document entitled Spill and Slug Prevention Control Plan for NBC Sewer Users. This plan shall include detailed plans of equipment and structures that have been or will be installed to prevent incidental or accidental spills of untreated wastewater, raw materials, and/or hazardous materials from entering the NBC facilities. This plan shall include a description of the operating procedures to contain and handle the spill and shall address all items in the enclosed copy of the plan. The permittee must obtain NBC approval of the Spill and Slug Prevention Control Plan. Within one (1) month from the approval date of the Spill and Slug Prevention Control Plan, the permittee must implement the NBC approved Spill and Slug Prevention Control Plan and must maintain the plan in effect at all times.

H. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350. Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
 - g. Change in the personnel responsible for the proper operation of pretreatment equipment.
3. Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

I. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

J. Fees:

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

K. Authorization To Do Business:

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Ravenous Brewing Company shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Ravenous Brewing 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 Ravenous Brewing 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 Ravenous Brewing Company 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.

NPD:NJD:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- Spill and Slug Prevention Control Plan

Table 1

NBC Effluent Discharge Limitations
Bucklin Point District

All parameters in mg/l unless otherwise specified

Parameter	Limitation (Max)
Arsenic(Total)	0.03
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.50*
Lead (Total)	0.69
Mercury (Total)	0.06
Nickel (Total)	1.62*
Silver (Total)	0.40
Zinc (Total)	1.67
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115**
Ammonia	50**
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 34, and 36	BOD ₅ and TSS	10
32	BOD	570
32	TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300**
32	Ammonia	300**

* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

Table 2

Ravenous Brewing Company
Sampling Requirements

Sample Location #1		
Sample Port on the Discharge Line of the Wastewater Collection and Treatment Tank		
Month	Composite Sample	Parameters
January		
February		
March		
April	X	BOD, TSS
May		
June		
July		
August		
September		
October	X	BOD, TSS
November		
December		

Legend

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

CERTIFICATE TO DISCHARGE

the following types of process water:

BREWING OPERATIONS WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Ravenous Brewing Company

10 Industrial Road

Cumberland, RI 02864

PERMIT NUMBER: B3602-004-0127

PERMIT EXPIRATION DATE: 01/31/2027

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

February 28, 2022

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL ZERO PROCESS
WASTEWATER-SANITARY
DISCHARGE PERMIT***



ZERO PROCESS WASTEWATER - SANITARY DISCHARGE PERMIT

Permit Number: P4100-109-0327
Company Name: **D & D CHROME PLATING, INC.**
Facility Address: 355 Dexter Street, Providence, RI 02907
Mailing Address: 355 Dexter Street, Providence, RI 02907
Facility President: Mr. David Habershaw
Facility Authorized Agent: Mr. David Habershaw
User Classification: Recycled Metal Finishing Operations
Categorical Standards Applicable: None

In accordance with R.I.G.L. §46-25-1 et. seq. and The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), the Narragansett Bay Commission hereby grants a Zero Process Wastewater-Sanitary Discharge Permit to **Mr. David Habershaw and D & D Chrome Plating, 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 13 pages with conditions A - T and Attachment A.

**This permit becomes effective on April 1, 2022
and expires on March 31, 2027.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

March 25, 2022
Date

Mr. David Habershaw and D & D Chrome Plating, Inc. hereby consents to this Zero Process Wastewater-Sanitary Discharge Permit. In so consenting, appropriate officers of **D & D Chrome Plating, Inc.** have personally read and understood each of the numbered provisions in this Zero Discharge Permit. This permit allows **D & D Chrome Plating, 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 that have been approved by the NBC. This pretreatment system shall be used specifically for the use of recycling wastewater or eliminating discharges from the following operations:

Electroplating Operations

2. The permittee shall make no changes to the process tanks or pretreatment system without first submitting plans to the NBC for approval. Only those solutions indicated as being discharged to the treatment system on the plans approved by the NBC may be treated on-site in the pretreatment equipment.
3. If any problems with the recycle system arise or if the permittee would like to connect to the sewer for the purpose of discharging any process wastewater streams, the permittee must notify the NBC, in writing, and obtain written approval from the NBC before resuming discharge or making any physical changes to process tanks, the pretreatment recycle system, or associated piping.
4. The permittee shall cap off and seal all process wastewater sewer drain lines in the facility and no process wastewater may be discharged to the sewer through sanitary or any other sewer connection.
5. The permittee shall post signs at all sanitary sewer connections stating the following: "Discharge of Chemicals Prohibited by Rhode Island Law".
6. Failure to notify NBC personnel prior to resuming process wastewater discharges to the sewer may be considered an intentional violation of the Rules and Regulations and may subject the permittee to civil and/or criminal penalties as defined in R.I.G.L. §46-25-25.2 and §46-25-25.3.

B. Prohibitions:

1. The permittee is strictly prohibited from discharging any type of process wastewater streams to the NBC sewer system including all prohibited substances as defined in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:

- a. Electroplating/Metal Finishing Wastewaters;
 - b. Cooling Wastewaters;
 - c. Rinse Solutions;
 - d. Soap Cleaning Solutions;
 - e. Cyanide Solutions;
 - f. Acid/Alkaline Solutions;
 - g. Vibratory/Tubbing Wastewaters;
 - h. Metal Cleaning Solutions;
 - i. Degreasing Solutions;
 - j. Solvents;
 - k. Sludges;
 - l. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater or sanitary wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 13, attached hereto and incorporated herein.
 3. The permittee shall not use portable pumps and flexible hoses within the facility for transfer of solutions without written authorization from the NBC.

C. Record Keeping Requirements:

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
 - a. Amount of sludge generated on a monthly basis;
 - b. Completed manifest forms for hazardous materials;
 - c. Maintenance performed on the pretreatment system and other maintenance requests specified by inspectors of the NBC.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

D. Certification of No Discharge:

The permittee shall submit written certification monthly stating that the permittee has made no process wastewater discharges to the sewer during the previous one (1) month period. This certification must be received within thirty (30) days from the end of the required reporting month. This certification must contain monthly water meter readings and must be made on the form designated as Zero Process Wastewater Discharge Certification, Attachment A.

E. Spill and Slug Control Plans:

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

F. Toxic Organic/Solvent Management Plan:

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

G. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781. Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

H. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

I. Fees:

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

J. Authorization To Do Business:

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. D & D Chrome Plating, Inc. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event D & D Chrome Plating, 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 D & D Chrome Plating, 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 D & D Chrome Plating, Inc. shall be subject to the terms and conditions of the permit as if named herein.

K. Closing, Selling, Moving the Business:

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to selling or ceasing business and/or disposing of any process waste associated with the move or the cessation of business.

L. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

M. Permit Violations:

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

N. Revocation/Suspension of Permit:

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
 - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
 - b. Failure to report changes in operations or wastewater constituents;
 - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
 - d. Failure to adhere to an approved compliance schedule;
 - e. Failure to comply with administrative orders or settlement agreements;
 - f. Failure to pay authorized fees and user charges;
 - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

O. Civil and Criminal Liability:

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

P. Duty To Comply:

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Q. Removed Substances:

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

R. Permit Modification/Renewal:

1. This permit may be modified for various reasons, including but not limited to the following:
 - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
 - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
 - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
 - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
 - e. Violation of any terms or conditions of the permit;
 - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
 - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
 - h. To correct typographical or other errors in the permit;
 - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
 - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

S. Integration:

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

T. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

EJS:NPD:smb

Attachments:

- Designation of Authorized Agent Form
- RCRA Handbook
- List of Toxic Organic Compounds
- Monthly Zero Process Wastewater Discharge Certification

Table 1

NBC Effluent Discharge Limitations
Field's Point District

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)
Arsenic(Total)	0.02*
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.58**
Lead (Total)	0.60
Mercury (Total)	0.005
Nickel (Total)	1.62
Silver (Total)	0.43
Zinc (Total)	2.61
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)
14	BOD ₅ and TSS	5
23 and 29	BOD ₅ and TSS	20
25, 28, 32, 34, and 36	BOD ₅ and TSS	10
33	BOD ₅ and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300***
32	Ammonia	300***

* The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L

** The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.

*** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

Attachment A

Zero Process Wastewater Discharge Certification

For the Month of _____, 20__

Company Name: _____

Address: _____

RETURN TO:
Narragansett Bay Commission
Pretreatment Program
2 Ernest Street
Providence, RI 02905-5502

I, _____, as authorized representative of _____, do hereby decree that no process wastewater was discharged into the Narragansett Bay Commission sewer system for the past month.

Date of Meter Readings: _____

<u>Meter Number</u>	<u>Water Meter Readings</u>	<u>Units (cf, gal.)</u>
Meter #1	_____	_____
Meter #2	_____	_____
Meter #3	_____	_____

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

Authorized Representative Signature

Date

***TYPICAL SEPTAGE HAULER
WASTEWATER DISCHARGE PERMIT***



NARRAGANSETT BAY COMMISSION SEPTAGE DISCHARGE PERMIT

Permit Number: B8000-150-0127
Company Name: **BLUE LINE SEPTIC**
Company President: Mr. Charles A. Lang
Facility Address: 23 Bishop Hill Road, Johnston, RI 02919
Mailing Address: P. O. Box 889, North Scituate, RI 02857
DEM License Number: 922

In accordance with Title 46, Chapter 25 (Act) of Rhode Island General Laws and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), the Narragansett Bay Commission (NBC) hereby authorizes **Mr. Charles A. Lang and Blue Line Septic**, 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 February 1, 2022
and expires on January 31, 2027.**

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

January 25, 2022
Date

CONDITIONS

All terms used herein unless otherwise indicated shall be construed as defined under Section 1.14.4 of the Rules and Regulations.

1. Location of Discharge: Septage may be discharged only at the NBC Lincoln Septage Receiving Station or other authorized location as the Commission may designate.

2. Origins of Septage: Septage to be discharged to the Commission's facilities must originate from domestic sources within the geographic boundaries of the State of Rhode Island.

3. Prohibitions: The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. The discharge of grease or septage loads containing grease is strictly prohibited by this permit. Mixing or blending of grease with septage loads is strictly prohibited. The permittee is strictly responsible for ensuring that loads containing grease are not taken to the NBC Lincoln Septage Receiving Station or enforcement action may result against the permittee.

4. Procedures for Discharging Septage: The permittee agrees to adhere to the NBC Septage Discharge Procedures, as detailed in Septage Discharge Permit Attachment A.

5. Fees: The permittee agrees to pay an application fee and all other fees assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

6. Records Retention: Records which substantiate any information supplied in permit applications, load manifest forms and any other informational requirements of the Rules and Regulations, or any applicable state or federal law, are to be kept by the permittee for a period of three (3) years, unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of three (3) years following resolution of such litigation or dispute.

7. Jurisdiction: This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

8. Integration: This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of the Rules and Regulations.

9. Transfer of Permit Prohibited: Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred, or sold to a new owner, new user, or different vehicle without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said business referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property. The new owner must apply for and be issued a new permit before discharges will be allowed.

10. Enforcement Costs: The permittee agrees to reimburse the Commission for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a Court of competent jurisdiction.

11. Damage to the Facilities: The permittee agrees to indemnify and hold harmless the Commission from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the Commission and caused by discharges from the permittee, either singly or by interaction with other wastes. If, after the discharge, further analysis of the waste shows it to be in violation of the Commission's wastewater discharge limitations, the Commission may impose fines, pursuant to R.I. General Laws 46-25.

12. Violation of the Commission's Permit: The permittee agrees to reimburse the Commission for any penalty and additional operating expense incurred by the Commission for violations of the Commission's NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes. Violations of this permit include but are not limited to the following: unauthorized discharge into Commission facilities, discharge without a load ticket or properly completed manifest form, failure to pay fees, and violation of any other applicable laws or regulations.

13. Penalties for Violations: Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

14. Revocation of Permit: Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, discharging or dumping grease, discharging septage into unauthorized locations, falsification of documents, including permit applications or manifest, etc.

15. Duty to Comply/Civil and Criminal Liability: The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements. Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

Septage Discharge Permit Number B8000-150-0127

Attachment A

Blue Line Septic

PERMITTED VEHICLES:

VEHICLE TYPE	REGISTRATION NUMBER	TRUCK VIN NUMBER	CAPACITY (GALLONS)
TANKER - INTERNATIONAL	RI-13122	1HTMSAAR7AH281993	3,444

Procedure for Adding Vehicle(s) to the Permit

1. The permittee must obtain appropriate registrations, insurance and DEM permits for the vehicle(s).
2. The permittee must make an appointment with the NBC Pretreatment personnel to determine the volume of the vehicle(s).
3. The volume of the vehicle is to be determined under NBC oversight as follows:
 - a. The empty vehicle is to be brought to the NBC treatment plant at a scheduled time to be inspected to ensure that it is empty.
 - b. The vehicle will then be weighed empty.
 - c. The vehicle will then be brought back to the NBC plant to be filled with plant water.
 - d. The vehicle will then be reweighed full.
 - e. The vehicle may discharge this water back at the NBC plant.

