

PRETREATMENT PROGRAM

# ANNUAL REPORT

JANUARY 1, 2024 - DECEMBER 31, 2024



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

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

***ATTACHMENT VOLUME I***

***SECTION 1***

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

***INFORMATIONAL LETTERS TO  
USERS***

February 8, 2024



**2023 ENVIRONMENTAL MERIT AWARDS**  
**Mass Mailing - All Users - Both Districts**  
**LIST ATTACHED**

Dear «Title» «Last\_Name»:

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

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

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

[https://narrabay.com/media/2023/2022-env-merit-awards-application\\_9x.pdf](https://narrabay.com/media/2023/2022-env-merit-awards-application_9x.pdf)

Please download the application and return it by March 8, 2024 to:

Jim Kelly, Environmental Science Technical Advisor  
The Narragansett Bay Commission  
Seven Service Road  
Providence, RI 02905  
Email: [jkelly@narrabay.com](mailto:jkelly@narrabay.com)

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

Sincerely,



Kerry M. Britt  
Pretreatment Manager

cc: Jim Kelly

March 8, 2024



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

Dear «Title» «Last\_Name»:

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 2023, 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 wishes you well at your efforts to comply with the NBC and EPA regulations throughout 2024. 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 fluid and cursive, written in a professional style.

Kerry M. Britt  
Pretreatment Manager

KMB:sm

cc: Pretreatment Inspectors



March 8, 2024



**PERFECT COMPLIANCE LETTER SIUs  
List Attached**

Dear «Title» «Last\_Name»:

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

Armbrust International, Ltd  
Chemart Company  
Electrolizing, Inc.  
HP Services, Inc.  
Interplex Engineered Products, Inc.  
John H. Collins & Sons Company  
Manchester Street, LLC  
Metallurgical Solutions, Inc.  
Narragansett Jewelry Co., dba C & J Jewelry  
Providence Metallizing Company, Inc.  
LMG Rhode Island Holdings Inc. dba The Providence Journal

Prysmian Cables and Systems USA, LLC  
Rhode Island Heat Treating & Black Oxide Company, LLC  
Rhode Island Resource Recovery Corporation  
Stackbin Corporation  
Tanury Industries PVD, Inc.  
Technodic, Inc.  
Teknor Apex Company  
Tiffany and Company  
Truex, Inc.  
Univar Solutions USA, Inc

An advertisement recognizing the achievements of these companies was published in the Providence Journal on February 29, 2024. Aligned herewith is a copy of the advertisement for your reference.

Sincerely,

Kerry M. Britt  
Pretreatment Manager

KMB:sm



March 12, 2024



**MASS MAILING**  
**Categories 11 Through 59 – Both Districts**  
**List Attached**

Dear «Title» «Last Name»:

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 (SNC). 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.

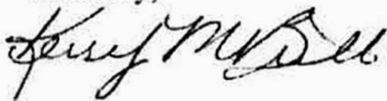
The EPA requires that the NBC review each industrial user file every three (3) months for SNC criteria A and B, referenced above, evaluating the user's previous six (6) month compliance status as can be seen from the enclosed EPA graphic. **If an industrial user exceeds the compliance percentages specified in the SNC criteria A or B, even for just one quarterly evaluation period, the user is in SNC and must be listed in the newspaper.** The compliance percentages specified in SNC criteria A and B are calculated for each sample location specified in your Wastewater Discharge Permit. The NBC still reviews each user file annually to determine 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 issues and would like assistance with pollution prevention measures. TAC staff is available to provide free technical assistance to your firm.

PLEASE NOTE THAT THE NBC DOES NOT WANT TO PUBLISH THE NAME OF ANY FIRM, BUT WE MAY HAVE NO CHOICE. On February 29, 2024, the names of fifteen firms from both districts were published in an advertisement in the Providence Journal due to their SNC status. These firms were billed by the NBC for the cost for this public notice. A copy of the public notice is enclosed for your information. Only you can ensure that the name of your firm is not published for being in SNC with NBC and EPA regulations. Please contact the Pollution Prevention staff if the NBC can be of assistance with your compliance endeavors. Good luck maintaining full compliance during 2024.

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,



Kerry M. Britt  
Pretreatment Manager

KMB:sm

Enclosures



# PUBLIC NOTICE

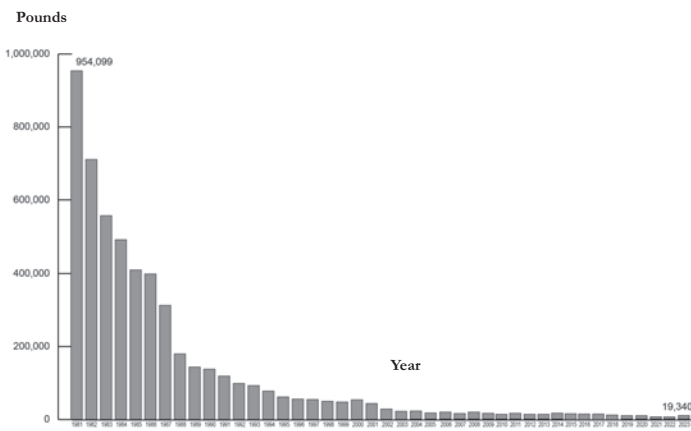
## Firms in Significant Non-Compliance

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGULATION 40 C.F.R. 403.8(f) (2) (vii) and Section 1.10 of the Narragansett Bay Commission, Rules and Regulations require the NBC to publish annually the names of all industrial users in Significant Non-Compliance (SNC) with pretreatment standards and other pretreatment requirements during the preceding year. Companies deemed to be in Significant Non-Compliance are those industrial users who have violated any of the Significant Non-Compliance criteria listed, as defined by Article 2 of the NBC Rules and Regulations during the time period from October 1, 2022 through December 31, 2023. The parameter for which a company was not in compliance and/or the specific administrative deficiency are listed after the company name. The number(s) in parentheses correspond to the type of SNC criteria specified below. Some of the firms listed below may have been issued an Administrative Order in which administrative and/or civil penalties may have been assessed. Many of the companies listed have made significant progress toward correcting the violation and may now be in compliance.

### Significant Non-Compliance Criteria:

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

### Total Metals Influent to Field's Point WWTF, 1981-2023



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 98.0% and 98.7% respectively. Similar toxic loading reductions have been observed at the NBC Bucklin Point facility.

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

### Bucklin Point Service Area

Pawtucket		
Company Name	Violations Cited	Present Status
City of Pawtucket (Public Works)	Failure to submit report on time (6)	Report has been received
Hord Crystal Corporation	Zn (2)	Firm is now in compliance
Isle Brewers Guild, LLC	Failure to submit report on time (6)	Report has been received
Summit Manufacturing Corporation	Failure to submit reports on time (6)	Reports have been received
Lincoln		
Denison Pharmaceuticals LLC	BOD (2) TTO (1,2)	Firm is now in compliance Firm is now in compliance
Palate Pack	Failure to submit reports on time (6) Failure to submit reports on time (6)	Reports have been received Reports have been received
Cumberland		
Cintas Corporation	TTO (1,2)	Firm is still experiencing compliance issues
Ravenous Brewing Company	Failure to submit report on time (6)	Report has been received
Synagro Northeast, LLC	TSS (2)	Firm is still experiencing compliance issues
Texcel Industries	Failure to submit report on time (6)	Report has been received
East Providence		
Aspen Aerogels Rhode Island, LLC	TSS (1,2)	Firm is now in compliance

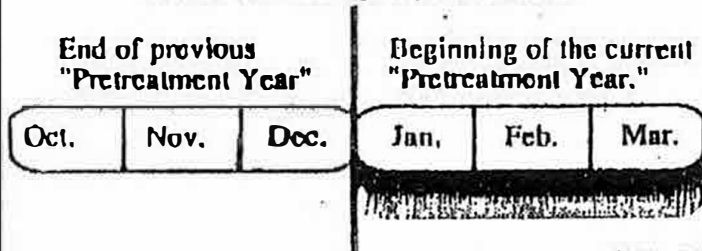
### Field's Point Service Area

Providence		
Company Name	Violations Cited	Present Status
271 Tockwotten Partners, LLC	BOD (1,2)	Firm is now in compliance
Providence Specialty Products, LLC	Failure to submit reports on time (6) BOD (1, 2) O&G (2)	Reports have been received Firm is still experiencing compliance issues
Quality Spraying Technologies	Failure to submit reports on time (6)	Reports have been received
Johnston		
R.I. Beef & Veal, Inc.	Failure to submit reports on time (6)	Reports have been received

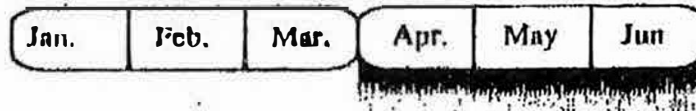
# Determination of Industrial User (IU) Significant Noncompliance (SNC)

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

### FIRST EVALUATION PERIOD



### SECOND EVALUATION PERIOD



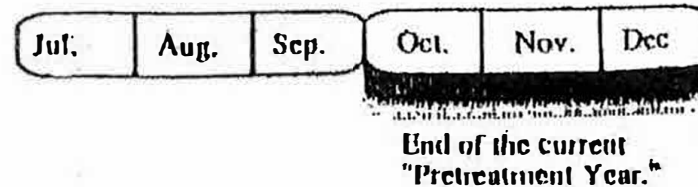
3. At the end of the first quarter (March 30th in our example), the POTW must evaluate the data from an industrial user for the previous six months (e.g., beginning with October 1 of the previous "Pretreatment Year" as in our example). Likewise, the POTW must evaluate six months of data at the end of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

### THIRD EVALUATION PERIOD



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

### FOURTH EVALUATION PERIOD



April 15, 2024



## 2024 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 29, 2024 as being in SNC with NBC or EPA regulations for the reporting period of October 1, 2022 through December 31, 2023. 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 12, 2024 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 \$75.00 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, 2024. (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 Pollution Prevention Staff is available to provide free technical assistance to your firm. To take advantage of the free NBC Pollution Prevention program, contact the NBC at 461-8848.

Sincerely,

A handwritten signature in black ink, appearing to read "Kerry M. Britt".

Kerry M. Britt  
Pretreatment Manager

KMB:sm

Enclosures

cc: Leah Foster  
Holly Ialongo, Esq.



# PUBLIC NOTICE

## Firms in Significant Non-Compliance

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- (3) Any other violation of a pretreatment effluent limit (daily maximum or long-term average) that the Commission determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of Commission personnel or the general public);
- (4) Any discharges of a pollutant that has caused imminent endangerment to human health, welfare or the environment or has resulted in the Commission's exercise of its emergency authority to halt or prevent such a discharge;
- (5) Failure to meet, within 90 days after the scheduled date, a compliance milestone contained in a Commission notification, permit or enforcement order, for starting construction, completing construction or attaining final compliance;
- (6) Failure to provide, within 30 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, self-monitoring compliance reports and reports on compliance with compliance schedules;
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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
City of Pawtucket (Public Works)	Failure to submit report on time (6)	Report has been received
Hord Crystal Corporation	Zn (2)	Firm is now in compliance
Isle Brewers Guild, LLC	Failure to submit report on time (6)	Report has been received
Summit Manufacturing Corporation	Failure to submit reports on time (6)	Reports have been received

#### Lincoln

Denison Pharmaceuticals LLC	BOD (2) TTO (1,2)	Firm is now in compliance Firm is now in compliance
Palate Pack	Failure to submit reports on time (6) Failure to submit reports on time (6)	Reports have been received Reports have been received

#### Cumberland

Cintas Corporation	TTO (1,2)	Firm is still experiencing compliance issues
Ravenous Brewing Company	Failure to submit report on time (6)	Report has been received
Synagro Northeast, LLC	TSS (2)	Firm is still experiencing compliance issues
Texcel Industries	Failure to submit report on time (6)	Report has been received

#### East Providence

Aspen Aerogels Rhode Island, LLC	TSS (1,2)	Firm is now in compliance
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### Field's Point Service Area

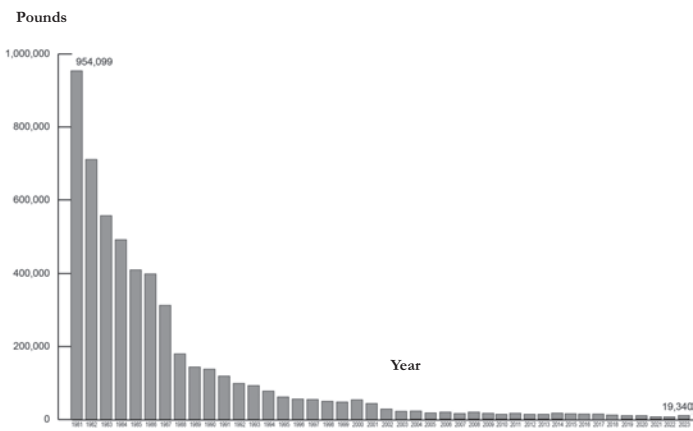
#### Providence

Company Name	Violations Cited	Present Status
271 Tockwotten Partners, LLC	BOD (1,2)	Firm is now in compliance
Providence Specialty Products, LLC	Failure to submit reports on time (6) BOD (1, 2) O&G (2)	Reports have been received Firm is still experiencing compliance issues
Quality Spraying Technologies	Failure to submit reports on time (6)	Reports have been received

#### Johnston

R.I. Beef & Veal, Inc.	Failure to submit reports on time (6)	Reports have been received
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### Total Metals Influent to Field's Point WWTF, 1981-2023



June 6, 2024



## **2024 SUMMER SHUT DOWN LETTER DATA BASE ATTACHED**

Dear «Title» «Last\_Name»:

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

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

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

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

Sincerely

A handwritten signature in black ink, appearing to read "Kerry M. Britt".

Kerry M. Britt  
Pretreatment Manager

Enclosure





# Narragansett Bay Commission

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

### Vacation Shutdown Prohibited Sewer Discharges

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

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

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

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

Vincent J. Mesoletta, *Chairman*

Laurie A. Horridge, *Executive Director*

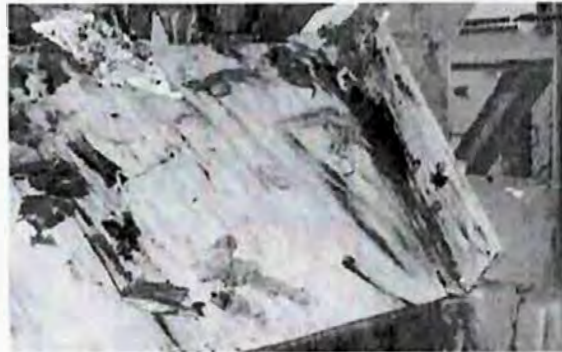
October 11, 2024



**2024 MASS MAILING**  
**Fuel Oil Users**  
**List Attached**

Dear «Title» «LastName»:

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



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

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

Sincerely,

Kerry M. Britt  
Pretreatment Manager

cc: Pretreatment Staff

November 22, 2024



MASS MAILING  
HOLIDAY SHUTDOWN LETTER  
ALL IU AND SIU (Categories 11 through 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,

A handwritten signature in black ink, appearing to read "Kerry M. Britt".

Kerry M. Britt  
Pretreatment Manager

KMB:sm

Enclosure

cc: Pretreatment Inspectors



# Narragansett Bay Commission

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

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- hinder the flow or causes obstructions to our facilities (example: fats, waxes, greases, oils, solids);
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Vincent J. Mesoletta, *Chairman*

Laurie A. Horridge, *Executive Director*

***NEWSPAPER AND MAGAZINE  
ARTICLES***

## ENVIRONMENT

# Pollution closed this RI beach a century ago. By 2026, it will be open to swimmers again.



**Alex Kuffner**

Providence Journal

Published 4:36 p.m. ET May 24, 2024

EAST PROVIDENCE – In one of the clearest signs yet of the water quality improvements in Narragansett Bay, Crescent Park Beach will officially reopen to swimming more than a century after being closed.

Governor Dan McKee and other elected officials announced plans on Friday to license the beach along the Riverside shore as swimmable and reopen it by May 2026, after restrooms are built in the park and lifeguards are hired.

It would become the northernmost licensed beach in the Bay.

“We know that Rhode Island is full of natural treasures,” McKee said. “It’s our job to share them.”

## **Beach to reopen as Narragansett Bay becomes cleaner**

The area around Crescent Park was a former summer colony, a onetime home to amusement parks and beach cottages that attracted visitors from across the state.

But pollution in the early part of the 20th century closed the beach to swimming and the only remnants of its glory days are the broken pilings visible at low tide that once held up bathhouses.

**The decision to reopen the beach** comes after steady improvements in water quality that have followed the completion of an enormous tunnel under Providence to collect overflows of sewage and stormwater that previously emptied untreated into the Bay.

The Narragansett Bay Commission, which operates the largest wastewater treatment system in Rhode Island, wrapped up the second phase of its three-part plan in 2014. Tests since then have found that the project cut bacteria counts in the Bay in half.

Improvements are expected to continue as the commission brings a second tunnel under Pawtucket that constitutes the third phase of the \$1.7-billion project into operation. The 2.2-mile-long tunnel was completed in February.

Tighter regulations on discharges from wastewater treatment plants that were enacted two decades ago have also helped make Crescent Park more swimmable. With lower levels of nutrients in the water that fuel algae growth, the waters in the Bay are clearer than they've been in generations.

“We've made investments over many years and they're paying off now,” said U.S. Sen. Jack Reed.

The latest investment is a \$300,000 grant from the Southeast New England Program, a U.S. Environmental Protection Agency initiative created by Reed that funds projects to restore coastal areas in the region.

## **Plans to reopen a beach in Riverside have been in the works for years**

East Providence officials had been talking for more than a decade about reopening a beach in Riverside, but the focus had been on Sabin Point to the north. Although the Bay waters off the beach there are clean enough for swimming, there are still persistent problems from outfall pipes that discharge stormwater from the surrounding neighborhood.

A series of small green infrastructure projects that will use swales and plantings to collect runoff are set to be built around the neighborhood to help address the problem, said Wenley Ferguson, director of habitat restoration with Save The Bay, which is advising the city on the work. Once they're implemented, Sabin Point could be licensed for swimming, too.

Save The Bay and The Nature Conservancy are also involved in work at Crescent Park to slow down erosion and stabilize parts of the shoreline that have been undercut by wind and waves.

John Torgan, Rhode Island director of The Nature Conservancy, said the reopening of the beach is a testament to the work by government agencies, scientists and environmental

advocates to clean up Narragansett Bay.

“This is a milestone,” he said. “To have a certified beach here is a credit to all the people that made this happen.”

## **Testing shows water is swimmable**

The state Department of Health and Save The Bay started testing the waters at Crescent Park Beach in 2017. After finding that they were safe for swimming, the department notified the city of the possibility of reopening the beach, said East Providence Mayor Bob DaSilva.

He said that residents of the city are the beneficiaries.

“For generations to come they will now be able to enjoy one of the most beautiful parts of our city and do so by the water,” he said.



## ENVIRONMENT

# Drilling of a 2.2-mile sewer tunnel under Rhode Island is finally complete. What comes next?



**[Alex Kuffner](#)**

Providence Journal

Published 4:37 p.m. ET Feb. 15, 2024 | Updated 6:21 a.m. ET Feb. 18, 2024

PAWTUCKET – In a huge burrow deep beneath the east bank of the Seekonk River on Thursday morning, heavy blocks of stone came crashing down as a giant machine chewed through the last stretch of bedrock to complete a 2.2-mile-long tunnel aimed at keeping the waters of Narragansett Bay clean.

With its cutter head rotating relentlessly, the tunnel boring machine has been working around the clock for a year and a half, grinding through 25 millimeters of rock face each minute to carve out the 30-foot diameter tunnel that will capture stormwater and sewage before they can reach the Seekonk River and then the Bay.

The work has been painstaking and incremental, but in the end it wrapped up sooner than anticipated.

“They were a little bit ahead of where we thought they would be,” said Jamie Samons, spokeswoman for the Narragansett Bay Commission, operator of the biggest wastewater treatment system in Rhode Island.

## What will the tunnel do?

The 125-foot-deep tunnel is the centerpiece of the final phase of the commission’s decades-long, \$1.7-billion project to prevent combined sewer overflows from polluting New England’s largest estuary.

Runoff from rains, especially when mixed with household waste, is one of the leading threats to the body of water at the heart of Rhode Island. The runoff transports the bacteria that

close beaches and shellfish beds, as well as nutrients that cause dangerous algae blooms.

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

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

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

The new tunnel that is at the heart of Phase III runs from the vicinity of the commission's other treatment plant at Bucklin Point in East Providence into Pawtucket along the east bank of the Seekonk River. It will be able to store 58.5 million gallons of overflow.

All told, the entire project aims to take care of 98% of overflow volumes into the Bay. The work so far in Providence has resulted in drastically lower bacteria counts, clearer water and reduced numbers of shellfish bed closures.

## **Work on the CSO project is far from over**

While the completion of the tunnel marks a major milestone for the construction project, there is still much work to be done.

First things first, the 300-foot-long boring machine will have to be disassembled and lifted back to the surface.

Then, work will pick up on the four drop shafts that will channel overflows into the storage tunnel.

And finally, the pump station that will send the stored mix of dirty water to the Bucklin Point plant for treatment will be completed.

The project is on schedule and set to wrap up in 2026.

“We are excited to complete this important milestone in the Phase III Restored Waters RI project,” said commission chairman Vincent Mesolella. “We are continuing to see the positive results of the investments made through this project, including a significantly cleaner Narragansett Bay, reopening of shellfishing beds and healthier waters for all Rhode Islanders for generations to come.”

# Warwick

## BEACON

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MAIN MENU



## Finding the bright side

Posted Tuesday, December 31, 2024 12:00 am

I've heard it more than once in the last week: "Well, the days are getting longer."

That's reassuring even though the temperature has been wildly swinging between single digits and an almost balmy 45 degrees and the sun drops below the horizon soon after 4 p.m. There's no other way to look at it: it's winter regardless of reports of global warming.

I'm not complaining as long as the furnace keeps running [I don't dare think of what the gas bill might be], the steam-filled pipes keep clanking and the radiators pump out the heat.

I was intently going through my post-Christmas emails Friday morning when Carol suggested I might want to look out at the Bay. My first thought was I would see a layer of ice, after all the temperatures had dropped into the teens overnight. But no. A flock of Brant geese patrolled the shoreline, diving occasionally to feed on seaweed, and beyond them the clear sky was reflected in tranquil waters.

There was more out there. Diehard quahoggers with their boats anchored were waiting for 8 a.m., when DEM regulations would allow limited harvesting of quahogs in the Providence River. They would have three hours to harvest the rich beds that first opened three years ago after being closed for more than 70 years.

Two developments prompted the opening: Foremost were efforts to clean up bay waters with the excavation of sub-terrain reservoirs enabling the Narragansett Bay Commission to capture and treat stormwater that would otherwise push raw sewage into the river. Then there was the decline of shellfish at regular fishing grounds.

Other than the temperature, this seemed like a beautiful day to be outside, and raking in the littlenecks to help quahoggers pay for home heating bills would be a Christmas bonus.

So, there was a bright side to the frigid conditions if you want to look at it that way.

I was reminded of my father decades ago when he decided it would be fun to celebrate Christmas in upstate New York. The family was excited. We'd got to cut down a tree in the woods [it was scraggly but had long green needles] and gather around the fireplace. The weather was nasty, but the windblown snow gave it a feeling of adventure and the snugly feeling inside once we arrived.

My parents loved wine with dinner, so choosing a gift was not difficult. I brought along a case of evenly divided red and white wines. So as not to spoil the surprise and with temperatures hovering near 25, I left the case in the trunk of the car. Overnight the temp dropped to minus 25. The radiators banged all night as did the nearby lake as it froze.

The morning was clear and still. The snow was crisp. It was deceiving. I reached for the car door handle with my ungloved hand. It instantly froze to the handle. Once free I opened the trunk to bring in the wine. The cardboard box was rumped where frozen wine had pushed corks free. The wine was mush.

Deflated, I carried the case in.

My father looked puzzled until I explained this was my Christmas gift. He brightened.

"You know," he said. "Let's drink it as soon as it thaws."

On the bay, looking at the quahoggers, I figured there had to be a bright side to being out there.

I called Jody King, whose boat I'd spotted in front of the house. He hoped for some wind. He had two sails up that would have given him some added torque. The sails flopped in the dead calm. It was the last day the quahog-rich Providence River would be open until well into the New Year. Jody harvested half of what he had expected to catch. He wasn't down. That's the way things work out.

I told him the wine story.

Was the glass half full or half empty?

He said it was what it was.

And I reminded him it was cold, but not cold enough to freeze wine. There was a bright side.

## Comments


NO COMMENTS ON THIS ITEM PLEASE LOG IN TO COMMENT BY CLICKING HERE (</login.html?referer=%2Fstories%2Ffinding-the-bright-side%2C275334>)

## OTHER ITEMS THAT MAY INTEREST YOU


[How to curb your dog's shoptlifting \(/stories/how-to-curb-your-dogs-shoptlifting,280406\)](/stories/how-to-curb-your-dogs-shoptlifting,280406)

[Finding a silver lining in the price of eggs \(/stories/finding-a-silver-lining-in-the-price-of-eggs,279526\)](/stories/finding-a-silver-lining-in-the-price-of-eggs,279526)


# GOLOCAL *Prov* News



**WEDNESDAY, MARCH 12 AT 7:30P**



401.421.ARTS (2787) PPACRI.ORG



TRENDING PHOTOS: RI Special Olympians Are Off to

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## \$2 Billion Investment Cleaning Up Narragansett Bay Hits Milestone

Thursday, February 22, 2024  
GoLocalProv News Team

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PHOTO: NBC

Rhode Island lives, plays, eats, and attracts visitors because of the beauty and bounty of Narragansett Bay. Critical to Rhode Island's environment and economy has been the nearly 30-year effort to build the three-phase Narragansett Bay Commission's (NBC) Combined Sewer Overflow (CSO) project.

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"By the time everything is said and done, NBC ratepayers will have made a nearly \$2 billion investment in the health of the bay. Along the way, the projects have created over 2000 direct and indirect jobs and the clean water that has resulted economically boosts our fishing and tourism industries," said NBC Chair Vincent Mesolella.

The project ranks as one of the biggest public works investments in Rhode Island's history. This phase creates approximately 1,700 direct and indirect jobs.

After centuries of mistreatment of Narragansett Bay - the Industrial Revolution, untreated waste, and the discharge from the plating process in the jewelry industry adversely impacted Narragansett Bay for more than a century.

"It's certainly exciting to know that we are undoing centuries of pollution with the CSO project and ensuring that our children and grandchildren will only ever know a healthy bay," said Mesolella.



GoLocal tour of the tunnel in July of 2022 PHOTO: GoLocal

The NBC has now completed the excavation and lining of the 2.2-mile Pawtucket Tunnel. The project is Phase III of the CSO project known comprehensively as RestoredWaters RI. It features a deep rock tunnel 125-feet below the surface.

The tunnel will store and transport storm-related combined sewer and stormwater overflow to NBC's Bucklin Point Wastewater Treatment Facility for full treatment before discharge into Narragansett Bay – all leading the way for cleaner waterways throughout Rhode Island.

The cutterhead of the tunnel boring machine (TBM), named "Chloe the Clean Water Cruncher" as a matter of naming traditions, was placed into the tunnel near Bucklin Point on June 22, 2022, marking the symbolic beginning of tunneling operations. Since then, the TBM has excavated 2.2 miles of earthen material spanning Pawtucket and Central Falls.

"We are excited to complete this important milestone in the Phase III RestoredWaters RI project," said Mesolella. "We are continuing to see the positive results of the investments made through this project, including a significantly cleaner Narragansett Bay, reopening of shellfishing beds, and healthier waters for all Rhode Islanders for generations to come. I want to especially thank the individuals who've contributed to the success of the project on a daily basis, the NBC Board of Commissioners, our local legislative

representatives and government supporters, our ratepayers, and the communities we serve."

With the tunnel boring complete, the concrete-lined tunnel is capable of storing 58.5 million gallons of combined sewer and stormwater overflow ready for treatment and discharge. Storm-related sewage will be pumped to NBC's Bucklin Point Wastewater Treatment Facility for full treatment.

The next step in this phase of the CSO program will include the installation of drop shafts and outfalls, which will divert storm-related sewer overflow into the tunnel.

RestoredWaters RI is the largest public works project in Rhode Island history. It continues to improve the health of shellfishing and swimming beaches across the state, reduce annual combined sewer overflow, and create green spaces for public access. Phase III of the project supported 1,700 direct or indirect jobs over the past three years.

### CSO Phase III Facts:

CSO Phase III is divided into four sub-phases. Phase IIIA includes the Pawtucket Tunnel, which is the largest single facility in Phase III, representing approximately 2/3 of the anticipated project cost.

According to NBC, the tunnel is an important step towards reaching compliance with their consent agreement with the Rhode Island Department of Environmental Management (RIDEM). The agency states:

- The program will protect the water quality in Narragansett Bay, contributing to reducing annual combined sewer overflow volumes by 98% and achieving an 80% reduction in shellfish bed enclosures
- In 2019, the project received a loan through the USEPA's Water Infrastructure Finance and Innovation Act (WIFIA) for 49% of the project cost

The CSO Phase III Facilities project includes design and/or construction of the following:

- 11,600-foot-long deep rock tunnel to provide a storage volume of 58.5 million gallons
- two launching and receiving work shafts
- four drop shafts to divert storm-related flow into the tunnel
- 160-foot-deep tunnel pump station to transport flow from the tunnel to the Bucklin Point WWTF for treatment
- several "green infrastructure" projects, providing permeable areas at the surface to absorb stormwater & keep it out of the sewer system
- modifications throughout the sewer system to optimize flow
- limited areas of sewer separation, where stormwater is directed into a separate pipe from sanitary sewage

The purpose of the project is to implement the final phase of the federally mandated CSO Abatement Program, significantly reduce CSO volumes in the Bucklin Point service area, and eliminate overflows from a three-month storm (1.614 inches of rain in six hours).

### Related Articles

- [Narragansett Bay Commission's CSO Phase III Will Cost \\$800M and Create 500+ Jobs, Says Mesoellella](#)
- [VIDEO: Narragansett Bay Commission Breaks Ground on Historic \\$800 Million Project](#)
- [Narragansett Bay Commission Offers Earth Day Clean-Up Grants](#)
- [Controversial Chemical Used in Oil Spills, Banned in Many Countries, Can Be Used in Narragansett Bay](#)
- [Narragansett Bay Commission Offers Additional No-Fee Payment Options Online or Via Phone](#)



**NBC Chairman Vin Mesoellella (right) PHOTO: GoLocal, July 2022**

[VIEW LARGER +](#)



[https://www.valleybreeze.com/news/improved-pierce-park-reopens-concession-stand-dedicated-to-evans/article\\_65b1540a-d506-11ee-a47a-636ff2a13985.html](https://www.valleybreeze.com/news/improved-pierce-park-reopens-concession-stand-dedicated-to-evans/article_65b1540a-d506-11ee-a47a-636ff2a13985.html)

# Improved Pierce Park reopens; concession stand dedicated to Evans

By LUZJENNIFER MARTINEZ Valley Breeze Deputy Editor luzjennifer@valleybreeze.com  
Feb 28, 2024

1 of 2



Officials and residents gathered to cut the ribbon on the reopened Pierce Park, at **975 High Street** in Central Falls. Breeze photo by LuzJennifer Martinez



CENTRAL FALLS – Four years after it was closed due to contaminated soil, Pierce Park has officially reopened, and the city hosted an event to celebrate the occasion on Feb. 22.

Officials unveiled the park's renovated concession stand, which is dedicated to Carol Evans, mother of Central Falls Youth Baseball President Thomas Evans. Carol died of heart issues in 2020.

Evans said that from a professional perspective, "it couldn't get any better than this."

"Every year, we allow 150 families to play baseball for free, and we always want our kids to have access to a field, access to coaches, and create lifelong experiences because that's what youth sports (does)," he said.

He thanked everyone who came to support the event, saying he's grateful for the concession stand dedication to his mother.

"Growing up, my father was the Central Falls Little League president and my mother would always run the concession stand," Evans said.

"She was a phenomenal woman; anytime a kid needed a ride to practice, she'd pick the kids up, she'd buy the kids cleats, she was a very giving person," he added.

When Evans decided to bring baseball back to Central Falls after 10 years, he said his mother was the first to support his decision.

"Because of her motivation, and her positive energy, we were able to really make it happen, and when she passed away, it really pushed us to get it done," he said.

"Her motivation is why we're here today."

"I'm proud of our amazing Planning Department for brainstorming creative ways we could make renovation possible, and their focus allowed us to keep our important recreational space available in our city," said Mayor Maria Rivera.

Rivera expressed thanks for Rhode Island Department of Environmental Management Brownfield Grant funding, American Rescue Plan Act money, and the Narragansett Bay Commission for investing in stormwater management at the park.

The park off High Street now includes adequate space for a Little League baseball field and basketball courts, giving youth teams a place to practice and play games.

"It's been a little tough practicing, since we've had to share the Louis Yip soccer field with the soccer players," said Dom Grillo, director of Central Falls Youth Baseball. "But this is great."

Last year, CFYB used Macomber Stadium for games, which Director Brittany Roy said they shared with the high school. “It was kind of hard having games here and practices there, since it breaks it up but (now) we’re excited,” she said.

According to Planning Director Jim Vandermillen, the groundbreaking for the park renovations kicked off in the late spring of 2022.

At the time, the project team also requested funds from the RIDEM to clean up the site.

Narragansett Bay Commission representatives took over construction and worked out an arrangement with the city to work together as the project team. That allowed them to manage the project, put it out to bid, and work together to design it, Vandermillen said.

The sidewalks around the park have also had new paving stones laid on them, ensuring no exposure to soil, which Vandermillen said is a primary concern with a contaminated site.

Central Falls has a history of industrial use, and RIDEM Director Terrence Gray said contamination left behind carried forward.

“We always like to be involved with the community, and we like to leave the community better than we found it,” said Vincent Mesolella, chairperson of the Narragansett Bay Commission.

---

**LuzJennifer Martinez**

Deputy Editor

# Long-Term Sampling in Narragansett Bay Reveals Plummeting Plankton Levels

By Bonnie Phillips / ecoRI News staff

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*The URI trawler Cap'n Bert motors out of Wickford Harbor weekly to collect samples of Narragansett Bay, with Abby Baskind and other graduate students. Over 60 years, all that weekly data adds up. (Steve Barber/URI)*

KINGSTON, R.I. — The level of tiny plantlike creatures called phytoplankton in Narragansett Bay has dropped by half in the past half-century, according to University of Rhode Island researchers and based on a new analysis of a long-term study of the bay.

The news, published by the University of Rhode Island's Graduate School of Oceanography (GSO), is both surprising and concerning. The URI research is the first such study of Narragansett Bay and offers a baseline look at changes occurring since 1957. It was funded by the National Science Foundation and Rhode Island Sea Grant.

The study shares information from one of the longest (<https://web.uri.edu/gso/research/plankton/>) plankton time series in the world.

Analyzing the time series of Narragansett Bay, the URI research team found that phytoplankton biomass in the bay declined by 49% from 1968 to 2019. The intensity of the winter-spring bloom, which starts the annual cycle of productivity in the bay, decreased over time and is also occurring earlier each year.



[\(https://www.rieea.org/programs/summit/\)](https://www.rieea.org/programs/summit/).

Narragansett Bay is not only a destination for generations of Rhode Islanders and tourists, but a research site for oceanographers at URI's Narragansett Bay Campus.

“A lot of people live, work and play on the shores of Narragansett Bay,” URI oceanography professor [Tatiana Rynearson](https://web.uri.edu/gso/meet/tatiana-rynearson/) said. She noted the bay provides important goods and services for the nearly 2 million people who inhabit its watershed. In the dense Northeast, Narragansett Bay stands out as a well-used body of water that sits between Arctic waters to the north and warm waters to the south, a scientific sweet spot that offers researchers a dynamic environment to study.

Much has changed around the bay since 1957, and in it, too.

Considered “primary producers” in the marine environment, phytoplankton are small in size but big in impact, fueling local food webs, indicating environmental quality, and pointing toward climate trends. The local declines mirror those observed elsewhere in the Gulf of Maine, Australian coast, and Black Sea.

One possible silver lining is that variability in phytoplankton biomass may point to resilience in the face of climate change. Researchers hope to examine such trends further, highlighting the need to sustain such marine time series in coming decades.

Rynearson described the impact and importance of phytoplankton as similar to the grass on an African savanna. All the animals rely on the grass, she said. Similarly, phytoplankton are key to the survival of all of the organisms in the bay.

“Phytoplankton are a key food source,” she said, “so this decrease we’re seeing is important.”

The winter-spring phytoplankton bloom kicks it all off early in the year, the start of the annual feeding cycle in the bay. The bloom provides nutrients to many animals, including those coming out of hibernation. With the new research, scientists learned that the bloom is happening five days earlier every decade.

“This event has a big impact,” Rynearson said, “and its timing is important; changes in the ecosystem are very delicate. Everything acts in concert.”



*Narragansett Bay is one of the most studied estuaries in the world, and its long-running URI plankton survey offers important historical context for the past half-century in the bay. Recent analysis of ocean sampling of the bay reveals plummeting levels of phytoplankton. (URI)*

Rynearson said she isn't sure how the earlier bloom will affect animals' development, noting that the first step is to understand what's happening at the base of the food web; next will be to see how it tracks and what's causing the changes.

The time series' weekly data results are communicated to GSO and beyond, provided free to two dozen partners across the state, including the state Department of Environmental Management, the Narragansett Bay Commission, nonprofit agencies, and interested academic and government partners.

“This data is of interest to time series studies all over the world,” Rynearson said. “And now that we have information on the status of the phytoplankton at the bottom of

the food web, we can set goals for collecting more information across the entire food web, while there is time to influence it.”

The data is captured each Monday at 7 a.m. by the Cap’n Bert, a 53-foot trawler operated by URI’s Department of Fisheries, Animal and Veterinary Sciences that sails out of Wickford Harbor.