The difference in weight will be used to determine the volume of the vehicle in gallons.
4. The permittee will be responsible to pay any costs associated with weighing the vehicle(s).
5. NBC personnel will affix a computer chip and volume sticker to the vehicle(s).
6. The Wastewater Discharge Permit will then be revised to include the additional vehicle(s).
7. The permittee may not discharge septage to the NBC receiving station from the new vehicle(s) until the revised permit is issued.

Septage Facility Discharge Procedures

1. The permittee must establish and maintain an account with a positive cash balance with the NBC Customer Service Section.
2. The permittee must ensure each vehicle permitted to discharge must have a computer chip, permitted vehicle decal and volume decal affixed to it.
3. The permittee must ensure the manifest form is completed in its entirety prior to proceeding to the septage facility and submitted to the NBC operator when the vehicle is checked in.
4. The permittee must ensure the volume of the vehicle meets NBC volume/time restrictions.
5. The NBC operator must scan the computer chip affixed to the vehicle.
6. Activate the gate and enter the facility.
7. Obtain a sample of the load from the discharge line of the vehicle.
8. The NBC operator will test the sample and may approve truck for discharge or may reject the load.
9. After NBC approval is granted, the permittee must connect the hose to the station receiving port and may begin discharge.
10. After the discharge is complete, disconnect the hose.
11. The permittee must wash any drippage and/or spillage into drains.
12. The permittee must exit the station.

***TYPICAL RESTAURANT
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: P8500-831-1226
Company Name: **CAYENNE SUSHI, INC.**
Facility Address: 1450 Atwood Avenue, Unit 11, Johnston, RI 02919
Mailing Address: 1450 Atwood Avenue, Unit 11, Johnston, RI 02919
Facility President: Mr. Xue Mei Chen
Facility Authorized Agent: Mr. Xue Mei Chen
User Classification: Restaurant/Food Preparation Operations
Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Xue Mei Chen and Cayenne Sushi, Inc.**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 13 pages with conditions A - T.

**This permit becomes effective upon receipt
and expires on December 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

January 11, 2022
Date

NOTE: The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Effluent Discharge Limitations:

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 13, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.

B. Permitted Discharges:

1. The permittee is authorized to discharge the following waste, solutions, or process wastewater streams to the NBC facilities:
 - a. Treated Food Preparation Wastewater;
 - b. Treated Dish, Pot, and Equipment Wash Water.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

C. Prohibitions:

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
 - a. Fryolator/Cooking Oils and Grease;
 - b. Ground Food, Food Products, or Solid Kitchen Waste;
 - c. Degreasing Solutions;
 - d. Solvents;
 - e. Sludges;
 - f. Fuel and Lubricating Oils.

2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1, attached hereto and incorporated herein.
3. The permittee is prohibited from discharging any solution or chemicals which might interfere with the proper operation of the automatic grease removal unit or may cause a violation of the Rules and Regulations.
4. The use of garbage grinders, food macerators, or other equipment used for the purpose of discharging solid waste to the sewer system is strictly prohibited.

D. Pretreatment Requirements:

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of 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 pipe from the automatic grease removal unit downstream of the three-bay sink, collecting all process discharges specified in Section B(1)(a and b) of this permit.

Sample Location #2 - Sample port on the discharge pipe from the automatic grease removal unit downstream of the wok 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. The process wastewater sampling location must be installed within thirty (30) days of the effective date of this permit and must be approved by the NBC prior to beginning construction. 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 at all times.

2. The permittee has installed two (2) automatic grease removal units in conformance with the plans approved by the NBC. The grease removal units shall be fully operational on a twenty-four (24) hour basis whenever kitchen operations are being conducted.

3. The permittee is responsible for operating and maintaining the automatic grease removal units so that the effluent limitations are met at all times. The permittee shall also be responsible for maintaining all records pertaining to the operation of the grease removal units including, but not limited to, the following:
 - a. The automatic grease removal units with all associated strainers must be inspected every workday to determine whether the system is functioning normally or in need of cleaning, grease disposal or any corrective measures;
 - b. Grease removal unit logbooks must be maintained at the permittee's facility and must be located near each grease removal unit. The logbooks must include such information as outlined under Section F, Record Keeping Requirements. The logbooks must be kept on the premises at all times and available to NBC personnel for their review;
 - c. Only kitchen wastewater from pot sinks, wok stations, and dinnerware/utensil prerinsing operations may be discharged into the automatic grease removal units. Sanitary waste, dishwasher wastewater and other wastewater may not be discharged to the grease removal units.
4. The permittee must install additional grease removal equipment that conforms with Section 1.8.8 of the Rules and Regulations if determined necessary by the NBC to ensure that effluent limitations are met at all times. Plans of the pretreatment system must be submitted to the NBC for approval before beginning construction, should installation of additional grease removal system be required.

E. Monitoring Requirements:

No regularly scheduled wastewater monitoring reports are required of the permittee. The NBC may, at any time, change the monitoring requirements specified in this permit. Conditions that may result in the imposition of monitoring requirements include, but are not limited to, the following:

- a. Inspections or samplings performed by NBC personnel;
- b. An increase in the seating capacity of the facility;
- c. An increase in flow to a grease removal unit;
- d. Discovery of additional information unavailable to the NBC at the time this permit was prepared;
- e. Improper maintenance of a grease removal unit;
- f. Failure to meet the NBC effluent discharge limitations.

F. Record Keeping Requirements:

1. The permittee must inspect and maintain each automatic grease removal unit at least once per day and record in a logbook the time and date (month, day, and year) of the inspection, each grease removal activity, and the name of the individual conducting the activity. Maintenance activities which must be documented in each logbook include the following:
 - a. Cleaning and emptying of the solids basket;
 - b. Cleaning of the wiper blades;
 - c. Cleaning of the trough;
 - d. The estimated amount of grease removed;
 - e. Wet vacuuming of the grease removal unit.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable state or federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

G. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

The permittee must maintain all associated facilities to ensure that incidental and accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system. Operational changes that may affect the quality or quantity of the process wastestream include, but are not limited to, the following:

- a. Restaurant expansion;
- b. Removal of equipment or installation of additional equipment;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- c. Changes in food preparation methods.

3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. Grease removal unit heating element failure;
- b. Grease removal unit timing unit failure;
- c. Grease removal unit wiper blade failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

H. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

I. Fees:

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

J. Authorization To Do Business:

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Cayenne Sushi, Inc. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Cayenne Sushi, 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 Cayenne Sushi, 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 Cayenne Sushi, Inc. shall be subject to the terms and conditions of the permit as if named herein.

K. Closing, Selling, Moving the Business:

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to selling or ceasing business and/or disposing of any process waste associated with the move or the cessation of business.

L. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

M. Permit Violations:

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

N. Revocation/Suspension of Permit:

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:

- a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
- b. Failure to report changes in operations or wastewater constituents;

- c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

O. Civil And Criminal Liability:

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

P. Duty To Comply:

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Q. Removed Substances:

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

R. Permit Modification/Renewal:

1. This permit may be modified for various reasons, including but not limited to the following:
 - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
 - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
 - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
 - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
 - e. Violation of any terms or conditions of the permit;
 - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
 - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
 - h. To correct typographical or other errors in the permit;
 - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
 - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

S. Integration:

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

T. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

EJS:NJD:smb

Attachments:

Designation of Authorized Agent Form
RCRA Handbook
Automatic Grease Removal Unit Logsheet

Table 1

NBC Effluent Discharge Limitations
Field's Point District

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:

**TREATED FOOD PREPARATION WASTEWATER AND
TREATED DISH, POT, AND EQUIPMENT WASH WATER**

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Cayenne Sushi, Inc.

1450 Atwood Avenue

Johnston, RI 02919

PERMIT NUMBER: P8500-831-1226

PERMIT EXPIRATION DATE: 12/31/2026

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.

January 11, 2022

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL DENTIST
WASTEWATER DISCHARGE PERMIT***



WASTEWATER DISCHARGE PERMIT

Permit Number: P9400-442-0927

Company Name: **RICCI FAMILY DENTISTRY**

Facility Address: 1252 Smith Street, Providence, RI 02908

Mailing Address: 1252 Smith Street, Providence, RI 02908

Facility Owner: Dr. Eric Ricci

Facility Authorized Agent: Dr. Eric Ricci

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. Eric Ricci and Ricci Family Dentistry**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 14 pages with conditions A - U and Attachment A.

**This permit becomes effective on October 1, 2022
and expires on September 30, 2027.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt
Kerry M. Britt, Pretreatment Manager
Narragansett Bay Commission

September 19, 2022
Date

NOTE: The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

CONDITIONS TO PERMIT

A. Effluent Discharge Limitations:

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 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. Acidic Solutions with a pH less than 5.0 standard units;
 - f. Caustic Solutions with a pH greater than 11.0 standard units;
 - g. Solvents;
 - h. Sludges.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
 3. Non-sanitary discharges other than those specified in Section B of this permit are prohibited unless specifically approved by the NBC in writing.
 4. No chemicals, oils, solutions and/or materials including solid substances such as towels, casts, etc. in quantities or of such size capable of causing obstruction to the flow in sewers may be discharged to the sewer unless specifically approved by the NBC in writing.
 5. Discharging of medical waste is strictly prohibited.

D. Pretreatment Requirements:

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the amalgam separator, collecting all process discharges specified in Section B(1) (a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

3. The permittee shall adhere to all mandatory best management practices of the NBC Best Management Practices on the management of Waste Dental Amalgam.
4. In accordance with 40 CFR §441.40, Pretreatment Standards for New Sources and the NBC Best Management Practice for the Management of Waste Dental Amalgam, the permittee shall install, operate and maintain an amalgam separator which is ISO 11143 certified to an efficiency of 99% removal in accordance with the plans approved the NBC. The amalgam separator shall be fully operational whenever discharges from dental procedures are occurring.
5. The permittee shall maintain the amalgam separator. Maintenance activities include but are not limited to the following:
 - a. The permittee must inspect the separator weekly to ensure proper operation;
 - b. The permittee must adhere to all manufacturers specifications for maintenance of the separator;
 - c. The maintenance activities must be documented in a logbook as required by Section G(2) of this permit.
6. The permittee shall install 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 three (3) sinks for equipment washing. These sinks must be plumbed to the amalgam separator through a sample location. Signs stating "Equipment Washing Only" must be posted at these sinks. Flow restrictors must be installed on the discharge pipes of these sinks to prevent overwhelming the amalgam separator.

10. The permittee has designated one (1) sink for sanitary use only. The permittee shall post signs at this sink stating "Sanitary Use Only". Washing of equipment, instruments, filters, and capsules in this sink 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 April to March. 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 wastewater monitoring is required at this time. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:

- a. Failure to meet effluent limitations;
- b. Change in production processes;
- c. Expansion or reduction of production;
- d. Change in water usage;
- e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

G. Record Keeping Requirements:

1. The permittee shall be responsible for maintaining onsite physically or electronically the manufacturers operating manual for the amalgam separator. In addition, a logbook documenting all records pertaining to the amalgam separator including, but not limited to, the following:
 - a. Date (month, day and year) of each trap and separator inspection and service activity;
 - b. The location of each trap and separator being serviced;
 - c. All routine and non-routine activities conducted (i.e. cleaning, maintenance, filter replacement);
 - d. Date of amalgam retaining container or equivalent container replacement;
 - e. Date when amalgam is picked up or shipped for proper disposal, including name of the permitted or licensed treatment, storage or disposal facility receiving the amalgam retaining containers;
 - f. Signature of person conducting activity.

2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

H. Emergency/Routine Notification Requirements:

1. Emergency Notification of Accidental/Incidental Discharge

The permittee must maintain all associated facilities to ensure that incidental and accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

Amalgam Separator Failure

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

I. Right of Entry:

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

J. 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. Ricci Family Dentistry shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Ricci Family Dentistry 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 Ricci Family Dentistry 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 Ricci Family Dentistry shall be subject to the terms and conditions of the permit as if named herein.

L. Closing, Selling, Moving the Business:

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

M. Transfer of Permit Prohibited:

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

N. Permit Violations:

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

O. Revocation/Suspension of Permit:

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:

- a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
- b. Failure to report changes in operations or wastewater constituents;
- c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

P. Civil and Criminal Liability:

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

Q. Duty To Comply:

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

R. Removed Substances:

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

S. Permit Modification/Renewal:

1. This permit may be modified for various reasons, including but not limited to the following:
 - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
 - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
 - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
 - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
 - e. Violation of any terms or conditions of the permit;
 - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
 - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
 - h. To correct typographical or other errors in the permit;
 - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
 - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

T. Integration:

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

U. Jurisdiction:

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

EJS:NJD:rcf

Attachments:

Designation of Authorized Agent Form
RCRA Handbook

Table 1

NBC Effluent Discharge Limitations
Field's Point District

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)
Arsenic(Total)	0.02*
Cadmium (Total)	0.11
Chromium (Total)	2.77
Copper (Total)	1.20
Cyanide (Total)	0.58**
Lead (Total)	0.60
Mercury (Total)	0.005
Nickel (Total)	1.62
Silver (Total)	0.43
Zinc (Total)	2.61
Total Toxic Organics (TTO)	2.13
Biochemical Oxygen Demand (BOD ₅)	300
Total Suspended Solids (TSS)	300
Total Oil and Grease (fats, oils and grease)	125
Total Nitrogen	115***
Ammonia	50***
pH range (at all times)	5.0 – 11.0 s.u.

The following limitations supersede those listed above for the specified categories:

Industrial User 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

Best Management Practice Certification

For the previous 12-month period from _____, 20__ to _____, 20__

Company Name: _____

Address: _____

RETURN TO:
Narragansett Bay Commission
Pretreatment Program
2 Ernest Street
Providence, RI 02905-5502

I, _____, as authorized representative of
_____, do hereby decree that the Narragansett Bay
Commission Best Management Practices for the Management of Waste Dental Amalgam have
been fully complied with for the past twelve month period.

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

Authorized Representative Signature

Date

CERTIFICATE TO DISCHARGE

the following types of process water:

DENTAL OPERATIONS WASTEWATER

into the facilities of the

Narragansett Bay Commission

is hereby granted to:

Ricci Family Dentistry

1252 Smith Street

Providence, RI 02908

PERMIT NUMBER: P9400-442-0927

PERMIT EXPIRATION DATE: 09/30/2027

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

September 19, 2022
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

(vii) Other special logbook requirements Yes No N/A

If yes, please specify _____

(g) Have Hazardous Waste Manifest forms been properly maintained on site?
Yes No N/A

Part IV - Spill, Slug and Solvent Discharge Control

(a) Is a Spill & Slug Prevention Control Plan (SSPCP) necessary based upon the facility inspection? Yes No

(b) Has a SSPCP been submitted? Yes No N/A

(c) Has a SSPCP been approved? Yes No N/A

(d) Detail how a spill in the process and pretreatment areas would be contained.

(e) Detail how a spill in the chemical storage area(s) would be contained: (Be sure to check both inside and outside storage areas, outside solvent holding tanks, etc.). _____

(f) Are spill control measures physically in place as stated in SSPCP?

Yes No N/A

* Check for open drains or other direct sewer access points.

(g) Is spill control in the boiler room satisfactory? Yes No N/A
 If no, what will be required to ensure proper containment in the boiler room?

(h) Based upon the facility inspection and observations noted in d, e, f, and g above, is the existing SSPCP accurate and sufficient? Yes No N/A
 If no, why? _____

(i) Is submission of a Toxic Organic/Solvent Management Plan (TO/SMP) necessary? Yes No

(j) Has TO/SMP been submitted? Yes No N/A

(k) Has TO/SMP been approved? Yes No N/A

(l) Is there proper containment of solvents as stated in the TO/SMP? Yes No N/A

(m) Is the existing TO/SMP accurate and sufficient? Yes No N/A

Part V - Process Flow Measurement

(a) How many flow meters are used to measure process wastewater discharges?

(b) Complete the following table for each process

<u>Location</u>	<u>Process Operation Monitored</u>	<u>Readings</u>	<u>Units</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

- (c) Are these flow meter readings an accurate measurement of process flows?
 Yes No N/A
- (d) If not, list user's estimate of the percent of total flow used for process water.
 _____%
- (e) Based upon _____, for the period from _____ to _____, the average daily process flow is _____GPD.
- (f) Based upon daily flow calculation, is user properly classified for permit fee billing purposes?
 Yes No N/A

Part VI - Sampling Procedures

- (a) Where should representative samples be taken for NBC and self-monitoring?

- (b) Are samples taken here presently? Yes No
 If no, why not? _____

- (c) Are non-contact cooling water or other dilution streams discharged upstream of the sampling location?
 Yes No
- * Check degreaser cooling water and steam condensate discharge lines.
- (d) Must the combined wastestream formula be used to determine compliance with EPA categorical pretreatment standards? (e.g. Does wastewater discharge through more than one (1) location?)
 Yes No
- (e) Does the firm conduct its own sample collection? Yes No
 If not, specify: _____
- (f) Is method of sample collection acceptable? Yes No
 If no, why not? _____

- (g) If firm is a metalfinisher, does cyanide sampling satisfy EPA requirements? Yes No N/A

If no, what must be changed? _____

- (h) Are sample collection procedures adequate?

(i) Samples refrigerated after collection? Yes No N/A

(ii) Proper preservation techniques used? Yes No N/A

(iii) How long are samples held before delivery to the laboratory for analysis? _

PART VII - LABORATORY ANALYSIS

- (a) Is a commercial laboratory used? Yes No

If so, which lab? _____

- (b) Is commercial lab state certified? Yes No N/A

- (c) For in-house analysis:

(i) Are duplicate samples analyzed? Yes No N/A

(ii) Are spiked samples used? Yes No N/A

(iii) Are equipment and instruments calibrated and maintained?
Yes No N/A

(iv) Is there a quality assurance plan in effect? Yes No N/A

(v) Is in-house lab state certified? Yes No N/A

(vi) If yes, request and attach copy of in-house lab certification and approved parameters.

Part VIII - User Education

(a) Educate users about each of the following:

Significant Non-Compliance (SNC) Criteria: Yes No

NBC Mission Statement: Yes No

Purpose and Types of NBC Inspections: Yes No

Monitoring and Reporting Requirements/Procedures: Yes No

Comments: _____

(b) Was the area outside the facility inspected? Yes No

Was litter observed? Yes No

If yes, educate the user of the impacts of litter on the sewer system.

***NBC INDUSTRIAL USER
INSPECTION CHECKLIST***

NARRAGANSETT BAY COMMISSION

Inspection Checklist
For Industrial Users

Company Name: _____ Tech./Eng.: _____
Person(s) Met With: _____ Date: _____
Company Classification: _____

Part I – Requirements/Progress Since Last Inspection

- (a) What was required of the firm since last inspection? _____

- (b) Has required work been completed? Yes No
If no, when will it be completed? _____

Part II –Pretreatment Equipment and Process Operations

- (a) List areas of the facility that were inspected:
 Process Operations
 Pretreatment Operations
 Other: _____
- (b) Have changes been without NBC notification and approval Yes No
If yes, detail changes. _____

Part III – Maintenance and Record Keeping

- (a) Is pH recording required? Yes No
 - (b) Are facility pH probes in calibration at the time of the inspection?
 Yes No N/A
- pH readings: NBC _____s.u. Company _____s.u
- * If discrepancy is greater than 0.5 s.u., and NBC instrument is verified to be in calibration, deficiency should be noted.
- (c) How often are pH probes cleaned and calibrated? _____
 - (d) Is the facility required to maintain a logbook? Yes No
If yes, is the logbook being maintained? Yes No N/A
If no, please specify _____

Part IV – Spill, Slug, and Solvent Discharge Control

- (a) Does the facility have a Spill & Slug Prevention Control Plan (SSPCP)?
 Yes No N/A
- (b) Has a SSPCP been approved?
 Yes No N/A
- (c) Are spill control measures physically in place as stated in SSPCP?
 Yes No N/A

If no, Explain _____

* Check for open drains or other direct sewer access points.

- (d) Does the facility have a Toxic Organic/Solvent Management Plan (TO/SMP)?
 Yes No N/A
 - (e) Has TO/SMP been submitted?
 Yes No N/A
 - (f) Has TO/SMP been approved?
 Yes No N/A
 - (g) Is the existing TO/SMP accurate and sufficient?
 Yes No N/A
- If no, Explain _____

Part V - Process Flow Measurement:

- (a) How many flow meters are used to measure process wastewater discharges?

- (b) Complete the following table for each process

Location	Process Operation Monitored	Readings	Units
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Part VI – Comments/Requirements:

Engineers Comments: _____

What will be required of the firm? _____

If this is an industrial vacation shutdown inspection, please provide a copy of the NBC notice detailing the proper disposal methods that should be used during the annual facility vacation shutdown.

Is the facility shutting down for vacation? Yes No N/A
If yes, provide dates _____

***NBC BREWERY-DISTILLERY
INSPECTION CHECKLIST***

NARRAGANSETT BAY COMMISSION

Brewery/Distillery Inspection Checklist
For Industrial Users

Company Name: _____ Technician/Engineer: _____
Person(s) Met With: _____ Date: _____
Company Classification: _____

Part I – Requirements/Progress Since Last Inspection

- (a) What was required of the firm since last inspection? _____

- (b) Has required work been completed? Yes No
If no, when will it be completed? _____

Part II –Pretreatment Equipment and Process Operations

- (a) List areas of the facility that were inspected:
 Process Operations Pretreatment Operations
 Other: _____
- (b) Have changes been made without NBC notification and approval Yes No
If yes, detail changes. _____

Part III – Maintenance and Record Keeping

- (a) Is pH recording required? Yes No
- (b) Are facility pH probes in calibration at the time of the inspection?
 Yes No N/A
- pH readings: NBC _____ s.u. Company _____ s.u
- * If discrepancy is greater than 0.5 s.u., and NBC instrument is verified to be in calibration, deficiency should be noted.
- (c) How often are pH probes cleaned and calibrated? _____
- (d) Is the facility required to maintain a logbook? Yes No
If yes, is the logbook being maintained? Yes No N/A
If no, please specify _____

Part IV – Spill, Slug, and Solvent Discharge Control

- (a) Does the facility have a Spill & Slug Prevention Control Plan (SSPCP)? __Yes __No __N/A
- (b) Has a SSPCP been approved? __Yes __No __N/A
- (c) Are spill control measures physically in place as stated in SSPCP? __Yes __No __N/A

If no, Explain _____

* Check for open drains or other direct sewer access points.

Part V – Sampling and Process Flow Measurement:

(a) Water Meter Location	Process Operations Monitored	Readings	Units
_____	_____	_____	_____
_____	_____	_____	_____

- (b) Is sampling being conducted in accordance with the Wastewater Discharge Permit? __Yes __No

If no, Explain _____

Part VI – Brewery/Distillery Prohibited Waste Disposal

- (a) How are spent mash, grains, and/or yeast collected and disposed? _____
- (b) How are tank heels/bottoms collected and disposed? _____
- (c) How would/is off specification product (bad batch of beer for example) be collected and disposed? _____

Part VII – Comments/Requirements:

Engineers Comments: _____

What will be required of the firm? _____

If this is an industrial vacation shutdown inspection, please provide a copy of the NBC notice detailing the proper disposal methods that should be used during the annual facility vacation shutdown. Is the facility shutting down for vacation? __Yes __No __N/A
If yes, provide dates _____

***NBC DENTAL FACILITY
INSPECTION CHECKLIST***

NARRAGANSETT BAY COMMISSION



Inspection Checklist For Dental Facilities

Company Name: _____
Facility Address: _____
Inspection Date: _____ NBC Inspector(s): _____
Person(s) met with: _____

Part I – Facility Information

- (1) Company Owner: _____
- (2) Contact Person: _____
- (3) Phone Number: _____
- (4) Hours of Operation: _____
- (5) Type of Dental Facility: _____
- (6) Make/Model of Amalgam Separator: _____

Part II - Requirements/Progress Since Last Inspection

- (1) What was required of the firm since the last inspection? _____

- (2) Has required work been completed? Yes No
If no, when will it be completed? _____

- (3) Have all required reports (BMP Certification, SMCRs) been submitted on time? Yes No
If no, discuss the ramifications of late submittals and SNC with the user _____

- (4) Has the firm been in compliance for the past 12 month period? Yes No
If no, detail the compliance issues and discuss with the user. _____

Part III – Amalgam Separator Maintenance/Installation Information

(1) Has the amalgam separator been installed according to NBC approved plans? * Yes No
If no, what needs to be corrected? _____

* Compare plans with existing system.

(2) Have changes been made without NBC notification and approval? [gu "P q
If yes, detail changes. _____

(3) Unit accessible? Yes No

(4) Solids container was present and operational? Yes No

(5) Level of sediment in solids collection container: _____

(6) Date solids container was last replaced/emptied: _____

(7) Sample port was properly installed? Yes No

(8) Unit has been properly maintained? Yes No

(9) How is waste amalgam disposed of? _____

(10) Type of vacuum pumps installed: _____
Verify that vacuum pump is equipped with a filter.