“We want this data from the bay to help tell the story of Narragansett Bay and be read by people in and around Rhode Island, the bay and beyond,” Rynearson said. “We want to get people interested. With more people knowledgeable, it’s possible to make a difference.”

Rynearson has directed the Narragansett Bay long-term plankton time series since 2008, including years of accumulated data that only existed on paper in a locked storage room. Digitizing those pre-1997 files was a longstanding goal of Rynearson’s, and she and her team transferred those data snapshots of Narragansett Bay from the analog 1960s through the ’90s, eventually gaining a complete dataset of long-term information on the bay.

“There’s so much value in this one-of-a-kind data, which had been sitting in holding over the decades,” she said.

Rynearson credited the study’s lead author and former URI postdoctoral fellow Patricia Thibodeau, now at the University of New England, with digitizing the data, a nearly yearlong process.

They shared the results with David Borkman, principal environmental scientist in shellfish water quality at DEM, who collected study samples when he was a URI student.

“The plankton time series is extremely valuable,” he said.



Rhode Island's rivers are as important to the state's history, economy, and identity as the ocean waters they flow into. Long plagued by pollution and neglect, rivers have been the focus of revitalization efforts, and URI has played an important role. The future of our rivers—and all our waterways—depends on how we manage, protect, and respect them.

*By Dave Lavalley '79, M.P.A. '87*

On a bright, fall day in the Olneyville section of Providence, the Woonasquatucket River roars over a dam that once powered the National and Providence Worsted Mills. The former textile mills now house stylish apartments and commercial spaces, including a cafe and yoga studio. Alongside the river sit the hulking, rusted remnants of the sluiceway that once controlled the flow of water to the mills. A fish ladder, completed in 2007, allows 40,000 herring to return upstream each spring for spawning, a rite once prevented by the dam. On the opposite side is the popular Woonasquatucket River Greenway Bike Path, which follows the river from Johnston to Providence.

But the scene on the banks of the Woonasquatucket wasn't always so idyllic.

"I moved to Rhode Island in 1988 and began work as a summer intern at DEM (R.I. Department of Environmental Management)," says Alicia Lehrer, M.S. '93, executive director of the Woonasquatucket River Watershed Council. Lehrer earned her URI graduate degree in natural resources science and developed the bacterial testing program for URI's Watershed Watch volunteer water monitoring program.

"The river was right outside my office door, and my coworkers took me outside to see it," Lehrer recalls. "They said, 'This is the Woonasquatucket. It is really contaminated. Don't go in there.'"

“There is really no comparison to the water quality now,” she says. “Until 2015, we had a lot of problems, including sewage from 19 combined sewer overflow pipes along the river.”



The remains of a sluiceway that once controlled the flow of the Woonasquatucket River.



Mallard ducks on the banks of the Blackstone River.

## **The Narragansett Bay Commission**

Combined sewer systems collect rainwater runoff, domestic sewage, and industrial wastewater in one pipe. Sometimes, during heavy rainfall, the runoff exceeds the pipe's capacity and untreated water flows into nearby water bodies.

Thanks to the Narragansett Bay Commission, which owns and operates Rhode Island's two largest wastewater treatment facilities—Field's Point in Providence and Bucklin Point in East Providence—combined sewage overflow has been greatly diminished. Three major commission projects are noteworthy—a below-ground, 65 million-gallon, 3-mile tunnel that captures and holds sewage for treatment at Field's Point; a system of near-surface pipes along the Seekonk and Woonasquatucket rivers to intercept overflows; and

a 2.2-mile, 65 million-gallon tunnel to hold overflow before it gets to the Seekonk River. The commission broke ground on the last of these in 2021. By the completion of the final phase, combined sewage overflow discharges to the rivers are projected to decrease by 93%. Additional projects have reduced nitrogen loads from the Field's Point and Bucklin Point facilities by 83%.

URI oceanography professor Chris Kincaid has worked with the commission since 1998, measuring and modeling the Seekonk and Providence rivers and upper Narragansett Bay, particularly for hypoxia, or low levels of dissolved oxygen. Hypoxia is caused by excessive nutrients, like nitrogen and phosphorous, that lead to aquatic plant blooms and fish kills, like the one in August 2003 on Greenwich Bay, when a million dead fish washed ashore.



Field's Point in Providence is one of Rhode Island's two largest wastewater treatment facilities. URI oceanography professor Chris Kincaid has worked with the Narragansett Bay Commission, which owns and operates the facility, since 1988 to measure and reduce nutrients in the water that comes out of treatment facilities. Engineering professor Vinka Oyanedel-

Craver assessed the baseline level of microplastics contamination at the facility.



Ashton Mill on the Blackstone River in Cumberland, R.I., produced muslin from 1867–1935, when it shut down during the Great Depression. The mill building now houses luxury apartments.

“There is a balance,” says Kincaid, who has collected 1 billion data points from the Seekonk and Providence rivers and the upper bay. “If you don’t have enough nitrogen, you starve the things that live in the water. But if you have too much nitrogen, you get a bloom of phytoplankton, algae, and grasses. When that material dies and settles to the bottom, detritivores, the organisms that break down the dead material, suck all the oxygen out of the water.

“After the Greenwich Bay fish kill, there was a rallying cry that this couldn’t happen again, but let’s make sure we understand the problem,” Kincaid says. “One of the first things that happened was treatment plants started using three-stage treatments to remove nitrogen from wastewater.”

“Narragansett Bay has one of the most extensive data sets in the world for coastal plumbing, or how water moves and flushes,” says Kincaid. “One of the reasons is the Narragansett Bay Commission’s support of science, data, and sound modeling. We have been working to balance ecosystem health with economic health, and to do that you need huge amounts of data to build accurate ecosystem modeling tools.

“Our most recent bay circulation models, improved through years of trial-and-error validation steps with data, show that managed nutrient reductions have been successful,” Kincaid says.

His simulations indicate that rivers and offshore intrusions—rather than sewage treatment plant inputs—now have the greatest impact on nutrient levels and blooms in the Providence and Seekonk rivers and in the upper bay.

“Before the 2003 fish kill,” says Kincaid, “treatment plants were discharging at 20 milligrams per liter concentrations for total nitrogen; now the concentration is 5 milligrams per liter coming out of the pipes.”



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“Once rivers are loved and revered, investment follows.”

Alicia Lehrer, M.S. '93, executive director of the Woonasquatucket River Watershed Council

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Such efforts have had significant positive impacts. “Recently, we collected data that showed swimmable water quality at Riverside Park, which is in the heart of Olneyville, a heavily industrialized area,” says Lehrer. “The water is not consistently clean enough for swimming, but this was kind of like a miracle.”

A cleaner river has led to almost \$1 billion in investment along the Woonasquatucket’s banks. Such developments as the Foundry Campus—a mixed-use property including residences and offices located in the former home of machine tool manufacturer Brown & Sharpe—now dot the river.

“Once rivers are loved and revered, investment follows,” says Lehrer.





The Blackstone River runs through the northeastern corner of Rhode Island and was once referred to as the hardest working river in America because it was home to hundreds of mills. It was also one of the most polluted rivers in the nation. Remediation efforts have made the river cleaner and more hospitable for people and wildlife.



The Blackstone River flows over a dam between Lincoln and Cumberland, R.I.

## **Rivers Foster Civilization**

The region's Indigenous people have long “loved and revered” local rivers.

Lorén Spears '89, Hon. '17, executive director of the Tomaquag Museum and a citizen of the Narragansett tribal nation, says, “We used rivers for transportation to trade and visit with other people. Food sources such as fish, turtles, and mammals were harvested from the rivers and their banks. We harvested plant matter like bulrush. Its seeds and roots are edible, and we wove stalks of the plant material for mats in our homes.”

The rivers allowed people to move from their winter homes to their summer homes. “We stayed in inland longhouses in the winter, and during the spring and summer we used the

rivers to get to our homes near the ocean,” Spears says.

“This traditional ecological knowledge—including food, medicine, technology, and spirituality—of the rivers and other waterways is passed down to our people today,” says Spears. “We share this knowledge through tours at the Tomaquag Museum.”

URI associate professor of geosciences Soni Pradhanang, who takes an interdisciplinary approach to her work on managing water resources and protecting ecosystems, echoes Spears on the centrality of rivers in the lives of ancient people.

“Human civilization owes its start to the rivers of the world,” Pradhanang says. “You can’t irrigate with seawater. It’s no coincidence that the great Mesopotamian and Egyptian cultures developed along the Euphrates and Tigris rivers and the Nile.

“And ancient people lived in or near the rivers’ floodplains,” Pradhanang adds. “When the rivers flooded and receded, they deposited beneficial soils and sediments on the land that the people farmed.”

## **Rivers as Economic Engines**

But centuries later, rivers became the engines that transformed Rhode Island into one of the richest states in the nation, as Samuel Slater and other industrialists built water-powered mills on them. Rhode Island’s rivers powered manufacturing giants including Fruit of the Loom, U.S. Rubber, and some of the biggest names in jewelry manufacturing.

The cost, however, was great as rivers became polluted with waste from inadequate sewage systems, residential cesspools, and toxins from the mills. The dams built to control water flow to the mills prevented migratory fish from returning to the rivers to spawn.

The revitalization of the state's rivers in the past half-century is due in large part to the Clean Water Act of 1972, which, according to Elizabeth Herron '88, M.A. '04, director of URI's Watershed Watch, required mills to pay for their pollution. The act empowered the Environmental Protection Agency (EPA) to implement wastewater standards for industry and made it unlawful to discharge pollutants into navigable waters without an EPA permit.



Elizabeth Herron '88, M.A. '04, director of URI's Watershed Watch, on a pedestrian bridge that crosses the Saugatucket River in Wakefield, R.I.



Herron, like Lehrer, observes that the economy is strengthened when rivers, along with their affiliated ponds and surrounding lands, are clean.

“Canoeing, kayaking, fishing, and other recreational activities have increased because water is cleaner,” says Herron. “People are buying and renting boats, kayaks, and fishing gear.”

And the state’s bike paths, several of which run along rivers, including the Blackstone, Woonasquatucket, Pawtuxet, Ten Mile, and Saugatucket, “have led to more businesses that recognize the beauty and value of the bike paths and rivers,” Herron says. “Along the Washington Secondary Bike Path near Route 117 in West Warwick, ice cream and breakfast places have oriented their stores to take advantage of the bike path and the nearby Pawtuxet River.”

And cleaner rivers are not just good for business. “Eels, herring, eagles, beavers, otters, egrets, herons, and mink have returned to the rivers,” Herron says, adding that there are more trees lining rivers across Rhode Island today than there were 100 years ago.

“Forests and their accompanying leaf litter slow and filter rainwater as it moves to lakes, ponds, and rivers,” Herron says.

## **URI Engineers and Scientists Help Establish Cleaner Rivers**

URI’s involvement in revitalizing the state’s rivers goes back decades. Raymond Wright, emeritus dean of the College of Engineering, worked closely with the EPA on a comprehensive report in 2001 after 10 years of study, showing the Blackstone River’s water quality had improved greatly. His Blackstone River Initiative report has been used as a model for other river studies. Wright conducted studies on the levels of nutrients, like phosphorous and nitrogen, as well as heavy metals like mercury, chromium, and lead in many of the state’s rivers.

“We collected data, which agencies like the EPA and DEM could use to develop regulations and water quality standards,” Wright says.

“Ray was a great supporter and mentor to me,” says Vinka Oyanedel-Craver, associate dean for research and professor of civil and environmental engineering—and one of the principal investigators with URI’s Water for the World Initiative. “I inherited his lab when I started at URI.”

One of her newest research projects involves working with the R.I. Department of Transportation (DOT) on street sweeping. Oyanedel-Craver calls the project a “nonstructural alternative” to addressing pollution in storm runoff.

“We are looking at the amount of dust and sand on the state’s roads and analyzing what is in those materials that could enter rivers, streams, and the bay,” she says. “DOT came to

us for assistance in determining a schedule that would help reduce the load of pollutants entering bodies of water in an effective and economical way.”

She says sources of contaminants on the state’s roads include car exhaust particles and materials from tire and brake decay.

Pradhanang also notes Wright’s influence. “When I led the Scituate Reservoir safe yield research in 2017,” she says, “I contacted Ray to learn about the Scituate reservoirs and their hydrodynamics. He is rich in information and is always eager to talk about science related to rivers and reservoirs. The background he provided helped us with our project.”

Wright’s late colleague, professor emeritus of chemical engineering Stanley Barnett, and former chemical engineering research professor Eugene Park, Ph.D. ’94, received the Narragansett Bay Commission’s 2011 Pollution Prevention Environmental Merit Award for their work on finding sustainable, cost-effective solutions to environmental problems.

Barnett and Park helped Rhode Island businesses reduce and prevent pollution for 25 years and served as pro bono engineering consultants to more than 500 companies. They worked closely with the DEM, Narragansett Bay Commission, and the EPA to resolve pollution problems in industries such as metal finishing, textiles, and auto body repair.

Andrew McNulty, M.E.S.M. '22, takes soil samples for a 2021 Department of Natural Resources Science project that mapped hundreds of acres of wetlands along the Pawcatuck River, which flows from Worden Pond in South Kingstown, R.I., to Stonington, Connecticut.

## **A More Sustainable Approach to Textiles**

Textile mills and other factories were prime sources of river pollution, but URI textiles professor emeritus Martin Bide conducted research to help the industry reduce pollution. Now, Professor Karl Aspelund of URI's Department of Textiles, Fashion Merchandising and Design aims to work with a still-thriving—albeit, smaller—textile industry to reduce pollution.

“I am planning a long-term, multidisciplinary project that will, if successful, create a model for how to run a textile manufacturing operation with a minimal ecological footprint,” Aspelund says. “A textile mill in nearby Massachusetts has agreed to open its doors to us completely so a team can conduct business and engineering analyses and assess the mill’s wastewater treatment and environmental impact. It will be broad research that will also look at the sociological impacts on the community.”

The team will work on a manufacturing model that puts less waste into the air, water, and landfills and fewer plastic particles into the environment. Aspelund says it’s a winning proposition for the mills, including the handful of textile operations still running in Rhode Island, because they could end up with a model for how to “continue to manufacture for generations to come in a way that is ecologically sound.”

Aspelund’s project will include scientists who investigate groundwater and soil contamination. “This team has already developed an interesting way of using plant life, mainly trees, as biofiltration devices,” says Aspelund. “We’re hoping to get them in there to check the state of the soil and water around the plant, and to then work with local flora to clean the area—and keep it clean.”



## In the Blackstone Valley

The 48-mile Blackstone River, which runs from Worcester, Mass., to Pawtucket, R.I., was once commonly referred to as the hardest working river in America because it was home to hundreds of mills.

Pollutants from the mills and other sources had, for many years, turned the river into an open sewer. The river was acidic—harmful for the ecosystem. “But now the water quality has improved greatly,” says Samantha Jackson ’22, director of education for the Blackstone Valley Tourism Council, adding that it has “a perfect pH, between 6 and 7.”

“I take a lot of seniors, people in their 80s and 90s, out on the river for tours, and they tell me you couldn’t go out on the river when they were young because it smelled so bad,” says Jackson, who leads tours on the Blackstone Valley Explorer riverboat. “The river was so polluted, and you couldn’t get a canoe in the river because there was so much trash. The seniors tell me the river ran from pink to purple and red to orange depending on the dyes being used in the textile factories.

“Our boat captains have been with us a long time, and they are seeing more and more wildlife, such as great blue herons,” Jackson says. “I saw a mated pair of eagles fishing in the river in Pawtucket.”

Central Falls Landing, a public space and dock where the tourism council is located, has become a gathering place where people launch canoes and kayaks. Like the Woonasquatucket, a prettier and cleaner Blackstone has spawned businesses like Shark’s Peruvian Cuisine, a bustling restaurant with an outdoor seating area overlooking the river.



“People should stop thinking, ‘seacoast, oceans, rivers, streams.’ It’s one water, one ocean.”

Samantha Jackson '22, director of education for the Blackstone Valley Tourism Council

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Samantha Jackson '22, director of education for the Blackstone Valley Tourism Council and Captain Joe Walkden, M.S. '98, on the Blackstone Valley Explorer Riverboat.

## One Water

Researchers and advocates, whether talking about rivers, streams, harbors, or the ocean—all emphasize a critical point: All water is connected.

“Water is a big repository,” says Oyanedel-Craver. “Everything we use, from plastics to fertilizers, shows up in the water—including medicines. I learned from a mentor that everyone is downstream, and there is only one water.”

“Rhode Island is called the Ocean State,” says Herron, “but we have to remember that anything that enters the rivers winds up in the ocean.”

Jackson makes that point when talking about the 19 dams along the Blackstone River. “They can’t be taken down because that would release poisonous sediment containing a variety of toxins into the river, and then, eventually, into the bay.”

“People should stop thinking, ‘seacoast, oceans, rivers, streams,’” says Jackson. “It’s one water, one ocean.”

Photos: Nora Lewis; Issac White

## Working for Rhode Island Rivers

URI researchers are a force for good when it comes to Rhode Island’s rivers—from the Blackstone to the Saugatucket.

—Dave Lavalley ’79, M.P.A. ’87

# Water Pressure

Spring/Summer 2024

## The battle to keep stormwater in check

By Ellen Liberman | Photographs by Dana Smith

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Kathy Ribeiro can't pinpoint the moment she told herself: "I can't do this anymore," but she figures it was a rainy, windy night. Those were the worst. She'd have to pull an all-nighter, with multiple sump pumps going to keep pace with the water pouring into her cellar "like a waterfall." Then, she would drag out her portable generator.

"You have to be ready—you don't want to set it up in the middle of the night when it's dark. If the electricity blows out, I'd be in a bind," she says. "It was a battle in the basement."

A special education teacher in Providence, Ribeiro became a student of rainfall and wind strength, constantly weighing the possibility that she would have to take a day off to protect her house. "I was like my own weather person," she says.

**We went out in dinghies and canoes  
and sailed our streets.**

The gray-shingled house on Abbott Street was built in 1900, just west of the Rhode Island-Massachusetts line in East Providence on a former wetland by the Runnins River. Over the next century, a neighborhood called Luther's Corner sprang up around it. Ribeiro and her husband Kenneth lived in Luther's Corner their whole lives and raised their four children in the Abbott Street house. Flooding was a some-time thing. There were the floods of 2005 when the remnants of Tropical Storm Tammy dropped almost 15 inches of rain in Rhode Island over three days. The last days of March 2010 brought a historic 500-year storm—9 inches of rain that capped a series of smaller but significant rain events—turning the Ribeiro's yard and much of the state into a lake.

"We went out in dinghies and canoes and sailed our streets," she recalls.

But in the last decade, there were too many battles in the basement to count. One sump pump became four sump pumps. Then, Kenneth passed away suddenly in 2017, and Kathy Ribeiro was managing the water by herself.



With 400 miles of coastline and 3,578 miles of streams and rivers, more than 33% of the state's land mass is water. Many more densely populated communities were developed in low-lying areas such as mill towns, where a nascent Industrial Revolution harnessed the hydropower of rivers such as the Blackstone and Woonasquatucket. Over time, the natural landscape that aided the old drainage systems by absorbing rain was buried under asphalt and concrete.

Rhode Island has warmed about 3 degrees Fahrenheit since 1900, bringing hotter, drier summers and falls. The shifting rainfall patterns produce wetter winters and springs, with more rain delivered in intense, frequent storms. Precipitation in the area has increased an inch per decade since the late 1800s.



Water quality and quantity are connected—when stormwater systems are blocked or overloaded, the excess becomes a source of nonpoint pollution. The cities' and towns' sewer and drainage systems are connected—yet many municipalities do not know exactly what is underneath their streets. Rhode Island's state and municipal road systems, a sluiceway for uncaptured water, are also connected.



The fight to prevent chronic flooding is underway across the state, especially in urban areas.

“We had six flash-flooding events in 2023 alone—certain neighborhoods and businesses flooded multiple times; we had to do water rescues from apartments—the problems are multiple,” says Sheila Dormody, chief of policy and resiliency for the city of Providence. “Some of it is related to elevations; some of it is that we have outdated, old infrastructure. Many of our stormwater pipes are more than 100 years old and not designed for the size of the storms we are having. We have a lot more impervious cover, so that means more stormwater runoff—it's the biggest source of unaddressed water pollution in the city's rivers, streams, and ponds. It's really come to a head all across the city.”

*Alicia Lehrer, executive director of the Woonasquatucket River Watershed Council*



There is a huge, deep rock tunnel under Providence.\* Here, the Narragansett Bay Commission's (NBC) combined sewer overflow (CSO) system holds overflow wastewater and stormwater until treated at the Fields Point Wastewater Treatment Facility.\*

Every time the stormwater runoff exceeds the capacity of an interceptor\* running into that tunnel, from her office in Providence's Olneyville neighborhood, Alicia Lehrer, executive director of the Woonasquatucket River Watershed Council (WRWC), gets a rancid reminder of how water quantity and quality are linked. [\* see correction in footnote]

"There's an overflow release valve in a little park, and it overflows all the time," she says. "It's like a geyser popping out of this manhole ... and you have bits of toilet paper everywhere. It's pretty disgusting."

Yet, as Elizabeth Scott, a former longtime Rhode Island Department of Environmental Management (DEM) employee who now helps the state's cities and towns develop stormwater management plans as Rhode Island's liaison for the EPA-funded Southern New England Program network, observes, "There isn't one agency that oversees stormwater management from a holistic perspective to look at both water quality and flooding."

The Rhode Island Emergency Management Agency (RIEMA) administers disaster relief after a flood. RIEMA also handles the federal National Flood Insurance Program, which offers property owners policies to recoup flood losses if their municipality has enacted and enforced a floodplain ordinance that will reduce flooding risks.

DEM is responsible for monitoring water quality and enforcing violations of state-issued stormwater management permits. Many large and small entities have entered into consent agreements to improve their systems. For example, the NBC has operated under several water quality consent agreements with the DEM since the 1990s to ensure that its two treatment facilities—the largest in the state—adhere to the requirements of their permits. One result is the NBC's Combined Sewer Overflow Program, the largest public works project in Rhode Island history, which includes the storage tunnel.





“Certainly, the DEM has lots of experts who understand hydrology and municipal drainage systems, but that’s not really their mandate,” says Scott. “So, there’s a gap.”

Nonetheless, there is a vast network of state and federal agencies, municipalities, universities, nonprofit environmental organizations, and citizens tackling the enormous challenge of flood mitigation and storm-water management.

“You really have to consider the entire watershed,” says Stefanie Covino, program manager for the Blackstone Watershed Collaborative at Clark University in Worcester, Massachusetts. “The climate effects are at the watershed scale, so it makes more sense to work together.”



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On a Sunday morning in February, Wayne Pauplis went fishing in the old Blackstone Canal. The channel was built in 1828 by Providence merchants who wanted a more efficient network to transport produce from farmers of Worcester and the Blackstone Valley to urban consumers. The canal functioned as a mill location and commercial waterway for two decades before the Providence and Worcester Railroad rendered the latter obsolete.

Much of the canal has been filled in, and the remaining parts are meant to be scenic companions to the river beside it. In Cumberland, it is part of the Blackstone River State Park and lazies past the old Ashton Mill, once part of the Lonsdale Company tex-tile empire, now apartments.

Pauplis, who lives at the converted mill, was using a 16-foot pool net to fish plastic bottles and beer cans caught in the fallen branches at the canal’s edge. Nearby, a volunteer crew from Cozy Rhody Litter Clean Up was doing the same, armed with plastic buckets and trash grabbers. Among them was the Markarian family, which was snagging lots of glass and dog poop bags. The January rainstorms had flooded the basement of the main apartment building and sent a torrent of trash down the Blackstone. John Marsland, president of [Friends of the Blackstone \(FOB\)](#), was there, too.

During the January storm, he was obsessively checking the U.S. Geological Survey’s cfs (cubic feet of water per second) data, watching it rise from a normal 600 cfs to 35,000 cfs. Then he met fellow FOB member Keith Hainley to see what those numbers looked like on the ground. The river had risen 5 feet behind the building FOB shares with the Blackstone River Watershed Council in Lincoln, spilling its banks by 100 feet and trashing the docks at Central Falls Landing, where lots of river tours and canoe trips launch.

“We were like holy s—!,” he recalls. “Once [the river] went down, it was like, look at the mess.”

That February day, volunteers spent three hours trash-picking the area around the Ashton Mill. Marsland says they didn’t even make a dent.

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Trash is one of flooding’s pollution byproducts; surface and legacy pollution distribution is another.

“A lot of our headwaters are urbanized,” says Covino. “Some rivers start as stormwater, so urban waterways are often influenced by how much it’s raining.”



The Blackstone Watershed Collaborative, a coalition of 115 municipalities and other entities connected to or interested in the watershed, works on stormwater management and watershed restoration in 39 Massachusetts and Rhode Island communities. For example, the collaborative and students from Worcester Polytechnic Institute have been working with the town of Sutton to prioritize the repair and replacement of its 80-some-year-old rusting steel culverts, now heavily taxed by flooding.

Tucked under roads, railroads, and bridges, culverts play a critical role in municipal drainage systems. They create stream continuity by channeling excess water into the watershed. Culvert failures can lead to catastrophic flooding and road collapses, which are much more disruptive and expensive repairs.

The collaborative also works in Worcester’s city center’s Green Island neighborhood. Fifteen percent of Green Island was built over the Blackstone Canal, which flows under shops and triple-deckers and serves as part of the combined stormwater and sewer system. If it rains enough, that system backs up.

“In Worcester, over 20% of the area is impervious surface, and anything over 10% reduces water quality. We also have a lot of private unpaved roadways located near waterbodies, where the water washes off the dirt and funnels it into the river, causing sedimentation. At the receiving end, Woonsocket also has a lot of impervious surface, which creates flash flooding,” Covino says. “When that water is directed from the ground to somewhere else, at the outfalls, you have big floods of dirty water.”

The Woonasquatucket River is also beset by legacy pollution, making it unsafe for swimming or fishing. In floods, it becomes a circulator of nasty industrial chemicals. With

headwaters in North Smithfield, the 19-mile river winds its way south through seven municipalities to the Providence River.

Historically, it has served as a dump for the textile, jewelry, and chemical industries. One of the country's worst Superfund sites is in North Providence and Johnston. The Centredale Manor Restoration Project is removing a laundry list of the industrial pollutants left behind by chemical production and drum reconditioning businesses, which buried toxic waste or discharged it directly into the ground and the river in a 9-acre area between the 1940s and 1970s.

In 2012, the EPA created a clean-up plan; in July 2018, it reached a \$100 million settlement with Emhart Industries, Inc. and Black & Decker, Inc. to implement it. Most of the contaminated river sediment and floodplain soil has been excavated, and now the project is seeking an offsite disposal and treatment facility. The WRWC provides input to the cleanup and handles community outreach via a technical advisory group. It's one of its many projects the council works on toward its goal of "a swimmable, fishable" river and "climate resilience for the surrounding community," Lehrer says.



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After days of gray, the sun and the winds are up on a Saturday afternoon in January, and the Woonasquatucket speeds clear and free through Olneyville. You can see right through the sienna-colored water to the carpet of stones on the river bed, and the banks are remarkably clear of trash. María José Gutierrez gives a brief tour of the greenway. She is a graduate of the [WRWC's Nuevas Voces](#), a program that taps community members for a leadership course on environmental justice and climate resilience.

Gutierrez, now a co-facilitator of the project, points out the bank erosion, the rain gardens that flank the bicycle path, and the activities depicted on a WRWC banner, flapping against a chain-link fence. The WRWC organizes trash pickups, runs summer camps, and monitors fish migration to raise environmental literacy and engage the surrounding community as stewards of the Woonasquatucket.

Since 40% of the river's neighbors are Latino, Nuevas Voces addresses cultural nuances, such as the tradition of kitchen gardens, advising residents not to grow vegetables in the ground without a soil test because it is likely contaminated.

"Our program makes people pay attention to all these natural phenomena and teaches them that they can be resilient to climate change," Gutierrez says. "And I am proud to be part of this organization because we have broken the language barrier and created the bond between Americans and the residents, who, regardless of their immigration status, are members of this community and have a right to have an active part."

Market Street in Warren near the Palmer River frequently floods. Photo by Kate Michaud for MyCoast.

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The state's main stormwater management system focuses on water quality—not quantity—under the authority of the federal Clean Water Act and separate municipal stormwater management permits. The Rhode Island Pollutant Discharge Elimination System (RIPDES) requires cities and towns to map their drainage systems, inventory their components, such as catch basins and outfalls, and perform basic maintenance.

The first five-year RIPDES permits issued to 29 municipalities expired in 2008 and have not been updated. Joseph B. Haberek, administrator of the DEM's Surface Water Protection unit, wrote in an email that the agency expects to have a draft permit available for public comment by the end of 2024 or early 2025. While Haberek doesn't anticipate that the new permit will include a specific flood control requirement, he says the pollution control measures may have additional benefits, such as promoting stormwater infiltration, that help with flooding.



On the state level, the Rhode Island Department of Transportation is in the sixth year of a 20-year plan to upgrade its stormwater management system after the federal government fined it for failing to meet its obligations under the Clean Water Act. The state agreed to fix the massive drainage system with 25,000 catch basins and 3,800 outfalls that serve more than 3,300 lane miles of divided highways and surface roads.

To date, it has spent more than \$70 million on watershed plans and stormwater treatment units that range from surface treatments such as bioswales (vegetated ditches) to subsurface devices such as hydrodynamic separators, which circulate incoming stormwater to remove the solids and allow clean water to move downstream.

Although the work addresses water quality, some of the improvements will also reduce stormwater flooding.

After what it termed “decades of neglect,” the department wrote in an email, “RIDOT is now making the necessary investments in rebuilding our stormwater infrastructure to bring it into a state of good repair so it will be resilient, environmentally compliant, and sufficient to protect our roadways from flooding in the future. We are also making investments for the necessary maintenance, both in terms of equipment and personnel, to preserve these investments.”



When the heavy rains come to Providence, Lindsay Dulude grabs her rain gear and an undersized dinosaur umbrella she appropriated from her son and heads out hunting for water—where it is flowing or pooling.

Dulude, a project manager for a software company, is one of about 30 volunteers using the city’s [RainSnap](#) app to take pictures and videos of storm drains, swales, and infiltration basins to be uploaded to the [Stormwater Innovation Center’s RainSnap](#) website. Dulude documents areas in Roger Williams Park, near her house, where the city has installed about 40 green infrastructure projects to filter polluted stormwater overflow from Mashapaug Pond.

“Some structures in the park work really well, but in others, the water just bypasses the trench completely and floods somewhere else,” says Dulude.

The vast majority of drainage networks are composed of aging gray infrastructure, such as pipes and tunnels. Increasingly, communities are retrofitting those systems with green infrastructure—a range of measures designed to reduce sewer flows by using landscaping, ditches, permeable pavers, gravel substrates, and other elements that tie back to the existing system to capture runoff and allow it to filter into the ground.

Providence has embarked on a multipart plan to address its stormwater management and flood control deficiencies. The city has hired a consultant to analyze the mitigation strategies and costs and to make recommendations.

In addition, officials are using federal grants to better understand the city's hydrology and flood patterns and aligning proposed solutions with its capital improvements budget. In the short term, the city is planting trees, which naturally soak up the rain and slow the rate at which it hits the ground, installing green infrastructure on city land, and encouraging private citizens to capture water with rain barrels and gardens.



"2023 was a case study of the consequences of inaction—failing infrastructure, sinkholes, road damage," Dormody says. "The whole system suffered from decades of deferred maintenance, and the bill has come due."

In 2019, the city established the Stormwater Innovation Center to research and monitor the existing green infrastructure in Roger Williams Park, experiment with new filtration technologies, train officials from other cities and towns, and serve as a stormwater professional information exchange. The center also enlists participatory scientists, like Dulude, and educates residents.

"We try to teach the public that all stormwater starts on an impervious surface, so replacing a patio or a driveway with something where the water can soak in—that's less water running off and contributing to that flooding," says center Director Ryan Kopp. "It's a balance between what the community can do and the load that the government has to carry."

That load can be heavy. Cranston, for example, spent \$131,000 in manpower alone to respond to the storm events in September, December, and January. But there is also lots of help. Cranston officials are working with the Stormwater Innovation Center and have applied to DEM for a \$300,000 grant to assist with site mapping, planning, and management of green infrastructure and tree planting, says spokesman Zachary DeLuca. Central Falls, which suffers from street and riverine flooding, has neither a facilities plan nor a good sewer and drainage system inventory. Nonetheless, "stormwater management has just become an essential part of the planning process," says City Planner and Director of Economic Development Jim Vandermillen.

Macomber Stadium, a multi-sports complex, now boasts a permeable paver mezzanine, stormwater bioswales, and a state-of-the-art synthetic turf surface, covering an infiltration

system and sand filter that captures runoff from more than 6 acres of surrounding hardscape. The field had been hosting Central Falls High School sports games since 1934 when Raymond Macomber bought the land from the Weyboset Mfg. Co. for \$10.

By 2017, the field was worthless, sited on top of contaminated soil too unsafe for athletic play. Stormwater runoff issues also plagued the surrounding cityscape of abandoned mills. With a \$6.5 million state loan and an \$800,000 DEM grant, Central Falls was able to remove or encapsulate thousands of tons of contaminated soil and piggyback on the NBC's CSO program and the stormwater tunnels running through the city. In 2020, officials cut the ribbon on the new Macomber Stadium.

"Now we have this beautiful new complex that sits on a combined sewer and stormwater chamber," he says.



Cities and towns also can get planning assistance from the U.S. Department of Agriculture's Natural Resources Conservation Service (NRCS). The agency, charged with watershed protection, conducts hydro-logic investigations of trouble spots and, if invited by a municipality, will work with the town to plan and design solutions. The NRCS is currently working on 14 different watershed projects statewide.

"One of my hopes is that we will start looking at the big picture. We are creating these hydrology models ... so when a decision to grant a permit is made, they can consider the effects downstream," says Darrell Moore, state conservation engineer for the NRCS.

Another source of support is the Rhode Island Infrastructure Bank (RIIB). In 2022, Rhode Island voters passed a \$50 million green energy bond, which included a \$16 million Municipal Resilience Program administered by the RIIB. In January, it awarded \$12 million to 19 communities. The demand outstripped the supply—the bank received \$52 million in requests from 30 communities.

"Up until five or 10 years ago, it wasn't on municipal officials' radar. But the frequency of the flooding has been a catalyst for people to realize that infrastructure has to change because it starts impacting property and commercial values and increasing other costs to cities and towns," says RIIB Executive Director William Fazioli. "A lot of municipalities have the ability to plan and conceive a solution, but at the end of the day, it comes down to funding to make those plans a reality."

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oThere was a time when the water rolling down Cross Street in Westerly was caught by a wooded lot behind Sherry Hall's furniture store. But the parcel was sold, and in 1957, the



Roman Catholic Diocese of Providence built St. Pius X, a beautiful stone-fronted church with a large asphalt parking lot in the back. Now, there is nothing to stop a hard rain from ending up in the store's basement. The January storms left 10 inches of water in a small troublesome area by the shop's back door. In mid-February, the water was still there.

"I have to have the fire department pump it out— it happens a couple of times a year," she says.

Hall took over the family business in 2000 when her parents retired. She changed the name to Hometown Furniture, picked up some more upscale furniture lines, and painted the exterior trim purple. She tried to address her water issues with a new roof and a rubber seal coat. But the cinderblock building sits low on Main Street, parallel to the Pawcatuck River.



In the summer of 2023, a Southern Rhode Island Conservation District (SRISD) representative approached Hall about participating in the Westerly Resilient Riverfront Renewal project. The conservation district, in partnership with the town, has been working on a more than \$2 million redevelopment of Main Street with stormwater, traffic, and streetscape plans to beautify this industrial-looking commercial stretch, make it more pedestrian-friendly, and control stormwater to protect the Pawcatuck, says District Manager Gina Fuller.

The SRISD has been recruiting property owners on Main Street to give up some of their hard surfaces—mostly parking spaces—to allow the construction of grass strips, rain gardens, and other containment structures.

"I saw this as a perfect opportunity to incorporate the state's stormwater management goals with the town's goals of revitalizing the economic district on Main Street," Fuller says. "Our roads are so narrow, and there really is no public property available for incorporating stormwater management best practices, so it's critically important that we have the support of private landowners willing to house these components."

The SRICD has signed up eight property owners to work on specific design plans. Hall is trying to weigh her parking needs against her desire for low-maintenance greenery that will boost Hometown's curb appeal.

"It's not just going to be beautiful, it's going to be functional," Hall says.

Sometimes, the best intervention takes away rather than adds. The NRC's Emergency Watershed Protection Program buys private property at fair market value to remove structures and restore the land to its natural state. The program is now working with some Cranston property owners beset by chronic flooding. In July 2022, it secured \$9.65 million

to buy flood-prone homes in Luther's Corner. Ribeiro was one of 18 who took advantage of the offer.

"I didn't have a lot of time to think about it," she says. "I just had to put my heart on the shelf." When the sale closed in November, "I was holding back tears, because I have a lot of memories there," she says. "But I couldn't keep doing what I was doing."

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*\* Correction to print version: The print version of this story incorrectly identified this tunnel as being in Pawtucket and Central Falls due to an editorial error. The overflow occurs at a near-surface interceptor connected to the tunnel, not the tunnel itself. More info about the CSO Project:*

The Providence tunnel went online in 2008 and has since captured over 16 billion gallons of flow. The NBC is constructing a similar tunnel under Pawtucket and Central Falls, slated for completion in 2028, which will send captured flow to the Bucklin Point Wastewater Treatment Facility. Even these massive tunnels, however, cannot capture every drop of water; in very heavy storms, the 65 million gallon capacity tunnels will fill up and the excess stormwater will overflow.



NBC's CSO project is not just tunnels. In addition to the tunnels, NBC did some sewer separation and a constructed wetland in Providence. Re: Macomber, the NBC's consent agreement with RIDEM stipulates a certain amount of investment in green stormwater infrastructure (GSI). The projects in Central Falls (Macomber, Pierce Park, Louis C. Yip Field) fulfill that requirement. The stormwater captured through the GSI projects does not go into the tunnel, but percolates into the ground via a variety of methods (bioswales, underground retention chambers, permeable pavement, etc.).