(11) Number of sinks discharging to the separator: _____
Verify that all sinks discharging to the separator are properly designated for equipment washing only.

(12) Are chair side traps present on all dental chairs? Yes No
Verify that chair side traps are being inspected daily and cleaned or replaced as necessary.

(13) Type of line cleaner used: _____

(14) Is elemental mercury stored onsite? If yes, how is it stored and disposed of? _____

Part IV – X-Ray Processor System Information

- (1) Is x-ray processing performed at this facility? Yes No
- (2) Are there discharges to the sewer from x-ray processing operations? Yes No
If yes, detail discharges. _____

- (3) Is there a silver recovery unit in place? Yes No
- (4) Has silver recovery unit been installed according to NBC approved plans?, [gu""P q
If no, what needs to be corrected? _____

- *Compare plans with existing system.
- (5) Sample port was properly installed? Yes No
- (6) Unit has been properly maintained? Yes No

Part V – Record Keeping

- (1) Is the facility required to maintain an amalgam separator logbook? Yes No
- (2) Does the amalgam separator logbook properly document the following?
- a. The date of each separator inspection and service activity? Yes No
 - b. The location of each trap and separator being serviced? Yes No
 - c. All routine and non routine activities conducted (i.e. cleaning, maintenance, filter replacement)? Yes No
 - d. Signature of person conducting activity? Yes No
- (3) Is the facility required to maintain a x-ray processor system logbook? Yes No
- (4) Does the x-ray processor system logbook properly document the following?
- a. Amount of chemicals used (i.e. fixer, developer)? Yes No N/A
 - b. Completed manifest forms for hazardous materials? Yes No N/A
 - c. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred? Yes No N/A
 - d. Maintenance performed on the pretreatment system? Yes No N/A

Part VI - User Education

(1) Educate users about each of the following:

NBC Dental BMP Program:	Yes	No
Permit/Logbook Requirements:	Yes	No
Monitoring and Reporting Requirements/Procedures:	Yes	No

Comments: _____

What will be required of firm? _____

***NBC FOOD PREPARATION
ESTABLISHMENTS INSPECTION
CHECKLIST***

NARRAGANSETT BAY COMMISSION



Inspection Checklist For Food Preparation Establishments

Inspection Date: _____

Company Name: _____

Facility Address: _____

Technician/Engineer: _____

Person(s) met with: _____

Part I - Facility Information

- (1) Company Owner: _____
- (2) Contact Person: _____
- (3) Type of GRU: _____
- (4) Brand of GRU: _____
- (5) Size of GRU: _____
- (6) Type of food served: _____
- (7) Hours of Operation: _____
- (8) Seating Capacity: _____
- (9) Based upon seating capacity, is user properly classified for permit fee billing purposes? Yes No
- (10) Menu on file? Yes No
- (11) Drive through window? Yes No

Part II - Requirements/Progress Since Last Inspection

- (1) What was required of the firm since the last inspection? _____
- (2) Has required work been completed? Yes No N/A
If no, when will it be completed? _____

Part III - GRU Maintenance/Installation Information

- (1) Has grease removal system been installed according to NBC approved plans? *
Yes No N/A

If no, what needs to be corrected? _____

* Compare plans with existing system.

- (2) Have changes been made without NBC notification and approval? (kitchen fixtures, menu, grease removal unit, etc.) Yes No N/A

If yes, detail changes. _____

- | | | | |
|---|-----|----|-----|
| (3) Unit accessible? | Yes | No | N/A |
| (4) Power supplied to GRU? | Yes | No | N/A |
| (5) GRU solids basket was present and operational? | Yes | No | N/A |
| (6) Solids basket had been emptied? | Yes | No | N/A |
| (7) GRU wiper blades were fully operational? | Yes | No | N/A |
| (8) GRU trough was clean and operational? | Yes | No | N/A |
| (9) GRU timer was fully operational? | Yes | No | N/A |
| (10) GRU installed in accordance with NBC requirements? | Yes | No | N/A |
| (11) Sample port was properly installed? | Yes | No | N/A |
| (12) Grease container present? | Yes | No | N/A |
| (13) Unit has been properly cleaned? | Yes | No | N/A |

- (14) How is waste grease disposed of? _____

Part IV - Record Keeping

- | | | | |
|--|-------|--------|---------|
| (1) Is the facility required to maintain a logbook? | Yes | No | N/A |
| If yes, logbook is required to be maintained | Daily | Weekly | Monthly |
| Is the logbook being maintained at the required frequency? | Yes | No | |
-
- | | | | |
|--|-----|----|-----|
| (2) Does the logbook properly document the following? | | | |
| a. Cleaning and emptying of solids basket? | Yes | No | N/A |
| b. Cleaning of wiper blades? | Yes | No | N/A |
| c. Cleaning of trough? | Yes | No | N/A |
| d. Estimated amount of grease removed? | Yes | No | N/A |
| e. Wet vacuuming of the GRU? | Yes | No | N/A |
| f. Thickness of the grease layer (passive)? | Yes | No | N/A |
| g. Mandatory monthly cleanings incl. amount of grease removed, date, time (passive)? | Yes | No | N/A |
| h. Maintenance performed? | Yes | No | N/A |
| i. Physical receipts for each pump-out retained? | Yes | No | N/A |

Part V - User Education

- | | | | |
|---|-----|----|-----|
| (1) Educate users about each of the following: | | | |
| NBC Grease Removal Program: | Yes | No | N/A |
| Permit/Logbook Requirements: | Yes | No | N/A |
| Monitoring and Reporting Requirements/Procedures: | Yes | No | N/A |

Comments: _____

What will be required of firm? _____

***NBC SEPTAGE TRUCK
INSPECTION CHECKLIST***

Lincoln Septage Facility
Septage Truck Inspection Checklist

Inspector : _____
Inspection Date: _____
Septage Hauler: _____
Vehicle Inspected: _____
Drivers Name: _____

Vehicle Inspection

Registration OK?	<input type="checkbox"/> Yes	<input type="checkbox"/> No – Call State Police
Insurance Card Ok?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
NBC Volume Sticker In Place	<input type="checkbox"/> Yes	<input type="checkbox"/> No – Issued NOV
NBC Permitted User Sticker in Place	<input type="checkbox"/> Yes	<input type="checkbox"/> No – Issued NOV
NBC Computer Chip In Place	<input type="checkbox"/> Yes	<input type="checkbox"/> No – Issued NOV

Paperwork Review

Manifest Properly Completed Yes No – Issued Nov and Refuse Load.

If No, List Problems: _____

Waste Discharge Inspection

pH of Waste: _____ s.u.

Was grease observed in Sample? Yes No - If yes, Refuse Load and Collect Sample for Evidence.

Was grease observed in lakeside? Yes No - If yes, Stop Load Discharge and Collect Sample.

Educational Procedure Review

Manifest Paperwork Completion procedure was reviewed with driver Yes No
Grease Policy reviewed with driver Yes No

Other Comments: _____

***NBC SAMPLING, REPORTING, AND
CHAIN OF CUSTODY FORMS***



The Narragansett Bay Commission
Pretreatment Program
2 Ernest Street
Providence, RI 02905

**Field's Point District
Self-Monitoring Compliance Report**

Company Name: _____

Address of Premises Sampled: _____

Date(s) Sampled: _____

Permit Sampling Month Satisfied: _____

Samples Taken By: _____
(Name) (Company)

Samples Analyzed By: _____
(Company)

Type of Sample: Grab _____ Composite _____

If Grab Sample, what time(s) was sample taken? _____

If Composite Sample, describe how composite was taken _____

Where was sample taken? _____

Water Meter Readings (List readings for all meters discharging to sampling location)

	#1	#2	#3
Closing Reading:	_____	_____	_____
Opening Reading:	_____	_____	_____
Total:	_____	_____	_____
Units (Circle One):	Cubic Feet/Gallons	Cubic Feet/Gallons	Cubic Feet/Gallons
	Other (Specify):_____	Other (Specify):_____	Other (Specify):_____

Were any batch discharges sampled? _____ Yes _____ No

What tank was sample taken from? _____

Indicate volume of batch discharge: _____

Is this analysis a resampling required to demonstrate compliance with a previous violation?
_____ Yes _____ No

What is the sample identification number(s) or the analytical report identification number(s) indicated on the analytical report(s) being submitted? _____

Is this analysis in full compliance with NBC standards listed on the back of this form?
_____ Yes _____ No

If your firm was in violation, what was the cause of the violation? _____

What steps will be taken by your firm to ensure full compliance with NBC standards on a continuous basis? _____

When will these steps be implemented? _____

If your firm is not in full compliance with the NBC standards, U.S. EPA Regulations, 40 CFR 403.12g (2) requires that you notify the NBC at 461-8848 within 24 hours of becoming aware of the violation and that your firm resample and analyze for the parameter(s) in violation of the NBC standards. The results after resampling must be submitted to the NBC no later than thirty (30) days following the date that you became aware of the initial violation of the standards.

Please attach the laboratory analysis sheet. Indicate on this sheet the method of analysis used for each parameter listed. Sampling and analysis shall be performed in accordance with the techniques prescribed by federal regulations (40 CFR, Part 136).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. In lieu of monitoring for Total Toxic Organics, I hereby certify that based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitations for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic/solvent management plan submitted to the NBC.

Signature of Authorized Company Representative

Date

Report will be returned if form is not properly completed and signed.

NBC Field's Point Effluent Discharge Limitations

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)	Parameter	Limitation (Max)
Arsenic(Total)	0.02**	Zinc (Total)	2.61
Cadmium (Total)	0.11	Total Toxic Organics (TTO)	2.13
Chromium (Total)	2.77	Biochemical Oxygen Demand (BOD ₅)	300
Copper (Total)	1.20	Total Suspended Solids (TSS)	300
Cyanide (Total)	0.58*	Total Oil and Grease (fats, oils and grease)	125
Lead (Total)	0.60	Total Nitrogen	115***
Mercury (Total)	0.005	Ammonia	50***
Nickel (Total)	1.62	pH range (at all times)	5.0 – 11.0 s.u.
Silver (Total)	0.43		

Mass Based Limitations (These limitations supersede those listed above for the specified categories)

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)	Converted Limitation (mg/L)
14	BOD ₅ and TSS	5	600
23 and 29	BOD ₅ and TSS	20	2400
25, 28, 34, and 36	BOD ₅ and TSS	10	1200
33	BOD ₅ and TSS	75	9000
33	Total Nitrogen	10***	1200
33	Ammonia	2***	240

* This limitation only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l.

** This limitation applies to all Industrial Users except the landfill which must meet 0.4 mg/l.

*** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st,



The Narragansett Bay Commission
Pretreatment Program
2 Ernest Street
Providence, RI 02905

Bucklin Point District
Self-Monitoring Compliance Report

Company Name: _____

Address of Premises Sampled: _____

Date(s) Sampled: _____

Permit Sampling Month Satisfied: _____

Samples Taken By: _____
(Name) (Company)

Samples Analyzed By: _____
(Company)

Type of Sample: Grab _____ Composite _____

If Grab Sample, what time(s) was sample taken? _____

If Composite Sample, describe how composite was taken _____

Where was sample taken? _____

Water Meter Readings (List readings for all meters discharging to sampling location)

	#1	#2	#3
Closing Reading:	_____	_____	_____
Opening Reading:	_____	_____	_____
Total:	_____	_____	_____
Units (Circle One):	Cubic Feet/Gallons	Cubic Feet/Gallons	Cubic Feet/Gallons
Other (Specify):	_____	Other (Specify): _____	Other (Specify): _____

Were any batch discharges sampled? _____ Yes _____ No

What tank was sample taken from? _____

Indicate volume of batch discharge: _____

Is this analysis a resampling required to demonstrate compliance with a previous violation?
_____ Yes _____ No

What is the sample identification number(s) or the analytical report identification number(s) indicated on the analytical report(s) being submitted? _____

Is this analysis in full compliance with NBC standards listed on the back of this form?
_____ Yes _____ No

If your firm was in violation, what was the cause of the violation? _____

What steps will be taken by your firm to ensure full compliance with NBC standards on a continuous basis? _____

When will these steps be implemented? _____

If your firm is not in full compliance with the NBC standards, U.S. EPA Regulations, 40 CFR 403.12g (2) requires that you notify the NBC at 461-8848 within 24 hours of becoming aware of the violation and that your firm resample and analyze for the parameter(s) in violation of the NBC standards. The results after resampling must be submitted to the NBC no later than thirty (30) days following the date that you became aware of the initial violation of the standards.

Please attach the laboratory analysis sheet. Indicate on this sheet the method of analysis used for each parameter listed. Sampling and analysis shall be performed in accordance with the techniques prescribed by federal regulations (40 CFR, Part 136).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. In lieu of monitoring for Total Toxic Organics, I hereby certify that based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitations for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic/solvent management plan submitted to the NBC.

Signature of Authorized Company Representative

Date

Report will be returned if form is not properly completed and signed.

NBC Bucklin Point Effluent Discharge Limitations

All parameters in mg/l unless otherwise specified.

Parameter	Limitation (Max)	Parameter	Limitation (Max)
Arsenic(Total)	0.03	Zinc (Total)	1.67
Cadmium (Total)	0.11	Total Toxic Organics (TTO)	2.13
Chromium (Total)	2.77	Biochemical Oxygen Demand (BOD ₅)	300
Copper (Total)	1.20	Total Suspended Solids (TSS)	300
Cyanide (Total)	0.50*	Total Oil and Grease (fats, oils and grease)	125
Lead (Total)	0.69	Total Nitrogen	115**
Mercury (Total)	0.06	Ammonia	50**
Nickel (Total)	1.62*	pH range (at all times)	5.0 – 11.0 s.u.
Silver (Total)	0.40		

The following limitations supersede those listed above for the specified categories.

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/1000 gal)	Converted Limitation (mg/L)
14	BOD ₅ and TSS	5	600
23 and 29	BOD ₅ and TSS	20	2400
25, 28, 34, and 36	BOD ₅ and TSS	10	1200
32	BOD	570	68,400
32	TSS	10	1200
33	BOD ₅ and TSS	75	9,000
33	Total Nitrogen	10**	1200
33	Ammonia	2**	240

Industrial User Category/Categories	Parameter(s)	Limitation (lbs/day)
32	Total Nitrogen	300**
32	Ammonia	300**

* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

** Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st,



TWENTY-FOUR (24) HOUR VIOLATION NOTIFICATION FAX FORM

Fax To: Narragansett Bay Commission – Pretreatment Section
401.461.0170

Company Name: _____
Facility Address: _____

This is to notify the Narragansett Bay Commission (NBC) that the above-referenced facility violated the NBC discharge limitations for the following parameter(s):

Sampling Date of Violation	Parameter	Concentration

I certify that I have just become aware of the above-referenced violation(s) within the past 24 hours and will immediately resample this waste stream for the parameter(s) exceeding the NBC discharge limitation(s). I certify under the penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information is, to the best of my knowledge and belief is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Initial sampling and all resampling results must be submitted within 30 days of the sample date. Please note, resampling must continue until four consecutive samples show compliance with NBC discharge limitations.

Signature of Authorized Agent

**CONTINUOUS DISCHARGE
PH MONITORING REPORT**
MONTH OF: _____ 20 ____



Company Name: _____
Address: _____

Return to: **Narragansett Bay Commission**
Pretreatment Section
2 Ernest Street
Providence, RI 02905

Date	MAXIMUM pH	MINIMUM pH	AVERAGE pH (VISUAL)	VOLUME/WATER METER READING IF REQUIRED*	COMMENTS
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations. I certify the above data has been reported directly from the recording chart of the final pH recorder and is reported to an accuracy of 0.1 standard units.

Signature

Date

Name (Print)

Title

*INDICATE IF GALLONS OR CUBIC FEET

**BATCH DISCHARGE
Ph MONITORING REPORT
MONTH OF: _____ 20 ____**



Company Name: _____
Address: _____

Return to: **Narragansett Bay Commission**
Pretreatment Section
2 Ernest Street
Providence, RI 02905

Date	Batch Discharge I		Batch Discharge II		Batch Discharge III		Batch Discharge IV		COMMENTS
	Final pH	Vol.	Final pH	Vol.	Final pH	Vol.	Final pH	Vol.	
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
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***



July 21, 2022

Mr. Maximillian Maher
RI Department of Environmental Management
Office of Water Resources
235 Promenade Street
Providence, RI 02908

RE: Notification of Substantial Change

Dear Mr. Maher:

In accordance with Part I.C.5.i of the RIPDES Permit for the Bucklin Point Wastewater Treatment Facility (RI0100072) and the Consent Order which was signed on July 19, 2018, the Narragansett Bay Commission (NBC) is notifying the DEM of the following substantial change in industrial discharge:

Company

CBNA Barletta Phase III CSO JV
(804 School Street, Pawtucket)

Substantial Change

This company is working on construction of the tunnel for Phase III of the NBC CSO project. The company requested an increase in the permitted flow in the Wastewater Discharge Permit to accommodate the increase of ground water observed in the mining of the tunnel. They are requesting the flow be increased to 250,000 gallons per day.

Pretreatment staff have determined the additional flow from this project will not adversely impact the treatment facility.

If you have any questions, please contact me at 401.461.8848 ext. 472.

Sincerely,

Kerry M. Britt
Pretreatment Manager

Cc: Walter Palm
Joseph Haberek, PE

**NOTICE OF VIOLATION
FAILURE TO MEET STANDARDS (USER SAMPLE)**



December 05, 2022

Mr. Eric Dodge
The Okonite Company
5 Industrial Road
Cumberland, RI 02864

Dear Mr. Dodge

The sample results for November which were received by this office on December 02, 2022 indicate that you are in violation of discharge limitations for the following:

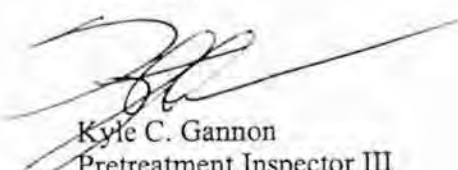
Sample Location # 1

Sample Date	Parameter	Sample Type	Sample Result	Standard Type	Max. Limit
11/23/2022	COPPER	Composite	1.710	LOCAL	1.200 mg/L

As a condition of your Wastewater Discharge Permit, these discharge limitations must be met at all times. Failure to meet the standards may result in the Commission initiating enforcement action against your firm and the publication of your company's name in the Commission's annual list of firms in Significant Non-Compliance which is published each year in the PROVIDENCE JOURNAL. Based upon these results, you must immediately resample your process discharge for the parameter(s) in violation noted above. You must continue this weekly sampling until four (4) consecutive weekly reports indicate full compliance with NBC discharge limitations. Results must be submitted for NBC review within three (3) weeks from the sampling date.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact the NBC at 461-8848 ext. 262.

Sincerely,



Kyle C. Gannon
Pretreatment Inspector III

NOTICE OF VIOLATION
FAILURE TO MEET STANDARDS (NBC SAMPLE)

September 15, 2022

Ms. Leann Cobb
Denison Pharmaceuticals, LLC
1 Powder Hill Road
Lincoln, RI 02865



Dear Ms. Cobb

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 August 31, 2022. These results indicate that you are in violation of Narragansett Bay Commission (NBC) discharge limitations for the following:

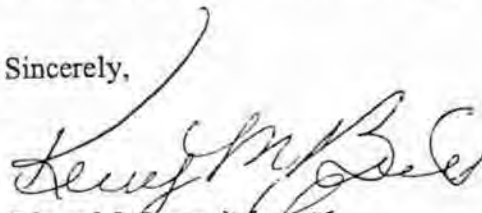
Sample Location # 1

Sample Date	Parameter	Sample Type	Sample Result	Standard Type	Max. Limit
8/31/2022	BOD	Grab	10.09	LOCAL	5.00 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

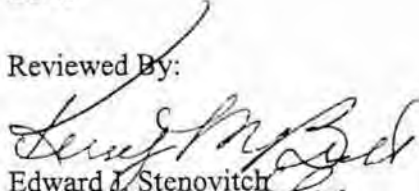
WASTEWATER SAMPLE ANALYSIS



Company Name: Denison
Pharmaceuticals, LLC
Company Address: 1 Powder Hill Road
Lincoln, RI 02865
Location Name: Sample Location # 1
Type of Sample: Grab
Date of Sample: August 31, 2022

Parameter	Concentration (mg/l)
BOD	1210.39
CADMIUM	0.015
CHROMIUM	0.075
COPPER	0.02
ETHYL ACETATE	0.05
ISOPROPYL ACETATE	0.05
LEAD	0.075
N-AMYL ACETATE	0.4
NICKEL	0.05
OIL & GREASE-T	9.259
SILVER	0.025
TSS	25.111
TTO	0.337
ZINC	0.06

Reviewed By:


Edward J. Stenovitch
Pretreatment Engineer

Notice of Violation
Failure to Meet Standards (Manhole)



February 22, 2022

Mr. Frank A. DiFruscio
DiFruscio Industries, Inc.
1425 Cranston Street
Cranston RI, 02920

Dear Mr. DiFruscio:

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 January 12, 2022, the NBC conducted surveillance manhole sampling up and down stream of your facility. The analytical results from the down stream manhole indicate noncompliance with the following parameters:

<u>Parameter</u>	<u>Sampling Type</u>	<u>Results</u> <u>(mg/L)</u>	<u>Daily Maximum</u> <u>(mg/L)</u>
Copper	Composite	1.29	1.20
Cyanide	Composite	2.16	0.58

It has been determined that your firm is the sole source of the non-compliant wastewater. You must submit a report by March 31, 2022 detailing the cause of the high concentration of metals and a proposal to ensure that wastewater from your facility is in compliance at all times.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help firm achieve and maintain compliance, contact the NBC at 461-8848x262.

If you have any questions regarding this letter, please contact me at 461-8848 ext. 490.

Sincerely,

Nathan P. Daggett
Principal Pretreatment Engineer

Attachment



Manhole Sample Analysis

Company: DiFruscia Industries, Inc.
Address: 20-A Starr Street, Johnston, RI 02919
Date of Sample: January 12, 2022

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	0.09644
Copper	0.03957	1.299
Cyanide	0.00767	2.16
Lead	<0.075	<0.075
Nickel	<0.05	0.4231
Silver	<0.025	<0.025
Zinc	0.124	1.084
pH (standard units)	6.3	7.1

Reviewed by:

Nathan J. Dean
Assistant Pretreatment Manager

**Notice of Violation
Failure to Immediately Report Violation**



September 14, 2022

Mr. Mark Federico
Providence Specialty Products, LLC
33 Dearborn Street
Providence, RI 02909

Dear Mr. Federico:

The Self-Monitoring Compliance report which was received by this office on September 13, 2022 indicated non-compliance with the NBC discharge limitations. EPA regulations, 40CFR. 403.12g(2), require that you notify the Narragansett Bay Commission (NBC) within 24 hours of becoming aware of this violation.

You failed to comply with this regulation since you did not notify the NBC within the 24 hour reporting period. This is not acceptable. In the future you must report any discharge violation within 24 hours by contacting me at 461-8848 or by using the attached FAX notification form.

In addition to notifying the NBC immediately regarding the violation, EPA regulations require that you repeat the sampling and analyses for the parameter(s) in violation and submit the resample results within thirty (30) days of becoming aware of the initial violation of the standards. Please note that the NBC requires that you begin weekly wastewater sampling for the parameter(s) in violation until such time that four (4) consecutive weekly sampling reports indicate full compliance with the NBC discharge limits. Failure to comply with these regulations and requirements may result in the initiation of enforcement action against your firm.

If you should have any questions regarding this matter, contact me at 461-8848 ext. 490.

Sincerely,

A handwritten signature in black ink, appearing to read "N. Daggett", is written over a light blue rectangular background.

Nathan P. Daggett
Principal Pretreatment Engineer

NOTICE OF VIOLATION
NOTICE OF PH VIOLATIONS



January 04, 2023

Mr. Stephen Pogorilich
Summit Manufacturing Corporation
248 Pine Street
Pawtucket, RI 02860

Dear Mr. Pogorilich

I have reviewed the November pH Monitoring Report submitted on December 30, 2022. Based upon this report, your facility has exceeded the pH discharge limitation as follows:

LOW LIMIT VIOLATIONS

2

HIGH LIMIT VIOLATIONS

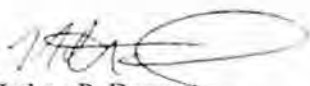
1

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,


Nathan P. Daggett
Principal Pretreatment Engineer

NOTICE OF VIOLATION
FAILURE TO SUBMIT COMPLIANCE REPORT

March 31, 2022



Mr. Shaun McDermott
Ira Green, Inc.
177 Georgia Avenue
Providence, RI 02905

Dear Mr. McDermott:

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

February-2022

Sample Location # 3

February-2022

Sample Location # 5

February-2022

To date, the Commission has not received a copy of these analytical results. Until a certified copy of the results and a Self-Monitoring Compliance Report are received, you are in violation of the terms of your permit. Failure to submit compliance monitoring results within thirty (30) days of the due date will result in your firm being in Significant Non-Compliance with the NBC and EPA regulations and will automatically result in the publication of the name of your firm in the Providence Journal. Please note that the NBC will bill you for the cost of this public notice. In addition, the Commission may initiate enforcement action against your firm for failing to submit reports on time. Should such an enforcement action be initiated, administrative penalties of up to \$25,000 per violation per day can be assessed.