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## Narragansett Bay Estuary Program

This issue is supported by the Narragansett Bay Estuary Program (NBEP), a nonprofit organization led by stakeholders that pursues place-based conservation across the three-state Narragansett Bay region.

With its 30-member partnership, NBEP catalyzes scientific inquiry and collective action to restore and protect the region's water quality, wildlife, and quality of life.

This issue of *41°N* highlights several of the stories and partners driving a 10-year blueprint to realize their vision of clean water and habitat to sustain all who live, work, and play in the Narragansett Bay region.

[Learn More](#)




# Warwick

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### NEWS

## Water quality is focus of next harbor management workshop

Posted Thursday, January 11, 2024 12:00 am

By **JOHN HOWELL**

The second in a series of four workshops on the city's harbor management plan will be held Jan. 9 starting at 6 p.m. As the workshop coincides with the monthly scheduled Zoning Board meeting in the conference room of the Saw Tooth Annex, principal planner Sean Henry said a site other than the Saw Tooth Annex is being explored and will be posted.

Henry doesn't anticipate the turnout anything like when the city's Harbor Management Commission held the first workshop devoted to public access. That session was scheduled for an office conference room that had to be relocated to the Saw Tooth Annex atrium when more than 30 people showed up.

The focus this time is "water quality."

"I don't expect as much public interest," said Henry.

And what can the Harbor Management Plan do to preserve and improve water quality?

Henry said the plan can look at sources leading to the pollution of the bay and cove waters.

“Recreational boating brings a lot of pollution,” he said referring to power boats. With 39 miles of coastline it’s no wonder Warwick has a lot of boats. According to Department of Environmental Management data, Warwick has 18 marinas offering a total of 3,264 slips. In addition, the city has 686 moorings.

According to guidelines set forth by the Coastal Resources Management Council the city plan should set goals and recommendations that are consistent with CRMC goals “to protect and continually improve the water quality for the citizens of the state.” It goes on to say the harbor management plan should “identify, measure and document all sources of both direct (point) and indirect (nonpoint) pollution and potential threats of pollution to these waters. Pollution from both land and water sources should be identified and the impacts of this pollution mitigated to the greatest extent practicable.”

How does Jody King, who chairs the city’s Harbor Review Commission see the issue of water quality?

“I’m asking for it to be dirtier,” he said laughing.

But King is not joking. As an Oakland Beach resident who makes his living from Narragansett Bay, he has tracked the decline in shellfish which he believes is a byproduct of cleaner bay waters resulting from stricter controls on the release of nitrogen by waste water treatment plants and the development of the massive combined storm water and sewage underground containment system developed by the Narragansett Bay Commission. The system allows for the storage of waste water during extreme water incidents, so that it can be treated before release.

The system has been credited with enabling the opening of the lower stretch – about 1,000 acres - of the Providence River to shellfishing for the first time in 70 years.

While King has benefited from opening the plentiful shellfish beds, he believes if more nitrogen is allowed to reach bay waters, it would stimulate the growth of plankton, a source of food for shellfish. This topic is a source of study a Special Legislative Commission To Study And Provide Recommendations On The Issues Relating To The Reduced Catch Of Quahogs in Narragansett Bay created by a resolution introduced in the House by Warwick Representatives Joseph Solomon and David Bennett and in the Senate by Sen. Mark McKenney. The commission that started its work in October is co-chaired by Solomon and Sen. Alana DiMario (D-North Kingstown, Narragansett, New Shoreham). The topic is also being studied by a group from the URI Coastal Institute, of which King is a member. He expects that report to be finalized by April or May.

“Having more nitrogen doesn’t correlate with being dirtier,” Solomon said Wednesday when told of King’s comment. He said the commission has held four or five meetings and is “hearing from all the experts.” He expects a report to be released in February or March. And, he doubts that the a single source such as a decline in nitrogen will be labeled as the cause for a reduction in shellfish.

“I expect it to be a combination of factors,” he said mentioning global warming as a possible contributing cause.

Solomon hopes to attend the Warwick meeting.

Future workshops of the Warwick Harbor Management Commission will focus on mooring management and storm preparedness

## Keywords

water, harbor, workshop

## Comments

NO COMMENTS ON THIS ITEM PLEASE LOG IN TO COMMENT BY CLICKING HERE (/LOGIN.HTML?REFERER=%2FSTORIES%2FWATER-QUALITY-IS-FOCUS-OF-NEXT-HARBOR-MANAGEMENT-WORKSHOP%2C237945%3F)

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### OTHER ITEMS THAT MAY INTEREST YOU

**Reed: 'We're in a big fight now' (/stories/reed-were-in-a-big-fight-now,281148)**

**Clock ticking on space at the Central Landfill (/stories/clock-ticking-on-space-at-the-central-landfill,281147)**

**Ming's set to open on Broad Street (/stories/mings-set-to-open-on-broad-street,281146)**

**Musicians help Episcopal church celebrate prized pipe organ (/stories/musicians-help-episcopal-church-celebrate-prized-pipe-organ,281145)**



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





# PUBLIC NOTICE

## Firms in Significant Non-Compliance

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGULATION 40 C.F.R. 403.8(f) (2) (vii) and Section 1.10 of the Narragansett Bay Commission, Rules and Regulations require the NBC to publish annually the names of all industrial users in Significant Non-Compliance (SNC) with pretreatment standards and other pretreatment requirements during the preceding year. Companies deemed to be in Significant Non-Compliance are those industrial users who have violated any of the Significant Non-Compliance criteria listed, as defined by Article 2 of the NBC Rules and Regulations during the time period from October 1, 2022 through December 31, 2023. 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 98.0% and 98.7% respectively. Similar toxic loading reductions have been observed at the NBC Bucklin Point facility.

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

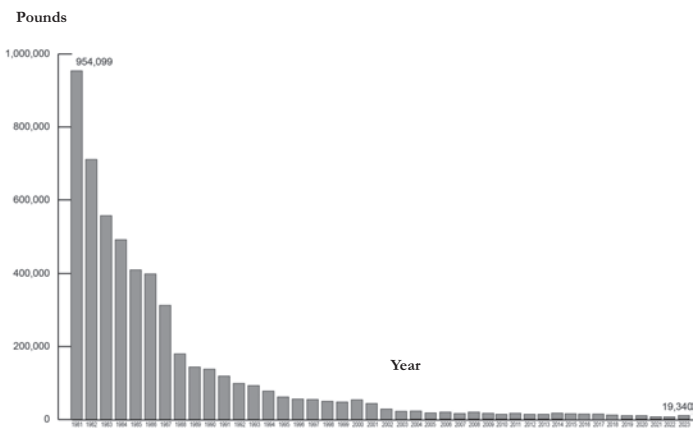
### Bucklin Point Service Area

Pawtucket		
Company Name	Violations Cited	Present Status
City of Pawtucket (Public Works)	Failure to submit report on time (6)	Report has been received
Hord Crystal Corporation	Zn (2)	Firm is now in compliance
Isle Brewers Guild, LLC	Failure to submit report on time (6)	Report has been received
Summit Manufacturing Corporation	Failure to submit reports on time (6)	Reports have been received
Lincoln		
Denison Pharmaceuticals LLC	BOD (2) TTO (1,2)	Firm is now in compliance Firm is now in compliance
Palate Pack	Failure to submit reports on time (6) Failure to submit reports on time (6)	Reports have been received Reports have been received
Cumberland		
Cintas Corporation	TTO (1,2)	Firm is still experiencing compliance issues
Ravenous Brewing Company	Failure to submit report on time (6)	Report has been received
Synagro Northeast, LLC	TSS (2)	Firm is still experiencing compliance issues
Texcel Industries	Failure to submit report on time (6)	Report has been received
East Providence		
Aspen Aerogels Rhode Island, LLC	TSS (1,2)	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 now in compliance
Providence Specialty Products, LLC	Failure to submit reports on time (6) BOD (1, 2) O&G (2)	Reports have been received Firm is still experiencing compliance issues
Quality Spraying Technologies	Failure to submit reports on time (6)	Reports have been received
Johnston		
R.I. Beef & Veal, Inc.	Failure to submit reports on time (6)	Reports have been received

### Total Metals Influent to Field's Point WWTF, 1981-2023



**NARRAGANSETT BAY COMMISSION**

# Perfect Compliance

*in recognition of Significant Industrial User Perfect Compliance in 2023*

**The Narragansett Bay Commission recognizes these Significant Industrial User companies for perfect regulatory compliance with Pretreatment Program regulations during 2023:**



Armbrust International, Ltd.	Electrolizing, Inc.
Chemart Company	HP Services, Inc.
Interplex Engineered Products, Inc.	John H. Collins & Sons Company
Manchester Street, LLC	LMG Rhode Island Holdings Inc., dba The Providence Journal
Metallurgical Solutions, Inc.	Narragansett Jewelry Co., Inc. dba C & J Jewelry Co.
Prysmian Cables and Systems USA, LLC	Providence Metallizing Company, Inc.
Rhode Island Resource Recovery Corporation	Rhode Island Heat Treating & Black Oxide Company, LLC
Stackbin Corporation	Tanury Industries PVD, Inc.
Technodic, Inc.	Teknor Apex Company
Tiffany and Company	Truex, Inc.
Univar Solutions USA, Inc.	

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**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](http://www.narrabay.com).

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

**One Service Road, Providence, RI 02905**

**401-461-8848 • [www.narrabay.com](http://www.narrabay.com)**

# ***NBC NEWSLETTERS***



# NBC Pipeline

## January 2024

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 HOLIDAY	2	3	4	5	6
7	8	9	10 Blood Drive COB 9 AM - 1 PM	11	12 Payday	13
14	15 MLK, Jr. Day HOLIDAY	16 BOC Meeting COB 11 AM	17	18	19	20
21	22	23	24	25 Full Moon	26 Payday	27
28	29	30	31			

#### Mark your Calendars: Brown Bag Lunch Series

Briefly discuss topics of public and scientific interests, such as microplastics, PFAS, hypoxia, green energy, food waste, etc..

**Location:** Online, link will be provided  
**Date:** 2/5, 3/4, 4/1, 5/6, & 6/3

**Time:** 12:00-12:30 PM  
**Facilitator:** Nicole Skyleson



# News Briefs...

## Mark your Calendars for Upcoming Education on your Retirement



To find out more about NBC's retirement plans and learn about retirement planning and investing basics, please join NBC for the following educational sessions with Zach Morris from Strategic Retirement Partners (SRP).

### Wednesday, January 24, 2024

9:00 am – Investing Basics

10:30 am – The Road to Retirement

Creating a plan for success

One-on-One meetings with Zach Morris from SRP will be available by appointment. To make an appointment use the link below.

[1/24/24 Retirement Education Registration](#)

## Retirement Plan Information

### Did you know?

NBC's 457 Deferred Compensation plan is available for all employees. Starting to contribute even a small amount each pay period will set you on the right path for success in your retirement.



- To enroll visit [www.empowermyretirement.com](http://www.empowermyretirement.com)
- You are eligible to make voluntary pre-tax or Roth Contributions

**Roth vs. pre-tax Contributions** – Roth contributions are after tax contributions. This means you pay the taxes now on the money you are saving. At retirement, if certain requirements are met, the withdrawals including any investment earnings, will be tax free. Pre-tax Contributions lower your federal and state taxable gross, you do not pay taxes on the money until you start to withdraw it at retirement. You should evaluate your current situation to determine which option is best for you.

— Continued on next page

## Welcome...

### Meet Paula Enciso!

Paula is NBC's new Bilingual Customer Care Representative. Paula is from Columbia and has her B.A. in Leadership for Change. She has four children and loves playing volleyball and going camping in her free time.



## Casual Day Update

In December, the NBC Casual Day Fund Committee conducted its annual raffle at the COB Employee Appreciation event to choose a winner to pick a 501(c)(3) charitable organization of their choice to make a donation.



The winner for this year was **Yhojana Henao** who chose the Columbian American Cultural Society. The NBC will donate \$500 on her behalf. The NBC also donated many cold weather necessities to the Boys & Girls Club of Pawtucket last month to help those in need. Thank you to all who donated!

### Follow us @narrabay



## Retirement Plan Information Continued...

**Compounding Interest** – Contributing even a small amount will give you the opportunity to have your money work for you. Compounding interest is the interest earned on your money you previously contributed including any interest already earned. Earning interest on your interest is called compounding interest.

For more information on the NBC retirement plans, or if you have any questions please reach out to our Retirement Plan Administrator, **Melissa Boccanfuso** at [mboccanfuso@narrabay.com](mailto:mboccanfuso@narrabay.com).

## Bruce Stoeckel's Son Follows His Passion for Music to Nashville

Proud Dad and NBC Assistant Controller, **Bruce Stoeckel's** son Dan is living his dream of being a professional musician in Nashville, Tennessee.

Dan moved to the music capital of the world in 2017 to pursue his love for music, specifically classic rock-oriented music, after some mixed feelings on his future career path. Dan always had a passion for music, listening to 60's and 70's music and tagging along in his dad's Lynyrd Skynyrd cover band when he was just a teen.

Having the support from his friends and family really helped him make the jump and continue to follow his dream. It was tough at first but now he's been playing in a band for few years now and has opened up for country music stars like Keith Urban and Lainey Wilson.

Keep chasing your dream, Dan!

To read the full article in The Smithfield Times visit and see page 11. <https://smithfieldtimesri.net/wp-content/uploads/2023/12/ST-Jan-2024-low-res.pdf>



*Photo Credit: The Smithfield Times*

## Congratulations...



To FP Assistant Manager, **Eric Bogosian** and his fiancée Sarah on the birth of their daughter, Cirè Paulette Bogosian!

Cirè was born on New Year's Day at 7:02 PM, weighing 8 lbs 14oz and 21 inches long.

Mom, dad and big sister Starr are so in love.

## NBC Celebrates Three Long-time NBC Employee's Retirements in Decemeber

In December NBC celebrated with pizza and cake to celebrate the retirement of Mechanical Inspector, **Joe Medina** and Senior E & I Technician, **John Contrino** on December 21st before their official last day on December 22nd. Joe worked for NBC for 21 over years and John, over 13 years.

Although his last day is not till January 19th, NBC also celebrated Director of Construction & Engineering, **Rich Bernier's** 37+ years of service with NBC at the Cranston Country Club on December 7th.



**EVERY SECOND COUNTS WHEN SAVING LIVES.**

Elizabeth Reed  
Tri Olympic Swimmer & Lifeguard



**BLOOD DRIVE**

**Narragansett Bay Commission**

**Wednesday, January 10, 2024**

**9:00 AM - 1:00 PM**

**COB Main Conference Room**

**1 Service Rd, Providence**

Scan the QR code to make an appointment:  
Sponsor Code **0665**  
**Walk-ins welcome!**



**Celebrate National Blood Donor Month**

Come to donate for a chance to win a \$100 gift basket. Winner weekly.

**\$100**

© 2023 American Red Cross

*Eat, hydrate, bring identification with you.*

**Rhode Island Blood Center**

401.453.8383 • rbc.org #ribloodcenter

**BP Maintenance Staff Complete Actuator Replacement**

BP's **Tim Henshaw, Guy Beaudette** and **Mike Arlan** spent 20 hours replacing the acuator on the tide gate. The old acuator had failed and needed replacement. This piece of equipment is used during high tides and when the facility is in a wet weather event. The timing of this replacement was impeccable due to heavy rain expected the following day on December 28th. Great work Tim, Guy and Mike!



**Set-up**

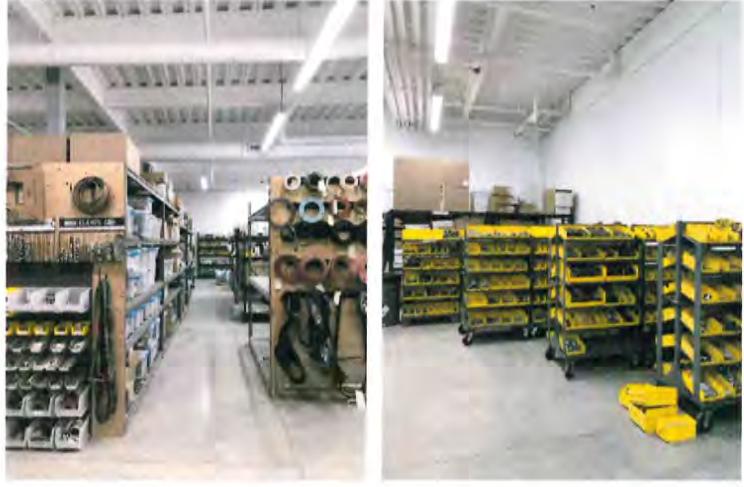


**Job Complete**

— Submitted by Mark Healy

**BP Operations & Maintenance Building is Almost Complete**

Bucklin Point staff have been working tirelessly to get the O&M building ready to go. The building is about 90% complete. O&M staff **Dave Sousa, Jon Isaza** and **Bernard Harwood** have been busy moving in equipment and organizing inventory. Great job done by all!



— Submitted by Mark Healy

**Thank You**

First storm of the 2024 season and NBC has this crew to thank for the exceptionally clean parking lot and walkways into the buildings. IM's **Ryan Porter, Mike Smith, Juan Andujar & Dave Weisman** and FP's **Norm Rodolewicz** worked around the clock Saturday and Sunday to ensure our safety coming in the offices Monday morning. Great job done by all!



— Submitted by Brian Blais



# NBC Pipeline

February 2024

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

## Calendar of Events *for February*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1	2	3
					Groundhog Day	
4	5	6	7	8	Payday	10
11	12	13	14	15	16	17
 Super Bowl			 Valentine's Day		Payday	
18	 President's Day HOLIDAY	20	21	22	23	24
						Full Moon
25	26	27	28	29		

### Mark your Calendars: Brown Bag Lunch Series

Briefly discuss topics of public and scientific interests, such as microplastics, PFAS, hypoxia, green energy, food waste, etc..

**Location:** Online, link will be provided  
**Date:** 2/5, 3/4, 4/1, 5/6, & 6/3

**Time:** 12:00-12:30 PM  
**Facilitator:** Nicole Skyleson





# News Briefs...

## NBC Wishes Paul Desrosiers and Steve Cote a Wonderful Retirement

In January, NBC celebrated two long-time NBC employees on their retirements. Technical Advisor for Operations, **Paul Desrosiers** retired on January 31st after 39 years of service and Senior Process Monitor **Steve Cote** retired on January 31st after 33 years of service. Staff celebrated with pizza and cake on January 9th. Paul and Steve were presented with the infamous “golden plunger” and some kind words by Rich Bernier and Meg Goulet.



*Left to right: Steve Cote & Paul Desrosiers*

Thank you Paul and Steve for your many years of service at NBC, wishing you all the best in your retirement! You will be missed!

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## Super Bowl Snack: Loaded Smashed Potatoes

*Serves: 8 Prep time: 20 minutes Cook time: 45 minutes*

### INGREDIENTS

- 2 lbs baby yellow potatoes
- Kosher salt and freshly ground black pepper, to taste
- 2 tablespoons olive oil
- 3/4 cup shredded cheddar cheese
- 4 slices bacon, diced
- 1/3 cup sour cream
- 2 tablespoons chopped fresh chives



### INSTRUCTIONS

1. Preheat oven to 450 degrees F. Lightly oil a baking sheet or coat with nonstick spray.
2. Place potatoes in a Dutch oven and cover with cold salted water by 1 inch. Bring to a boil and simmer until just tender, about 15 minutes; drain well and let cool slightly.

*Continued on next page.*

## Welcome...

### Meet Jameek Fisher!

Jameek started in January as an Operator I at the BP facility. He is originally from Brooklyn, NY. He has two sons, ages 12 and 1. Loves to travel to his favorite island, Jamaica.



### Meet Liam Burns!

Liam started in January as an Operator at BP. He was born and raised in RI.



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## February P-Bruins Offer:

The P-Bruins are on a winning streak! Check out the February game offer for their 4th annual RI Comic Con Weekend celebrations.



**Friday, February 16th at 7:05pm**  
**Sunday, February 18th at 4:05pm**

*Can't make it to RI Comic Con weekend?*  
Game offers are also available on the site for February 9th, 23rd, and 25th

### **Ticket Details:**

\$25 for 100 Level Seating  
One (1) Providence Bruins Logo Hat

Tickets can be purchased for this game at:  
[www.ProvidenceBruins.com/Group-Tickets](http://www.ProvidenceBruins.com/Group-Tickets)

## Super Bowl Snack: Loaded Smashed Potatoes Continued...

3. Place potatoes onto the prepared baking sheet. Using a flat dry measuring cup or glass, carefully smash the potatoes until flattened but still in one piece. Brush with olive oil; season with salt and pepper, to taste.
  4. Place into oven and bake for 25-30 minutes, or until golden brown and crisp. Sprinkle the tops of each potato with cheese; place into oven and bake until cheese has melted, an additional 2-3 minutes.
  5. Heat a large cast iron skillet over medium high heat. Add bacon and cook until brown and crispy, about 6-8 minutes. Drain excess fat; transfer bacon to a paper towel-lined plate.
  6. Top each potato with sour cream, bacon and chives.
- Serve immediately.

— *Damndelicious.net*

## Spare a Pair: Donate Now Through April 1st

The NBC will be participating in the RI Coat Exchange Spare a Pair sock and underwear drive **now through April 1st**. In addition, they will be supporting RED.Lined again this year by collecting menstrual products. Products should be individually wrapped but can be purchased in bulk. **Donation bins will be set up at the COB, FP, BP and the LAB for any staff who would like to donate items.**



### *Why these items?*

Socks and underwear are among the most frequently requested items by people experiencing homelessness or living in shelters. Period products are a necessity and sometimes out of reach for those experiencing

homelessness, housing insecurity or financial hardship.

Unopened, new packages of socks for children and adults of all sizes are accepted. For adults, plus size underwear are in high demand as well as tall, thick, warm socks for winter months. All kids items will be donated to their community partner, Clothes to Kids RI.



For more information about Spare a Pair and RI Coat Exchange visit: [www.ricoatexchange.org](http://www.ricoatexchange.org)

## Congratulations on your Years of Service at NBC as of January 2024!



## Spring Tuition Reimbursement

Applications for tuition reimbursement for Local 1033, Council 94 and Non-Union Employees must be submitted to Karen Musumeci by **Friday, February 9, 2024**. Each application must be accompanied by a short course description taken from the college catalog along with documentation of the cost.



Blank application forms may be obtained from the Human Resources Office or by going on Baynet to General Information, Benefits, Tuition Reimbursement Programs.

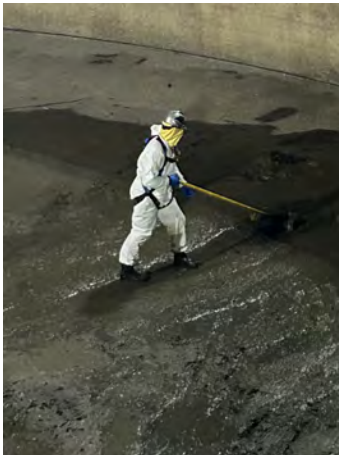
If you have any questions about the program, you may contact **Karen Musumeci, at extension 322**.

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## Thankful for NBC Operators and All That You Do

Shoutout to all the Field's Point and Bucklin Point staff for the outstanding job managing NBC facilities during the intense rain events we've had over the last year. With these rain events there have been technical issues that have come along with it.

FP staff were diligently working on Wet Weather Tank #2 last month. The facility was having issues pumping out of this tank due to build up of sludge from recent rain events in December. In order to have the tank pump out properly, Operators had to physically get in the tank and make piles on the outer edge of the tank, leaving it accessible for IM staff to vactor out the sludge for disposal.



*Pictured: Jaiden Alvarado*

The crew completed this task on January 4th and as of right now the tank is operating smoothly and luckily the area has not had any major weather events to cause any issues but they will need to further assess the problem with a contractor to determine if there is an obstruction or break in the pipe.

Thank you to FP Operations and IM staff for all your efforts on this project!



To Director of Environmental Science and Compliance, **Walter Palm** and Field's Point Operations Manager, **Nathan Boiros** on their recent awards from NEWEA.

Nathan Boiros received the Alfred E. Pelouin Award which recognizes an individual whose personal service has contributed to excellence in plant operations either directly at a treatment plant, or indirectly through assistance to plant operations personnel.

Walter Palm received the Laboratory Analyst Excellence Award which recognizes individuals for outstanding performance, professionalism and contributions to the water quality analysis profession.



*Left to right: NEWEA President, Aimee Killeen & Walter Palm. Photo Credit: NEWEA.*

Awards were presented at the Annual NEWEA Conference on January 24th at the Boston Marriot Copley Place. The annual conference attracts over 2,300 engineers, consultants, scientists, wastewater operators and students. It features 200 exhibits and technical sessions for those who attend and allows professionals to network on wastewater treatment and other water environment issues.

Nathan was unable to attend the conference but the NBC will honor and present the awards to both Nathan and Walter to the Board of Commissioners at the next meeting on March 5th.

Congratulations Walter and Nathan!






# NBC Pipeline

March 2024

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## Calendar of Events *for March*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1	2
					Payday	
3	4	5	6	7	8	9
		BOC Meeting COB 11 AM				
10	11	12	13	14	15	16
 Daylight Saving Time Begins				Pi Day	Payday	
17	18	19	20	21	22	23
 St. Patrick's Day		First Day of Spring ----- St. Joseph's Day			World Water Day	
24	25	26	27	28	29	30
Palm Sunday	Full Moon				Good Friday ----- Payday	
31	<p>Save the Date: NBC Celebrates RI Clean Water Week with an Open House on <u>Saturday, April 13th 10 AM - 1 PM</u>, offering public tours and other clean water activities, more details to come!</p>					
 Easter Sunday						

# News Briefs...

## Chloe the Clean Water Cruncher Completes her 2.2 Mile-long Journey

On Thursday, February 15th NBC celebrated another exciting milestone with RestoredwatersRI, the CSO Phase III project. The Tunnel Boring Machine, Chloe the Clean Water Cruncher completed her 2.2 mile long, year and a half journey, breaking through the deep tunnel rock at the receiving shaft located in Pawtucket.



Photo Credit: Peter Goldberg

The tunnel is 125 feet below ground and 30 feet in diameter. Once the project is fully complete, the tunnel will be able to hold 58.5 million gallons of combined sewage until NBC's Bucklin Point facility can put it through for full treatment and then discharge the clean water into the Seekonk River.

Just like the tunnel in Providence connected to Field's Point, it will result in cleaner water in the river and bay, reduced bacteria levels, more days for shellfishing and less beach closures.

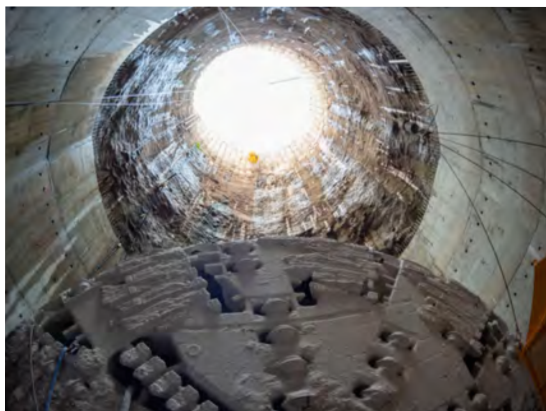


Photo Credit: Peter Goldberg

*What's next for Chloe?* Chloe will be disassembled and brought up to the surface. The pieces will then be shipped back to Germany to the manufacturer, inspected and cleaned-up for possible re-use.

The tunnel is expected to be fully functional in 2026.

To watch a short clip of the breakthrough visit: <https://www.youtube.com/watch?v=Ah-RV9Sk1kw>

## Welcome...

### Meet Jaclyn Cotter!

Jaclyn started in February as the new Associate Legal Counsel. She's from St. Louis, MO, and has a cat named Buckley. She loves chocolate ice cream, puzzles, and likes to de-stress by going for a long run. Something that is on her bucket list is to hopefully one day visit Santorini.



### Meet Joselin Abreu Delgado!

Joselin started in February as a new Customer Care Representative. She was born in the Dominican Republic and lives in Providence, RI now. Joselin has three wonderful children and 2 cats. Her favorite ice cream flavor is vanilla.



## Mark your Calendars: Brown Bag Lunch Series

Briefly discuss topics of public and scientific interests, such as microplastics, PFAS, hypoxia, green energy, food waste, etc..



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**Time:** 12:00-12:30 PM

**Date:** 4/8, 5/6, & 6/3

**Facilitator:** Nicole Skyleson

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For more information about Spare a Pair and RI Coat Exchange visit: [www.ricoatexchange.org](http://www.ricoatexchange.org)

## Congratulations on your Years of Service at NBC as of February 2024!



## Calling all Volunteers

The RI Science and Engineering Fair will be taking place March 16th at CCRI in Warwick from 11 AM - 3 PM. Each year NBC chooses a winner/winners for their outstanding work and presentation; students chosen receive a \$200 check from the NBC and will be recognized in early June along with our Poster Contest winners.



**If you are interested in volunteering to judge at the fair, please contact Jamie Samons at ext. 377 or [jsamons@narrabay.com](mailto:jsamons@narrabay.com).**

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## Congratulations, NBC!

The NBC received two National Environmental Achievement Awards (NEAA) at the National Association of Clean Water Agencies (NACWA) Winter Conference in Austin, Texas last month. Executive Director Laurie Horridge accepted the awards during the ceremony.

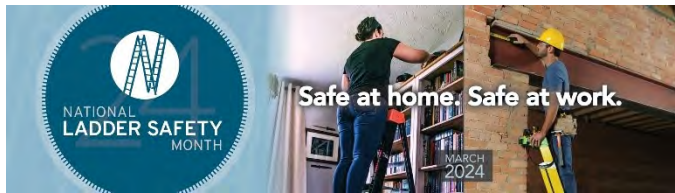
NBC received the **NEAA Operations and Environmental Performance Award for NBC's IFAS Implementation**, the largest application in the world. This system has helped NBC reduce nitrogen levels by 83%, significantly improving water quality in the Upper Bay.

NBC received the **NEAA Public Information and Education: Education Program for the NBC Watershed Explorers Summer Camp**.

In summer of 2023 NBC held its first week-long summer camp for fourth and fifth graders that were chosen from the year-long Watershed Explorers program with Cynthia Morissette. Students spent a fun-filled educational week being ambassadors of clean water, participating in field trips, exploring NBC water quality monitoring and wastewater biology and learning about their local watershed and ecosystems.



## March is National Ladder Safety Month



The National Safety Council has designated the month of March as National Ladder Safety Month. Sponsored by The American Ladder Institute (ALI), this annual campaign is dedicated to raising awareness of ladder safety at home and in the workplace, in addition to decreasing the overall number of ladder-related injuries and fatalities throughout the country. With more than 100 ladder-related fatalities and thousands of emergency room-treated injuries caused by falls from ladders each year, all NBC employees should ensure ladders are being used correctly throughout the workplace and at home.

The goals of National Ladder Safety Month are to:

- Decrease the number of ladder-related injuries and fatalities,
- Increase the number of ladder safety training certificates issued by ALI,
- Increase the frequency that ladder safety training modules are viewed,
- Lower the rankings of ladder-related safety citations on OSHA's annual "Top 10 List,"
- Increase the number of in-person ladder trainings,
- Increase the number of companies and individuals that inspect and properly dispose of old, damaged, or obsolete ladders.

In its ongoing mission to educate the public on the proper selection, care and safe use of all ladder types, the ALI is providing FREE Online Ladder Safety Training, which can be accessed by visiting [www.laddersafetytraining.org](http://www.laddersafetytraining.org). NBC employees are also strongly encouraged to visit the ALI webpage and explore other free resources, such as flyers, videos and articles on ladder safety. Throughout March, NBC's Technical Analysis & Compliance section will be distributing helpful infographics on the following weekly themes:

- Week One – Training and Awareness
- Week Two – Inspection and Maintenance
- Week Three – Stabilization, Setup, and Accessories
- Week Four – Safe Climbing and Positioning

### REMINDER! - NBC Procedure for Reporting Workplace Injuries

As a friendly reminder to all NBC employees, the established procedure for reporting workplace injuries has been streamlined to ensure that appropriate personnel are promptly notified. An injured employee must fill out the top half of the Initial Injury Report Form and their supervisor must complete the bottom half and sign this form.

Also, the employee's manager or supervisor must complete the First Report of Injury Form to the best of their ability. These forms are available on the SharePoint "Forms" tab as fillable PDFs. Once completed, BOTH forms must be emailed to Crystine Marandola as soon as possible, and the following employees must be copied: Casandra Bennett, Kristen Petit, Walter Palm, Dave Aucoin and Kelsie Bryer. Medical care should never be delayed in order to complete these forms. Employees may contact Dave Aucoin at ext. 418 with any questions.

— Submitted by Dave Aucoin

### RIDEM Takes a Tour through the 2.2 Mile-long Tunnel

On Thursday, February 15th, staff from RIDEM including Director, Terry Gray took a ride through the full length of the tunnel after the morning breakthrough event.





# NBC Pipeline

April 2024

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	1	2	3	4	5	6
	April Fool's Day	BOC Meeting COB 11 AM				
7	8	9	10	11	12	13
		RI Clean Water Week April 7th - April 13th				Field's Point Open House 10 AM - 1 PM
					Payday	
14	15	16	17	18	19	20
21	22	23	24	25	26	27
	Earth Day	Blood Drive COB 9 AM - 1 PM ..... Full Moon				
					Payday	
28	29	30				

### Mark your Calendars: Brown Bag Lunch Series

Briefly discuss topics of public and scientific interests, such as microplastics, PFAS, hypoxia, green energy, food waste, etc..

**Location:** Online, link will be provided  
**Time:** 12:00-12:30 PM

**Date:** 4/8, 5/6, & 6/3  
**Facilitator:** Nicole Skyleson





# News Briefs...

## NBC Celebrates Clean Water Week with an Open House at the Field's Point

In celebration of Rhode Island Clean Water Week, April 7th through 13th, the NBC will offer free public tours of the Field's Point Wastewater Treatment Facility and state-of-the-art Water Quality Science Building on Saturday, April 13th from 10:00 AM to 1:00 PM.



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

Staff are encouraged to bring family and friends to "look behind the curtain" and view the process that has made Narragansett Bay cleaner than it has been in 150 years. You can book a tour by contacting Jamie Samons at x377 or [jsamons@narrabay.com](mailto:jsamons@narrabay.com). Spaces are limited.

## Congratulations on your Retirement, Dave Sousa!

On Thursday, March 21st Bucklin Point celebrated long-time employee **David Sousa** on his well-deserved retirement. Dave Sousa had been with NBC for 39 years.

Congratulations, Dave!



*Left to right: Dave Sousa & Marc Pariseault*



**Narragansett Bay Commission**  
**Tuesday, April 23**  
**9:00am - 1:00pm**

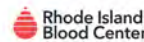
**Narragansett Bay Commission**  
COB Main Conference Room  
1 Service Road, Providence



Scan the QR code and enter sponsor code **0665**

**Walk-ins welcome!**

Please remember to eat, drink, and bring your ID with your name and photo. Appointments are preferred however walk-ins will be welcomed if space permits. Visit [ribc.org/coronavirus](http://ribc.org/coronavirus) for COVID-19 safety protocols.



## 2024 Run for Clean Water 5K

The Rhode Island Clean Water Association (RICWA) will be holding its first 5K run on **Sunday, May 18th at 8 AM**.

Any employee that participates will be able to receive an NBC wellness incentive credit with a copy of your entry paperwork.



**Location:** Fort Adams State Park, Newport RI  
**Race Entry Fee:** \$35/per person, kids under 10 years old are free

Registration can be done through Racewire:  
<https://my.racewire.com/event/8013>

For more information on registration and sponsorships visit [www.ricwa.com](http://www.ricwa.com)

If you have any questions or if your interested in putting together an NBC team reach out to Nora Lough at [nlough@narrabay.com](mailto:nlough@narrabay.com). If you have any questions on the wellness incentive for this event contact Crystine Marandola at [cmarandola@narrabay.com](mailto:cmarandola@narrabay.com)

## 2024 Earth Day River Clean Up Grant Recipients

The NBC is looking forward to celebrating Earth Day this April with all of the 2024 Earth Day River Restoration grant recipients.

Each year hundreds of volunteers from local organizations gather in April to remove thousands 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.



*Volunteers from the RICWA Earth Day Clean-up event in 2023.*

Grantees for 2024 include: Neutaconkanut Hill Conservancy, Inc., The Squantum Association, City of Central Falls, BVTC/Keep Blackstone Valley Beautiful, Save the Bay, Waterman Street Dog Park Association, Lincoln Conservation Commission, Edgewood Waterfront Preservation Association, City of East Providence, Woonasquatucket River Watershed Council, Town of Smithfield, Rhode Island Clean Water Association, Partnership for Providence Parks, Blackstone River Watershed Council/Friends of the Blackstone, Friends of the Moshassuck, and The Empowerment Factory.

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## Congratulations, Jim Kelly!

**Jim Kelly** has been promoted to Technical Advisor within the division of Operations and Maintenance. Staff at the WQSB celebrated on March 13th, your presence within the WQSB will be missed!



## Help NBC Reduce the use of Single-use Plastics

Here at the NBC, we think about sustainability on a variety of levels; we protect and preserve the environment and public health, we operate with sound budgeting and management principles to ensure we can meet our strategic goals, we foster a safe working environment for the security of our staff, and we try to reduce our carbon footprint through use of renewable energy. The list can go on and on.

Single-use plastics present a problem to our sustainability goals. Plastic never dies: it is with us forever. As it breaks down in the microplastics and nanoplastics, it makes its way into the food chain of the entire planet.



Many countries have already banned single use plastics; over 170 nations have pledged to “significantly reduce” plastics by 2030 (World Economic Forum).

What can we do here at the NBC to reduce our reliance on single-use plastics? By now, we all have a re-usable water bottle and stainless tumbler. But what else can we do? Let us know your ideas!

— Submitted by Charles Moreau

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## Senator Sheldon Whitehouse Visits CSO Phase III Tunnel

Senator Sheldon Whitehouse paid a visit to the RestoredWatersRI tunnel on March 18th. Chairman Mesollesa escorted him 200 ft below Pawtucket to view the completed 2.2 mile long tunnel. The tunnel will be fully functional by February 2028.