Sincerely,

Nathan P. Daggett
Principal Pretreatment Engineer

NOTICE OF VIOLATION
FAILURE TO SUBMIT PH MONITORING REPORT



October 03, 2022

Ms. Leann Cobb
Denison Pharmaceuticals, LLC
1 Powder Hill Road
Lincoln, RI 02865

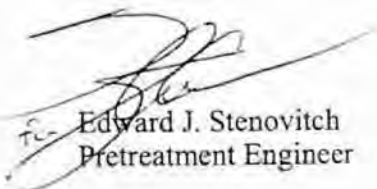
Dear Ms. Cobb:

In accordance with your Wastewater Discharge Permit, it is necessary for you to submit pH results for the month(s) of:

Sample Location # 1
August 2022

To date, the Commission has not received a copy of the above referenced pH monitoring report(s). Until a signed copy of the above referenced pH monitoring report(s) are received, you are in violation of the terms of your permit. Failure to submit pH monitoring results within thirty (30) days of the due date will result in your firm being in Significant Non-Compliance (SNC) with the NBC and EPA regulations and will automatically result in the publication of the name of your firm in the NBC annual list of violators published in the Providence Journal. Please note that the NBC will bill you for the cost of this public notice. In addition, the Commission may initiate enforcement action against your firm for failing to submit reports on time. Should such an enforcement action be initiated, administrative penalties of up to \$25,000 per violation per day can be assessed.

Sincerely,


Edward J. Stenovitch
Pretreatment Engineer

NOTICE OF VIOLATION
FAILURE TO SUBMIT CERTIFICATION



May 02, 2022

Dr. David I. Konicov
David I. Konicov, D.D.S.
189 Governor Street
Providence, RI 02906

Dear Dr. Konicov:

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:

March-2022

To date, the NBC has not received a copy of the above referenced certification. Until a signed copy of the above referenced certification is received, you are in violation of the terms of your permit. Failure to submit this Certification within thirty (30) days of the due date will result in your firm being in Significant Non-Compliance (SNC) with the NBC and EPA regulations and will automatically result in the publication of the name of your firm in the NBC annual list of violators published in the Providence Journal. Please note that the NBC will bill you for the cost of this public notice. In addition, the Commission may initiate enforcement action against your firm for failing to submit reports on time. Should such an enforcement action be initiated, administrative penalties of up to \$25,000 per violation per day can be assessed.

Sincerely,

A handwritten signature in cursive script that reads "Edward J. Stenovitch".

Edward J. Stenovitch
Pretreatment Engineer

NOTICE OF VIOLATION
FAILURE TO SATISFY NBC REQUIREMENTS



October 5, 2022

Mr. Alfred Silva
Chemart Company
15 New England Way
Lincoln, RI 02865

Dear Mr. Silva:

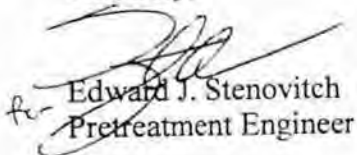
Per the requirements of letter(s) from this office, the following item(s) were required to be completed and/or submitted by the due date(s) indicated below:

<u>Required Submittal</u>	<u>Notice</u>	<u>Issue Date</u>	<u>Due Date</u>
Submit Report on Manhole Violations Letter		8/16/2022	9/15/2022

You must immediately satisfy the past due Narragansett Bay Commission (NBC) requirements as detailed in the above referenced documents. Your failure to complete the aforementioned requirements within thirty (30) days from the specified due date will place your firm in Significant Non-Compliance (SNC) with NBC regulations and will automatically result in the publication of the name of your firm as a violator in the Providence Journal. Your continued failure to complete these requirements may result in the initiation of enforcement action against your firm. Please note that the NBC 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,


Edward J. Stenovitch
Pretreatment Engineer

EJS:sm

NOTICE OF VIOLATION
LETTER OF DEFICIENCY



March 24, 2022

Mr. Fernando Viera
Monarch Metal Finishing Co., Inc.
189 Georgia Avenue
Providence, RI 02905-4516

Certified Mail
Return Receipt Requested

91 7108 2133 3937 9677 3344

RE: 100 Railroad Avenue Facility

Dear Mr. Viera:

This letter serves to summarize the Narragansett Bay Commission (NBC) inspection of your facility conducted on March 22, 2022. During the inspection, the following deficiency was noted:

A calibrated NBC pen showed that your effluent pH recorder is not properly calibrated. Immediately, you must calibrate your effluent pH meter to accurately monitor and record the effluent pH of the wastewater discharged from your facility. You must continue this pH probe calibration regularly on at least a monthly basis and the pH probe must be cleaned at least weekly. The NBC has developed the following procedure to ensure that all pH probe calibrations are consistently performed. This procedure must be used each time pH probe calibration is conducted. Prior to calibrating the pH probe, all process discharges must cease. The pH chart must be advanced, and a line drawn across the chart to indicate the beginning of calibration. Below this line, the following information must be written on the chart: the date, time, and person performing the calibration. A line must be drawn on the chart indicating the end of calibration and the chart paper must again be advanced. Process discharges may resume when the calibration has been completed. By following this procedure, calibration spikes will not be required to be reported on the monthly pH Monitoring Reports. Please note that process discharges are prohibited any time that the pH recording device is not fully operational. Please note that this pH system maintenance, including probe calibration and cleaning data, must be recorded in your pretreatment system log book.

Page 2

Monarch Metal Finishing Co., Inc.

Failure to correct the above-mentioned deficiency could result in the initiation of enforcement action against your firm. Please note that the NBC can assess administrative penalties of up to \$25,000 per violation per day. In addition to the aforementioned deficiency, the following is required of your firm:

During the inspection, you indicated that your firm would be consolidating all plating operations into the 100 Railroad Avenue facility. As stated in Section J(2) of your permit, 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. This notification must include process and pretreatment system plans that show all information on the enclosed checklists.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact Mr. James Kelly at 461-8848, ext. 262.

If you have any questions regarding this matter or require further assistance, please contact me at 461-8848, ext. 490.

Sincerely,



Nathan P. Daggett
Principal Pretreatment Engineer

NPD:smb

Enclosure

Monarch Metal Finishing Co., Inc.
PLANS OF PROCESS OPERATIONS

The information with an "X" before it must be shown on the plan or submitted before the plans of the wet process operations can be approved.

1. X All tanks, their contents and volume. Please note compartmentalized tanks must be indicated as such.
2. X Any other water using processes (i.e. rectifiers, tubing, cooling water, etc.).
3. X Whether each tank will be batch discharged, continuously discharged, or not discharged.
4. X Where the tank discharges to (i.e. pH neutralization, cyanide destruct, A/A treatment, process operation tank, etc.).
5. X The volume and dump frequency of each batch discharge.
6. X The flow rate for continuous discharges.
7. X All floor drains, trenches, berms, sumps, pump stations, piping, valves, and the point of discharge of each tank or pipe.

Please note, process operation and pretreatment system plans must be at least 11" x 17" and cannot exceed 36" x 24" in size.

Monarch Metal Finishing Co., Inc.
PRETREATMENT SYSTEM PLANS

The information with an "X" before it must be shown on the plan or submitted before the pretreatment system plans can be approved.

1. All wastewater treatment tanks/component equipment, including filters, ion exchange columns, membrane-type equipment etc., their size, material of construction, and the projected daily flows to each treatment process including backwash, regeneration rinse, maintenance, and cleaning flow rates and duration of each.
2. All pumps, piping, valves, mixers, controls, instrument probes, etc. Valve schedules referencing all operational modes of equipment, etc. All tanks and discharges must be hard-piped with PVC, CPVC or other chemically compatible piping. The firm may apply for special case variances to use short sections of flexible hose. These requests will be reviewed on a case by case basis.
3. A description of the treatment procedure for each treatment process including but not limited to acid/alkali, cyanide destruct, pH adjustment, ion exchange column regeneration, and backwash procedures. Procedures must include valve sequences showing all operational modes.
4. A process schematic of the pretreatment system. For pretreatment systems which utilize filter and/or ion exchange columns, include all pretreatment operations and components thereof.
5. The type, volume and/or quantity of ion exchange resin or other media must be provided. Manufacturer's specification data for all pretreatment process components (i.e. resins, membranes, etc.) must be provided for all pretreatment components utilized.
6. A plant layout showing the pretreatment system, water using process tanks, and location of each in the facility.
7. All sump pumps or effluent transfer stations, including size of transfer station, flow rate, and pump capacity.
8. The wastewater sampling location.
9. Views or elevations of all inlet and outlet connections on treatment tanks. This information must be provided for the internal components of pretreatment systems including but not limited to all filter and ion exchange columns in the form of cut-away views, including all distribution manifolds and resin/media heights.
10. A Rhode Island Professional Engineer's (P.E.) stamp and signature (a xerox copy is not acceptable).

Please note, process operation and pretreatment system plans must be at least 11" x 17" and cannot exceed 36" x 24" in size.



October 11, 2022

Mr. Ryan Blaney
Arigna Irish Pub & Coal Fire Kitchen
1058 Charles Street
North Providence, RI 02904

Certified Mail
Return Receipt Requested

91 7108 2133 3937 9775 4717

Dear Mr. Blaney:

It has come to my attention from the Narragansett Bay Commission (NBC) pretreatment staff that your company has failed to submit Wastewater Discharge Permit Application and Permit Application Fee, which have been overdue since June 3, 2022. Notices of Violation have been issued and have been presumably ignored by your firm.

This default is in violation of the NBC Rules and Regulations. The NBC has the authority to fine persons violating provisions of any permit, rule, regulation, or order and may assess an administrative penalty of up to twenty-five thousand (\$25,000) dollars per day for each violation.

Please be advised that if this matter is not satisfactorily addressed within thirty (30) days, enforcement action will follow. Should you have any questions regarding the NBC requirements of your firm, you should contact Travis H. Costa at 461-8848, ext. 490. Thank you for your anticipated cooperation.

Very truly yours,

Holly R. Ialongo, Esq.
Chief Legal Counsel

HRI:rcf

cc: Travis H. Costa

NARRAGANSETT BAY COMMISSION
ADMINISTRATIVE ORDER # BP-01-22

IN THE MATTER OF:

MIRROR IMAGE, INC
190 EXCHANGE STREET
PAWTUCKET, RI 02860

COMPLIANCE ORDER
AND
PENALTY ASSESSMENT

AND

RICHARD ROTH, PRESIDENT

LEGAL AUTHORITY

The following findings are made and order issued pursuant to the authority vested in the Narragansett Bay Commission (NBC) under Rhode Island General Laws (R.I. Gen. Laws) Title 46 Chapter 25, the Narragansett Bay Commission Act (the Act) as amended and the NBC Rules and Regulations for *Use of the Wastewater Facilities*, 835-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 §§ 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. Mirror Image, Inc. (Mirror Image) is a foreign corporation formed under the laws of the State of Massachusetts doing business and with a principal office in Pawtucket, Rhode Island that discharges process silkscreen wastewater containing pollutants into the NBC's facilities.
2. Mirror Image is a user of the NBC's facilities as defined by the Rules and Regulations, § 1.2.
3. Richard Roth (Roth) is an individual who is the President of Mirror Image (Mirror Image and Roth collectively hereinafter Permittee).
4. In accordance with the Act and the Rules and Regulations, Permittee was required to submit a permit application to the NBC by June 3, 2019.
5. Several notices of violation (NOVs) were issued to Permittee between June 3, 2019, and November 1, 2019, for failure to submit a permit application (See Attachment I). Additionally, during that time period the NBC made numerous phone calls to Permittee to remind Permittee of its obligation to submit a permit application.
6. Permittee submitted its permit application on November 7, 2019.
7. In accordance with the Act and the NBC's Rules and Regulations, the NBC issued Wastewater Discharge Permit #B9902-078-1124 (Permit) to Permittee on or about November 20, 2019. The Permit, effective as of December 1, 2019, authorizes the Permittee to discharge into the NBC's facilities so long as the Permittee adheres to the conditions of its Permit and complies with the Rules and Regulations. Prior to December 1, 2019, discharges into the NBC's facilities were authorized by and subject to the terms of Permit # B9902-056-1119.
8. As a condition of the Permit and pursuant to the Rules and Regulations, Permittee is required to collect samples from the final collection tank every April and October, analyze the samples for chromium, copper, and zinc, and timely submit analytical results and self-monitoring compliance reports (SMCRs) to the NBC.
9. Numerous NOVs were issued to Permittee between May 31, 2019, and October 19, 2022, for failure to submit analytical results and SMCRs (See Attachment II). Numerous phone calls to Permittee were also made during that time-period to remind Permittee to submit the required analytical results and SMCRs to the NBC. Additionally, Permittee was provided several in-person reminders during facility inspections to submit its analytical results and SMCRs. As of the date of this writing, the analytical results and SMCRs for April 2021, October 2021, and April 2022 remain outstanding.
10. Numerous correspondences were sent to Roth from the NBC's legal department between March 16, 2020, and March 30, 2022, informing him that failure to submit the

outstanding analytical results and SMCRs would result in escalated enforcement action and the assessment of an administrative penalty.

11. On or about June 16, 2022, Roth was issued a certified notice requiring his attendance at a July 12, 2022, mandatory meeting at the NBC. Roth failed to attend this meeting.

THEREFORE, based on the above findings, Mirror Image and Roth are hereby notified of the following violations:

Violation A: Failure to timely submit a wastewater discharge permit application.

Violation B: Failure to timely submit self-monitoring compliance reports.

Violation C: Failure to submit self-monitoring compliance reports.

**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 § 403.8 Pretreatment Program Requirements: Development and Implementation by POTW.

(f) *POTW pretreatment requirements.* A POTW pretreatment program must be based on the following legal authority and include the following procedures. These authorities and procedures shall at all times be fully and effectively exercised and implemented.

(1) *Legal authority.* The POTW shall operate pursuant to legal authority enforceable in Federal, State or local courts, which authorizes or enables the POTW to apply and to enforce the requirements of sections 307 (b) and (c), and 402(b)(8) of the Act and any regulations implementing those sections. Such authority may be contained in a statute, ordinance, or series of contracts or joint powers agreements which the POTW is authorized to enact, enter into or implement, and which are authorized by State law. At a minimum, this legal authority shall enable the POTW to:

(i) Deny or condition new or increased contributions of pollutants, or changes in the nature of pollutants, to the POTW by Industrial Users where such contributions do not meet applicable Pretreatment Standards and Requirements or where such contributions would cause the POTW to violate its NPDES permit;

(ii) Require compliance with applicable Pretreatment Standards and Requirements by Industrial Users;

(iii) Control through Permit, order, or similar means, the contribution to the POTW by each Industrial User to ensure compliance with applicable Pretreatment Standards and Requirements. In the case of Industrial Users identified as significant under § 403.3(v), this control shall be achieved through individual permits or equivalent individual control mechanisms issued to each such User except as follows.

(B) Both individual and general control mechanisms must be enforceable and contain, at a minimum, the following conditions:

(4) Self-monitoring, sampling, reporting, notification and recordkeeping requirements, including an identification of the pollutants to be monitored (including the process for seeking a waiver for a pollutant neither present nor expected to be present in the Discharge in accordance with § 403.12(e)(2), or a specific waived pollutant in the case of an individual control mechanism), sampling location, sampling frequency, and sample type, based on the applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law;

(iv) Require (A) the development of a compliance schedule by each Industrial User for the installation of technology required to meet applicable Pretreatment Standards and Requirements and (B) the submission of all notices and self-monitoring reports from Industrial Users as are necessary to assess and assure compliance by Industrial Users with Pretreatment Standards and Requirements, including but not limited to the reports required in § 403.12.

(v) Carry out all inspection, surveillance and monitoring procedures necessary to determine, independent of information supplied by Industrial Users, compliance or noncompliance with applicable Pretreatment Standards and Requirements by Industrial Users. Representatives of the POTW shall be authorized to enter any premises of any Industrial User in which a Discharge source or treatment system is located or in which records are required to be kept under § 403.12(o) to assure compliance with Pretreatment Standards. Such authority shall be at least as extensive as the authority provided under section 308 of the Act;

(vi)(A) Obtain remedies for noncompliance by any Industrial User with any Pretreatment Standard and Requirement. All POTW's shall be able to seek injunctive relief for noncompliance by Industrial Users with Pretreatment Standards and Requirements. All POTWs shall also have authority to seek or assess civil or criminal penalties in at least the amount of \$1,000 a day for each violation by Industrial Users of Pretreatment Standards and Requirements.

(2) *Procedures.* The POTW shall develop and implement procedures to ensure compliance with the requirements of a Pretreatment Program. At a minimum, these procedures shall enable the POTW to:

(viii) Comply with the public participation requirements of 40 CFR part 25 in the enforcement of National Pretreatment Standards. These procedures shall include provision for at least annual public notification in a newspaper(s) of general circulation that provides meaningful public notice within the jurisdiction(s) served by the POTW of Industrial Users which, at any time during the previous 12 months, were in significant noncompliance with applicable Pretreatment requirements. For the purposes of this provision, a Significant Industrial User (or any Industrial User which violates paragraphs (f)(2)(viii)(C), (D), or (H) of this section) is in significant noncompliance if its violation meets one or more of the following criteria:

(A) Chronic violations of wastewater discharge limits . . .

(C) Any other violation of a Pretreatment Standard or requirement as defined by 40 CFR 403.3(l) (daily maximum, long-term average, instantaneous limit, or narrative Standard) that the POTW determines

has caused, alone or in combination with other Discharges, Interference or Pass Through (including endangering the health of POTW personnel or the general public);

(D) Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under paragraph (f)(1)(vi)(B) of this section to halt or prevent such a discharge;

(E) Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance;

(F) Failure to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules;

(G) Failure to accurately report non-compliance;

(H) Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local Pretreatment program.

40 CFR § 403.12 Reporting requirements for POTW's and industrial users.

(h) Reporting requirements for Industrial Users not subject to categorical Pretreatment Standards. The Control Authority must require appropriate reporting from those Industrial Users with Discharges that are not subject to categorical Pretreatment Standards. Significant Non-categorical Industrial Users must submit to the Control Authority at least once every six months (on dates specified by the Control Authority) a description of the nature, concentration, and flow of the pollutants required to be reported by the Control Authority. In cases where a local limit requires compliance with a Best Management Practice or pollution prevention alternative, the User must submit documentation required by the Control Authority to determine the compliance status of the User. These reports must be based on sampling and analysis performed in the period covered by the report, and in accordance with the techniques described in 40 CFR part 136 of this chapter and amendments thereto. This sampling and analysis may be performed by the Control Authority in lieu of the significant non-categorical Industrial User. For Industrial Users for which EPA or the authorized state, tribe, or territory is the Control Authority, as of December 21, 2025 or an EPA-approved alternative date (see 40 CFR 127.24(e) or (f)), all reports submitted in compliance with this section must be submitted electronically by the industrial user to the Control Authority or initial recipient,

as defined in 40 CFR 127.2(b), in compliance with this section and 40 CFR part 3 (including, in all cases, subpart D to part 3), 40 CFR 122.22, and 40 CFR part 127. 40 CFR part 127 is not intended to undo existing requirements for electronic reporting. Prior to this date, and independent of 40 CFR part 127, the Industrial Users for which EPA or the authorized state, tribe, or territory is the Control Authority may be required to report electronically if specified by a particular control mechanism or if required to do so by state law.

(o) *Record-keeping requirements.*

(1) Any Industrial User and POTW subject to the reporting requirements established in this section shall maintain records of all information resulting from any monitoring activities required by this section, including documentation associated with Best Management Practices. Such records shall include for all samples:

(i) The date, exact place, method, and time of sampling and the names of the person or persons taking the samples;

(ii) The dates analyses were performed;

(iii) Who performed the analyses;

(iv) The analytical techniques/methods used; and

(v) The results of such analyses.

(2) Any Industrial User or POTW subject to the reporting requirements established in this section (including documentation associated with Best Management Practices) shall be required to retain for a minimum of 3 years any records of monitoring activities and results (whether or not such monitoring activities are required by this section) and shall make such records available for inspection and copying by the Director and the Regional Administrator (and POTW in the case of an Industrial User). This period of retention shall be extended during the course of any unresolved litigation regarding the Industrial User or POTW or when requested by the Director or the Regional Administrator.

(3) Any POTW to which reports are submitted by an Industrial User pursuant to paragraphs (b), (d), (e), and (h) of this section shall retain such reports for a minimum of 3 years and shall make such reports available for inspection and copying by the Director and the Regional Administrator. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the Industrial User or the operation of the POTW Pretreatment Program or when requested by the Director or the Regional Administrator.

GENERAL LAWS OF RHODE ISLAND

General Powers: § 46-25-5:

(10) To establish a sewage pretreatment program, and to require as a condition, to the grant or reissuance of any approval, license, or permit required under the program, that the person applying for the approval, license, or permit, pay to the commission a reasonable fee based on the cost of reviewing and acting upon the application and based on the costs of implementing the program. In addition, where violations of the provisions of §§ 46-25-25 — 46-25-25.3, or of any permit, rule, regulation, or order issued pursuant thereto have occurred, the violator shall reimburse the commission for the actual costs of implementing and enforcing the terms of the permit, rule, regulation, or order as a condition to the grant or reissuance of any approval, license, or permit.

(16) To issue orders of general or specific applicability to carry out the purposes of the project.

(17) To have and exercise all powers necessary or convenient to effect its purposes.

(18) To impose administrative penalties in accordance with the provisions of § 46-25-25.4.

Orders as to Pretreatment of Sewage: § 46-25-25:

(a) Without limiting the generality of the foregoing, the authority hereby vested in the commission shall include the authority to limit, reject, or prohibit any direct or indirect discharge of pollutants or combination of pollutants, as defined by applicable federal or state law, into the facilities of the project; to require that any person or class of user shall cause pollutants from his or her property, prior to their entry into the facilities of the project, to be submitted to such pretreatment standards and requirements as the commission may prescribe by rule or regulation. The commission shall prescribe such rules and regulations for pretreatment as in the opinion of the commission:

(1) Are required by applicable federal or state law,

(2) Are required under the terms of the project's federal permit(s), or

(3) Are necessary and appropriate for the project.

(b) The commission shall have the authority to issue or deny permits to any person for the direct or indirect discharge of any pollutants into the facilities of the project; to require the development of a compliance schedule by each person to insure compliance with such pretreatment as the commission may prescribe. No person shall discharge any pollutant into the facilities, except as in compliance with the provisions of this section, and any rules and regulations promulgated hereunder, and pursuant to the terms and conditions of a permit.

(c) The commission may, by regulation, order, permit, or otherwise require any person who discharges into the facilities of the project to:

(1) Establish and maintain such records;

(2) Make such reports;

(3) Install, calibrate, use, and maintain such monitoring equipment or methods, including where appropriate, biological monitoring methods;

(4) Sample such discharges and effluents, in accordance with such methods, at such locations, at such intervals, and in such manner as the commission shall prescribe; and

(5) Provide such other information relating to discharges into the facilities of the project as the commission may reasonably require to insure compliance with prescribed pretreatment. The information shall include, but not be limited to, those records, reports, and procedures required by applicable federal law.

(d) Notwithstanding any other provision of this section, the commission shall have the authority, and shall prescribe the appropriate procedures, after informal notice to the discharger, immediately and effectively to halt or prevent any discharge of pollutants into the facilities of the project which reasonably appears to present an imminent endangerment to the health or welfare of persons. Halting or preventing may include, but shall not be limited to, physically plugging and/or blocking the discharger's connection to the facilities of the project. The commission shall also have the authority, and shall prescribe the appropriate procedures, which shall include notice to the affected discharger and an opportunity to respond, to hold, or prevent any discharge into the facilities of the project which presents or may present an endangerment to the environment or which threatens to interfere with the operation of the project. Procedures prescribed under this subsection which comply in form with those provided in § 42-17.1-2(21) shall be deemed to be appropriate.

Civil penalties: § 46-25-25.2:

(a) Any person who shall violate the provisions of §§ 46-25-25 – 46-25-25.3, or of any permit, rule, regulation, or order issued pursuant thereto, shall be subject to a civil penalty of not more than twenty-five thousand dollars (\$25,000) per day for each violation.

(b) The commission shall, in the same manner as cities and towns authorized under the provisions of § 45-6-2.3(a)(4), issue regulations to obtain actual costs and reasonable attorney's fees incurred by the commission in seeking compliance, penalties, or damages.

Enforcement authority and procedure: § 46-25-25.4:

(a) The commission shall have authority to seek legal or equitable relief in the federal court or in the superior court of Providence county to enforce the requirements of §§ 307(b) and (c), 402(b)(8) and other applicable sections of the Federal Water Pollution Control Act, also known as the Clean Water Act, 33 U.S.C. § 1251 et seq., and any regulations implementing those sections or authorized by this chapter and/or by chapter 12 of this title. Whenever, on the basis of any information available to the commission, the commission has reasonable grounds to believe that a person has violated any provision of §§ 46-25-25 through 46-25-25.6 or any permit, rule, regulation or order issued pursuant thereto the commission may institute administrative, civil or criminal proceedings in the name of the commission. The commission shall not be required to enter into any recognizance or to give surety for costs prior to instituting such proceedings. The commission has the authority to order any person who violates any provision of §§ 46-25-25 through 46-25-25.6, any permit, rule, regulation or order issued pursuant thereto to cease and desist the violation, or to remedy the violation and to impose administrative penalties. ...