Senator Whitehouse has always been a huge supporter of NBC and all of our efforts to protect our water ways and NBC thanks him for that!



## Safety Corner: April is Distracted Driving Awareness Month

Below are some tips on how to handle distractions before you drive...



1. Program your route, silence and put away phone and set up music/podcast while still parked.
2. Avoid distractions from cellphone use, passengers, pets, events outside your vehicle, eating, adjusting gps, music or audiobooks and using your vehicles touch-screen.
3. Prevent distracted driving from the passenger seat:
  - Speakup if you feel the driver is distracted
  - Say no to to any behavior that draws the drivers' attention away from the road
  - Prevent distractions: offer to operate the radio, gps and ventilation
4. Keep your eyes on the Road!

—Submitted by Kelsie Bryer

## March Employee Appreciation Event Recap



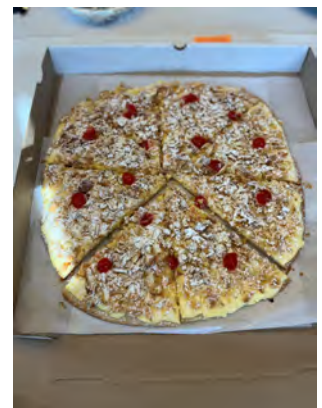
Another successful and FUN employee appreciation event in the books for NBC! On Tuesday, March 19th we celebrated both holidays, St Patricks Day and St. Joseph's Day with some yummy desserts, games, trivia and more.



## WQSB 2nd Annual Pi Day Celebration

On March 14th, also known as Pi Day the WQSB celebrated for the second year in a row with a pot luck pie buffet. It was the perfect combination of sweet and savory pies to share.

Thank you to to all the bakers and contributors who made this a fun, delicious event!



*Zeppole Pizza Pie*



**RHODE ISLAND  
CLEAN WATER ASSOCIATION**

**JOIN US!**

**April 20, 2024**

**9-12pm**

**EARTH DAY CLEANUP**

**KETTLE POINT PARK**

**EAST PROVIDENCE**



Volunteer and cleanup your community for Earth Day!

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Bring a reusable water bottle!

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Join us for refreshments!

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Sign up before it's too late!

**ricwa@ricwa.org by April 13, 2024**

All must sign a waiver to participate



The Narragansett Bay Commission



**United Rentals**

All supplies will be provided

Overflow Parking

University Orthopedics

1 Kettle Point Avenue

East Providence, RI



# NBC Pipeline

May 2024

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

## Calendar of Events *for May*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
			Central Falls High School Career Day	Central Falls High School Career Day		
5	6	7	8	9	10	11
Cinco De Mayo					Payday	
12	13	14	15	16	17	18
Mother's Day		BOC Meeting COB 11 AM		Watershed Explorers Conference at Goddard Park		
19	20	21	22	23	24	25
				Full Moon	Payday	
26	27	28	29	30	31	
						

### Mark your Calendars: Brown Bag Lunch Series

Briefly discuss topics of public and scientific interests, such as microplastics, PFAS, hypoxia, green energy, food waste, etc..

**Location:** Online, link will be provided  
**Time:** 12:00-12:30 PM

**Date:** 5/6 & 6/3  
**Facilitator:** Nicole Skyleson



# News Briefs...

## NBC Honors Twenty-two Companies in Perfect Compliance

On Thursday, April 11th the NBC honored twenty-two companies in the NBC service area for perfect compliance, marking NBC's 29th year issuing Environmental Merit Awards. NBC recognizes those companies among its 1500 permitted users who have achieved perfect regulatory compliance and outstanding pollution prevention in the previous year.

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

The companies in perfect compliance include: Armbrust International, Ltd., Chemart Company, Electrolizing, Inc., HP Services, Inc., Interplex Engineered Products, Inc., John H. Collins & Sons Company, LMG Rhode Island Holdings Inc. dba The Providence Journal, Manchester Street, LLC, Metallurgical Solutions, Inc., Narragansett Jewelry Co., Inc. dba C & J Jewelry Co., Providence Metallizing Company, Inc., Prysmian Cables and Systems USA, LLC, Rhode Island Heat Treating & Black Oxide Company, Rhode Island Resource Recovery Corporation, Stackbin Corporation, Tanury Industries PVD, Inc., Technodic, Inc., Teknor Apex Company, Textron, Inc., Tiffany and Company, Truex, Inc. and Univar Solutions USA, Inc.

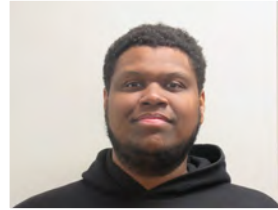
NBC has one of the most successful pretreatment programs in the country. Kerry Britt, NBC's Pretreatment Manager, and her entire staff are repeatedly recognized for their excellence and expertise. Congratulations to the twenty-two companies and the NBC Pretreatment team for all their efforts!



*Left to right: Chairman Mesoletta and Senator DiPalma.*

## Welcome...

### Meet Eric Carvalho!



Eric is an Operator I at Field's Point. He is from East Providence and has two children. He enjoys photography in his

free time and one thing on his bucket list to travel to Ghana and Cape Verde someday.

### Meet Jason Cerrato!



Jason is an Operator I at Field's Point. His favorite way to de-stress after a long day is to visit the gym and listen to

music. Jason's big bucket list item is to one day visit South America

### Meet Sharon Grande!



Sharon is a Customer Care Representative with NBC. She's married, has 2 daughters, and a dog named Roxy. She's a

lover of honey and chocolate chip cookie dough ice cream and in her free time enjoys paddleboarding in the ocean and driving her '64 mustang.

Beautiful  
Double Rainbow  
Over Field's  
Point on  
Saturday April  
20th



*Photo Credit: Bob Baglini.*

## Friendly Reminder: Inspect Those Boots and Prescription Safety Glasses!



NBC employees are allowed one pair of approved PPE boots per fiscal year, in addition to one pair of prescription safety glasses every two years.

Reimbursement guidelines must be met for each type of PPE. Approval guidelines and applicable reimbursement forms can be found on SharePoint.

The signed reimbursement forms (with receipt) for each type of PPE must be sent to Pam Ciolfi by email or interoffice mail so reimbursement can be processed. Reimbursement will be made via ACH into the main bank account on file in Payroll.

Maintaining all types of PPE is required of all applicable NBC employees. Don't miss your chance to get paid for replacing your safety boots and prescription safety glasses!

For more information, employees may contact **Pam Ciolfi** at ext. 555 or **Dave Aucoin** at ext. 418.

<b>Aspen</b> Single Medical Donor Blood & Plasma Maxima Recipient	<b>Jude &amp; Janelle</b> Mother Single Cell Anemia Blood Recipient	<b>Rowan</b> Microtransfusing Blood & Plasma Recipient	<b>Aria</b> Anemia on Iron Blood Recipient - Red Cell	<b>Matthew</b> Single Cell Anemia Blood Recipient - Red Cell
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*thank you for saving lives like theirs!*

### Narragansett Bay Commission

Your blood drive had  
**10** presenting donors  
Resulting in **9** donations  
Helping to save up to **27** lives!

**Next Blood Drive:**  
Tuesday, June 18, 2024  
9:00am – 1:00pm

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



800.283.8385 • ribc.org #ribloodcenter



A big **THANK YOU** to all the NBC staff who volunteered during our annual Open House, making NBC's participation in RI Clean Water Week a resounding success!



*FP Supervisor Liam Walsh showing a group the grit tanks, part of preliminary treatment.*

Thirty-five people visited the facility to participate in wastewater tours of Field's Point and tours of the WQSB on Saturday, April 13th. Guests were highly impressed with NBC's facilities and equipment, knowledgeable staff and the work NBC does on daily basis to protect the health of Narragansett Bay and our local communities.

We're so grateful for David Weisman, Juan Andujar, Ryan Potter, Nathan Boiros, Liam Walsh, CJ Spellman, Kerry Britt, Michael McBurney, Tyler Bissonette, Fern Johnson, Daryll Sirleaf, Michael Golenia, Angelina Glater, Nora Lough, Kim Sandbach, Olga Yankov, and Abigail Ernest-Beck for being fantastic abassadors for the NBC!



*Principal Environmental Engineer CJ Spellman shows a group the primary clarifiers where the organic matter starts to settle.*

## 2024 Run for Clean Water 5K

The Rhode Island Clean Water Association (RICWA) will be holding its first 5K run on **Sunday, May 18th at 8 AM.**

Any employee that participates will be able to receive an NBC wellness incentive credit with a copy of your entry paperwork.



**Location:** Fort Adams State Park, Newport RI  
**Race Entry Fee:** \$35/per person, kids under 10 years old are free

Registration can be done through Racewire:  
<https://my.racewire.com/event/8013>

For more information on registration and sponsorships visit [www.ricwa.com](http://www.ricwa.com)

If you have any questions or if your interested in putting together an NBC team reach out to Nora Lough at [nlough@narrabay.com](mailto:nlough@narrabay.com). If you have any questions on the wellness incentive for this event contact Crystine Marandola at [cmarandola@narrabay.com](mailto:cmarandola@narrabay.com)

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## BP Construction Update

Two new screw pump bodies for Bucklin Point have arrived.



*Photo credit: Bob Baglini*

Installing these ensures BP's WWTF will be ready to handle tunnel pumpbacks from the Pawtucket Tunnel Pump Station once it's online.

## 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, 2024.



Click Here: [Wellness Incentive Credits](#)

.....  
NBC will be offering a three-week walking program starting on May 5th and is open to all NBC employees, all eligible employees can receive \$100 after completing the program. Forms can be found on the link above or in Jess Toporoski's initial email.

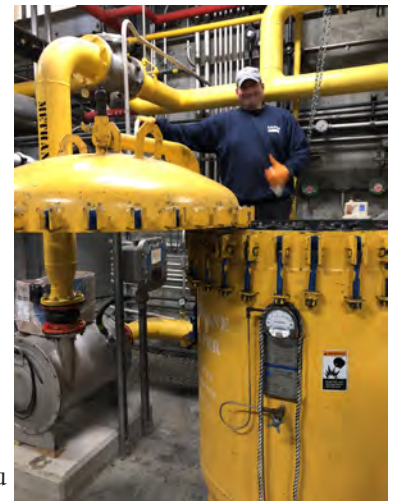
If you have any questions on the walking program or other incentive credits, reach out to Jess at x370.

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## Improvements to BP Digesters

Improvements to the BP digesters continue as NBC patiently awaits getting the biogas system up and running again.

At the end of March removal and replacement of socks to the gas conditioner (Nelson filter) in the digester control building were completed. BP's **Guy Beaudette, Jesse Gomez, Mike D'Arezzo and Mike Arlan** have been working diligently to order the necessary tools, clean specific parts, installed a new drain line and new drain valves and built a new O-ring. Great job and thank you for your hard work!



*Pictured: Jesse Gomez*

— Submitted by Mark Healy



# NBC Pipeline

June 2024

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## Calendar of Events *for June*

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



# News Briefs...

## NBC Watershed Explorers Celebrate year end Program at Goodard Park

The rain didn't stop the NBC Watershed Explorers on Thursday, May 16th! Environmental Education Coordinator **Cynthia Morissette's** efforts to make this event still amazing for these students with the forecasted weather is incredible. Over the 2023-2024 school year she worked with 14 schools in the NBC service area totaling over 800 students. About half of the schools decided the rain was not going to stop them and still attended the end-of-year celebration at Goodard Park in Warwick.



The program encourages students and teachers to become stewards of the environment focusing on their local watershed and other surrounding water bodies. It also helps students understand the connection between the health of their local watersheds and Narragansett Bay, encouraging students to help keep these precious resources healthy for future generations.



The conference kicked-off with student presentations. A group of students from each school were chosen to present their song, rap or poem from their macroinvertebrate projects. Following



*Rich Bernier was the most prepared out of anyone for the rainy day!*

presentations students participated in educational activities presented by NBC staff, RI Audubon Society, Save the Bay, Mass Audubon, Norman Bird Sanctuary, Resource Recovery, Woonasquatucket River Watershed Council, and Mystic Aquarium.

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

## Welcome...

### Meet Dylan Barlow!



Dylan started in May as a FP Operator I. He is from Warwick, RI and enjoys going to the gym after a

long day to de-stress. He loves chocolate ice cream and hopes to one day travel the world.

## Mark your Calendars: Brown Bag Lunch Series

Briefly discuss topics of public and scientific interests, such as microplastics, PFAS, hypoxia, green energy, food waste, etc..



**Location:** Online, link will be provided

**Date:** 7/8

**Time:** 12:00-12:30 PM

**Facilitator:** Nicole Skyleson

## 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, 2024.

Click Here: [Wellness Incentive Credits](#)

# BLOOD DRIVE

DONATIONS SAVE LIVES

## Narragansett Bay Commission

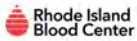
**Tuesday, June 18**  
**9:00am-1:00pm**

COB Main Conference Room  
1 Service Road, Providence

Sign up at [ribc.org/drives](http://ribc.org/drives)  
and use code #0665



Please remember to eat, drink, and bring your ID with your name and photo. Appointments are preferred however walk-ins will be welcomed if space permits. Visit [ribc.org/ribboncenter](http://ribc.org/ribboncenter) for COVID-19 safety protocols.



401.453.8383 - [ribc.org](http://ribc.org) #ribbloodcenter

## Casual Day Update

Based on the suggestions from participants, in April the Casual Day Fund made donations of \$500 to each of these organizations:



**ALS United RI** - Fighting for a cure and helping people with ALS live their lives to the fullest

**Breath of Hope RI** - brings awareness to Idiopathic Pulmonary Hemosiderosis, a rare lung disorder

**Providence Animal Rescue League** - provides for the rescue and relief of suffering and homeless animals, and performs charitable or benevolent acts for the welfare of animals

**Refocus RI** - serves adults with differing physical and developmental needs

These organizations were chosen at random from the list of very excellent suggestions. The Casual Day Fund Committee thanks everyone for their great ideas and looks forward to more giving in the future!

## NBC Hosts Two-day Career Day Event for Central Falls High School Students

Students and teachers from Central Falls High School visited the NBC on May 1st and 2nd. Students toured the FP WWTF and WQSB where students were introduced to various clean water career paths. NBC had a new addition to the Career Day agenda this year, after the tours and lunch students went to Collier Park to do some water testing of their own in the Providence River.



NBC's Process Monitor Jaiden Alvarado, a Central Falls High School alum gave the WWTF tours with Assistant Ops Manager Eric Bogosian. Jaiden is a recruit from a career day NBC hosted two years ago.

Thank you to all the wonderful NBC staff who volunteered to participate, showing off your career at NBC and being such an awesome ambassador for NBC!

Students and teachers were very impressed and students showed interest in many of the career fields discussed, NBC may have another future employee from this Career Day!

## June is National Safety Month



Since 1996, the National Safety Council (NSC) has designated the month of June as National Safety Month. The NSC utilizes this time of the year to provide employers and employees with free safety resources to highlight leading causes of preventable injuries and fatalities throughout the country.

Throughout June, TAC's Safety Team will be distributing electronic safety resources to all employees, focusing on the following weekly safety topics:

— Continued on next page

## 2024 Weekly Safety Topics



Employees should keep an eye out for a National Safety Month campaign poster throughout NBC break areas, as well as weekly 5-minute Safety Talks, weekly videos, and weekly facts and figures.

NBC employees will also have the opportunity to take the NSC “Safe At Work Pledge.” Keep an eye out for a link on NBC’s SharePoint homepage, and be prepared to show your commitment to workplace safety for not only yourself, but also for your family and co-workers. Safety is everyone’s responsibility!

— Submitted by Dave Aucoin

## NBC Hosts Two Successful Shellfishing Transplants in May

The NBC is happy to report two successful shellfishing transplants on Tuesday, May 2nd in the Oakland Beach area and on May 17th in Greenwich Cove.

On May 2nd 64 fishermen participated, collecting 1156 bags, totaling 57,800 pounds of shellfish and on May 17th 67 fishermen participated collecting 1253 bags of shellfish totaling 62,650 lbs of shellfish to transplant.

Thanks to NBC’s CSO Phase I and II projects and soon Phase III, NBC is able to now divert stormwater so shellfisherman now see an average of 65 extra days for shellfishing in this multi-million dollar industry.



A big thanks to all the NBC staff involved and helping make these events happen!



Top row left to right: Walter Palm, Junel Grande, Nathan Dean, Fern Johnson, Daryll Sirleaf & Dee Bigotte. Bottom row left to right: Justin Vigorito, Liz Kobr & Sara Nadeau.

## RICWA Honors BP and Retiree, Paul Desrosiers at Annual Awards Banquet

On Friday May 10th the Rhode Island Clean Water Association held its Annual Awards Banquet at the Cranston Country Club. NBC is proud to announce that



Left to right : Scott Mangold from Jacobs, Marc Pariseault, Bill Dolan, TJ Harrington.

the Bucklin Point WWTF received the Silver Facility Excellence Award for only having one violation during the calendar year.

NBC Retiree Paul Desrosiers received the Lifetime Member Award, given in recognition of association members in good standing for a minimum of 10 years and who have retired from active work in the field of water pollution control.



Paul Desrosiers & RICWA President, Peter Connell.

Well deserved BP & Paul, congratulations!



# NBC Pipeline

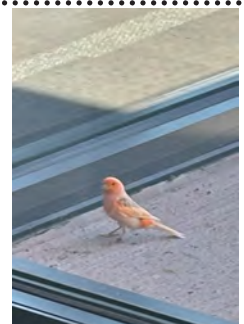
July 2024

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

## Calendar of Events *for July*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1	2	3		5	6
7	8	9	10	11	Payday	13
14	15	16	17	18	19	20
21	22	23	24	25	Payday	27
National Ice Cream Day Full Moon	COB, LAB & IM Ice Cream Social 1 PM	FP & PT Ice Cream Social 12 PM		BP Ice Cream Social - 12 PM National Intern Day		
28	29	30	31			

This little guy made his way to Bucklin Point for help at the right time. On Tuesday, June 25th as staff was preparing for the Board of Commissioners meeting this little parakeet made his way over to the entrance of the new Administration Building and wouldn't leave. After close observation, staff discovered this was a domestic bird and was not meant to be outside. East Providence Animal Control came to take the bird and hopefully find its owner. Thank you to all who helped care for the bird until animal control arrived!





## Congratulations...

To Field's Point Assistant Operations Manager **Eric Bogosian** and his wife Sara on their dream wedding in Aruba on May 13th. The beautiful couple had a reception to follow here in Rhode Island over the weekend of June 29th. Wishing you and your family a lifetime of happiness, congratulations to the newlyweds!



*From left to right: Nathan Boiros, Steve Cote, Eric, Sara, Manny Correia, Rick Mello & Tony DiIorio.*

## NBC's Data Stream & Staff Save the Day

The Data Stream had an eventful day on June 17th while out in the upper bay conducting routine bay bacteria monitoring. Two youths on a 12-foot Jon Boat were in distress because they could not get their motor started and the wind and current were pushing the boat towards the concrete hurricane barrier. The Data Stream crew consisting of **Jeffrey Tortorella, Tyler Bissonette, Amanda Kezirian and Mike Golenia** quickly rendered assistance and towed the youths to safety back to where they launched at the Gano Park Boat Ramp. The two youths were beyond grateful!



Great job everyone!

— Submitted by Nathan Dean

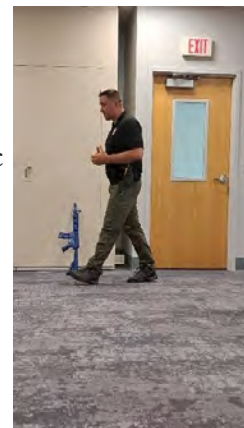
## NBC Employees Receive Active Shooter Response Training

Throughout May, 63 NBC employees received valuable classroom training on active shooter awareness and response. This free training was delivered by Lt. Patrick Potter, Weapons Bureau Commanding Officer for the Providence Police Department. With 20 years of experience on the police department, Lt. Potter added valuable insight to each training session. NBC employees received instruction on how and when to “Run, Hide or Fight” if ever faced with an active shooter situation.



NBC began partnering with the Providence Police Department in 2018 to deliver this life-saving training to its employees. Building security measures continue to improve, based on recommendations made by the Department. Most recently, protective window safety film was installed on the public-facing entrances of the buildings at the Field's Point campus. Future security enhancements include plans for deadbolt locks on designated lockdown rooms, installing additional panic buttons in certain locations, and installing more protective window film at Bucklin Point.

For more information on Active Shooter preparedness and response actions, please see the fact sheet in Kelsie Bryer's email from June 3rd.



— Submitted by Dave Aucoin

## Thank You


To all those who participated in June's NBC Blood Drive! NBC had 11 donors, resulting in 11 donations which will help save up to 33 lives!

**Mark your calendar: NBC's next blood drive will be on Monday, August 19th from 9 AM -1 PM.**



# HEAT Safety

## Protecting Workers from the Effects of Heat

<p><u>What is Heat-Related Illness?</u></p>	<p><u>How Can it be Prevented?</u></p>	<p><u>Personal Risk Factors</u></p>
<p>As outdoor and indoor temperatures rise, a worker's core body temperature may also begin to rise. The body's natural way to regulate temperature is to increase its heart rate and sweat. Heat illness develops when these mechanisms are not enough to keep the core body temperature from rising.</p>	<p>Consume adequate fluids such as water and sport drinks, take frequent breaks and use a fan in your personal space.</p> 	<p>Some workers are more susceptible to heat-related illness. Personal risk factors include medical conditions, lack of physical fitness, previous episodes of heat-related illness, alcohol consumption, drugs, and use of certain medication.</p> <p><b>KNOW YOUR PERSONAL RISK FACTORS!</b></p>

### Heat-Related Medical Emergencies Requiring Immediate Action


**If a worker experiences:**

- Abnormal thinking or behavior
- Seizures
- Fainting
- Heavy sweating or hot, dry skin

**CALL 911 IMMEDIATELY! COOL THEM DOWN WITH WATER OR ICE! MOVE TO SHADE!**

For more information on heat safety:

Heat - Overview: Working in Outdoor and Indoor Heat Environments (Occupational Safety and Health Administration (osha.gov))



YOU'RE INVITED TO NBC'S

# ICE Cream SOCIAL

.....

MONDAY, JULY 22ND  
1 PM – COB, LAB & IM

.....

TUESDAY, JULY 23RD  
12 PM – FIELD'S POINT & PT

.....

THURSDAY, JULY 25TH  
12 PM – BUCKLIN POINT

.....

ENJOY AN ICE CREAM ON US!

## RIsing Sludge Takes Home First Place Overall at NEWEA's Operations Challenge

Congratulations to RI's Operations Challenge team RI-sing Sludge on winning all five individual events and winning first place overall in the NEWEA Operations Challenge.

NBC's Bucklin Point Supervisor **Shaun Collum** is a part of this talented team. The team will continue on to WEFTEC in October for the international competition with over sixty teams from around the world competing. In addition, NBC's **Nora Lough** is the Vice Chair of the NEWEA Operations Challenge and **Kim Sandbach** is the laboratory event coordinator.

This challenge allows wastewater professionals to showcase their skills and improve upon them in a fun, challenging environment. Teams are judged in five categories; maintenance, lab, safety, collections and process to reflect the different skills, challenges and aspects of the wastewater field.



*Shaun Collum second from the left.*

Best of luck at WEFTEC to Shaun and the entire RI-sing Sludge team!



# NBC Pipeline

August 2024

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## Calendar of Events *for August*

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



# News Briefs...

## NBC Celebrates Dave Brouillard's Retirement

Bucklin Point's Maintenance Manager **Dave Bruoillard** retired on July 19th after 32 years of service with NBC. Staff and Dave's family gathered at Bucklin Point on Thursday, July 18th to celebrate with pizza, cake and beautifully made golden wrench in his honor.

Dave worked at Field's Point up until 2015 before transferring over to Bucklin Point where he has worked the last nine years. Wishing you a happy and healthy retirement, Dave!



*From left to right: TJ Harrington, Dave Brouillard & Marc Pariseault*

## NBC Celebrates National Ice Cream Day

NBC's first Ice Cream Social was a success! Staff from all locations, buildings and shifts were able to enjoy a refreshing treat in honor of National Ice Cream Day on July 21st!



*Photo Credit: Anne Marie Higgins*

## Welcome...

### Meet Finneas Osterhout!



Finn started as an Environmental Technician under Interceptor Maintenance in July. He's from East Greenwich, RI, loves some good old fashioned rocky road ice cream and a good book to de-stress. Fun Fact about Finn, he can unicycle.

### Meet Alejandra Tobon!




Alejandra will start in August as a Pretreatment Inspector I. She is from Columbia and has two children. Her favorite way to de-stress after a long day is to go to the gym.



**Kelsie Bryer** joined NBC as a Customer Care/Fiscal Representative in December 2022. In July 2023, she transferred to the WQSB in the TAC Department to assist with various projects. One of those projects lead her to the Safety & Compliance Department, where she has remained for the last year. Kelsie has recently been offered a full time, permanent position as Safety Compliance Coordinator I and will continue to work side by side with Dave Aucoin, Safety Compliance Coordinator II, to keep employees safe!


Kelsie is from Warwick, RI and loves cruising on her motorcycle, shooting pool, and decompressing at the gun range in her spare time. Welcome to the team, Kelsie!



# SAFETY ALERT!

## FIRE SAFETY FACT SHEET

Narragansett Bay Commission



### Precautions to Take

Employers must create Emergency Action and Fire Prevention plans to protect employees in a time of emergency. Review these plans so you know what to do when disaster strikes.

Know at least two exit routes from your workplace – if one route is blocked, knowing a second route may save your life. Your employer must ensure that the exit routes at your workplace comply with the standards.

Different types of fires require different fire extinguishers. Read the label to make sure you are protected with the right type of fire extinguisher.

### Hazards

- **Class A** – ordinary combustible materials such as paper, wood, or cloth
- **Class B** – flammable liquids, gases, and grease
- **Class C** – energized electrical equipment
- **Class D** – combustible metals such as magnesium, titanium, zirconium, sodium, lithium, and potassium
- **Class K** – this new class (not listed in the OSHA standards) was established because of the difficulty in extinguishing fires in cooking appliances that involve combustible cooking media, such as vegetable or animal oils and fats.

### Fire Safety at Home

#### Statistics

- Roughly three out of five fire deaths happen in homes with either no smoke alarms or no working smoke alarms.
- More than one-third (38 percent) of home fire deaths result from fires in which no smoke alarms are present.
- The risk of dying in a home fire is cut in half in homes with working smoke alarms.

#### Safety Tips

- Install smoke alarms in every sleeping room and outside each separate sleeping area. Install alarms on every level of the home. Install alarms in the basement.
- It is best to use interconnected smoke alarms so that when one smoke alarm sounds, they all sound.
- Test all smoke alarms at least once a month. Press the test button to be sure the alarm is working.
- A closed door may slow the spread of smoke, heat, and fire.
- Working smoke alarms are an important part of a home fire escape plan.

For More Information on Fire Safety  
[NFPA | The National Fire Protection Association](http://www.nfpa.org)

## Mark Your Calendars

NBC's next Blood Drive will be held on **Monday, August 19th** in the COB Main Conference Room from 9 AM - 1 PM.



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

The annual NBC Golf Tournament is scheduled for...



**Thursday, October 3, 2024**  
**Swansea Country Club.**  
**Start time: 10:00 AM**

The format will be the same as prior years, teams of four with everyone starting at the same time but at a different hole. Participants will be playing a “scramble” which means you always hit from the best shot of the four players. There will also be a closest to the pin and longest drive award. This year's event will include lunch; two hot dogs, chips, and soda. The cost will be \$72.00 per person and \$288 for a foursome.

**Payment and team roster must be submitted to Eric Bogosian by Friday, September 20th.** If payment is not received on time, your team will not be scheduled to play, as we are responsible for no-shows. Please check with your supervisor on scheduling vacation or personal time for this.

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

## BP Replaces Screw Lift Pumps in Part of Expansion Project

On July 10th, construction crews at Bucklin Point removed the screw from Archimedes Screw Pump No. 1 in preparation for the installation of larger capacity pumps. These are the pumps that take all the wastewater into the plant to begin the treatment process.

Two of the four screw pumps are being replaced as part of the \$74 million dollar project to expand Bucklin Point.

— Submitted by Greg Waugh








# NBC Pipeline

September 2024

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

### Just in time for Spooky Season...

A very rare sighting of a Black Widow Spider last month at BP, these creatures usually go unnoticed, hiding in dark wooded areas in RI. BP Mechanic Guy Beaudette had the pleasure of finding the spider when he was returning his ladder to the rack.

— Submitted by Marc Pariseault



# News Briefs...

Welcome...

## Meet Tara Franey!



Tara started on August 26th as NBC's Environmental Scientist III. She is from Lexington, Kentucky, home of UK Basketball. She loves crafting, but especially loves to crochet.

## Meet Jacob Bidon!



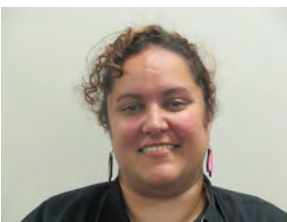
Jacob goes by Jay and will start as Bucklin Point's Operator I on September 3rd. Jay resides in Warwick with his cat, Mama and Husky, Nikko. Two future bucket list items of his are to go to Japan and purchase a motorcycle. Some of the best advice he has ever received is, "its either one day or day one. You decide."

## Meet Aimee Bilodeau!



Aimee started on August 26th as NBC's new Senior Accountant. She is from Auburn, MA, home of the first successful launch of a liquid-fueled rocket. She has a goldendoodle named Ollie, loves peanut butter cup ice cream, and hopes to visit Australia one day.

## Meet Megan Rodrigue!



Megan will start in Septemeber as NBC's IM Inspector. Megan is originally from Pennsylvania. She loves to spend time with her two dogs, both hounds, loves mint chocolate chip ice cream, reading and pottery. One thing on her bucket list is that she hopes to one day visit Trinidad with her her mother to see where she grew up.

## Meet Lori Pawlitschek!



Lori started on August 26th as NBC's new Help Desk Technician II.

## Mark Your Calendars

The annual NBC Golf Tournament is scheduled for...



**Thursday,  
October 3, 2024  
Swansea Country Club.  
Start time: 10:00 AM**

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

This year's event will include lunch; two hot dogs, chips, and soda. The cost will be \$72.00 per person and \$288 for a foursome.

**Payment and team roster must be submitted to Eric Bogosian by Friday, September 20th.** If payment is not received on time, your team will not be scheduled to play, as we are responsible for no-shows. Please check with your supervisor on scheduling vacation or personal time for this.

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

---

## Thank You

The August blood drive had 7 donations helping to save up to 21 lives!



**Next Blood Drive: Tuesday, November 5, 2024, 9:00am – 1:00pm**

Scan QR code to make appointment.

Use Sponsor Code **0665**



## Successful Second Year for the NBC Watershed Explorer's Summer Camp

Kudos to NBC's Environmental Education Coordinator Cynthia Morissette for another successful year hosting a week of summer camp at NBC!

Students from the year-long NBC Watershed Explorers Program were given the opportunity to write an essay or submit a video to be entered in for a chance to attend a free week of camp at NBC and three students were chosen.

These three lucky students spent a fun filled week learning about NBC's wastewater treatment process and visiting NBC's state-of-the-art Water Quality Science Building to meet with Biologist Nora Lough to learn about how she uses the sea urchins for water quality research at NBC. Campers also enjoyed a field trip to Save the Bay for a Bay Experience, a trip to Frosty Hollow Pond in Exeter to search for critters and visited URI's Graduate School of Oceanography and many other fun activities and learning experiences in-between.



## P-Bruins are Back!

The P-Bruins are excited to announce their first group offer of the season with us! The first event is the Boston Bruins Black & Gold game right here in Providence. See some of your favorite Boston Bruins take the ice in Providence as a part of their 2024 training camp.



### Game Details:

**Saturday, September 21st, 2024**

**1:00 PM**

**Amica Mutual Pavilion, Providence**

### Ticket Options:

- \$30 for 200 Level Seating
- \$40 for 100 Level Seating

Tickets can be purchased for this game at:  
[www.ProvidenceBruins.com/Group-Tickets](http://www.ProvidenceBruins.com/Group-Tickets)

## Out With the Old and In With the New, BP Installs New Screw Pump

As reported on July 10th, BP construction crews removed the screw from Archmedes Screw Pump 1 in preparation for the install of a larger capacity pump. Two of the four pumps are being replaced as part of the \$74 million dollar project to expand Bucklin Point.

On August 22nd the new screw pump, pictured to the right was installed. These screw pumps are very important to NBC's facilities. Their job is to pump the wastewater into the facility to begin the treatment process.










# NBC Pipeline

## October 2024

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### Calendar of Events *for October*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
		1	2	3	4	5
			Rosh Hashana	NBC Golf Tournament		
6	7	8	9	10  Flu Shots: COB	11 Yom Kippur Payday	12
13	14  Columbus Day HOLIDAY	15	16	17	18	19
20				24  Pumpkin Decorating Contest	25 Payday	26
27	28	29 11:00 AM Board of Commissioners Meeting	30	31  Halloween!		

### P-Bruins Ticket Special



- Grab your tickets to two awesome nights with the Providence Bruins.
- Friday, October 11 @ 7:05 PM: opening night with a rally towel giveaway at the door
  - Sunday, October 20 @ 3:05 PM: Halloween spooktacular
  - \$25 for 100-level seating
  - Free Bruins hat for everyone in the group
  - Scan the QR code or visit [www.providencebruins.com/grouptickets](http://www.providencebruins.com/grouptickets)



# News Briefs...

## Flu Shot Clinic

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 clinic will take place on **Thursday, October 10** at the COB from 7:30 - 11:30 AM. Registration is highly recommended.

To register:

- Visit [www.thewellcomp.com/pathlogin.aspx](http://www.thewellcomp.com/pathlogin.aspx)
- Enter login ID **NarrBay1010** or scan the QR code at right.
- Remember to bring your insurance card!



## BP RAS Pipe Installation a Success

Overnight between Tuesday, September 17 and Wednesday September 18 a new Return Activated Sludge pipe was installed at Bucklin Point. This pipe will service the two new clarifiers currently under construction. The job took precisely eight hours and went off without a hitch.

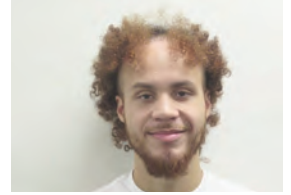
Congratulations to **Bucklin Point Operations staff** and **Construction staff** for coordinating a very successful operation!



Photo courtesy of Marc Pariseault

## Welcome

**Jarren Jimenez**  
Operator I  
Bucklin Point  
WWTF



**Gerardo Duran Canario**  
Mechanic I  
Field's Point WWTF



## Spirit Week is Here!



## And Pumpkins, Too!

NBC's annual Pumpkin Decorating Contest is **Thursday, October 24** in the Field's Point Education Center. This year's theme is to creatively interpret the NBC. Set up is at 12:30 and judging is from 1:00 - 3:00. Join in for some snacks, beverages, and voting!



## Congratulations!!



To **Talia Cheshier** and husband **Brandon** on the birth of baby **Luke Matthew Cheshier** on September 28! Big brothers **Cole** and **Nico**, big sister **Ryleigh**, and fur-siblings **Jett** and **Wendy** were happy to welcome 8 lb 7 oz **Luke** home.

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 25 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.

Other recent donations from the Fund have included Mothers Against Drunk Driving and Breakthrough T1D (formerly the Juvenile Diabetes Research Fund).

If you are a Fund participant and would like to request a donation to a qualifying charity, please contact a member of the Casual Day Fund Committee (**Leah Foster**, **Patricia Pinilla**, **Eliza Moore**, **Renee Rinaldi Patterson**, **Ashley Petteruto**, **Jamie Samons**). Qualifying charities must be a recognized 501 (c)(3) and cannot be political or religious in nature.



## NBC Participates in Annual Port Evacuation Drill



From Left to Right: **Diego Gutierrez**, **Trish Fabrizio**, **Nicole Klebauskas**, **Caitlin Vallee**, **Maryann Sourivong**, **Jahnaa Burke**, **Kara Taglianetti**, **Joe Devit**, **Peter Gnocchi**, **Liam Walsh**, **Sean O'Keefe**. Photo courtesy of **Kelsie Bryer**.

On September 24<sup>th</sup>, the Providence Emergency Management Agency (PEMA) conducted the annual Port of Providence Evacuation Drill. This drill is necessary to ensure that businesses within and around the Port are prepared to receive emergency notifications from PEMA and implement their internal emergency notification systems to notify employees.

The drill began at noon with the activation/test of the Port Siren System. Several sirens are installed throughout the Port to notify anyone outdoors of an imminent threat, such as a chemical leak, severe weather alert, etc. Following the siren test, PEMA sent an emergency drill message via the mass notification system for the Port area. NBC's participation in the drill began when the Field's Point Process Monitor received the CodeRED message. Utilizing NBC's current phone paging system, the on-duty Process Monitor, **George Dolan**, did an excellent job of clearly communicating the drill announcement to all NBC employees.

NBC drill volunteers were then asked to evacuate to NBC's off-site emergency rally point, in Cranston (upper parking lot). NBC evacuates to this location due to its large population compared to other businesses within and around the Port. PEMA also has rally points throughout the City for other businesses. TAC's **Kelsie Bryer** reported to the City's rally point on Eddy Street to account for NBC during the drill. A HUGE thank you to George, Kelsie, and each of this year's drill volunteers for your active participation in this important drill!

—Submitted by *Dave Aucoin*

## NBC Staff Receive CPR/AED & First Aid Training

On September 26<sup>th</sup>, a CPR/AED & First Aid certification class was held at Bucklin Point. Special thanks to **Dave Lavallee** from CPR & Safety Classes of RI for delivering yet another outstanding training for NBC. Eleven employees took advantage of this extremely valuable training and are now equipped with live-saving skills!







## Awesome!

Congratulations to **Liam Walsh, Sean O’Keefe, John Cavanagh, and Gene Medeiros** on their successful completion of the 2024 DEM Boot Camp! Boot Camp is a rigorous Management Succession-Planning Program which focuses on transitioning operators into supervisory and management roles. Candidates are nominated and selected for this high level of professional development. After a year-long broad range of training and presentation, the program culminates at the graduation ceremony. This year’s ceremony was held in conjunction with the Rhode Island Clean Water Association’s annual trade show

## RICWA News

The NBC participated in the Rhode Island Clean Water Association sponsored Operator Exchange program by providing a detailed tour of the Field’s Point facility. Thank you to **Eric Bogosian** for hosting and leading the tour for the Massachusetts based operator.

The NBC was also represented well at the Annual RICWA tradeshow. **Kim Sandbach**, NBC Environmental Chemist II and RICWA secretary, was instrumental in the planning and success of this event.

NBC Field’s Point and IM staff attended a Bioreactor training which included nitrification and operational adjustments.

In addition, NBC staff participated on the exhibit floor and spoke to various vendors on new products and services for wastewater operations and maintenance.

—Submitted by *Nora Lough*



*Joe Devitt, Norm Ellinwood, Joe Malouin and Mark Taylor attended the RICWA Trade Show in September.*

## Good News for RI Beaches

The Providence Journal reported on September 18 that beach closures have dramatically decreased over the past twenty years. One significant factor reported by Alex Kuffner is the NBC’s CSO Project.

*“Weather may be the critical factor when it comes to beach closures, but human intervention still plays a big role in water quality.*

*Nothing demonstrates that more than the impact of an enormous tunnel network being built by the Narragansett Bay Commission to control combined sewer overflows from the largest wastewater treatment system in Rhode Island.”*

Read the story here.









# NBC Pipeline

## November 2024

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### Calendar of Events *for November*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
3  Fall back! DST ends	4	5  Election Day	6	7	8 Payday	9
10	11  Veterans Day HOLIDAY	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28  Thanksgiving HOLIDAY	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 once again hold Holiday Employee Appreciation events. Dust off your Jenga-stacking skills and brush up on your Connect-4 strategy! Other traditions to continue this year include a holiday toy drive and the charitable giving raffle.

Mark those calendars for **the weeks of December 9th & 16th**. Look for more details in next month's Pipeline.

# News Briefs...

## Meet Your Cornhole Champs!

On October 15, the NBC held its first ever Cornhole Competition, with 32 teams participating. Topping the leaderboard was Team #5, **Bruce Stoeckel and Nic DaSilva**, with Team # 2, **Aaron Amaral and Liam Walsh**, close behind. Congratulations also go to runners up Team #17, **Nathan Boiros and Marcos Quinones**, and Team #26, **Joe Moniz and Jim Golden**. To all the other teams: there's always next year!

Big shout out to **HR** for organizing this fun event!

*Photos by Jess Toporoski*



*Cornhole royalty: Bruce Stoeckel, Nick DaSilva, Aaron Amaral, and Liam Walsh.*



## Golfing Greats

Congratulations to **Eric Bogossian, Jay Malouin, Mark Taylor** and **Mike Hernandez** for winning the 2024 NBC Golf Tournament!



## IT Shows its Super Powers



Instead of having to listen to the rest of us shriek at our monitors when something goes awry, your Friendly Neighborhood IT Department had a few screams of their own on the Superman hypercoaster at Six Flags of New England. **Ian Wenskowicz, Lori Pawlitschek, Christine Cooper, John Motta, Anne Marie Higgins, and Jason Galego** all braved the 208 feet tall ride, with a mind-blowing 221 foot drop, and zoomed through 5,400 feet of twisting tracks at 77 miles per hour.

A hypercoaster is a roller coaster with a height or drop measuring at least 200 feet. Six Flags's Superman hypercoaster was ranked best rollercoaster in the world by *Amusement Today* magazine in 2003, 2006, 2007, 2008, and 2009.

Exery time they save us from a computer disaster, we know IT has superpowers. Now we should consider getting them capes!

Maybe we've been working Amy too hard lately.



*Thanks to Mike Cook for the laugh!*



## FY2026 Budget Kicks Off

On October 16, **Michelle McCabe** and **Krystine DeLeon Severino** kicked off the FY2026 Budget process for the NBC. The new budget will align with the NBC's new Strategic Plan that is currently in development. The kickoff presentation and other documents necessary for the budgeting process are available on the Operating Budget webpage [here](#).

## Coyote on the Tracks!



No, this is not the trope of a Wyle E. Coyote and Road Runner cartoon, but an actual coyote spotted zipping along the train tracks near Shipyard Street. Thanks to **Gail Degnan's** eagle eye for spotting the speeding canine.

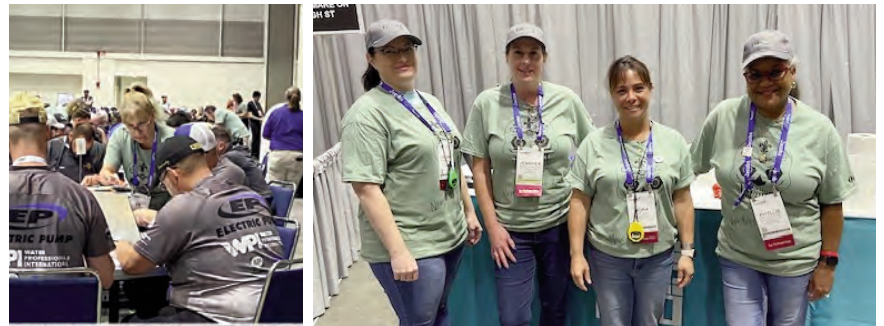
**Open Enrollment:  
Through 11/8**

## Rising Sludge Achieves Strong Performance at WEFTEC

The team from Rhode Island named RIsing Sludge demonstrated impressive results at the recent WEFTEC Operations Challenge, held in New Orleans, LA. The team competed extremely well showcasing their expertise across multiple categories.

Fifty-nine teams competed this year in five events that make up Operations Challenge. These are the ultimate tests of wastewater treatment pros. From pump fixes to lab work, process control, safety checks, and collection system challenges, these events showcase the diverse skills needed for top-tier water sector talent.

**Shaun Collum** of Bucklin Point showcased his skills under extreme pressure as Rhode Island competed for the first time in Division I. **Nora Lough** and **Kim Sandbach** participated in judging the events which is a vital component to operations challenge as part of the members and support team on the national level.



Top, Team RIsing Sludge, including NBC's **Shaun Collum**, second from right. Bottom left, **Kim Sandbach** as judge. Bottom right, **Nora Lough** (2nd from right) and the lab judges.



Key achievements included: 2nd place in the Process Event, 7th place in the Lab Event, 7th place in the Safety Event, 8th place in the Maintenance Event, and 5th place in the Collections Event.

These strong placements earned RIsing Sludge an impressive 6th place overall among a competitive field of participants.

The team's performance reflects their technical skill, teamwork, and dedication to environmental and wastewater management.

**Congratulations to everyone!**

*Thank you to Nora Lough for the news and photos.*



NBC creativity was out in full force for the 2024 Pumpkin Decorating Contest! The carvers and painters did not disappoint with their takes on the theme **Interpret the NBC**. It was a close race, with Lab's depiction of super scientist Jackie O'Lantern as the top vote-getter, but it was obvious that more awards were due. Thanks to all who participated!



**LAB**  
Most Votes and Best Use of Dry Ice



**EM**  
Shiniest and Gassiest



**HR**  
Duckiest!



**LEGAL/LEG**  
Most New England



**FP OPS**  
Most Sophisticated Interpretive Signage



**TAC**  
Most Sea-worthy!



**PAYROLL**  
Best Use of Cold Hard Cash

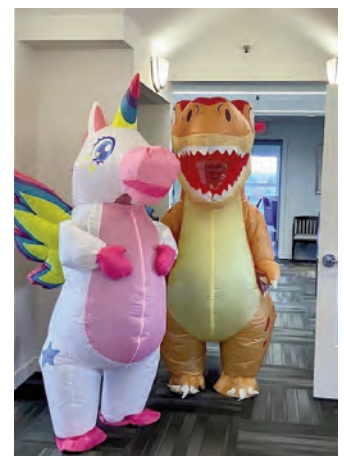
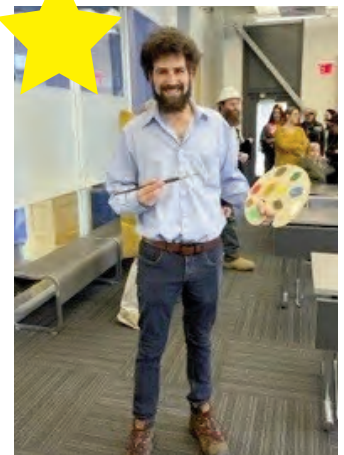


Thanks to Jess Toporoski and Dee Bigotti for contributing photos!

# Spirit

# Week

It was an epic Spirit Week at the NBC, with fantastic displays of headwear, mismatched outfits, costumes, and more!!  
Congratulations to **Tyler Bissonette** for his award-winning impersonation of Bob Ross.  
*Mega high-5 to HR for organizing! Thanks to Jess Toporoski & Dee Bigotti for the photos!*





## FP Awards Employee & Team of the Year

On October 8, Field's Point staff gathered to announce the 2024 Employee and Team of the Year. These awards began in 2023 and provide an opportunity to bestow well-deserved recognition on fellow staff members.

**Tiziano Roncone** was chosen by his fellow employees as Employee of the Year. His nominators lauded his initiative, creativity, ethics, and values. "His code of conduct, ethics and values of the organization are set to the highest of NBC standards," wrote one nominator.



"Nothing in the plant would run as smoothly and efficiently as it does without him," said another. And a third gave Tiziano perhaps the greatest compliment: "If I owned my own company Tizzy would be the first person I would hire."



The Team of the Year Award went to **David Miller, Norman Rodolewicz, Maxwell Duncan, Broc Hector, John Colson, and Liam Walsh**. In the wake of a spill on-site by Synagro, the team reacted quickly and effectively, exhibiting admirable work standards and true environmentalism. The group includes multiple departments, as well as Union and Non-Union staff. Their work together not only accomplished a difficult task, but their actions prevented a violation.

"All team members acted swiftly and did an amazing job cleaning the spill. They showed an outstanding code of conduct in this situation and responded with the poise and determination that express the values of our fine organization," said the nominator.

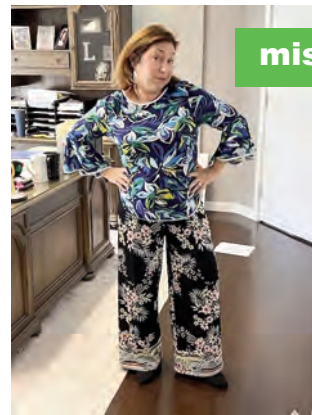
## Spirit Week



crazy hat day



mismatch day



NBC blue day






# NBC Pipeline

## December 2024

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

### Holiday Employee Appreciation Events

- Thursday, December 12, 1:00 - 3:00 PM at Field's Point  
COB, IM, EM, TAC, Lab, Pretreatment
- Tuesday, December 17, various times  
Field's Point all shifts
- Thursday, December 19, various times  
Bucklin Point, all shifts

Read on for more holiday happenings!





# News Briefs...

## P-Bruins Winter Fest Tickets

Once you've eaten all the Thanksgiving leftovers, why not hit the ice? NBC employees and their families and friends can get great seats to P-Bruins games throughout December, including the always-popular Winter Fest on December 7 and 8. Scan the QR code at right or visit [providencebruins.com/grouptickets](http://providencebruins.com/grouptickets).

Disney on Ice tickets will be available later in December for you *Frozen* and *Encanto* fans. Stay tuned!

2024-2025 PROVIDENCE BRUINS  
**GROUP OUTING**  
Narragansett Bay Commission

WINTER FEST  
DECEMBER 7

WINTER FEST  
DECEMBER 8

**TICKET DETAILS**  
- 100 LEVEL SEATING  
- ONE (1) FREE CHUCK-A-PUCK PER TICKET  
- OTHER AVAILABLE GAMES:  
- DECEMBER 13th, 15th, & 21st

**ONLY \$25 PER PERSON!**

PURCHASE ONLINE NOW AT:  
[WWW.PROVIDENCEBRUINS.COM/GROUPTICKETS](http://WWW.PROVIDENCEBRUINS.COM/GROUPTICKETS)

PURCHASE INSTRUCTIONS: Once purchased, you will receive an email from Faveo, our group ticketing platform, with instructions to access your tickets.  
Your mobile tickets are your vouchers to pick up your hat at the Group Sales Table in Section 118. For more info, please call/Email Anthony with the Bruins at (401) 850-4713 or [antonio@faveoagency.com](mailto:antonio@faveoagency.com)

## Safety Corner

In recent months, NBC's Health & Safety Training Program has continued to deliver high quality in-person training to employees in various sections.

The following safety trainings took place throughout October and November.



**Hearing Conservation & Audiometric Testing - 10/22 & 10/23:** ASI Health Services conducted this on-site training and testing for 138 employees included in NBC's Hearing Conservation Program. This is an annual training requirement for NBC

employees who are or may be exposed to noise levels of 85 dB or higher throughout the workplace, in accordance with OSHA General Industry regulation 29 CFR 1910.95.

**Flagger Certification/Work Zone Safety - 10/23:** RI Local Technical



Assistance Program (RILTAP) conducted this training for two new NBC employees. This training is required for Interceptor Maintenance, Environmental Monitoring, Pretreatment, and E&I Technicians upon initial hire and every 4 years thereafter. Upon completion, these employees become certified Flaggers through the American Traffic Safety Services

Association (ATSSA) and are authorized by NBC to setup and control temporary work zones on secondary roads throughout NBC's District. Training is conducted in accordance with the USDOT's Manual of Uniform Traffic Control Devices (MUTCD).

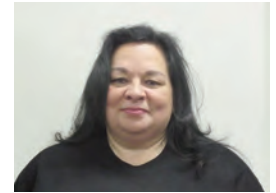
## Welcome

**Lydia Clifford**  
Chemist



Lydia hails from Coventry and enjoys reading and playing volleyball. Her favorite ice cream flavor is coffee and she hopes to one day travel to Italy!

**Aida Lyon**  
Customer Care Representative



Aida loves to bake for her daughter Sofia and husband Dereck. She's a fan of strawberry ice cream. Her motto is "No one loves you more than your mother!"

**Todd Paschoal**  
Maintenance Supervisor



Todd is from Swansea, MA. He has 2 children and enjoys playing softball and going to the gym.

**Jefferson Polanco**  
Operator I FP



Jeff ("Jeffy") is from the Dominican Republic, where his family helped found his hometown. He enjoys being out in nature and once hiked a huge rock in Columbia. Still on the bucket list: seeing Adele live.

**David Trudeau**  
Maintenance Supervisor



David has 4 children and 6 grandchildren (and one on the way!). In his spare time he likes to cook and take part in barbeque competitions. The best advice he's ever received is "Always smile!"

*continued on page 4*



Throughout October and November, **nearly 1000 people** came for tours at Field's Point and Bucklin Point. The visitors included a bunch of elementary school students, architecture students from RISD, environmental students from Brown, urban planners from Columbia University in New York, a LEGO robotics team, a magazine photographer, and a group of fellows from the National Oceanic and Atmospheric Administration. Every person who toured was impressed by the important work done at the NBC and the professionalism of the staff.

A big THANK YOU to the staff of both WWTFs for their hospitality and assistance. You are true H2O Heroes!

## NBC on YouTube

Have you checked out NBC's YouTube Channel lately? Head over to @BayCommission on YouTube to view the real-time breakthrough of the Pawtucket CSO tunnel, see some cool underwater video, or watch the award-winning virtual tour *NBC Water Works!*



Narragansett Bay Commission: Pawtucket Tunnel Breakthrough



Narragansett Bay Commission: Water Works!

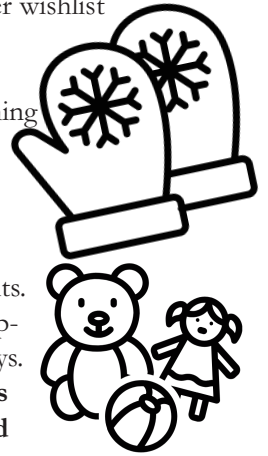
## Holiday Donations to Children's Friend

This year, the NBC will collect toys, clothing, and other wishlist items for the **Children's Friend Spirit of Giving Holiday Drive**.

The Spirit of Giving Holiday Drive provides clothing and toys to children and families in Rhode Island who need our help. The Children's Friend Spirit of Giving Holiday Drive is unique from other toy and donation drives this time of year because Children's Friend is actively involved with every child or family who benefits. Children and their families will continue receiving wrap-around support from the agency, even after the holidays.

**The NBC will collect winter coats, gloves, hats scarves, boots, and warm socks as well as toys and books for children of all ages.**

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



On Wednesday, November 27, Bucklin Point staff gathered to celebrate the retirement of Heavy Equipment Operator John Dufresne.

John joined the NBC in July 1995. John exhibited his caring and welcoming personality every day and was well-loved by his co-workers. In his retirement, he will hopefully explore his hobbies of antique cars and racing.

Happy retirement, John! Thank you for your service to clean water!

*Photo credit: Marc Pariseault*

## Casual Day Fund Giving & Raffle



Over the past several months the Casual Day Charitable Giving Fund has made donations to MADD, the Gloria Gemma Breast Cancer Research Foundation, and T1D (formerly the Juvenile Diabetes Research Foundation) as requested by Fund participants to aid these important organizations in their missions.

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 new Administration and Maintenance Buildings are completed and occupied and work is ongoing on the final clarifiers and UV disinfection upgrades that will make Bucklin Point more resilient and prepare the facility for increased flows once the Pawtucket CSO tunnel goes on line.

The top photo shows the outline of new final clarifier number 7. At the end of November, the contractor completed installing 233 micropiles that will support the clarifier. The micropiles are drilled into bedrock and are designed to support a compressive load of 160,000 lbs each. The next step is to install the 48" mixed liquor piping beneath the base slab of the clarifier. Concrete work for the clarifier is expected to start in January 2025.

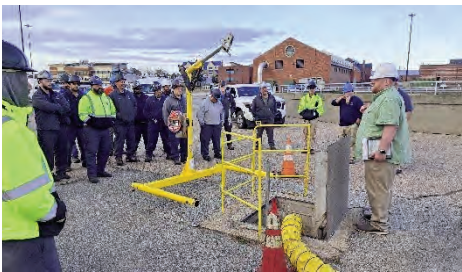
The bottom photo shows the status of the concrete work associated with the new UV building. The structure is approximately 75% complete; the next major activity after the completion of the concrete work is the erection of the structural steel which is scheduled to start in January 2025. The new UV equipment was recently shop tested and delivered to Bucklin Point.

Representatives from CDM Smith and NBC traveled to Trojan Technologies in Ontario Canada to witness the testing.

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



## Safety Corner, continued



**Confined Space Field Training** - 10/3 & 11/5: Cintas conducted this on-site training for 113 employees included in NBC's Confined Space Program. This is an annual training requirement for NBC employees who physically enter confined spaces or are required to serve as part of an entry team that is planning a confined space entry. Training topics covered include fall protection, atmospheric testing and control, hazard identification and mitigation, NBC permit completion, and non-entry emergency rescue. Training is conducted in compliance with OSHA General Industry regulation 29 CFR 1910.146.

**HAZWOPER Training** – 11/13 – 11/15: Ocean State Safety Training conducted this training for 3 new employees in NBC's HAZWOPER Training Program. This 24-hour training is required upon initial hire for Pretreatment, Environmental Monitoring, and Laboratory employees and requires an annual 8-hour refresher component. Employees in NBC's HAZWOPER Program are trained to notify emergency response personnel, and then respond to chemical releases for the purpose of stopping the release, if safe to do so. Training is conducted in compliance with OSHA General Industry regulation 29 CFR 1910.120.

**EHS on Tap: CPR/AED & First Aid Certification** – 12/3. Register through the link on the Bay Academy calendar or contact Dave Aucoin at x 418 for assistance. Space is limited!

—submitted by Dave Aucoin

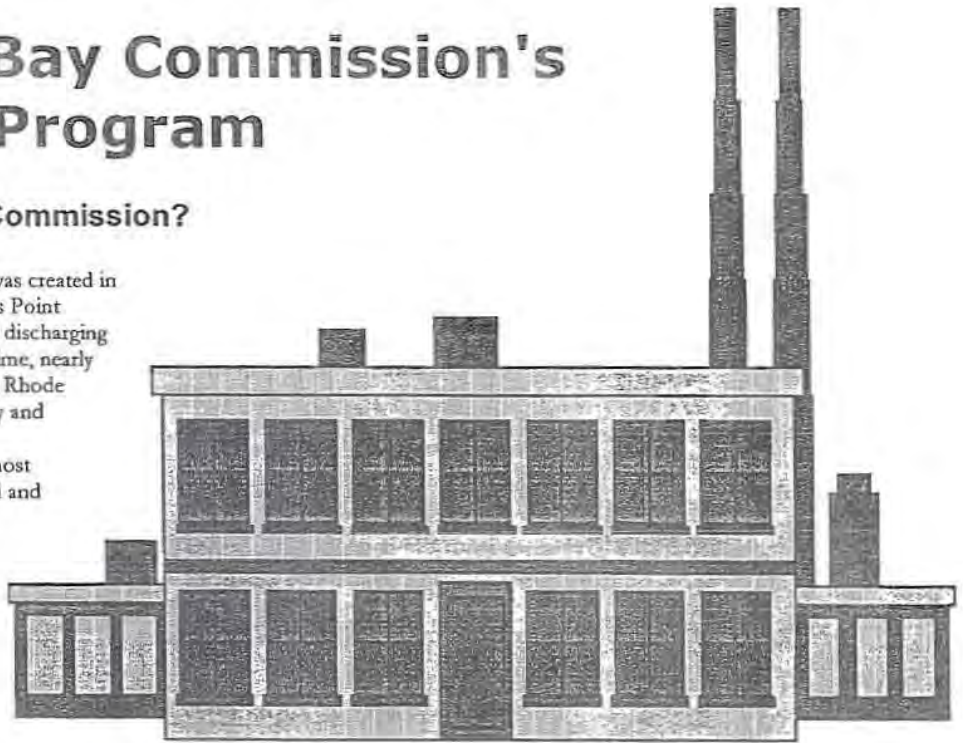
# ***EDUCATIONAL DOCUMENTS***

# Narragansett Bay Commission's Pretreatment Program

## What is the Narragansett Bay Commission?

The Narragansett Bay Commission, or the NBC, was created in 1980 to reduce the amount of pollutants the Field's Point Wastewater Treatment Facility, in Providence, was discharging into Narragansett Bay and its tributaries. At that time, nearly 65 million gallons of untreated sewage flowed into Rhode Island's waterways everyday, resulting in temporary and permanent closures of shellfishing beds in Upper Narragansett Bay, violations of federal laws, and most importantly, threatened the region's environmental and economic well-being. The NBC acquired the facility from the City of Providence in 1982, and has spent the last decade transforming the once failing, antiquated facility into the highly sophisticated, award winning facility it is today.

In 1992, the NBC assumed ownership of the Bucklin Point Wastewater Treatment Facility in East Providence. The NBC now owns and operates the state's two largest wastewater treatment facilities and provides quality wastewater collection and treatment services to about 300,000 persons and 8,000 commercial and industrial customers in Providence, North Providence, Johnston, Pawtucket, Central Falls, Cumberland, Lincoln, the northern portion of East Providence and small sections of Cranston and Smithfield.



## What is the purpose of a Pretreatment Program?

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

Depending upon what kind of business or industry is discharging into the system, certain substances can do a lot of damage to the sewer system, the wastewater treatment facility, the environment and, ultimately, to people. The discharge of metals and other toxics into the sewer system jeopardizes the health and safety of NBC personnel, clogs sewer lines, can be extremely toxic, if dumped in high concentrations, and can mix with other chemicals to form toxic gases in the sewer system.

Heavy metals and other toxics interfere with the operation of the wastewater treatment process by upsetting the biological process at the facilities and killing the microorganisms needed for proper treatment. This prevents the NBC from meeting its effluent limits that are established by EPA and RI DEM. Approximately 40 to 60 percent of the heavy metals and toxics in wastewater can settle out in the sludge, contaminating the sludge, and preventing its reuse, while the remainder of the toxics empty into Narragansett Bay and its tributaries. Once this happens, marine life is exposed to toxic substances, which may enter the food chain and eventually expose people to these toxic substances. While our mission at the NBC is to protect the environment, our top priority is to protect human health. Our pretreatment program helps us accomplish this goal.

## How effective is the Pretreatment Program?

To date, this program has had a major positive impact on the quality of treatment and discharges from the Field's Point and Bucklin Point facilities. By taking steps to permit, monitor and regulate the thousands of sewer users in the NBC District, the NBC has dramatically reduced the amount of metals and toxics being dumped into the sewer system and ultimately into Narragansett Bay. For example, in 1981, local industries discharged 954,099 pounds of heavy metals and 80,440 pounds of cyanide to the Field's Point Wastewater Treatment Facility. Data for 2006 indicates that significant reductions in metals (96.6%) and cyanide (96.7%) were achieved. Additionally, nearly 95.6% of all our regulated users are adhering to these environmental regulations.

## Why do I have to pay sewer user fees and permit fees?

Sewer user fees are necessary for the NBC to recover the cost to transport and treat wastewater discharged from commercial, industrial, and residential users. The user fees are based, in part, on the amount of water discharged to the sewer system and are regulated by the Public Utilities Commission (PUC). Part of the fee charged to users is a fixed amount, the other part is based on how much water is used. By conserving water, a sewer user can reduce the portion of the fee associated with the amount of water used.

In May, 1990, the PUC issued an order requiring that the expense of the NBC's Pretreatment Program must be paid for entirely by the permitted user. These permit fees are necessary to recover costs associated with satisfying all EPA and State mandates and to ensure the protection of the treatment facilities and Narragansett Bay. The rates charged are PUC approved and cover the cost of program administration, facility inspection and facility sampling conducted by the NBC.

## How were permit fees determined?

Discharge permit fees range from \$217 - \$14,492 per year. Individual rates are based on the effort necessary for the NBC to regulate a user. The level of effort is dependent on the size of a facility, the volume of discharge, the toxicity of the chemicals used, etc. Budget plans are available for any business demonstrating financial hardship. Simply contact the NBC Customer Service Section at 461-8828 to discuss a budget payment plan.

## What if I don't get a permit?

Failure to apply for a wastewater discharge permit may subject you to administrative, civil and/or criminal penalties of up to \$25,000 per violation per day and you may lose your privilege to discharge into the NBC sewer system. The NBC is strict about the enforcement of this requirement because we need to know what is going into the sewers so we can protect our treatment facilities and the bay. Further, inconsistent permitting would be unfair to other permitted users and ultimately increase the cost to all other users.

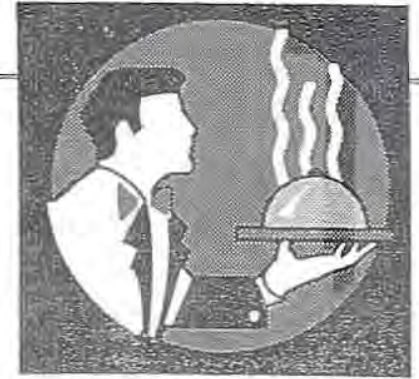
## What if I need technical assistance?

The NBC has available free, non-regulatory technical assistance through its Environmental, Safety & Technical Assistance (ESTA) Section, formerly known as Pollution Prevention. Pollution prevention is any practice that reduces or eliminates the amount of hazardous materials entering a waste system. Elimination of pollution at the source will not only help you remain in compliance with discharge standards, but will save you money by taking full advantage of all your resources. Pollution Prevention engineers and chemists are available to assist you incorporate the latest source reduction technologies into your manufacturing operations. We will evaluate your operating procedures and general practices and recommend alternatives, such as chemical substitution, that will generate less waste without sacrificing quality production. This program is confidential; no regulatory repercussions will occur by taking advantage of this program. If you wish to have NBC's ESTA staff visit your facility, or if you wish to find out more about this program, please contact James McCaughey, P.E., Environmental, Safety & Technical Assistance Manager, at 461-8848 ext. 352. This program is meant to be one alternative or a step a business can take to meet pretreatment requirements. It may be necessary for a business to seek additional professional guidance from an outside consultant.

## What if I have more questions?

Ask us. The NBC has well-trained and capable chemical engineers, technicians and others who would be happy to answer any questions or concerns you may have regarding your permit, or any other program relating to the NBC. For questions regarding the Pretreatment Program, please contact Kerry M. Britt, Pretreatment Manager at 461-8848 ext. 490. For other questions, contact our Public Affairs Office at 461-8848/TDD 461-6540 or email at [jsamons@nartabay.com](mailto:jsamons@nartabay.com).

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



## *What is the Narragansett Bay Commission?*

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

## *What is the purpose of a Pretreatment Program?*

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

## *What is a Grease Removal Program?*

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

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

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

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

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

## *How can grease discharges be controlled and minimized?*

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

## *What is a GRU?*

A GRU is a device designed to collect

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

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

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

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

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

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

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

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

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

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

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

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

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

*What is required by the Wastewater Discharge Permit?*

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

*What if I have more questions?*

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



# NARRAGANSETT BAY COMMISSION



## ENVIRONMENTAL

BEST

MANAGEMENT  
PRACTICES

*for*

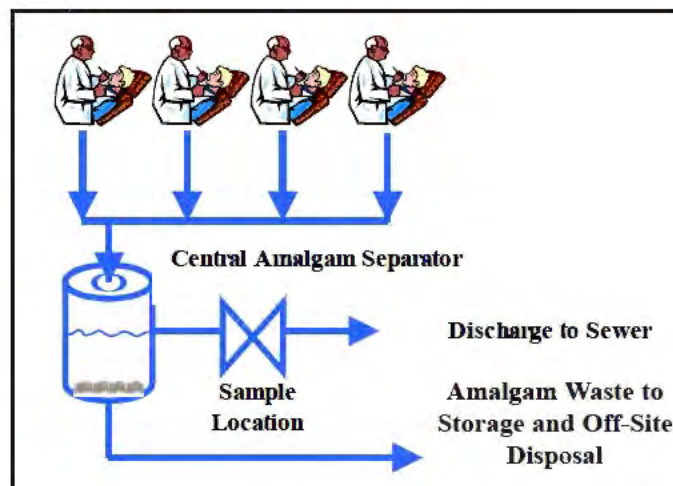
## the Management of Waste Dental Amalgam

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



## NBC BMP Implementation with the Installation of an Amalgam Separator

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



*Typical wastewater plumbing diagram for dental office with an amalgam separator*

## Specific Requirements for NBC Dental BMP Option

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

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

*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.*

## 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.

# 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](http://www.narrabay.com)  
[www.epa.gov/mercury/index.html](http://www.epa.gov/mercury/index.html)  
[www.state.ri.us/dem](http://www.state.ri.us/dem)  
[www.newmoa.org](http://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](http://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

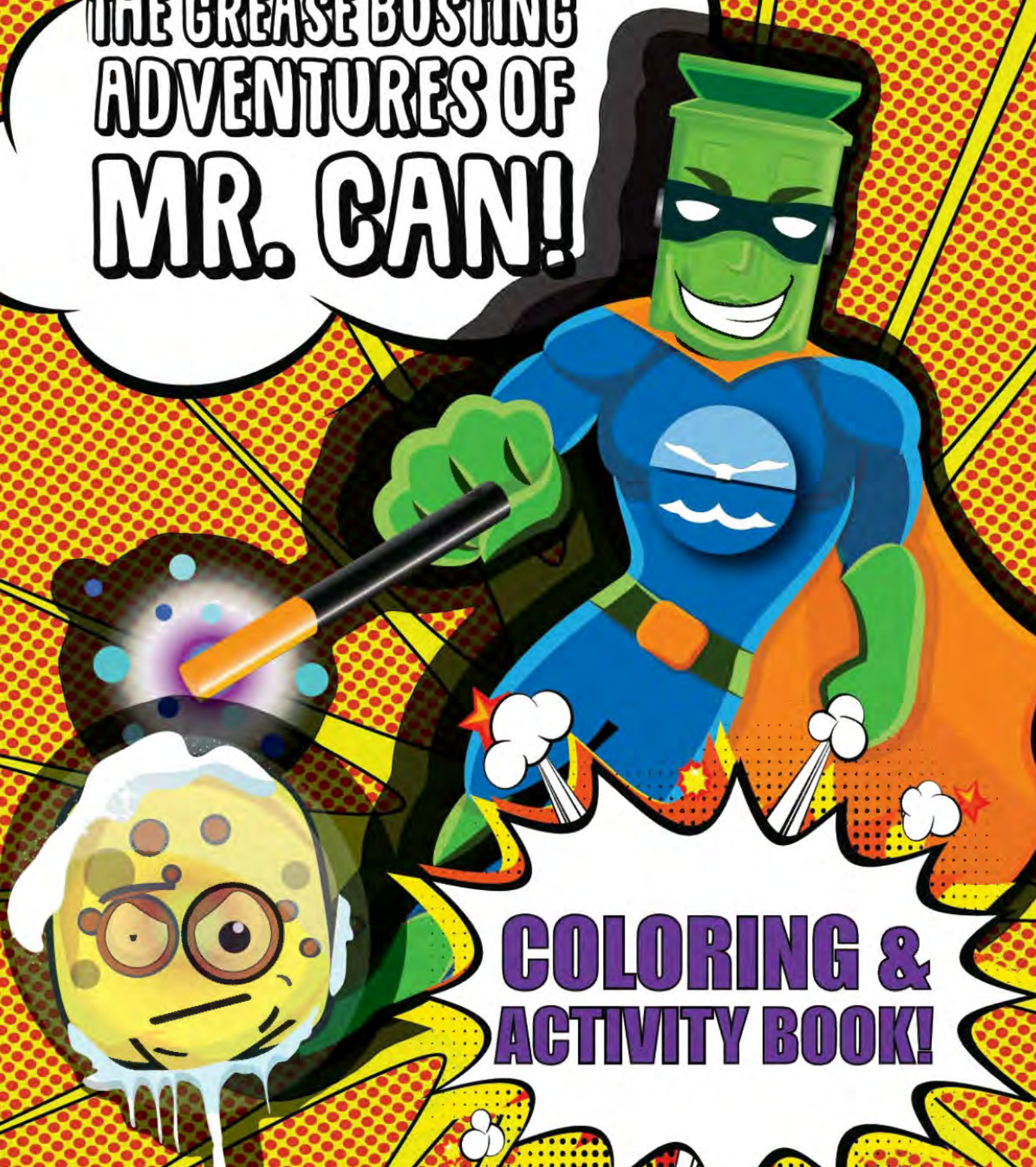
One Service Road, Providence, RI 02905

[www.narrabay.com](http://www.narrabay.com)