**NBC'S RULES AND REGULATIONS FOR THE USE OF THE
WASTEWATER FACILITIES**

SECTION 1.7 Inspection Powers

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

1.8.1 Wastewater Discharge Permits Required

- A. Existing Sources: All users connected to the NBC's wastewater facilities must obtain a wastewater discharge permit. All users proposing to connect to or discharge into any part of the NBC's wastewater facilities must obtain a wastewater discharge permit before connecting to or discharging to the facilities.
- B. New Sources: New industrial and commercial sources must obtain a wastewater discharge permit before connecting to or discharging to the facilities. The industrial and commercial user must be in compliance with effluent limitations upon start-up of operation. Any required pretreatment must be installed and operational in accordance with plans and approved by the NBC. The pretreatment system shall be inspected and approved by NBC personnel before a wastewater discharge permit will be issued.

1.8.5 Permit Conditions

- A. Wastewater discharge permits shall be expressly subject to specific permit provisions contained therein as well as to provisions of this Part and all other regulations, user charges, and fees established by the NBC. Wastewater discharge permits may include such conditions as are reasonably deemed necessary by the NBC to prevent Pass Through or Interference, protect the quality of the water body receiving the treatment plant's effluent, protect worker health and safety, facilitate sludge management and disposal, protect ambient air quality, and protect against damage to the NBC's facilities. Such conditions may include, but are not limited to, the following:
 - 1. The average and maximum wastewater constituents and characteristics permitted in the process water discharges;
 - 2. Limits on rate and time of discharge or requirements for flow regulation and equalization;
 - 3. Requirements for installation of inspection and sampling facilities and specifications for self-monitoring;
 - 4. Requirements for the submission of periodic self-monitoring compliance reports, which shall include, but not be limited to, volume or rates of flow, concentrations of controlled pollutants, or other information that relates to the generation of waste;
 - 5. Requirements for maintaining and submitting technical reports and plant records relating to wastewater discharges;

6. Daily average and daily maximum discharge rates, or other appropriate conditions when pollutants subject to limitations and prohibitions are proposed or present in the user's wastewater discharge permit;
7. Compliance schedules;
8. Requirements for installation of pretreatment systems, spill and slug-prevention control plans and solvent-management plans;
9. Provisions for authorized NBC employees and agents to enter and inspect the premises, including provisions for copying records, inspecting monitoring equipment and sampling effluent;
10. Compliance with Federal, state, and other governmental laws, rules, and regulations;
11. Fees and costs including supplemental fees assessed because of the special nature of the user's effluent in accordance with the provisions of § 1.5 of this Part and additional costs and fees based on the costs of enforcing these regulations or the permit, as in accordance with R.I. Gen. Laws § 46-25-5(10);
12. Signatory requirements; and
13. Any other reasonable conditions necessary to ensure compliance with the provisions of R.I. Gen. Laws § 46-25-1 *et seq.*, or any state and Federal laws, rules, and regulations.

SECTION 1.9 Wastewater Monitoring and Reporting

1.9.1 Records and Monitoring

- A. All users who discharge or propose to discharge wastewater directly or indirectly to the facilities shall maintain records that substantiate any information supplied in permit applications. Such records shall include, but not be limited to, pH tapes, chemical usage data, log sheets, hazardous waste manifests, water meter readings, effluent monitoring reports, self-monitoring compliance reports and any other informational requirements of this Part or required by a user's wastewater discharge permit or any applicable State and Federal laws and Regulations. These records are to be kept for a period of three (3) years unless there is a pending dispute or pending litigation involving the subject of these records, in which case these records are to be kept for a period of three (3) years following resolution of such dispute or litigation.

1.9.3 Monitoring And Analysis of Process Wastewater

- A. Sampling and analysis of industrial wastewater for the purpose of compliance determinations with respect to § 1.5 of this Part shall be done through industry self-

monitoring and through monitoring performed by the NBC. All analyses, including sampling results submitted in support of any application reports, evidence, or as required by any permit or order shall be performed in accordance with the techniques prescribed in 40 C.F.R. Part 136 (2018) incorporated herein by reference, not including later amendments, or, if 40 C.F.R. Part 136 (2018) does not contain sampling or analytical techniques for the pollutant in question, in accordance with procedures approved by EPA. The NBC may, at its sole discretion, require any user to monitor for any parameter which may pose a public health risk, may adversely impact NBC facilities, cause treatment plant process Interference or Pass through, and/or impact receiving water quality, including but not limited to, any new pollutants such as emerging pollutants of concern, which include, but are not limited to, PFAS compounds, pharmaceuticals, etc. The NBC may, at its discretion, require an independent laboratory to conduct the sampling and analysis at the user's own cost.

1. Self-Monitoring Requirements:

- a. Self-monitoring results must be accompanied by a certified laboratory analysis sheet, indicating the EPA approved test procedure for each parameter analyzed. The user must also submit a self-monitoring report with the results on a form prescribed by the NBC.
- b. All Self-Monitoring Reports must be signed and certified in accordance with § 1.9.10 of this Part.
- c. If any sampling performed by a user indicates any violation(s) of discharge limitations, the user shall notify the NBC within twenty-four (24) hours of becoming aware of the violation(s). The user shall repeat the analysis immediately for the parameters determined to be in violation and submit the resampling results to the NBC within thirty (30) days after becoming aware of the violation(s).

2. Sample Collection:

- a. Except as indicated in § 1.9.3(A)(3) of this Part below, wastewater samples collected for the purpose of determining user compliance with pretreatment standards and requirements must be obtained using flow proportional composite sample collection techniques. In the event that flow proportional sampling is not feasible, the NBC may authorize the use of time proportional sampling.
- b. For automatic samplers, the intake line hose must be at least one quarter inch (1/4") (0.6 cm) internal diameter and the velocity in the intake line must be maintained at least at two feet (2') per second.
- c. Samples for oil and grease, temperature, pH, cyanide, phenols, toxicity, sulfides, and volatile organic chemicals must be obtained using a grab sample.

3. Analysis of Wastewater Samples:

Laboratory analysis and sample preservation of industrial wastewater samples for user self-monitoring and compliance monitoring by the NBC shall be performed in accordance with EPA approved methods. Where applicable, the laboratory must be certified by the state in which it is located.

SECTION 1.10 Enforcement

1.10.1 Administrative Enforcement Options

- A. The NBC may implement any combination of the following administrative and/or judicial responses if a user is in violation of any provision of state or Federal requirements, the R.I. Gen. Laws Chapter 46-25, this Part, a permit, or an order issued by the NBC.
1. Issue a Notice of Violation;
 2. Require the User to attend a mandatory compliance meeting at the NBC Corporate Office during business hours, or at any other reasonable time, to discuss its violations or alleged violations, the remedial actions that it might take, and the actions that the NBC might take under the Act and the this Part;
 3. Issue an Administrative Order requiring any action that the NBC is authorized to require;
 4. Enter into a Consent Order or Settlement Agreement with the user;
 5. Revoke, modify, deny, suspend, or refuse to renew a Permit issued under the Act;
 6. Terminate or suspend sewer services provided to the user;
 7. Assess a civil administrative penalty;
 8. Institute a court action for civil penalties, criminal fines and/or other criminal punishment, injunctive relief, reimbursement of costs and/or damages resulting from a violation or threatened violation; and/or any other relief authorized by law or regulation.

ORDER

THEREFORE, based on the above findings and violations, Mirror Image and Roth are hereby ORDERED to:

1. Within fourteen (14) days of receipt of this Order, collect a grab sample from the final collection tank on three (3) separate days and separately analyze the samples for chromium, copper, and zinc, and submit the analytical results and SMCRs to the NBC within thirty (30) days of the sample collection date.
2. Immediately implement steps to ensure timely submission of all future analytical results and SMCRs.
3. Pay an administrative penalty of thirteen thousand five hundred dollars (\$13,500.00) to the NBC within twenty-one (21) days of receipt of this Order.

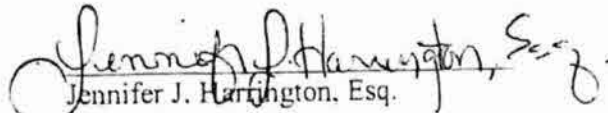
Pursuant to R.I. Gen. Laws §§ 46-25-25(d) and 42-17.1-2(21) and Section 1.10 of the Rules and Regulations, Mirror Image and Roth have the right to file a written request with the Executive Director for a hearing on said alleged violations within twenty (20) days of service of this notice to show cause why it should not be found in violation of the Rules and Regulations and why enforcement action should not be taken against it. If a hearing is requested within the twenty (20) day time period, the NBC shall provide written notice to Mirror Image and Roth of the date, time, and place for the hearing. If Mirror Image and Roth fail to request a hearing within the aforementioned time frame, this Order shall automatically become an immediate compliance order and Mirror Image and Roth shall be deemed to have waived the right to an adjudicatory hearing on the above cited violations.

IF MIRROR IMAGE AND ROTH WAIVE THEIR RIGHT TO AN ADMINISTRATIVE HEARING WITHIN TWENTY (20) DAYS AND FAIL TO COMPLY WITH THE REQUIREMENTS LISTED IN THE ABOVE ORDER, THEN MIRROR IMAGE AND ROTH ARE 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 THE PERMITTEE'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 MIRROR IMAGE AND ROTH TO CIVIL AND/OR CRIMINAL PENALTIES OF UP TO \$25,000 PER DAY

PER VIOLATION PURSUANT TO R.I. GEN. LAWS §§ 46-25-25.2 AND 46-25-25.3.

FOR THE NARRAGANSETT BAY
COMMISSION,

10-27-2022
Date

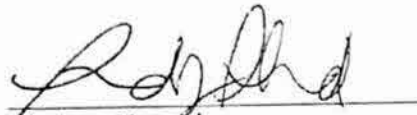

Jennifer J. Harrington, Esq.
General Counsel

CERTIFICATION

I hereby certify that on the 27th of October, 2022, true and accurate copies of the within ADMINISTRATIVE ORDER AND PENALTY ASSESSMENT were sent by certified mail, return receipt requested to the following individual:

- | | | | |
|----|--|----|---|
| 1. | Mirror Image, Inc
190 Exchange Street
Pawtucket, RI, 02860 | 2. | Richard Roth
190 Exchange Street
Pawtucket, RI, 02860 |
|----|--|----|---|

10-27-2022
Date


Lindsey Hazard
General Counsel Assistant



ATTACHMENT I

Failure to Satisfy NBC Requirements:

Required Submittal	Issue Date	Due Date	NOVs Issued	Status
Permit Application	5/02/2019	6/03/2019	June 3, 2019 July 1, 2019 August 1, 2019 September 3, 2019 October 1, 2019 November 1, 2019	Received November 7, 2019

ATTACHMENT II

Failure to submit Self-Monitoring Compliance Reports:

Month	Due Date	# of NOV's Issued	Date NOV's Issued	Status
April 2019	May 30, 2019	4	May 31, 2019 July 1, 2019 July 31, 2019 September 3, 2019	Received 09/12/2019
October 2019	November 30, 2019	6	December 2, 2019 December 31, 2019 February 3, 2020 March 2, 2020 March 31, 2020 April 30, 2020	Received 05/06/2020
April 2020	May 30, 2020	12	June 1, 2020 June 30, 2020 July 31, 2020 August 31, 2020 October 1, 2020 November 2, 2020 December 1, 2020 January 4, 2021 February 1, 2021 March 3, 2021 March 31, 2021 May 3, 2021	Received 05/19/2021
October 2020	November 30, 2020	10	December 1, 2020 January 4, 2021 February 1, 2021 March 3, 2021 March 31, 2021 May 3, 2021 June 1, 2021 July 1, 2021 August 2, 2021 August 31, 2021	Received 09/13/2021
April 2021	May 30, 2021	7	June 1, 2021 July 1, 2021 August 2, 2021 August 31, 2021 October 1, 2021 August 31, 2022 October 19, 2022	Outstanding

October 2021	November 30, 2021	10	December 1, 2021 January 3, 2022 January 31, 2022 March 3, 2022 March 31, 2022 May 2, 2022 May 31, 2022 July 1, 2022 August 31, 2022 October 19, 2022	Outstanding
April 2022	May 30, 2022	4	May 31, 2022 July 1, 2022 August 31, 2022 October 19, 2022	Outstanding