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



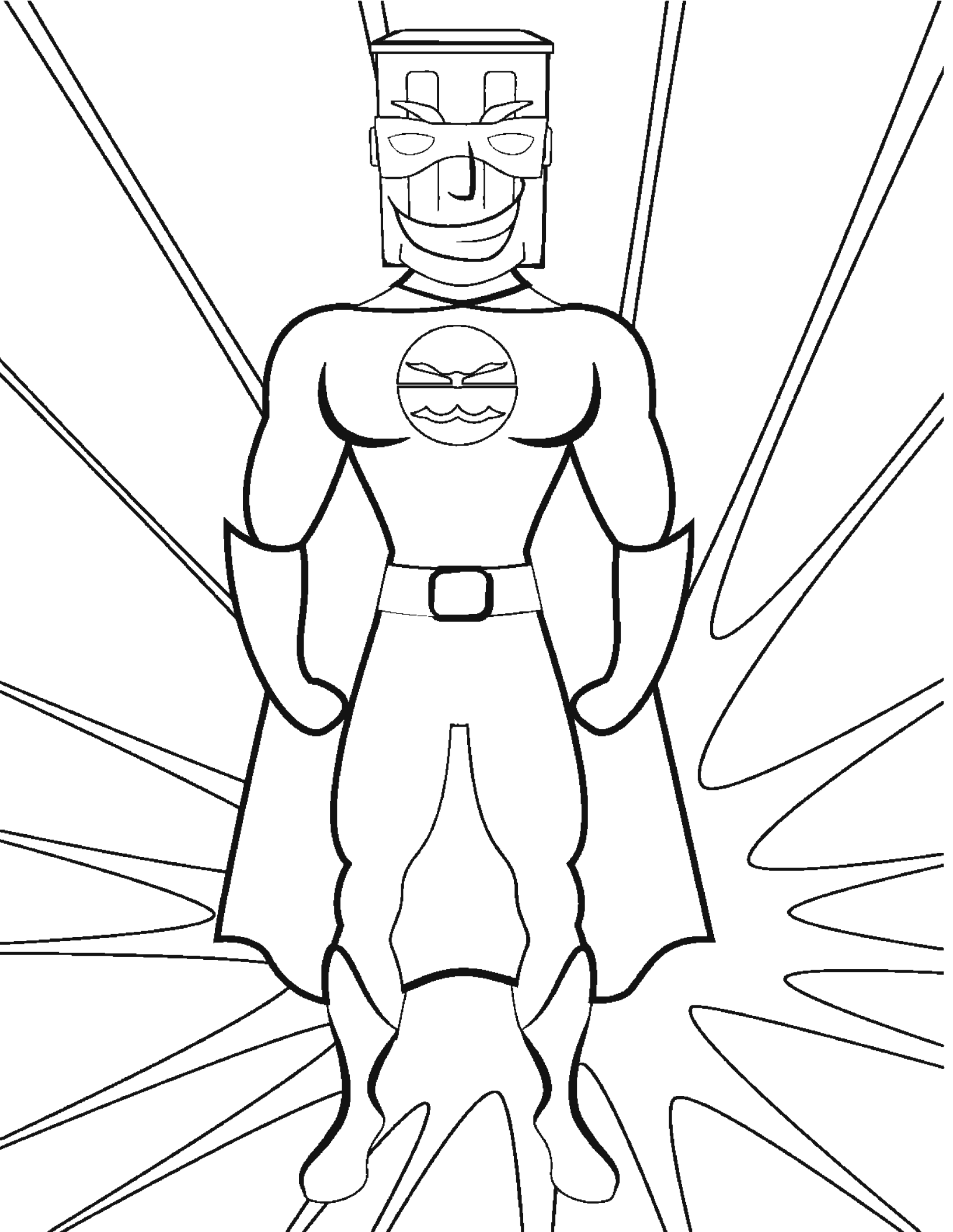
**COLORING &  
ACTIVITY BOOK!**

**COOL IT  
& CAN IT!**



\_\_\_\_\_

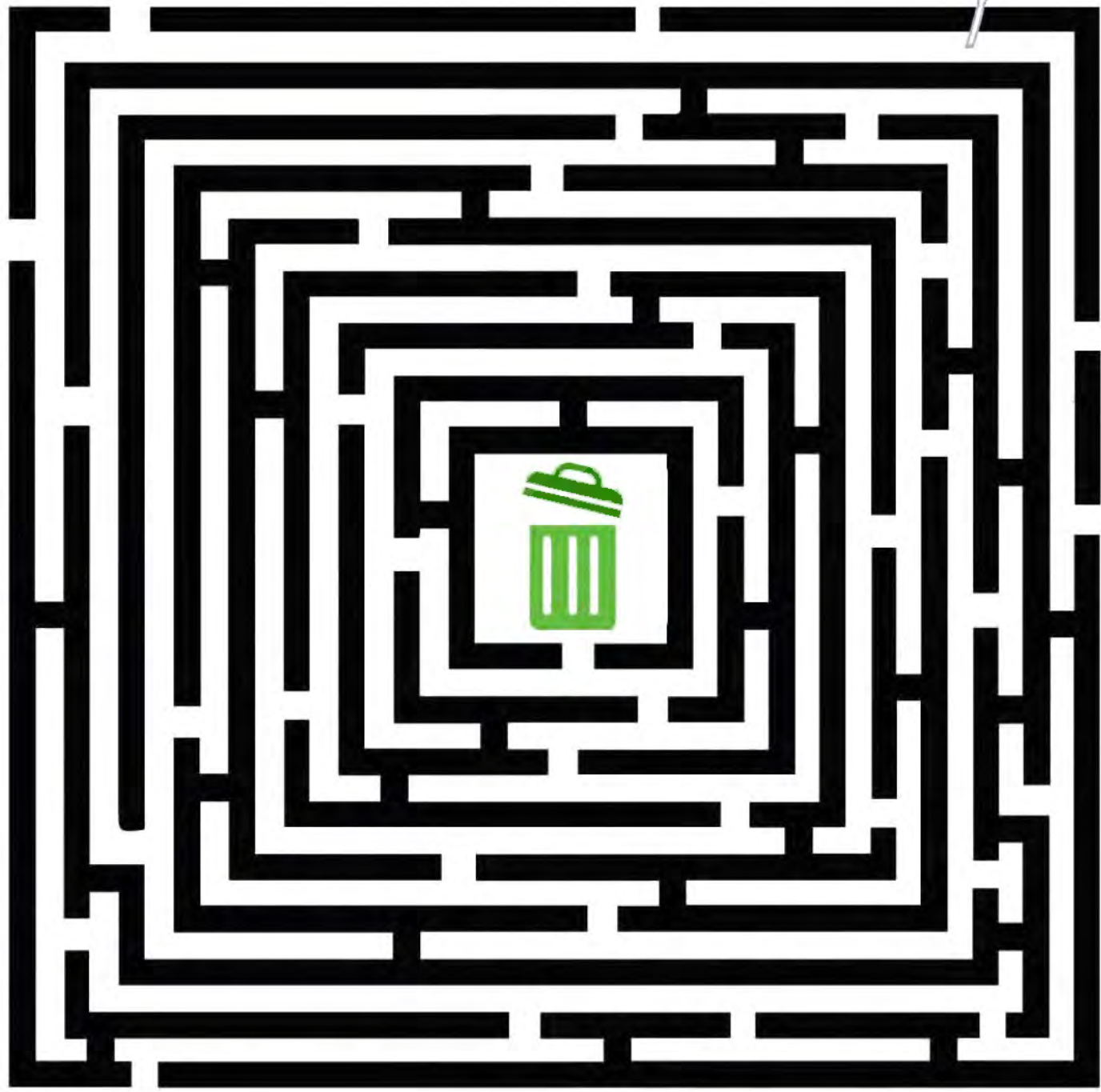
**Pledge to COOL IT & CAN IT and  
help Mr. Can share the message  
of proper grease disposal!**



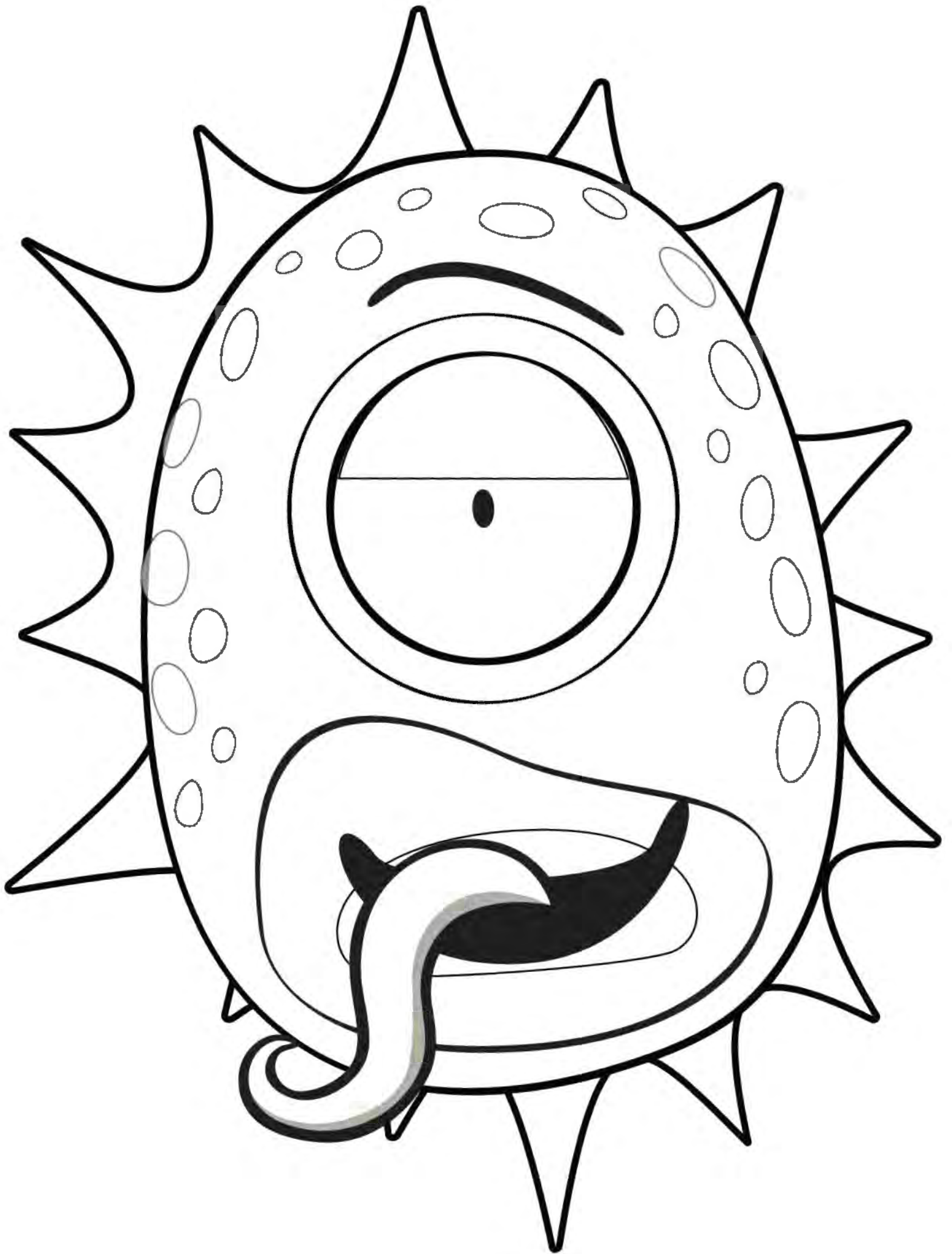
# GUIDE THE GREASE!



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



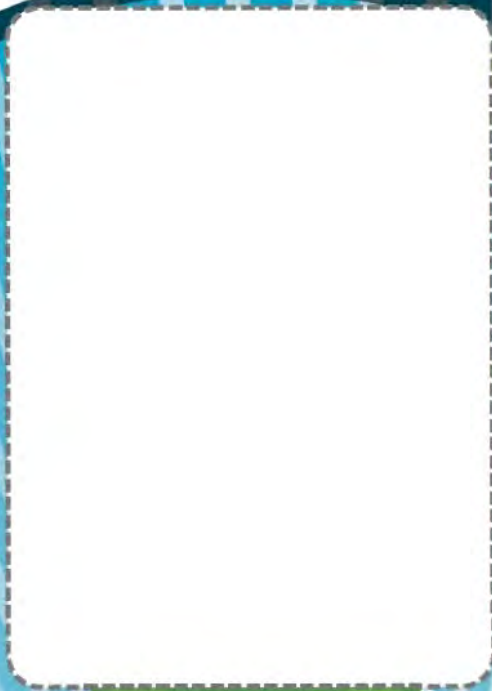






# SUPER HERO FACE SWAP!

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







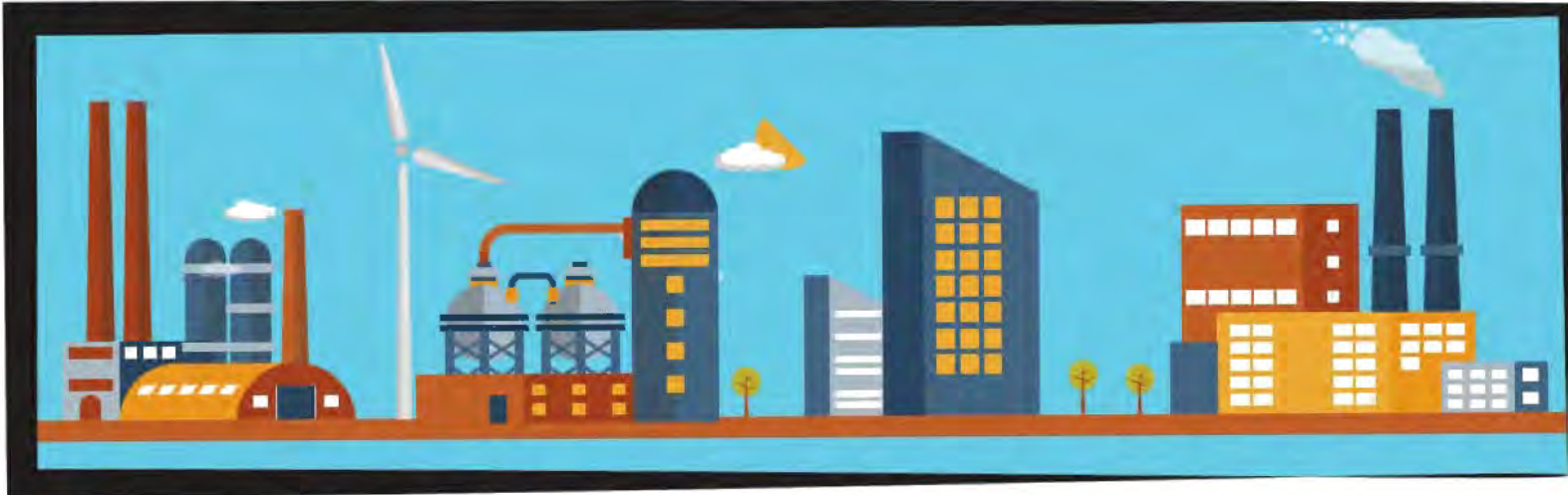


WASTEWATER TREATMENT FACILITY IMAGE 1

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



WASTEWATER TREATMENT FACILITY IMAGE 2





**ZAP!!**



LARD  
VEGETABLE OIL

DRIPPINGS  
GREASE

MR. CAN  
NBC

WATER  
COOL IT

CAN IT  
NARRAGANSETT BAY

**LGNMXIARCANITTSNAAT  
LRKBGNVEGETABLEOILA  
LEDECBLIWIWATEROETS I  
AACOOLITVDRIPPIN GSM  
RSTIVNADSNXMRCA NP H  
DET NARRAGANSETT BAY**





# DRAW COMIC STYLE!

## STEP 1

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



## STEP 2

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



# DRAW COMIC STYLE!

## STEP 3

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

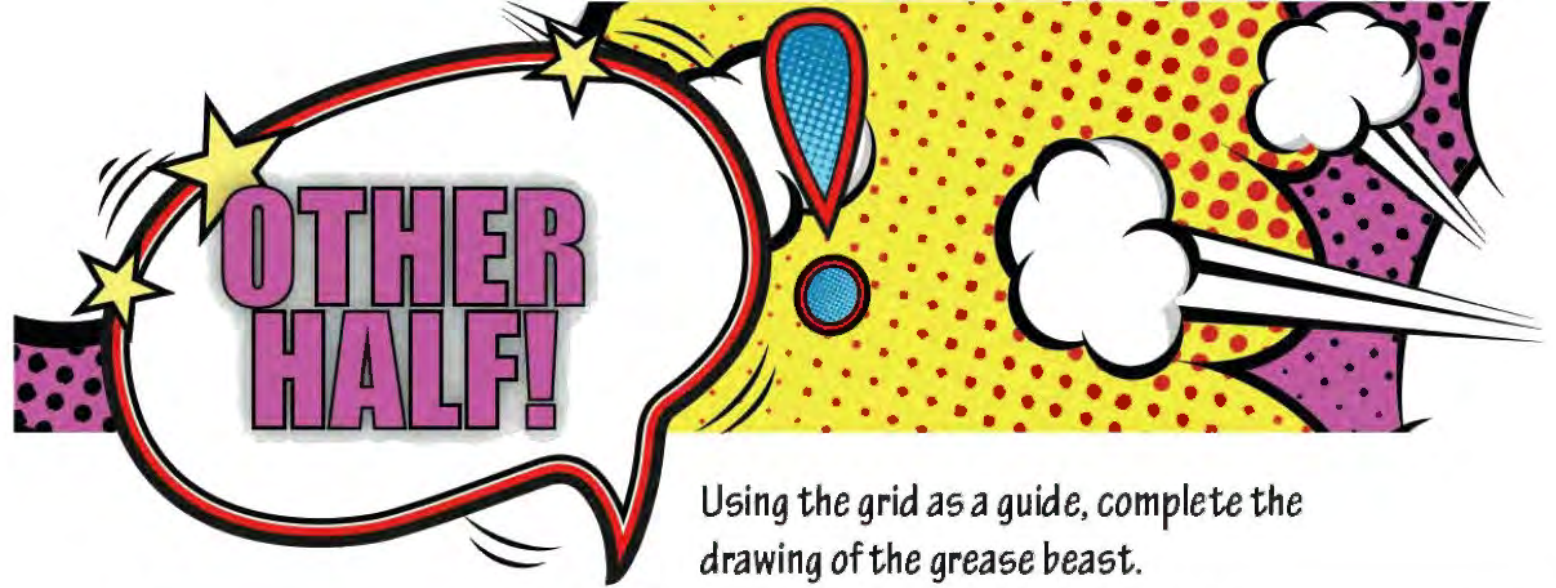


## STEP 3

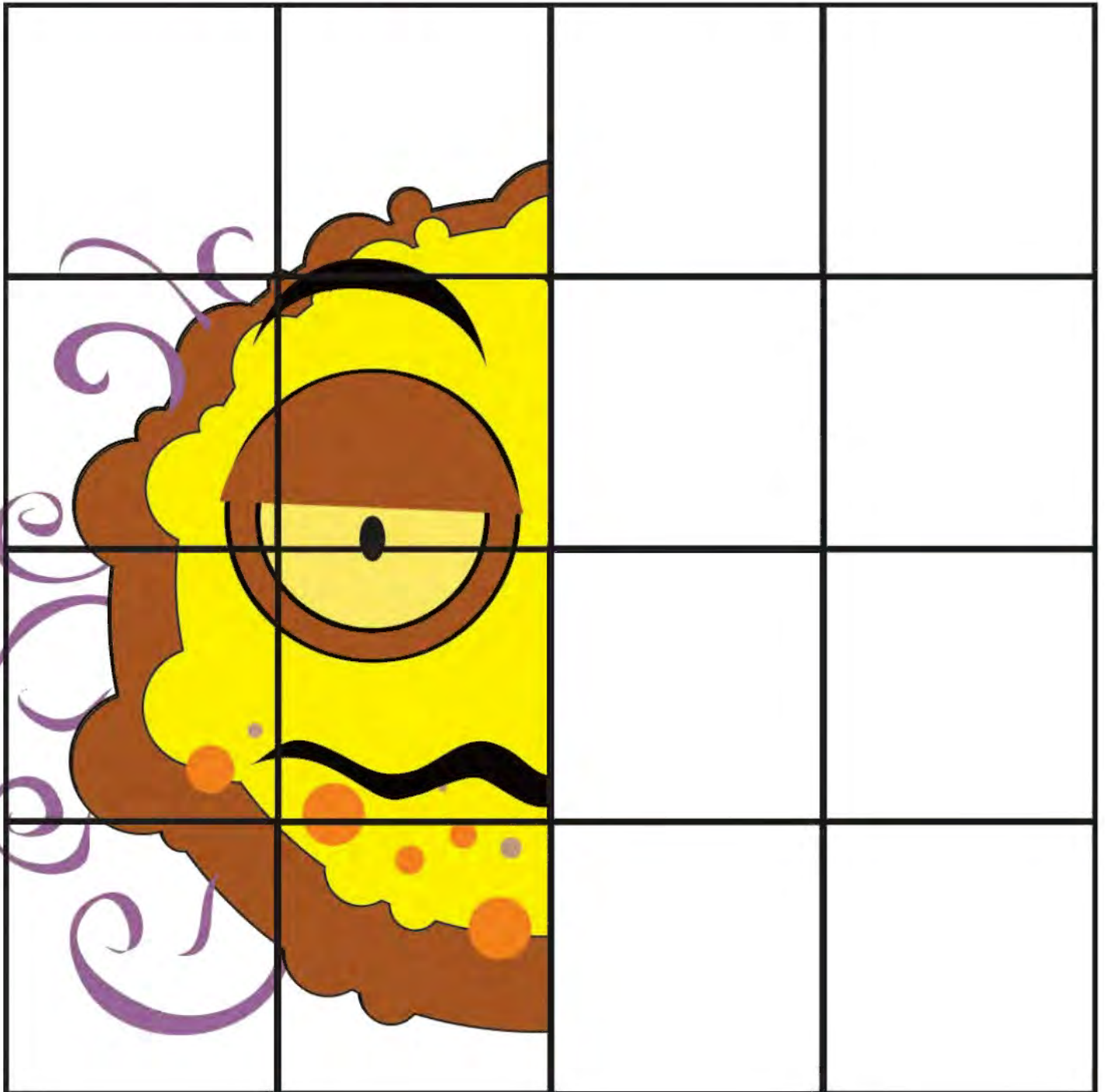
Use a heavier pencil to add more detail and shadow. Go over the drawing in black ink pen or marker, then color your super hero in bright, comic-book colors!



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



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



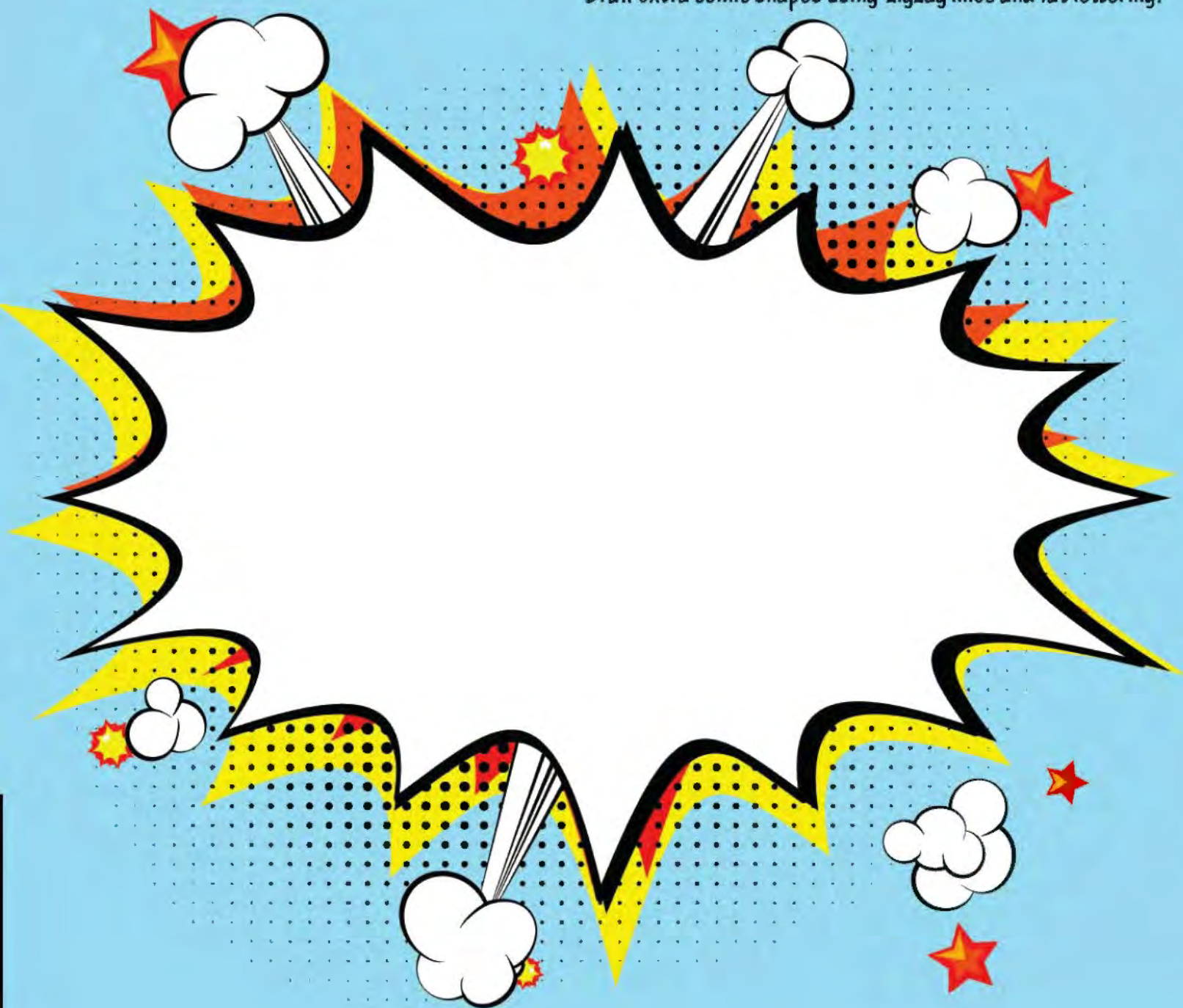






# COMIC STRIP ADVENTURE!

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





**COOL IT  
& CAN IT!**

**[www.narrabay.com](http://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:

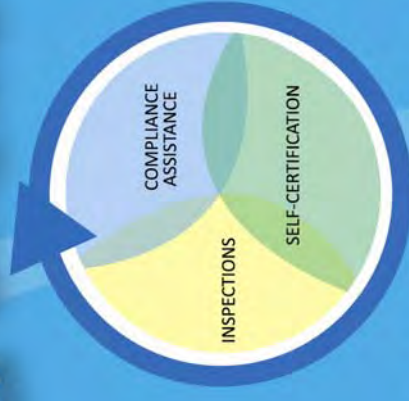
- On-site Technical Assistance
- Workshops
- Development and use of FOG Best Management Practices (BMPs)
- FOG management "Self-Evaluations"
- Compliance Inspections
- FOG data collection and analysis



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.



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.

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

### 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](http://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](http://RestoredWatersRI.com/blasting)



***ATTACHMENT VOLUME I***

***SECTION 2***

***TYPICAL NBC WASTEWATER  
DISCHARGE PERMITS***

***TYPICAL METALFINISHER  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: B1112-100-0929

Company Name: **TANURY INDUSTRIES PVD, INC.**

Facility Address: 7 New England Way, Lincoln, RI 02865

Mailing Address: 6 New England Way, Lincoln, RI 02865

Facility President: Mr. Michael Akkaoui

Facility Authorized Agent: Mr. Christopher Tremblay

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. Michael Akkaoui and Tanury Industries PVD, 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 16 pages with conditions A - W.

**This permit becomes effective on October 1, 2024  
and expires on September 30, 2029.**

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 17, 2024  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 16, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee agrees that the average discharge per calendar day of metal finishing process wastewater is less than 2,500 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 the only cyanide bearing solutions used in the facility are recycled through a zero discharge system. The NBC effluent discharge limitations for Total Cyanide are more stringent than the EPA Total Cyanide limitations at the final effluent. Therefore, the NBC Total Cyanide limitations will be enforced at the final discharge location.

## **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Ultrasonic Cleaner Solutions;
  - b. Treated Galvex Cleaner;
  - c. Physical Vapor Deposition (sputtering) 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. Concentrated Electroplating Solutions;
  - b. Concentrated Cyanide Solutions;
  - c. Metal Finishing Rinsewater;
  - d. Compressor Condensate;
  - 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 batch discharging the contents of the pH adjust tank without first obtaining approval from the NBC. In order to obtain approval, the contents of the pH adjust tank must be sampled in accordance with Section F(2) 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 16, 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 one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - The sample port on the discharge line of the pH adjust tank, collecting all process discharges specified in Section B(1) (a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee has installed and shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

#### **E. Zero Discharge/Recycle Operation Requirements:**

1. The permittee has installed and 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 purpose of recycling wastewater or eliminating discharges from the following process operations:
  - a. Metal Finishing Rinsewaters;
  - b. Gold Strip;
  - c. Compressor Condensate.

2. The permittee shall make no changes to the metal finishing rinsewater tanks, gold strip process tanks, the metal finishing rinsewater recycle system, or the gold strip 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 the metal finishing rinsewater or gold strip operation to the sewer for the purpose of discharging any process wastewater streams from the metal finishing rinsewater operation or the gold strip operation, the permittee must notify the NBC, in writing and obtain written approval from the NBC before resuming discharges from the metal finishing rinsewater or gold strip operation 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 metal finishing rinsewater and gold strip operation vicinities and no process wastewater from the metal finishing rinsewater and/or gold strip operation 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 from the metal finishing rinsewater recycle system or the gold strip operation 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.

**F. Monitoring Requirements:**

1. The permittee shall monitor the final pH and volume of each treated batch discharge and shall record the data in the pretreatment system logbook referenced in Section G 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. Prior to batch discharging the contents of the treated solution in the pH adjust tank, the permittee must collect two grab samples directly from the sample port on the discharge line of the pH adjust tank, Sample Location #1. The first grab sample must be collected, preserved, and analyzed in accordance with all EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Silver (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)
	Nickel (Total)	



The second 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. The preserved grab sample must be refrigerated until analysis and must be analyzed within fourteen (14) days of collection for **Total Cyanide**.

The analytical results must be submitted to the NBC along with a properly completed Self-Monitoring Compliance Report (SMCR) and chain of custody documentation requesting permission to batch discharge the pH adjust tank. The permittee may only batch discharge the contents of the pH adjust tank once approval is received from the NBC. The permittee must discharge the entire contents of the pH adjust tank within five days of receiving NBC approval and the date of the discharge must be recorded in the pretreatment logbook as required in Section G(1)(d) of this permit.

3. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of sampling and at the end of sampling. These readings and the resultant total flow are to be submitted with the sampling results.
4. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
5. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding BOD, TSS and pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.

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.

### **G. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
  - a. Amount of chemicals used on a monthly basis to provide pretreatment;
  - b. Amount of sludge generated on a monthly basis;
  - c. Completed manifest forms for hazardous materials;
  - d. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred;
  - e. The amount of chemicals added to provide pretreatment of batch discharges;
  - f. 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.

## **H. Spill and Slug Prevention Control Plan:**

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

## **I. Toxic Organic/Solvent Management Plan:**

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

## **J. Emergency/Routine Notification Requirements:**

### 1. Emergency Notification of Accidental/Incidental Discharge

**In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR §403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

### 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

### 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. Chemical feed pump failure;
- c. Pretreatment system pump, filter, or mixer failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

## **K. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

**L. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

**M. Authorization To Do Business:**

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Tanury Industries PVD, Inc. shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Tanury Industries PVD, 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 Tanury Industries PVD, 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 Tanury Industries PVD, Inc. shall be subject to the terms and conditions of the permit as if named herein.

**N. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

**O. Transfer of Permit Prohibited:**

Wastewater Discharge Permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

## **P. Permit Violations:**

### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other State or Federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

## **Q. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable State or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:

- a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
- b. Failure to report changes in operations or wastewater constituents;
- c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this Wastewater Discharge Permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay all associated fees, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The NBC shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the Wastewater Discharge Permit.

## **R. Civil and Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

## **S. Duty to Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

## **T. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **U. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;
  - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
  - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.



The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

## **V. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

## **W. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

KCG:MM:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Batch pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- List of Toxic Organic Compounds

**Table 1**

**NBC Effluent Discharge Limitations**  
**Bucklin Point District**

All parameters in mg/l unless otherwise specified

<b>Parameter</b>	<b>Limitation (Max)</b>
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 <sub>5</sub> )	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:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300**
32	Ammonia	300**

\* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

# CERTIFICATE TO DISCHARGE

the following types of process water:

**TREATED CLEANING SOLUTIONS AND NON-CONTACT COOLING WATER**

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Tanury Industries PVD, Inc.

7 New England Way

Lincoln, RI 02865

**PERMIT NUMBER:** B1112-100-0929

**PERMIT EXPIRATION DATE:** 09/30/2029

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 17, 2024  
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

<b>Parameter</b>	<b>Limitation (Max)</b>
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 <sub>5</sub> )	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:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
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**

<b>Subpart D</b>		
<b>PSNS for Mixing, Compounding, and Formulating Subcategory D</b>		
<b>Pollutant or Pollutant Property</b>	<b>Maximum for Any One Day (mg/L)</b>	<b>Maximum for Monthly Average (mg/L)</b>
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**

<b>Sample Location #1</b>		
<b>Effluent Monitoring Station</b>		
<b>Month</b>	<b>Grab Sample</b>	<b>Parameters</b>
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: B1506-018-0428

Company Name: **TIFFANY AND COMPANY**

Facility Address: 300 Maple Ridge Drive, Cumberland, RI 02864

Mailing Address: 300 Maple Ridge Drive, Cumberland, RI 02864

Facility President: Mr. Anthony Ledru

Facility Authorized Agents: Mr. Christopher Lepore, Ms. Michelle Park, Mr. Steven Saulen,  
Mr. Robert Alley

User Classification: Non-Ferrous Precious Metal Forming Operations

Categorical Standards Applicable: 40 CFR §471.45, Pretreatment Standards for New Sources

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Anthony Ledru and Tiffany and Company** hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 21 pages with conditions A - W.

**This permit becomes effective on May 1, 2023  
and expires on April 30, 2028.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

April 25, 2023  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 17, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee is classified as a non-ferrous precious metal former and, therefore, must at all times comply with EPA Categorical Regulations 40 CFR §471.45, Pretreatment Standards for New Sources. EPA regulations require that non-ferrous precious metal formers maintain production and flow data to ensure full compliance with categorical limitations for cadmium, copper, cyanide, and silver. Table 2 attached to the permit provides concentration based limits calculated from EPA production based limitations and facility production and flow data. The calculations are outlined in Attachment A. Since the EPA limitations in Table 2 are more stringent than the NBC limitations in Table 1, the EPA limitations will be enforced at the final discharge location. Local limitations will be enforced for all other parameters as categorical limitations do not apply.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Pickling Rinsewaters;
  - b. Treated Backwash from Filters;
  - c. Treated Investing Wastewaters;
  - d. Treated Divesting Wastewaters;
  - e. Treated Sanding and Grinding Area Floor Spills;
  - f. Treated Wastewater Treatment Room Floor Spills;
  - g. Treated Hand Wash Sink Wastewaters;
  - h. Treated Annealing Quench Contact Cooling Water;

- i. Treated Shot Casting Contact Cooling Water;
  - j. Non-Contact Cooling Water;
  - k. Air Compressor Condensate;
  - l. Eye Wash Station Discharge.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Concentrated Pickling Solutions;
  - b. Mass Finishing Wastewaters;
  - c. Soak Cleaner Solutions;
  - d. Soak Cleaner Rinsewaters;
  - e. Ultrasonic Cleaner Rinsewaters;
  - f. Ultrasonic Cleaner Solutions;
  - g. Wet Air Scrubber Wastewater;
  - h. Casting Department Chiller Unit Solutions;
  - i. Stamp & Strike Annealing Oven Non-Contact Cooling Water;
  - j. Wet Grinding/Sanding Wastewaters;
  - k. Filtered Polishing Wastewaters;
  - l. Cooling Tower Discharges;
  - m. Electroplating Solutions;
  - n. Acetone Dip Tank Solutions;
  - o. Isopropyl Alcohol;
  - p. Isopropyl Alcohol-Castor Oil Solutions;
  - q. Concentrated Cyanide Solutions;
  - r. Acidic Solutions with a pH less than 5.0 standard units;
  - s. Caustic Solutions with a pH greater than 11.0 standard units;
  - t. Degreasing Solutions;
  - u. Solvents;
  - v. Sludges;
  - w. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 17, attached hereto and incorporated herein.

3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

#### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of two (2) sample locations must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the final pH adjustment tank, collecting all process discharges specified in Section B(1) (a through j) of this permit.

Sample Location #2 - Sample port on the discharge line of the oil/water separator in the Mechanical Room, collecting all process discharges specified in Section B(1)(k) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Locations #1 and #2 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit. The discharge through Sample Location #1 must be in compliance with the EPA Non-Ferrous Precious Metal Former Standards referenced in Section A(4) and Table 2 of this permit.

2. The permittee shall install, operate, and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

## **E. Zero Discharge/Recycle Operation Requirements:**

1. The permittee shall operate and maintain a Zero Process Discharge Wastewater Recycle Pretreatment System as illustrated in the plans that have been received by the NBC. This system shall be used specifically for the purpose of recycling wastewater or eliminating discharges from the following operations:
  - a. Ultrasonic Cleaner Rinsing Operations;
  - b. Soak Cleaner Rinsewaters;
  - c. Mass Finishing Wastewaters;
  - d. Casting Department Chiller Units;
  - e. Wet Grinding/Sanding Operations;
  - f. Filtered Polishing Operations;
  - g. Polishing Department Cleaning Lines;
  - h. Solvent Cleaning Unit Operations;
  - i. Annealing Oven Non-Contact Cooling Water;
  - j. Castor Oil-Isopropyl Alcohol Operations;
  - k. Acetone Dip Tank Operations;
  - l. CNC Cooling Oils.
2. The permittee shall make no changes to the process tanks or zero discharge system without first submitting plans to the NBC for approval. Only those solutions indicated as being discharged to the zero discharge system on the plans received by the NBC on dates referenced in Section E(1) above may be treated on-site in the pretreatment equipment.
3. If any problems with the zero discharge systems arise, or if the permittee would like to connect to the sewer for the purpose of discharging wastestreams referenced in Section E(1) above, the permittee must notify the NBC, in writing, and obtain written approval from the NBC before resuming discharge or making any physical changes to the process tanks, recycle systems, evaporation systems, or associated piping.
4. The permittee has capped off and sealed all sewer drain lines associated with the process operations identified in Section E(1) above. They must remain capped off and sealed so that no process wastewater may be discharged to the sewer through sanitary or any other sewer connections from the zero discharge operations.
5. The permittee shall post signs at all sanitary sewer connections stating the following: "Discharge of Chemicals Prohibited by Rhode Island Law".
6. Failure to notify NBC personnel prior to resuming process wastewater discharges to the sewer from the process operations listed in Section E(1) above may be considered an intentional violation of the NBC's Rules and Regulations and may subject the permittee to civil and/or criminal penalties as defined in R.I.G.L. §46-25-25.2 and §46-25-25.3.

**F. Monitoring Requirements:**

1. The permittee shall monitor the pH of the effluent discharge and record it continuously. The permittee shall report the results monthly in a summary report giving the maximum, minimum and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The pH Monitoring Report must be received by the NBC within thirty (30) days from the end of the month in which the data is recorded. The original recording chart must be maintained on site for a period of at least three (3) years.
2. The permittee shall conduct sampling over one (1) full normal operating day during the months of February, April, June, August, October, and December until the expiration date of this permit.

- a. A composite sample is to be collected which must consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the sample port on the discharge line of the final pH adjustment tank, Sample Location #1. The composite samples collected in April and October are to be collected, preserved and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Lead (Total)	Silver (Total)
Chromium (Total)	Nickel (Total)	Zinc (Total)
Copper (Total)		

The composite samples collected during all other sampling months are to be preserved, and analyzed in accordance with EPA protocols for the following parameters:

Copper (Total)	Silver (Total)
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- b. During the months of April and October, on the same day that the composite samples listed in Section F(2)(a) above are being collected, the permittee shall collect a minimum of four (4) grab samples at equidistant time intervals over the entire operating day from the sample port on the discharge line of the final pH adjustment tank, Sample Location #1 (i.e., one (1) grab sample collected every two (2) hours over an eight (8) hour operating day). Each grab sample must be preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.6 grams of ascorbic acid must be added. The sample should then be retested for chlorine residual, and if it is present, the addition of ascorbic acid should be repeated. Once residual chlorine has been eliminated from the sample, the pH of the sample must be checked and elevated to greater than 12.0 standard units by the addition of sodium hydroxide, if necessary. Once the grab sample has been preserved to a pH

greater than 12.0 standard units and no chlorine residual is detected, it may be composited with the other grab samples collected on that operating day. The composite of preserved grab samples must be refrigerated until analysis and must be analyzed within fourteen (14) days of collection for **Total Cyanide**.

3. During the month of October, until the expiration date of this permit, the permittee shall collect one (1) grab sample from the sample port on the discharge line of the oil/water separator in the Mechanical Room, Sample Location #2. The grab sample for each month is to be collected in a glass bottle and must be preserved and analyzed in accordance with EPA protocols for the following parameter:

Total Oil and Grease (fats, oils, and grease)

Table 3 attached hereto summarizes the sampling requirements for this facility.

4. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of sampling and at the end of sampling. These readings and the resultant total flow are to be submitted with the sampling results.
5. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
6. The permittee must compare the analytical report results with the NBC's effluent discharge limitations listed in Table 1. If there are any violations of the NBC's standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC's standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
7. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in water usage;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.



## **G. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
  - a. Amount of chemicals used on a monthly basis to provide pretreatment;
  - b. Amount of sludge generated on a monthly basis;
  - c. Completed manifest forms for hazardous materials;
  - d. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration, and other maintenance requests specified by inspectors of the NBC.
2. The permittee shall be responsible for maintaining production and flow data for all categorical processes, as defined in 40 CFR §471.45 which discharge to the sewer. These records must be maintained at the facility and be available at all times for NBC review. The permittee shall report the production and flow data monthly to the NBC within thirty (30) days from the end of the month in which the data is recorded.
3. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

## **H. Spill and Slug Prevention Control Plan:**

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

## **I. Toxic Organic/Solvent Management Plan:**

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

## **J. Emergency/Routine Notification Requirements:**

### 1. Emergency Notification of Accidental/Incidental Discharge

**In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR §403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

### 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

### 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

### **K. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

### **L. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

### **M. Authorization To Do Business:**

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Tiffany and Company shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Tiffany and Company has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Tiffany and Company is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Tiffany and Company shall be subject to the terms and conditions of the permit as if named herein.

### **N. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

### **O. Transfer of Permit Prohibited:**

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

### **P. Permit Violations:**

#### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

**Q. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The NBC shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

### **R. Civil and Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

### **S. Duty to Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

### **T. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **U. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;
  - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
  - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

## **V. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

## **W. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

CLV:NJD:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Continuous pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Toxic Organic Compounds



**Table 1**

**NBC Effluent Discharge Limitations**  
**Bucklin Point District**

All parameters in mg/l unless otherwise specified

<b>Parameter</b>	<b>Limitation (Max)</b>
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 <sub>5</sub> )	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:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
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**

<b>Parameter</b>	<b>Daily Max. (mg/L)</b>	<b>Monthly Average (mg/L)</b>
Cadmium (Total)*	0.10	0.10
Copper (Total)*	1.05	1.04
Cyanide (Total)*	0.43	0.43
Silver (Total)*	0.35	0.35

EPA discharge limits are based upon average production and flow data for the facility and the Non-Ferrous Precious Metal Forming Pretreatment Standards for New Sources 40 CFR §471.45. See Attachment A of this permit for more details.

\*The US EPA Discharge Limitations are more stringent than NBC Effluent Discharge Limitations listed in Table 1. Permittee will be periodically reviewed and discharge limitations may change as production and water usage change.

**Combined Wastestream Formula (CWF)**

**Alternative Mass Limit Formula**

$$M_{cwf} = (\sum M_i) * ((F_t - F_d) / (\sum F_i))$$

$M_{cwf}$  = alternate mass limit for pollutant

$M_i$  = categorical pretreatment standard mass limit for pollutant in stream i

$F_i$  = average daily flow of stream i (minimum 30 day average)

$F_d$  = average daily flow of dilute wastestream (minimum 30 day average)

$F_t$  = average daily flow through the combined treatment facility (minimum 30 days average)

**Categorical discharge limitation in mg/L**

$$C = M_{cwf} / F_t$$

$F_t$  = average monthly flow through this combined treatment facility

**Table 3**

**Tiffany and Company**  
**Sampling Requirements**

	<b>Sample Location #1</b>		<b>Sample Location #2</b>	
	<b>Sample Port on the Discharge Line of the Final pH Adjustment Tank</b>		<b>Sample Port on the Discharge Line of the Oil/Water Separator in the Mechanical Room</b>	
<b>Month</b>	<b>Composite Sample</b>	<b>Parameters</b>	<b>Grab Sample</b>	<b>Parameters</b>
January				
February	X	Cu, Ag		
March				
April	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN		
May				
June	X	Cu, Ag		
July				
August	X	Cu, Ag		
September				
October	X	Cd, Cr, Cu, Pb, Ni, Ag, Zn, CN	X	Total Oil and Grease (fats, oils, and grease)
November				
December	X	Cu, Ag		

**Legend**

Cd - Cadmium  
Cr - Chromium  
Cu - Copper  
CN - Cyanide  
Pb - Lead  
Ni - Nickel  
Ag - Silver  
Zn - Zinc

O&G - Total Oil and Grease (fats, oils, and grease)

**Attachment A**

**Tiffany and Company**  
**Basis for EPA Discharge Limitations**

**Production Based Standards**

Subpart D PSNS for Surface Treatment Rinse		
Pollutant or Pollutant Property	Maximum for Any One (1) Day	Maximum for Monthly Average
	mg/off-kg (pounds per million off-pounds) of precious metals surface treated	
Cadmium	0.21	0.093
Copper	1.17	0.616
Cyanide	0.179	0.074
Silver	0.253	0.105

Subpart D PSNS for Shot Casing Contact Cooling Water		
Pollutant or Pollutant Property	Maximum for Any One (1) Day	Maximum for Monthly Average
	mg/off-kg (pounds per million off-pounds) of precious metals surface treated	
Cadmium	0.125	0.055
Copper	0.698	0.367
Cyanide	0.107	0.044
Silver	0.151	0.0631

Subpart D PSNS for Heat Treatment Contact Cooling Water		
Pollutant or Pollutant Property	Maximum for Any One (1) Day	Maximum for Monthly Average
	mg/off-kg (pounds per million off-pounds) of precious metals surface treated	
Cadmium	0.142	0.063
Copper	0.793	0.417
Cyanide	0.0121	0.050
Silver	0.171	0.071

**Attachment A**  
**(continued)**

**Tiffany and Company**  
**Basis for EPA Discharge Limitations**

**Combined Wastestream Formula (CWF)**

**Alternative Mass Limit Formula**

$$M_{cwf} = (\sum M_i) * ((F_t - F_d) / (\sum F_i))$$

$M_{cwf}$  = alternate mass limit for pollutant

$M_i$  = categorical pretreatment standard mass limit for pollutant in stream i

$F_i$  = average daily flow of stream i (minimum 30 day average)

$F_d$  = average daily flow of dilute wastestream (minimum 30 day average)

$F_t$  = average daily flow through the combined treatment facility (minimum 30 day average)

**Conversion to mg/l ( $C_{mg/l}$ )**

$$C_{mg/l} = M_{cwf} / F$$

$F$  = Average monthly flow through this combined treatment facility

# CERTIFICATE TO DISCHARGE

the following types of process water:

**TREATED NON-FERROUS PRECIOUS METAL FORMING WASTEWATER**

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Tiffany and Company

300 Maple Ridge Drive

Cumberland, RI 02964

**PERMIT NUMBER:** B1506-018-0428

**PERMIT EXPIRATION DATE:** 04/30/2028

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

April 25, 2023

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL LANDFILL OPERATIONS  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: P3112-001-1024

Company Name: **RHODE ISLAND RESOURCE RECOVERY CORPORATION**

Facility Address: 65 Shun Pike, Johnston, RI 02919

Mailing Address: 65 Shun Pike, Johnston, RI 02919

Facility Executive Director: Mr. Joseph Reposa

Facility Authorized Agents: Mr. Joseph Brennan, Ms. Inga Hoit, Mr. Patrick Doyle

User Classification: Landfill Operations

Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Joseph Reposa**, in his capacity as Executive Director of Rhode Island Resource Recovery Corporation, and **Rhode Island Resource Recovery Corporation**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 16 pages with conditions A - T and Attachment 1.

**This permit becomes effective on June 1, 2021  
and expires on October 31, 2024.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.



For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

May 12, 2021  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 15, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee shall not discharge more than 650,000 gallons per day. The permittee shall not exceed a maximum discharge flow rate of 38,000 gallons per hour. The daily average flow rate shall not exceed 27,000 gallons per hour. The permittee agrees not to exceed the specified maximum daily and hourly flow restrictions and must notify the NBC in advance of any exceedances of the aforementioned flow rates.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Landfill Leachate;
  - b. Treated Discharges from the OU1/Phase 1 Site;
  - c. Gas Line Condensate;
  - d. Oil/Water Separator Discharges.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Electroplating Solutions;
  - b. Cyanide Solutions;
  - c. Acidic Solutions with a pH less than 5.0 standard units;
  - d. Caustic Solutions with a pH greater than 11.0 standard units;
  - e. Degreasing Solutions;
  - f. Solvents;
  - g. Sludges;
  - h. Fuel and Lubricating Oils;
  - i. Gasoline;
  - j. Benzene;
  - k. Radioactive Wastes;
  - l. Hazardous Wastes;
  - m. Trucked or hauled waste of any type.
2. The permittee is strictly prohibited from accepting wastewater from the combustion condensate and gas conditioning and compression operations conducted by Rhode Island LFG Genco, LLC without receiving written approval from the NBC. The valve in Manhole Number 5 must remain locked out at all times.
3. The permittee is strictly prohibited from accepting and treating wastewater from any other source or business through the SBR pretreatment system without first obtaining written approval from the NBC on any such discharge.
4. New or existing companies located on Rhode Island Resource Recovery Corporation property are strictly prohibited from connecting to the NBC sewer system without obtaining a NBC Sewer Connection Permit or discharging to the NBC system via the Rhode Island Resource Recovery Corporation discharge system without prior NBC approval.
5. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or waste streams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 15, attached hereto and incorporated herein.
6. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals, or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.

7. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

#### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of two (2) sample locations must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the final equalization tank, collecting all process discharges specified in Section B(1) (a and b) of this permit.

Sample Location #2 - Sample port on the discharge line of the oil/water separator located near the SBR Administration Building, collecting all process discharges specified in Section B(1)(d) of this permit.

The permittee is prohibited from discharging dilution waste streams into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Locations #1 and #2 must be in compliance with the effluent limitations specified in Section A, Table 1 of this permit.

2. The permittee shall operate and maintain pretreatment systems in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee shall add a carbon source to the SBR pretreatment system throughout April of each year to accelerate biological nutrient removal processes and shall operate the system to the fullest extent necessary to achieve and maintain compliance with the discharge limitations for nitrogen compounds specified in Table 1 of this permit.
4. The permittee has installed a Proline Promag L 400 electro-magnetic meter on the discharge line of the SBR pretreatment system. This magnetic water meter will be used for NBC billing purposes and is prohibited from being reset by Rhode Island Resource Recovery Corporation. The meter must be equipped with magnetic strips and the casing must be fitted with a lock to ensure the meter will not be reset. The key for the magnetic meter must be given solely to the NBC Customer Service Section. The Proline Promag L 400 electro-magnetic meter must be inspected on a monthly basis, cleaned accordingly, and calibrated quarterly until the expiration date of this permit. A meter reading from the last day of each month is to be submitted to the NBC Customer Service Section on the first day of following month.

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.

<b>Parameter</b>	<b>Limitation (Max)</b>
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 <sub>5</sub> )	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:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 32, 34, and 36	BOD <sub>5</sub> and TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
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 (BOD<sub>5</sub>) and Total Suspended Solids (TSS) are to be collected as composite samples. No preservation chemicals are needed for these parameters.

The permittee may collect one composite sample for the aforementioned parameters. The composite sample may be poured off into three separate bottles. One bottle each for metals, nutrient, and BOD/TSS.

**Cyanide:** Four (4) grab samples shall be collected at equidistant time intervals over the entire operating day (i.e. one (1) sample every two (2) hours over the course of an eight (8) hour operating day). Each grab sample must be preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.6 grams of ascorbic acid must be added. The sample should then be retested for chlorine residual, and if it is present, the addition of ascorbic acid should be repeated. Once residual chlorine has been eliminated from the sample, the pH of the sample must be checked and elevated to greater than 12.0 standard units by the addition of sodium hydroxide, if necessary. Once the grab sample has been preserved to a pH greater than 12.0 standard units and no chlorine residual is



detected, it may be composited with the other grab samples collected on that operating day. The composite of the four (4) preserved grab samples must be refrigerated until analysis and must be analyzed within fourteen (14) days of collection.

**Total Oil and Grease (fats, oils, and grease):** Four (4) grab samples shall be collected at equidistant time periods over the entire operating day (i.e. one (1) sample every two (2) hours over the course of an eight (8) hour operating day). Each grab sample must be collected in a glass bottle, preserved, and analyzed separately in accordance with EPA protocols. The mathematical average of the four results must be reported to determine compliance with the NBC discharge limitation of 125 ppm for Total Oil and Grease.

**Total Toxic Organics (TTO)** shall be conducted by collecting two separate samples according to the following procedures:

- a. ***Volatile Organic Compounds Sampling*** - Four (4) grab samples are to be collected at equidistant time periods over the entire operating day (i.e. one (1) sample every two (2) hours over the course of an eight (8) hour operating day). Each grab sample is to be collected in a glass bottle with a Teflon lined cap with a volume of either 25 or 40 ml. Each grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e. 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0 - 4°C until analysis. No air bubbles may be present in any grab sample or that sample must be discarded. Each grab sample is to be analyzed separately and the mathematical average reported. Alternatively, the grab samples may be composited in the laboratory at a temperature of 0 - 0-4°C immediately before analysis. All samples must be analyzed within three (3) days of collection for the Volatile Organic Compounds (purgeables) fraction of the Total Toxic Organics (TTO) list enclosed.
- b. ***Acid, Base, and Neural Fraction Sampling*** - Collect a composite sample, which is to consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. A minimum of 1,000 ml (1L) of wastewater is to be collected in an amber glass bottle with a Teflon lined cap and submitted for analysis. Each grab sample must be preserved immediately upon sample collection according to EPA protocols prior to compositing with other preserved grab samples. If an automatic composite sampler is used, it must be as free as possible of plastic tubing and other potential sources of contamination; if the sampler includes a peristaltic pump, use a minimum length of properly cleaned

silicone rubber tubing. The sampler must utilize glass sampling containers. The samples must be refrigerated to a temperature of 0-4°C during sample collection and must be immediately preserved once the sample collection process is completed. The samples must be tested for residual chlorine with potassium iodide paper. If chlorine residual is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e. 80mg per liter of sample collected). The sample should then be retested for chlorine residual, if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample must be stored in the dark until analysis. All samples must be extracted within seven (7) days of collection and must be analyzed within forty (40) days of extraction for the **Acid, Base and Neutral** fraction of the Total Toxic Organics (TTO) list enclosed.

# CERTIFICATE TO DISCHARGE

the following types of process water:

**LANDFILL LEACHATE DISCHARGES**

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into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Rhode Island Resource Recovery Corporation

65 Shun Pike

Johnston, RI 02919

**PERMIT NUMBER:** P3112-001-1024

**PERMIT EXPIRATION DATE:** 10/31/2024

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

May 12, 2021  
Initial Date of Issuance

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager

***TYPICAL AEROGEL MANUFACTURING  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: B3206-002-0426

Company Name: **ASPEN AEROGELS RHODE ISLAND, LLC**

Facility Address: 3 Dexter Road, East Providence, RI 02914

Mailing Address: 3 Dexter Road, East Providence, RI 02914

Facility President: Mr. Donald R. Young

Facility Authorized Agents: Mr. Matthew Milliken, Ms. Thalia Valkanos

User Classification: Aerogel Manufacturing with High Conventional Pollutant Loads

Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Donald R. Young and Aspen Aerogels Rhode Island, LLC**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 21 pages with conditions A - V.

**This permit becomes effective upon receipt  
and expires on April 30, 2026.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

August 25, 2022  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 20, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee conducts aerogel manufacturing operations and discharges wastewater with high concentrations of conventional pollutants. The permittee must comply with the Ammonia, Biochemical Oxygen Demand, Total Nitrogen, and Total Suspended Solids limitations for Category 32 specified in Table 1 on page 19, attached hereto and incorporated herein. The Ammonia and Total Nitrogen limits will be enforced from May 1st through October 31st. These limits are in pounds per day and apply to the entire facility.
4. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
5. The permittee agrees that the discharge per calendar day of aerogel manufacturing wastewater is greater than or equal to 50,000 gallons. Decreasing or increasing the daily water usage may affect the monitoring frequency specified in this permit. The permittee must notify the NBC of any deviations from the aforementioned flow range so that required permit modifications may be made.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:

- a. Treated Scrubber Blowdown;
  - b. Extractor Wash Water;
  - c. Coating Line Equipment Wash Water;
  - d. Water Jet Machine Wastewater;
  - e. Cooling Tower Purge;
  - f. Plunger CO<sub>2</sub> Pump Water;
  - g. Air Compressor Condensate;
  - h. AFTF Catalyst Process Wastewater.
2. The permittee may batch discharge the entire contents of the cooling towers, boilers, and chillers after receiving approval from the NBC. In order to receive approval, the permittee must sample the contents in accordance with Sections E(6, 7, and 8) of this permit.
  3. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Raw Materials;
  - b. Off Specification Materials;
  - c. Sol Prep Solutions;
  - d. Casting Solutions;
  - e. Aging Fluid;
  - f. Solids greater than 1/2 inch in diameter;
  - g. Acidic Solutions with a pH less than 5.0 standard units;
  - h. Caustic Solutions with a pH greater than 11.0 standard units;
  - i. Degreasing Solutions;
  - j. Solvents;
  - k. Sludges;
  - l. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from batch discharging the entire contents of the cooling towers, boilers, and chillers without first receiving approval prior to discharge. In order to receive approval, the contents of the cooling towers, boilers, and chillers must be sampled in accordance with Section E(6 through 8) of this permit.
3. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 20, attached hereto and incorporated herein.



4. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
5. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

#### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of ten (10) sample locations must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - pH Adjustment Tank, collecting all process discharges specified in Section B(1)(a) of this permit.

Sample Location #2 - Sample port downstream of Clean In Place Tank and AFTF Catalyst Process discharge line, collecting all process discharges specified in Section B(1)(b and h) of this permit.

Sample Location #3 - Sample port on the discharge line of the Coating Line Wastewater Sump Tank and Water Jet Machine #2, collecting all process discharges specified in Section B(1)(c and d) of this permit.

Sample Location #4 - Sample port on the Buildings 1 and 2 Cooling Towers discharge line, collecting all process discharges specified in Sections B(1) (e and f) and B(2) of this permit.

Sample Location #5 - Sample port on the Building 3 Cooling Tower discharge line, collecting all process discharges specified in Section B(1) (e and f) and B(2) of this permit.

Sample Location #6 - Sample port on the Buildings 1 and 2 Boiler discharge line, collecting all process discharges specified in Section B(2) of this permit.

Sample Location #7 - Sample port on the Building 3 Boiler discharge line, collecting all process discharges specified in Section B(2) of this permit.

Sample Location #8 - Sample port on the Buildings 1 and 2 Chiller discharge line, collecting all process discharges specified in Section B(2) of this permit.

Sample Location #9 - Sample port on the Building 3 Chiller discharge line, collecting all process discharges specified in Section B(2) of this permit.

Sample Location #10 - Sample port on the discharge line of water jet machine #1, collecting all process discharges specified in Section B(1)(d) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Locations #1, #2, #3, #4, #5, #6, #7, #8, #9, and #10 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee must ensure that all floor drains are equipped with screens, filters, or some other solids retention device to ensure that solids larger than 1/2 inch are not discharged to the sewer system.
4. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

#### **E. Monitoring Requirements:**

1. The permittee shall monitor the pH of the effluent discharge through Sample Location #1 and record it continuously. The permittee shall report the results monthly in a summary report giving the maximum, minimum and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The pH Monitoring Report must be received by the NBC within thirty (30) days from the end of the month in which the data is recorded. The original recording chart must be maintained on site for a period of at least three (3) years.

2. The permittee shall conduct sampling over one (1) full normal operating day during the months of February, April, June, August, October, and December until the expiration date of this permit.

- a. A composite sample is to be collected which must consist of equal volume grab samples collected at least every half hour over the operating day or collected continuously with a composite sampler. The samples are to be collected from the pH Adjustment Tank, Sample Location #1. The composite sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameter:

Biochemical Oxygen Demand (BOD)

During the months of June, August, and October, a portion of the composite sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Ammonia  
Total Nitrogen

- b. On the same day that the composite sample listed in Section E(2)(a) above is being collected, the permittee shall collect four (4) grab samples from the pH Adjustment Tank, Sample Location #1, at equidistant time periods the operating days (i.e., one (1) sample every two (2) hours over the operating day). Each grab sample is to be collected in a glass bottle with a Teflon lined cap with a volume of either 25 or 40 ml. Each grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0 - 4°C until analysis. No air bubbles may be present in any grab sample or that sample must be discarded. Each grab sample is to be analyzed separately and the mathematical average reported. Alternatively, the grab samples may be composited in the laboratory at a temperature of 0 - 4°C immediately before analysis. All samples must be analyzed within three (3) days of collection for the **Volatile Organic Compounds (purgeables)** fraction of the Total Toxic Organics (TTO) list enclosed.

- c. On the same day that the composite sample listed in Section E(2)(a) above is being collected, the permittee shall collect a composite sample consisting of a minimum of twelve (12) equal volume grab samples collected at least every half hour over the course of the operating day or collected continuously with a composite sampler. The samples are to be collected from the pH Adjustment Tank, Sample Location #1. A minimum of 1,000 ml (1L) must be collected for analysis in a glass amber bottle with a Teflon lined cap. Each grab sample must be preserved immediately upon sample collection according to EPA regulations prior to compositing with other preserved grab samples. If an automatic composite sampler is used, it must be as free as possible of plastic tubing and other potential sources of contamination; if the sampler includes a peristaltic pump, use a minimum length of properly cleaned silicone rubber tubing; the sampler must utilize glass sample containers; the samples must be refrigerated to a temperature of 0 - 4°C during sample collection; and they must be immediately preserved once the sample collection process is completed. The samples must be tested for residual chlorine with potassium iodide paper. If chlorine residual is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 80 mg per liter of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the pH of the sample must be adjusted to between 6.0 and 9.0 standard units and the sample must be stored in the dark until analysis. All samples must be extracted within seven (7) days of collection and must be analyzed within forty (40) days of extraction for the **Acid, Base/Neutral fraction** of the Total Toxic Organics (TTO) list enclosed.

3. During the months of February, April, June, August, October and December until the expiration date of this permit, the permittee shall conduct sampling from the sample port downstream of the Clean In Place Tank and AFTF Catalyst Process discharge line, Sample Location #2, while a batch discharge is occurring, three grab samples must be collected as follows:

- a. A grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand (BOD)  
Total Suspended Solids

During the months of June, August, and October, a portion of the composite sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Ammonia  
Total Nitrogen

- b. A grab sample is to be collected in a glass bottle with a Teflon lined cap with a volume of either 25 or 40 ml. The grab sample must be preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0 - 4°C until analysis. No air bubbles may be present in the grab sample or that sample must be discarded. The grab sample is to be analyzed within three (3) days of collection for the **Volatile Organic Compounds (purgeables)** fraction of the Total Toxic Organics (TTO) list enclosed.
  - c. A grab sample consisting of a minimum of 1,000 ml (1L) must be collected for analysis in a glass amber bottle with a Teflon lined cap. The grab sample must be preserved immediately upon sample collection according to EPA regulations. The sample must be tested for residual chlorine with potassium iodide paper. If chlorine residual is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 80 mg per liter of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the pH of the sample must be adjusted to between 6.0 and 9.0 standard units, and the sample must be stored in the dark and refrigerated at a temperature of 0 - 4°C, until analysis. The sample must be extracted within seven (7) days of collection and must be analyzed within forty (40) days of extraction for the **Acid, Base/Neutral fraction** of the Total Toxic Organics (TTO) list enclosed.
4. During the months of February, June, and October, until the expiration date of this permit, the permittee shall conduct sampling from the sample port on the discharge line of the Coating Line Wastewater Sump Tank and Water Jet Machine #2, Sample Location #3, while batch discharge is occurring. Three (3) grab samples must be collected as follows:
    - a. A grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand (BOD)  
Total Suspended Solids

- b. A grab sample is to be collected in a glass bottle with a Teflon lined cap with a volume of either 25 or 40 ml. The grab sample must be preserved immediately upon sample collection in accordance with EPA regulations. The grab sample must immediately be tested for residual chlorine with potassium iodide paper. If residual chlorine is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 2 mg per 25 ml of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the sample should be stored in the dark and refrigerated at a temperature of 0 - 4°C until analysis. No air bubbles may be present in the grab sample or that sample must be discarded. The grab sample is to be analyzed within three (3) days of collection for the **Volatile Organic Compounds (purgeables)** fraction of the Total Toxic Organics (TTO) list enclosed.
  - c. A grab sample consisting of a minimum of 1,000 ml (1L) must be collected for analysis in a glass amber bottle with a Teflon lined cap. The grab sample must be preserved immediately upon sample collection according to EPA regulations. The sample must be tested for residual chlorine with potassium iodide paper. If chlorine residual is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 80 mg per liter of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the pH of the sample must be adjusted to between 6.0 and 9.0 standard units, and the sample must be stored in the dark and refrigerated at a temperature of 0 - 4°C, until analysis. The sample must be extracted within seven (7) days of collection and must be analyzed within forty (40) days of extraction for the **Acid, Base/Neutral fraction** of the Total Toxic Organics (TTO) list enclosed.
5. During the months of April, August, and October, until the expiration date of this permit, the permittee shall collect a grab sample from the sample port on the discharge line of the water jet machine, Sample Location #10. The grab sample is to be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Biochemical Oxygen Demand (BOD)  
Total Suspended Solids

Table 2 attached hereto summarizes the sampling requirements for this facility.

6. Prior to obtaining approval to discharge the contents of any cooling tower, a grab sample of the cooling tower wastewater must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Silver (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)
	Nickel (Total)	

Analytical results must be submitted to the NBC along with a properly completed Self-Monitoring Compliance Report and chain of custody documentation requesting permission to discharge the contents of the cooling tower. The permittee may only discharge the contents of the cooling tower once approval is received from the NBC.

7. Prior to obtaining approval to discharge the contents of any boiler, a grab sample of the boiler wastewater must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Silver (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)
	Nickel (Total)	

Analytical results must be submitted to the NBC along with a properly completed Self-Monitoring Compliance Report and chain of custody documentation requesting permission to discharge the contents of the boiler. The permittee may only discharge the contents of the boiler once approval is received from the NBC.

8. Prior to obtaining approval to discharge the contents of any chiller, a grab sample of the chiller wastewater must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Cadmium (Total)	Copper (Total)	Silver (Total)
Chromium (Total)	Lead (Total)	Zinc (Total)
	Nickel (Total)	

Analytical results must be submitted to the NBC along with a properly completed Self-Monitoring Compliance Report and chain of custody documentation requesting permission to discharge the contents of the chiller. The permittee may only discharge the contents of the chiller once approval is received from the NBC.

9. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.
10. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.

11. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
12. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in water usage;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

#### **F. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
  - a. Amount of chemicals used on a monthly basis to provide pretreatment;
  - b. Completed manifest forms for hazardous materials;
  - c. A listing of all batch discharges including the date of the discharge and a description of the tank from which the discharge occurred;
  - d. The amount of chemicals added to provide pretreatment of batch discharges;
  - e. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration, and other maintenance requests specified by inspectors of the NBC.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.



### **G. Spill and Slug Prevention Control Plan:**

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

### **H. Toxic Organic/Solvent Management Plan:**

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

### **I. Emergency/Routine Notification Requirements:**

#### 1. Emergency Notification of Accidental/Incidental Discharge

**In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 434-6350.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

#### 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

### 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

## **J. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

**K. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

**L. Authorization To Do Business:**

The permittee is a limited liability company. The permittee shall ensure the limited liability company be registered with the Rhode Island Secretary of State Corporations Division. Aspen Aerogels Rhode Island, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Aspen Aerogels Rhode Island, LLC has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Aspen Aerogels Rhode Island, LLC is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Aspen Aerogels Rhode Island, LLC shall be subject to the terms and conditions of the permit as if named herein.

**M. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

**N. Transfer of Permit Prohibited:**

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

## **O. Permit Violations:**

### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

## **P. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:

- a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
- b. Failure to report changes in operations or wastewater constituents;
- c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

#### **Q. Civil And Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

#### **R. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

## **S. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **T. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;
  - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
  - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

#### **U. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

#### **V. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

NPD:NJD:rcf

Attachments:

- Self-Monitoring Compliance Report Form
- Continuous pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- List of Toxic Organic Compounds

**Table 1**

**NBC Effluent Discharge Limitations**  
**Bucklin Point District**

All parameters in mg/l unless otherwise specified

<b>Parameter</b>	<b>Limitation (Max)</b>
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 <sub>5</sub> )	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:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
32	Total Nitrogen	300**
32	Ammonia	300**

\* The limitation listed above for cyanide and nickel only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide and 0.50 mg/l for nickel.

\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.



**Table 2**

**Aspen Aerogels Rhode Island, LLC**  
**Sampling Requirements**

Month	Sample Location #1 pH Adjustment Tank		Sample Location #2 Sample Port Downstream of the Clean In Place Tank and AFTF Catalyst Process Discharge Line		Sample Location #3 Sample Port on the Discharge Line of the Coating Line and Water Jet Machine #2 Wastewater		Sample Location #4 Sample Port on the Discharge Line of the Water Jet Machine	
	Composite Sample	Parameters	Grab Sample	Parameters	Grab Sample	Parameters	Grab Sample	Parameters
January								
February	X	BOD, VOC, EXT	X	BOD, TSS, VOC, EXT	X	BOD, TSS, VOC, EXT		
March								
April	X	BOD, VOC, EXT	X	BOD, TSS, VOC, EXT			X	BOD, TSS
May								
June	X	BOD, VOC, EXT, TN, NH <sub>3</sub>	X	BOD, TSS, VOC, EXT, TN, NH <sub>3</sub>	X	BOD, TSS, VOC, EXT		
July								
August	X	BOD, VOC, EXT, TN, NH <sub>3</sub>	X	BOD, TSS, VOC, EXT, TN, NH <sub>3</sub>			X	BOD, TSS
September								
October	X	BOD, VOC, EXT, TN, NH <sub>3</sub>	X	BOD, TSS, VOC, EXT, TN, NH <sub>3</sub>	X	BOD, TSS, VOC, EXT		
November								
December	X	BOD, VOC, EXT	X	BOD, TSS, VOC, EXT			X	BOD, TSS

**Legend**

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

VOC - Volatile Organic compounds Portion of TTO List

EXT - Extractable Portion of TTO List

TN – Total Nitrogen

NH<sub>3</sub> – Ammonia

# CERTIFICATE TO DISCHARGE

the following types of process water:

**AEROGEL MANUFACTURING WASTEWATER**

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Aspen Aerogels Rhode Island, LLC

3 Dexter Road

East Providence, RI 02914

**PERMIT NUMBER:** B3206-002-0426

**PERMIT EXPIRATION DATE:** 04/30/2026

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

August 25, 2022  
Initial Date of Issuance

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager

***TYPICAL WHOLESALE FOOD  
PROCESSING OPERATIONS WITH  
HIGH CONVENTIONAL  
POLLUTANT LOADS  
WASTEWATER DISCHARGE  
PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: P3302-025-0129

Company Name: **BAYSIDE FOODS, INC. D/B/A BONOLLO PROVISIONS**

Facility Address: 55 Clarkson Street, Providence, RI 02908

Mailing Address: 55 Clarkson Street, Providence, RI 02908

Facility President: Mr. Jose Genere

Facility Authorized Agents: Mr. Sean Buchanan, Mr. Juan Cavaan, Mr. Adolfo Longoria

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. Jose Genere and Bayside Foods, Inc. d/b/a Bonollo Provisions**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 15 pages with conditions A - T.

**This permit becomes effective upon receipt  
and expires on January 31, 2029.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

April 8, 2024  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 14, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee conducts food processing operations and discharges wastewater with high concentrations of conventional pollutants. The permittee must comply with the Ammonia, Biochemical Oxygen Demand, Total Nitrogen, and Total Suspended Solids limitations for Category 33 specified in Table 1 on page 14, attached hereto and incorporated herein.
4. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
5. The permittee agrees that the discharge per calendar day of food processing wastewater is greater than or equal to 1,000 gallons, but less than 10,000 gallons. Decreasing or increasing the daily water usage may affect the monitoring frequency specified in this permit. The 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. Equipment Wash Water;
  - b. Process Area Walls and Floors 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 - Sampling tee in the final retention tank of the in-ground passive grease removal unit, collecting all process discharges specified in Section B(1)(a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee has installed and shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.
3. The permittee must ensure that all floor drains are equipped with screens, filters, or some other solids retention device to ensure that solids larger than ½ inch are not discharged to the sewer system.
4. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

**E. Monitoring Requirements:**

1. During the months of January and July, until the expiration date of this permit, the permittee must collect two (2) grab samples from the sampling tee in the final retention tank of the in-ground passive grease removal unit, Sample Location #1. The first grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

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

The second grab sample is to be collected in a glass bottle, preserved and analyzed in accordance with EPA protocols for the following parameter:

Total Oil and Grease (fats, oils, and grease)

During the month of July, the permittee must collect a third grab sample. This grab sample must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Ammonia  
Total Nitrogen

Table 2 attached hereto summarizes the sampling requirements for this facility.

2. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.



3. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and 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. The thickness of the grease layer must be recorded in the logbook. The grease removal unit must be maintained according to manufacturer's specifications and pumped out accordingly. If grease is observed in the final sampling tee, the grease removal unit must be pumped out immediately;
  - b. All pump-outs are to be recorded, listing the firm that performed the pump-out, estimated gallons pumped, and the date and time when the pumping occurred;

- c. Physical receipts for each pump-out are to be kept with the permittee's logbook. These receipts must be kept for a period of three (3) years and must be made available to NBC inspectors.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

## **G. Emergency/Routine Notification Requirements:**

1. Emergency Notification of Accidental/Incidental Discharge

**In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
  - g. Change in the personnel responsible for the proper operation of pretreatment equipment.
3. Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

#### **H. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

#### **I. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

**J. Authorization To Do Business:**

The permittee is a corporation. The permittee shall ensure the corporation be registered with the Rhode Island Secretary of State Corporations Division. Bayside Foods, Inc. d/b/a Bonollo Provisions shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Bayside Foods, Inc. d/b/a Bonollo Provisions 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 Bayside Foods, Inc. d/b/a Bonollo Provisions 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 Bayside Foods, Inc. d/b/a Bonollo Provisions shall be subject to the terms and conditions of the permit as if named herein.

**K. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

**L. Transfer of Permit Prohibited:**

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

**M. Permit Violations:**

1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

**N. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay all associated fees, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.

**O. Civil And Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

**P. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

**Q. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **R. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;
  - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
  - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

## **S. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

## **T. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

JU:MM: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
- Logsheet for In-Ground Passive Grease Removal Unit
- Mass-Based Limits Worksheet



**Table 1**

**NBC Effluent Discharge Limitations**  
**Field's Point District**

All parameters in mg/l unless otherwise specified.

<b>Parameter</b>	<b>Limitation (Max)</b>
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 <sub>5</sub> )	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:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 32, 34, and 36	BOD <sub>5</sub> and TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
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**

**Bayside Foods, Inc. d/b/a Bonollo Provisions**  
**Sampling Requirements**

<b>Sample Location #1</b>		
<b>Sampling Tee in the Final Retention Tank of the In-Ground Passive Grease Removal Unit</b>		
<b>Month</b>	<b>Grab Sample</b>	<b>Parameters</b>
January	X	BOD, TSS, O&G
February		
March		
April		
May		
June		
July	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
August		
September		
October		
November		
December		

**Legend**

BOD - Biochemical Oxygen Demand

NH<sub>3</sub> - Ammonia

TN - Total Nitrogen

TSS - Total Suspended Solids

O&G - Total Oil and Grease (fats, oils, and grease)

# CERTIFICATE TO DISCHARGE

the following types of process water:

**EQUIPMENT, FLOOR, AND WALL WASH WATER**

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Bayside Foods, Inc. d/b/a Bonollo Provisions

55 Clarkson Street

Providence, RI 02908

**PERMIT NUMBER:** P3302-025-0129

**PERMIT EXPIRATION DATE:** 01/31/2029

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 8, 2024

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL BEVERAGE MANUFACTURING  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: P3402-015-1228

Company Name: **LULUNA HEALTH, LLC**

Facility Address: 53 Rathbone Street, Providence, RI 02908

Mailing Address: 53 Rathbone Street, Providence, RI 02908

Facility Owner: Ms. Lucille Kreger

Facility Authorized Agent: Ms. Lucille Kreger

User Classification: Beverage Manufacturing Operations with High Conventional  
Pollutant Loads and Low Flow

Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Ms. Lucille Kreger and Luluna Health, 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 14 pages with conditions A - T.

**This permit becomes effective upon receipt  
and expires on December 31, 2028.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

February 15, 2024

Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

# CONDITIONS TO PERMIT

## **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 13, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee conducts beverage manufacturing operations and discharges wastewater with high concentrations of conventional pollutants. The permittee must comply with the Biochemical Oxygen Demand, and Total Suspended Solids limitations for Category 34 specified in Table 1 on page 13, attached hereto and incorporated herein.
4. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
5. The permittee agrees that the discharge per calendar day of beverage manufacturing wastewater is less than 2,500 gallons. Decreasing or increasing the daily water usage may affect the monitoring frequency specified in this permit. The permittee must notify the NBC of any deviations from the aforementioned flow range so that required permit modifications may be made.

## **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Fermenting Vessel Wash Water;
  - b. Electric Brewer Wash Water;
  - c. 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 Kombucha and Off-Specification Product;
  - b. Spent Produce used in Preparation;
  - c. Symbiotic Culture of Bacteria and Yeast;
  - 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 13, attached hereto and incorporated herein.
3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the three-bay sink, collecting all process discharges specified in Section B(1)(a, b, and c) of this permit.



2. 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 process wastewater sampling location must be installed within thirty (30) days from the effective date of this permit and must be approved by the NBC prior to beginning construction. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.
3. The permittee must ensure that all drains of the three bay sink 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 three-bay sink, Sample Location #1, and consist of equal volume grab samples collected from each batch discharge of fermenting vessel wash water. 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 must record the date, volume, and pH of each batch discharge and keep it in a logbook.
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

**In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

### 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

3. Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

#### **H. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

#### **I. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

#### **J. Authorization To Do Business:**

The permittee is a limited liability company. The permittee shall ensure the limited liability company be registered with the Rhode Island Secretary of State Corporations Division. Luluna Health, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Luluna Health, 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 Luluna Health, 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 Luluna Health, LLC shall be subject to the terms and conditions of the permit as if named herein.

## **K. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to 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 all associated fees 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.

MH:MM:lp

Attachments:

- Self-Monitoring Compliance Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- Mass-Based Limits Worksheet



**Table 1**

**NBC Effluent Discharge Limitations**  
**Field's Point District**

All parameters in mg/l unless otherwise specified.

<b>Parameter</b>	<b>Limitation (Max)</b>
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 <sub>5</sub> )	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:

<b>Industrial User</b>	<b>Parameter(s)</b>	<b>Limitation</b>
<b>Category/Categories</b>		<b>(lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 32, 34, and 36	BOD <sub>5</sub> and TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

<b>Industrial User</b>	<b>Parameter(s)</b>	<b>Limitation</b>
<b>Category/Categories</b>		<b>(lbs/day)</b>
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**

**Luluna Health, LLC**  
**Sampling Requirements**

<b>Sample Location #1 Sample Port on the Discharge Line of the Three-Bay Sink</b>		
<b>Month</b>	<b>Composite Sample</b>	<b>Parameters</b>
January		
February		
March		
April	X	BOD, TSS
May		
June		
July		
August		
September		
October	X	BOD, TSS
November		
December		

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

# CERTIFICATE TO DISCHARGE

the following types of process water:

**FERMENTING VESSEL WASH WATER, ELECTRIC BREWER  
WASH WATER, AND GLASSWARE WASH WATER**

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into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Luluna Health, LLC

53 Rathbone Street

Providence, RI 02908

**PERMIT NUMBER:** P3402-015-1228

**PERMIT EXPIRATION DATE:** 12/31/2028

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

February 15, 2024  
Initial Date of Issuance

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager

***TYPICAL BREWERY OPERATIONS  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: P3602-012-0829

Company Name: **ARCANE MEAD & WINERY, LLC**

Facility Address: 11 Aleppo Street, Unit #7, Providence, RI 02909

Mailing Address: 11 Aleppo Street, Unit #7, Providence, RI 02909

Facility Managing Members: Mr. Jamie Burnet, Mr. Jake Tobak

Facility Authorized Agents: Mr. Jamie Burnet, Mr. Jake Tobak

User Classification: Winemaking 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. Jamie Burnet, Mr. Jake Tobak, and Arcane Mead & Winery, LLC**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 15 pages with conditions A - U.

**This permit becomes effective upon receipt  
and expires on August 31, 2029.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission:**

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

October 3, 2024  
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 winemaking 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 winemaking 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 waste, solutions, or process wastewater streams to the NBC facilities:
  - a. Hot Liquor Tank Wash Water;
  - b. Fermenters Wash Water;
  - c. Brite Tank Wash Water;
  - d. Reverse Osmosis Reject Water;
  - e. Floor and 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 Wine, Mead, and Off-Specification Product;
  - b. Spent Purees, Fruit Solids, and Yeast;
  - c. Tank Heels/Bottoms;
  - d. Solids Greater than ½ 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. Solvents;
  - h. Sludges;
  - i. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 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 fermenters, brite tank, and hot liquor tank washing operations. The length of the flexible hose shall not exceed ten (10) 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 wastewater holding tank, collecting all process discharges specified in Section B(1)(a, b, and c) of this permit.



The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The process wastewater sampling location must be installed within thirty (30) days from the effective date of this permit and must be approved by the NBC prior to beginning construction. 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 may only treat and/or discharge those solutions that are indicated in Section B(1) of this permit. The permittee is strictly prohibited from discharging any other solutions, chemicals or raw materials including all prohibited substances as defined in the Rules and Regulations without written approval from the NBC.
4. The permittee must ensure that all floor drains are equipped with screens, filter, or some other solids retention device to ensure that solids larger than ½ inch are not discharged to the sewer system.
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 May and November, until the expiration date of this permit. A composite sample must be collected from the sample port on the wastewater holding tank, Sample Location #1, and consist of equal volume grab samples collected from each batch discharge of the wastewater tank washouts. The composite samples collected in May and November 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 location 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 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, 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 limited liability company. The permittee shall ensure the limited liability company be registered with the Rhode Island Secretary of State Corporations Division. Arcane Mead and Winery, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Arcane Mead and Winery, 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 Arcane Mead and Winery, 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 Arcane Mead and Winery, LLC shall be subject to the terms and conditions of the permit as if named herein.

**L. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

**M. Transfer of Permit Prohibited:**

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

## **N. Permit Violations:**

### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

## **O. Revocation/Suspension of Permit:**

### 1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:

- a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
- b. Failure to report changes in operations or wastewater constituents;
- c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
- d. Failure to adhere to an approved compliance schedule;

- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay all associated fees 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.

JU:NPD:lp

Attachments:

- Self-Monitoring Compliance Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories
- List of Toxic Organic Compounds
- Spill and Slug Prevention Control Plan
- Mass-based Limits

**Table 1**

**NBC Effluent Discharge Limitations**  
**Field's Point District**

All parameters in mg/l unless otherwise specified.

<b>Parameter</b>	<b>Limitation (Max)</b>
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 <sub>5</sub> )	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:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 32, 34, and 36	BOD <sub>5</sub> and TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
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**

**Arcane Mead & Winery, LLC**  
**Sampling Requirements**

<b>Sample Location #1</b>		
<b>Sample Port on the Wastewater Holding Tank</b>		
<b>Month</b>	<b>Composite Sample*</b>	<b>Parameters</b>
January		
February		
March		
April		
May	X	BOD, TSS
June		
July		
August		
September		
October		
November	X	BOD, TSS
December		

**Legend**

BOD - Biochemical Oxygen Demand

TSS – Total Suspended Solids

\*Composite samples must consist of equal volume grab samples collected from each batch discharge of tank wash water over the operating day.

# CERTIFICATE TO DISCHARGE

the following types of process water:

**WINEMAKING OPERATIONS WASTEWATER**

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Arcane Mead & Winery, LLC

11 Aleppo Street, Unit #7

Providence, RI 02909

**PERMIT NUMBER:** P3602-012-0829

**PERMIT EXPIRATION DATE:** 08/31/2029

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

October 3, 2024

Initial Date of Issuance

/s/ Kerry M. Britt

Kerry M. Britt, Pretreatment Manager

***TYPICAL AUTOMOTIVE  
FLEET WASHING WASTEWATER  
DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: P3702-083-0929  
Company Name: **UNITED STATES POSTAL SERVICE**  
Permitted Facility: **Providence VMF**  
Facility Address: 55 Corliss Street, Providence, RI 02904  
Mailing Address: 55 Corliss Street, Providence, RI 02904  
Facility Fleet Operations Manager: Mr. Michael Squatrito  
Facility Authorized Agent: Mr. Robert Masefield  
User Classification: Automotive Operations  
Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations) **Mr. Michael Squatrito and United States Postal Service**, 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 - S.

**This permit becomes effective upon on October 1, 2024  
and expires on September 30, 2029.**

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 6, 2024  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 13, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Vehicle Wash Water and Rinsewater;
  - b. Treated Wastewater from Facility Floor Washing.
2. No other process wastewater, chemicals, or solutions are to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances as detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Oils and Greases;
  - b. Fuels and Lubricating Oils;
  - c. Solvents;
  - d. Sludges;
  - e. Solids/Grit;



- f. Antifreeze Solutions;
  - g. Degreasing Solutions;
  - h. Caustic Solutions with a pH greater than 11.0 standard units;
  - i. Acidic Solutions with a pH less than 5.0 standard units.
2. The permittee is strictly prohibited from discharging wastewater containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 13, attached hereto and incorporated herein.
  3. The permittee may only treat and/or discharge those solutions that are specified in Section B(1) of this permit. The permittee is strictly prohibited from discharging any other solutions, chemicals or materials including all prohibited substances as defined in the Rules and Regulations without written approval from the NBC.
  4. No tanks are to be discharged to the sewer unless specifically approved by the NBC in writing.
  5. The use of portable pumps and/or flexible hose for transfer of chemicals or wastewater is specifically prohibited without written approval from the NBC.

#### **D. Pretreatment Requirements:**

1. The permittee must ensure that all vehicle wash water, rinsewater, and floor washing wastewater discharges to a solids/grit removal chamber or some other solids retention device to ensure that solids such as sand and grit are not discharged to the sewer system.
2. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - The effluent sampling tee in the oil and solids/grit separating tank, collecting wastestreams referenced in Section B(1)(a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through each sample location must be in compliance with the effluent limitations specified in Table 1 of this permit.

3. The permittee has installed and must operate and maintain the oil and solids/grit removal system. This oil and solids/grit removal system shall be fully operational whenever process discharges to the sewer system occur.

4. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

**E. Monitoring Requirements:**

1. During the months of January and July, until the expiration date of the permit, the permittee shall collect two (2) grab samples from the effluent samplings tee in the oil and solids/grit separating tank, Sample Location #1 while vehicle and floor washing operations are being conducted. The grab sample for each month is to be collected in a glass bottle and must be preserved and analyzed in accordance with EPA protocols for the following parameter:

Total Oil and Grease (fats, oils, and grease)

The second grab sample for each month must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

Lead (Total)                  Zinc (Total)

Table 2 attached hereto summarizes the sampling requirements for this facility.

2. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and must certify that the information submitted is accurate and complete to the best of their knowledge.
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 readings and the resultant total flow are to be submitted with the sampling results.

4. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
5. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in water usage;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

#### **F. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the oil and solids/grit removal system including, but not limited to, the following:
  - a. Date on which the separator is inspected, cleaned, and by whom;
  - b. Nature of any maintenance and corrective measures required to maintain proper performance of separator and other maintenance requests specified by inspectors of the NBC;
  - c. Completed manifests or physical receipts for waste materials removed from the facility.
2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

## **G. Emergency/Routine Notification Requirements:**

1. The permittee must maintain all associated facilities to ensure that incidental and accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 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:

Oil and Solids/Grit Separation System Failure

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

**H. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

**I. Permit Fee:**

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. 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.

## **K. Transfer of Permit Prohibited:**

Wastewater Discharge Permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

## **L. Permit Violations:**

### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other State or Federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

## **M. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable State or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this Wastewater Discharge Permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay all associated fees since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the Wastewater Discharge Permit.

## **N. Civil and Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

## **O. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.

2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

**P. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

**Q. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;



- i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
- j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

- 2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

## **R. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

## **S. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

VD:NPD:lp

Attachments:

- Self-Monitoring Compliance Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- List of Licensed Laboratories
- Twenty-four (24) Hour Violation Notification Fax Form

**Table 1**

**NBC Effluent Discharge Limitations**  
**Field's Point District**

All parameters in mg/l unless otherwise specified.

<b>Parameter</b>	<b>Limitation (Max)</b>
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 <sub>5</sub> )	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:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 32, 34, and 36	BOD <sub>5</sub> and TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
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**

**United States Postal Service – Providence VMF**  
**Sampling Requirements**

<b>Sample Location #1</b>		
<b>The Effluent Sampling Tee in the Oil and Solids/Grit Separating Tank</b>		
<b>Month</b>	<b>Grab Sample</b>	<b>Parameters</b>
January	X	Pb, Zn, O&G
February		
March		
April		
May		
June		
July	X	Pb, Zn, O&G
August		
September		
October		
November		
December		

**Legend**

- Cd - Cadmium
- Cr - Chromium
- Cu - Copper
- CN - Cyanide
- Pb - Lead
- Ni - Nickel
- Ag - Silver
- Zn - Zinc
- BOD - Biochemical Oxygen Demand
- TSS - Total Suspended Solids
- O&G - Total Oil and Gease

# CERTIFICATE TO DISCHARGE

the following types of process water:

**VEHICLE WASH WATER AND RinSEWATER,  
WASTEWATER FROM FACILITY FLOOR WASHING**

---

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

United States Postal Service – Providence VMF

55 Corliss Street

Providence, RI 02904

**PERMIT NUMBER:** P3702-083-0929

**PERMIT EXPIRATION DATE:** 09/30/2029

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 6, 2024  
Initial Date of Issuance

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager

***ANAEROBIC DIGESTOR  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: P3812-003-0927

Company Name: **RHODE ISLAND BIOENERGY, LLC**

Facility Address: 289 Scituate Avenue, Johnston, RI 02919

Mailing Address: c/o Anaergia Services, LLC 705 Palomar Airport Road,  
Suite 200, Carlsbad, CA 92011

Facility Chief Executive Officer: Mr. Andrew Benedek

Facility Authorized Agents: Mr. Kevin Bell, Mr. Alex McFarlane

User Classification: Anaerobic Food Digestion Operations

Categorical Standards Applicable: None


By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Andrew Benedek and Rhode Island Bioenergy, LLC**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 16 pages with conditions A - V.

**This permit becomes effective upon receipt  
and expires on September 30, 2027.**

Noncompliance with any term or condition of this permit shall constitute a violation of the Rules and Regulations and may subject the user to an **Administrative or Civil Penalty** of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

For the **Narragansett Bay Commission**:

  
\_\_\_\_\_  
Kerry M. Britt, Pretreatment Manager  
Narragansett Bay Commission

October 12, 2022

\_\_\_\_\_  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

# CONDITIONS TO PERMIT

## **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 15, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.
4. The permittee shall not discharge more than 148,000 gallons per day of food waste digestate and gas scrubber wastewater. The permittee must notify the NBC within twenty-four (24) hours if the daily flow restriction is exceeded.

## **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Food Waste Digestate;
  - b. Treated Condensate from Biogas Washing Scrubbers.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

## **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Solids larger than 1/2 inch in size;
  - b. Concentrated/Untreated Food Waste;



- c. Acidic Solutions with a pH less than 5.0 standard units;
  - d. Caustic Solutions with a pH greater than 11.0 standard units;
  - e. Degreasing Solutions;
  - f. Solvents;
  - g. Sludges;
  - h. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 15, attached hereto and incorporated herein.
  3. The permittee may only treat and/or discharge those solutions that were indicated as such on plans approved by the NBC. The permittee is strictly prohibited from discharging any other tanks, solutions, chemicals or materials, including all prohibited substances as defined in the Rules and Regulations, without written approval from the NBC.
  4. The permittee is strictly prohibited from using portable pumps and/or flexible hose to transfer solutions directly to the pretreatment system or to bypass the pretreatment system and/or discharge solutions directly to the sewer without written approval from the NBC.

#### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line from the MBR system, collecting all process discharges specified in Section B(1) (a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee has installed and shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.

3. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.

### **E. Monitoring Requirements:**

1. The permittee shall monitor the pH of the effluent discharge and record it continuously. The permittee shall report the results monthly in a summary report giving the maximum, minimum and average pH readings for each day of operation (see sample copy enclosed). The data must be reported directly from the recording chart to an accuracy of 0.1 standard units. The pH Monitoring Report must be received by the NBC within thirty (30) days from the end of the month in which the data is recorded. The original recording chart must be maintained on site for a period of at least three (3) years.
2. The permittee shall monitor the quantity of treated wastewater discharged to the NBC sewer system and record the total daily flow from the turbine water meter. The permittee shall report the daily flow in a summary report which must be received by the NBC within thirty (30) days from the end of the month in which the flow was recorded. The turbine meter must be inspected at a minimum of one (1) time per year and calibrated as needed.
3. The permittee shall conduct sampling over one (1) full normal operating day during the months of January, February, March, April, May, June, July, August, September, October, November, and December until the expiration date of this permit from the sample port on the discharge line from the MBR system, Sample Location #1. The monthly samples must be collected, preserved, and analyzed in accordance with EPA protocols for the following parameters:

*Nitrogen Parameters\*:*

Ammonia (Total)  
Total Nitrogen\*

*Other Parameters:*

Biochemical Oxygen Demand (BOD<sub>5</sub>)  
Total Suspended Solids (TSS)  
Total Oil & Grease (fats, oils, and grease)

\*The limitations for ammonia and nitrogen are seasonal and will be enforced from May 1<sup>st</sup> through October 31<sup>st</sup>. The Total Nitrogen result must be provided in total concentration (mg/L) and total loading (pounds).

Table 2 attached hereto summarizes the sampling requirements for this facility.

4. All water meters measuring flows, which ultimately discharge to the sampling locations specified previously, are to be read at the start of the sampling day and at the end of the sampling day. These results and the resultant total flow are to be submitted with the sampling results.
5. The analytical results for each sampling month listed above must be received by the NBC within thirty (30) days after the end of the month in which the samples are to be collected. All sampling and analyses are to be done in accordance with EPA approved procedures (40 CFR §403 and 40 CFR §136). The permittee must complete and submit a Self-Monitoring Compliance Report (copy enclosed) with each certified laboratory analysis sheet including chain of custody documentation. The laboratory analysis report must indicate the EPA approved test procedure for each parameter listed. All Self-Monitoring Compliance Reports must be signed by the permittee or authorized agent and certify that the information submitted is accurate and complete to the best of their knowledge.
6. The permittee must compare the analytical report results with the NBC effluent discharge limitations listed in Table 1. If there are any violations of the NBC standards, the permittee must notify the NBC within twenty-four (24) hours of becoming aware of the violation by contacting pretreatment staff at 461-8848 or by using the twenty-four (24) hour violation notification FAX form and must resample and analyze for the parameter(s) in violation of the NBC standards, excluding pH. The resampling results must be received by the NBC no later than thirty (30) days following the date that the permittee became aware of the initial violation of the standards.
7. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:
  - a. Failure to meet effluent limitations;
  - b. Change in production processes;
  - c. Expansion or reduction of production;
  - d. Change in water usage;
  - e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

#### **F. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining a logbook documenting all records pertaining to the operation of the pretreatment system including, but not limited to, the following:
  - a. Amount of chemicals used on a monthly basis to provide pretreatment;
  - b. Amount of sludge generated on a monthly basis;
  - c. Completed manifest forms for hazardous materials;

- d. Maintenance performed on the pretreatment system including weekly probe cleaning, monthly probe calibration, and other maintenance requests specified by inspectors of the NBC;
  - e. Turbine meter inspections, maintenance, and calculations.
2. Records which substantiate any information supplied in permit applications. Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable State or Federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

### **G. Spill and Slug Prevention Control Plan:**

The permittee must maintain an approved Spill and Slug Prevention Control Plan and all associated facilities to ensure that incidental and accidental spills are unable to enter the NBC sewer system.

### **H. Toxic Organic/Solvent Management Plan:**

The permittee must ensure that toxic organic compounds are not routinely discharged or spilled into the sewer system and must at all times maintain associated spill control facilities to ensure proper containment and disposal of toxic organic compounds. A list of toxic organic compounds is enclosed.

### **I. Emergency/Routine Notification Requirements:**

1. Emergency Notification of Accidental Incidental Discharge

**In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its twenty-four (24) hour Emergency Hotline Number, 222-6781. Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.**

## 2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures.

Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;

Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

## 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

- a. pH monitoring equipment failure;
- b. pH probe failure;
- c. pH chart recorder failure;
- d. Chemical feed pump failure;
- e. Pretreatment system pump, filter, or mixer failure;
- f. Turbine meter failure.

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions, including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

**J. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

**K. Fees:**

The permittee agrees to pay all sewer user fees, including application fees, assessed by the NBC in accordance with rates and fees approved by the Public Utilities Commission pursuant to R.I.G.L. §39-1-1 et seq. and §46-25-1 et seq. The permittee agrees to reimburse the NBC for the cost of the collection of any and all fees associated with the permit, including reasonable attorney's fees.

**L. Authorization To Do Business:**

The permittee is a limited liability company. The permittee shall ensure the limited liability company be registered with the Rhode Island Secretary of State Corporations Division. Rhode Island Bioenergy, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Rhode Island Bioenergy, LLC has its charter or existence revoked by the Rhode Island Secretary of State, the permittee shall notify the NBC in writing within thirty (30) days of notice of such revocation.

In the event Rhode Island Bioenergy, LLC is no longer in good standing with the Rhode Island Secretary of State or the charter is revoked for any reason, any individual named as a co-permittee or any individual exercising ownership of Rhode Island Bioenergy, LLC shall be subject to the terms and conditions of the permit as if named herein.

### **M. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

### **N. Transfer of Permit Prohibited:**

Wastewater discharge permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

### **O. Permit Violations:**

#### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

#### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

#### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other state or federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

#### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and or imprisonment as defined in R.I.G.L. §46-25-25.3.

#### **P. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable state or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this wastewater discharge permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the wastewater discharge permit.



### **Q. Civil And Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

### **R. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

### **S. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

### **T. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;

- d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
- e. Violation of any terms or conditions of the permit;
- f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
- g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
- h. To correct typographical or other errors in the permit;
- i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
- j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

### **U. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

## **V. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

NPD:KMB:sm

Attachments:

- Self-Monitoring Compliance Report Form
- Continuous pH Monitoring Report Form
- Designation of Authorized Agent Form
- RCRA Handbook
- Twenty-four (24) Hour Violation Notification Fax Form
- List of Licensed Laboratories

**Table 1**

**NBC Effluent Discharge Limitations**  
**Field's Point District**

All parameters in mg/l unless otherwise specified.

<b>Parameter</b>	<b>Limitation (Max)</b>
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 <sub>5</sub> )	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:

<b>Industrial User</b>	<b>Parameter(s)</b>	<b>Limitation</b>
<b>Category/Categories</b>		<b>(lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 32, 34, and 36	BOD <sub>5</sub> and TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***
<b>Industrial User</b>		<b>Limitation</b>
<b>Category/Categories</b>	<b>Parameter(s)</b>	<b>(lbs/day)</b>
32	Total Nitrogen	300***
32	Ammonia	300***

- \* The limitation listed above for arsenic applies to all Industrial Users except the landfill which must meet 0.4 mg/L
- \*\* The limitation listed above for cyanide only applies to Industrial Users in categories 11 and 15. All other users must meet 0.4 mg/l for cyanide.
- \*\*\* Total Nitrogen and Ammonia Limitations are seasonal from May 1st through October 31st.

**Table 2**

**Rhode Island Bioenergy, LLC**  
**Sampling Requirements**

Sample Location #1		
Sample Port on the Discharge Line from the MBR System		
Month	Composite Sample	Parameters
January	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
February	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
March	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
April	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
May	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
June	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
July	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
August	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
September	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
October	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
November	X	BOD, TSS, O&G, NH <sub>3</sub> , TN
December	X	BOD, TSS, O&G, NH <sub>3</sub> , TN

**Legend**

BOD - Biochemical Oxygen Demand

TSS - Total Suspended Solids

O&G - Total Oil and Grease (fats, oils, and grease)

NH<sub>3</sub> - Ammonia

TN - Total Nitrogen

# CERTIFICATE TO DISCHARGE

the following types of process water:

TREATED DIGESTATE AND GAS SCRUBBING CONDENSATE

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Rhode Island Bioenergy, LLC

289 Scituate Avenue

Johnston, RI 02919

PERMIT NUMBER: P3812-003-0927

PERMIT EXPIRATION DATE: 09/30/2027

The discharge permit must be kept at the above address for inspection. Failure to comply with the rules and regulations of the Narragansett Bay Commission or with the conditions of the discharge permit will subject the permittee to fines of up to \$25,000 per violation per R.I.G.L. 46-25-25.3.

October 12, 2022

Initial Date of Issuance



Kerry M. Britt, Pretreatment Manager

***TYPICAL GROUNDWATER  
REMEDICATION WASTEWATER  
DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: B4012-041-0829  
Company Name: **CONOPCO, INC. D/B/A UNILEVER**  
Facility Address: 35A Martin Street, Cumberland, RI 02864  
Mailing Address: 700 Sylvan Avenue, Englewood Cliffs, NJ 07632  
Facility President: Mr. Herrish Patel  
Facility Authorized Agent: Ms. Natalia Cavaliere  
User Classification: Groundwater Remediation Discharges  
Categorical Standards Applicable: None

By virtue of Rhode Island's General Laws Title 46 Chapter 25 (Act) and in accordance with The Narragansett Bay Commission Rules and Regulations for Use of the Wastewater Facilities (Rules and Regulations), **Mr. Herrish Patel and Conopco, Inc. d/b/a Unilever**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 15 pages with conditions A - T.

**This permit becomes effective upon receipt  
and expires on August 31, 2029.**

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 30, 2024  
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 shall not discharge greater than 215,000 gallons per calendar day of groundwater. The permittee agrees to not exceed the maximum daily flow restriction and must notify the NBC of any exceedances of the daily maximum flow rate.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following tanks, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Groundwater Remediation Discharges;
  - b. Treated Steam Condensate Extraction Wastewater;
  - c. Cooling Tower Blowdown;
  - d. Steam Boiler Blowdown;
  - e. Water Softener Blowdown.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:

- a. Untreated Groundwater;
  - b. Untreated Steam Condensate Extraction Wastewater;
  - c. Acidic Solutions with a pH less than 5.0 standard units;
  - d. Caustic Solutions with a pH greater than 11.0 standard units;
  - e. Degreasing Solutions;
  - f. Solvents;
  - g. Sludges;
  - h. Fuel and Lubricating Oils.
2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1 on page 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 port downstream of the pretreatment system, collecting all process discharges specified in Section B(1)(a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee has installed and shall operate and maintain a pretreatment system in conformance with plans approved by the NBC. This pretreatment system shall be fully operational whenever process discharges to the sewer occur.

3. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.
4. The permittee must maintain a discharge flow meter with a mechanical, non-resettable totalizer to measure the amount of groundwater discharged. The meter must be operational at all times that discharges occur and will be utilized to assess sewer use fees based upon the volume of wastewater discharged 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.

### **E. Monitoring Requirements:**

1. 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 consisting of a minimum of twelve (12) equal volume grab samples shall be collected at least every half hour over the course of the operating day or shall be collected continuously with a composite sampler. The sample is to be collected from the sample port downstream of the pretreatment system, Sample Location #1. A minimum of 1,000 ml (1L) glass amber bottle with Teflon lined cap should be submitted to the laboratory for analysis. Each grab sample must be preserved immediately upon sample collection in accordance with EPA protocols, prior to compositing with other preserved grab samples. If an automatic composite sampler is used, the sample 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 sample must be tested for residual chlorine with potassium iodide paper. If chlorine residual is present in the sample, then 0.008% by volume of sodium thiosulfate must be added (i.e., 80 mg per liter of sample collected). The sample should then be retested for chlorine residual; if it is present, the addition of sodium thiosulfate should be repeated. Once chlorine residual has been eliminated from the sample, the pH of the sample must be adjusted to between 6.0 and 9.0 standard units and the sample must be stored in the dark until analysis at a temperature of 0-4°C. 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.

- b. On the same day that the composite sample listed in Section E(1)(a) above is being collected, four (4) grab samples are to be collected at equidistant time periods over an 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 be preserved immediately upon sample collection in accordance with EPA protocols. 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 sample may be composited in the laboratory immediately before analysis. All samples must be analyzed within three (3) days of collection for the **Volatile Organic Compounds (purgeables) fraction** of the Total Toxic Organics (TTO) list enclosed.

Table 2 attached hereto summarizes the sampling requirements for this facility.

2. The discharge flow meter referenced in Section D(4) must be read at the start of sampling and at the end of sampling. These readings and the resultant flow must 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. Amount of chemicals used on a monthly basis to provide pretreatment;
  - b. Completed manifest forms for hazardous materials;
  - c. Maintenance performed on the pretreatment system and other maintenance requests specified by inspectors of the NBC;
  - d. Discharge flow meter readings on a weekly basis.
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

**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. Chemical feed pump failure;
- b. Pretreatment system pump, filter, or mixer failure;
- c. Discharge flow meter failure and/or malfunction.

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. Conopco, Inc. d/b/a Unilever shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Conopco, Inc. d/b/a Unilever 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 Conopco, Inc. d/b/a Unilever 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 Conopco, Inc. d/b/a Unilever shall be subject to the terms and conditions of the permit as if named herein.

#### **K. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.



## **L. Transfer of Permit Prohibited:**

Wastewater Discharge Permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

## **M. Permit Violations:**

### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other State or Federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

## **N. Revocation/Suspension of Permit:**

1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable State or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:
  - a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
  - b. Failure to report changes in operations or wastewater constituents;
  - c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;
  - d. Failure to adhere to an approved compliance schedule;
  - e. Failure to comply with administrative orders or settlement agreements;
  - f. Failure to pay authorized fees and user charges;
  - g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this Wastewater Discharge Permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to pay the permit fee, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the Wastewater Discharge Permit.

## **O. Civil And Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

## **P. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

## **Q. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **R. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;
  - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
  - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

### **S. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

### **T. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

THC:KMB: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
- List of Toxic Organic Compounds

**Table 1**

**NBC Effluent Discharge Limitations**  
**Bucklin Point District**

All parameters in mg/l unless otherwise specified

<b>Parameter</b>	<b>Limitation (Max)</b>
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 <sub>5</sub> )	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:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
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**

**Conopco, Inc. d/b/a Unilever**  
**Sampling Requirements**

<b>Sample Location #1</b>		
<b>Sample Port Downstream of the Pretreatment System</b>		
<b>Month</b>	<b>Composite Sample</b>	<b>Parameters</b>
January	X	VOC, EXT
February	X	VOC, EXT
March	X	VOC, EXT
April	X	VOC, EXT
May	X	VOC, EXT
June	X	VOC, EXT
July	X	VOC, EXT
August	X	VOC, EXT
September	X	VOC, EXT
October	X	VOC, EXT
November	X	VOC, EXT
December	X	VOC, EXT

**Legend**

VOC - Volatile Organic compounds Portion of TTO List

EXT - Extractable Portion of TTO List

# CERTIFICATE TO DISCHARGE

the following types of process water:

**TREATED WASTEWATER FORM GROUNDWATER REMEDIATION OPERATIONS**

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Conopco, Inc. d/b/a Unilever

35A Martin Street

Cumberland, RI 02864

**PERMIT NUMBER:** B4012-041-0829

**PERMIT EXPIRATION DATE:** 08/31/2029

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 30, 2024  
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: B4100-030-0529

Company Name: **EATON CORPORATION**

Facility Address: 10 New Road, Rumford, RI 02916

Mailing Address: 10 New Road, Rumford, RI 02916

Facility President: Mr. John Sapp

Facility Authorized Agents: Mr. Peter Elleman, Mr. Joseph Estano

User Classification: Zero Discharge Metal Finishing, Machining, Cooling Tower and  
Non-Contact Cooling Water 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. John Sapp and Eaton Corporation**, 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 June 1, 2024  
and expires on May 31, 2029.**

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 8, 2024  
Date

**Mr. John Sapp and Eaton Corporation** hereby consents to this Zero Process Wastewater-Sanitary Discharge Permit. In so consenting, appropriate officers of **Eaton Corporation** have personally read and understood each of the numbered provisions in this Zero Discharge Permit. This permit allows **Eaton Corporation** to continue to discharge sanitary wastewater into the Narragansett Bay Commission sewer system while operating a process wastewater recycle system on the premises.

A corporation organized under the laws of \_\_\_\_\_,  
composed of officers as follows:

<u>Please Type or Print</u>	<u>Signature</u>	
_____ President	_____	_____ Date
_____ Vice President	_____	_____ Date
_____ Secretary	_____	_____ Date
_____ Treasurer	_____	_____ Date

I have read and understood the Rules and Regulations and the conditions and procedures contained in this permit.

Company Authorized Agent(s) \_\_\_\_\_ **Company Seal**

Title \_\_\_\_\_

Signature \_\_\_\_\_

**NOTE:** The NBC will accept the person(s) named on page 2 of this permit as the company's authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the company's by-laws or per a vote of the directors if the company is a corporation; a general partner or proprietor if the company is a partnership or sole proprietorship respectively; or a duly authorized representative, the individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the company. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

# CONDITIONS TO PERMIT

## **A. Zero Process Discharge-Wastewater Recycle Pretreatment System Requirements:**

1. The permittee shall operate and maintain a Zero Process Discharge Wastewater Recycle Pretreatment System as proposed in the plans that have been approved by the NBC. This pretreatment system shall be used specifically for the use of recycling wastewater or eliminating discharges from the following operations:
  - a. Pickling Wastewaters;
  - b. Cleaning Line Wastewaters;
  - c. Tubbing/Vibratory Wastewaters;
  - d. Machining Waste Solutions;
  - e. Waste Coolant and/or Cooling Solutions;
  - f. Air Compressor Condensate;
  - g. Cooling Tower Blowdown/Discharges;
  - h. Non-Contact Cooling Water from the Hydraulic Presses.
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 has capped off and sealed 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. Machining Waste Solutions;
  - c. Cooling Tower Blowdown/Discharges;
  - d. Cooling Wastewaters;
  - e. Rinse Solutions;
  - f. Soap Cleaning Solutions;
  - g. Cyanide Solutions;
  - h. Acid/Alkaline Solutions;
  - i. Vibratory/Tubbing Wastewaters;
  - j. Metal Cleaning Solutions;
  - k. Degreasing Solutions;
  - l. Solvents;
  - m. Sludges;
  - n. 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, 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 follow

- 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. Eaton Corporation shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Eaton Corporation 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 Eaton Corporation 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 Eaton Corporation 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 all associated fees, since the permit itself will not be revoked. During such suspension, the user shall be disconnected from the facility. The Commission shall have the authority to make periodic inspections during this time to determine whether the user is continuing to discharge regulated wastewater. Such discharge may be considered grounds for revocation of the Wastewater Discharge Permit.

**O. Civil and Criminal Liability:**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance with the Rules and Regulations or State or Federal laws or regulations.

**P. Duty To Comply:**

1. The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for enforcement proceedings including administrative, civil and/or criminal penalties, injunctive relief and summary abatements.
2. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

**Q. Removed Substances:**

Solids, sludges, filter residue or other pollutants removed in the course of treatment or control of waters or wastewaters shall be disposed of in accordance with §405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act. A Resource Conservation and Recovery Act (RCRA) informational brochure is attached to this permit to inform you of your RCRA obligations.

## **R. Permit Modification/Renewal:**

1. This permit may be modified for various reasons, including but not limited to the following:
  - a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
  - b. Material or substantial alterations or additions to permittee's process operations, discharge volume or discharge characteristics which were not considered in the drafting of this permit;
  - c. A change in any condition regarding either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
  - d. Information indicating that the permitted discharge poses a threat to the NBC collection or treatment system, POTW personnel, the general public, or the receiving waters;
  - e. Violation of any terms or conditions of the permit;
  - f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
  - g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR §403.13;
  - h. To correct typographical or other errors in the permit;
  - i. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
  - j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a permit renewal in accordance with the requirements of Section 1.8 of the Rules and Regulations a minimum of one hundred and eighty (180) days prior to the expiration date.

**S. Integration:**

This permit represents the entire agreement and understanding of the parties hereto to those matters contained herein. No prior oral or written understanding shall be of any force or effect with respect to those matters covered hereunder. This permit may not be modified or altered except in accordance with the provisions of Section 1.8 of the Rules and Regulations. All terms used in this permit shall be construed as defined under Section 1.2 of the Rules and Regulations.

**T. Jurisdiction:**

This permit shall be administered and interpreted under the laws of the State of Rhode Island. Jurisdiction of litigation arising from this permit shall be in the State of Rhode Island. If any part of this permit is found to be in conflict with applicable laws, such part shall be inoperative, null and void insofar as it is in conflict with said law, but the remainder of this permit shall be in full force and effect.

CLV:MM:rcf

Attachments:

- Designation of Authorized Agent Form
- RCRA Handbook
- List of Toxic Organic Compounds
- Monthly Zero Process Wastewater Discharge Certification

**Table 1**

**NBC Effluent Discharge Limitations**  
**Bucklin Point District**

All parameters in mg/l unless otherwise specified

<b>Parameter</b>	<b>Limitation (Max)</b>
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 <sub>5</sub> )	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:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
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.

**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: B8000-158-0429  
Company Name: **RI SEPTIC & CESSPOOL**  
Company President: Ms. Sarah Luther  
Facility Address: 29 Institute Lane, Apt. 6, North Scituate, RI 02857  
Mailing Address: 29 Institute Lane, Apt. 6, North Scituate, RI 02857  
DEM License Number: 1006

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 **Ms. Sarah Luther and RI Septic & Cesspool**, 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 upon receipt  
and expires on April 30, 2029.**

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

June 17, 2024  
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 B8000-158-0429**  
**Attachment A**  
**RI Septic & Cesspool**

**PERMITTED VEHICLES:**

VEHICLE TYPE	REGISTRATION NUMBER	TRUCK VIN NUMBER	CAPACITY (GALLONS)
TANKER - INTERNATIONAL	RI-1QT826	1HTMMMMN1FH721217	2,699

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: P8500-077-0429

Company Name: **MOSLEY A GROSS INC. D/B/A FRESH PITA TWIST**

Facility Address: 1385 Mineral Spring Avenue #A, North Providence, RI 02904

Mailing Address: 1385 Mineral Spring Avenue #A, North Providence, RI 02904

Facility President: Ms. Alexandria Mosley

Facility Authorized Agent: Ms. Sara Gross

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), **Ms. Alexandria Mosley and Mosely A Gross Inc. d/b/a Fresh Pita Twist**, hereinafter jointly referred to as **Permittee**, is hereby authorized to discharge process wastewater from the above identified facility in accordance with the terms and conditions set forth in this permit.

All discharges authorized herein must be consistent with the effluent limitations, monitoring requirements and other conditions set forth in this permit. The discharge of any pollutant not identified in this permit or any pollutant identified in this permit at a level in excess of that authorized shall constitute a violation of the permit. This permit consists of 12 pages with conditions A - T.

**This permit becomes effective upon receipt  
and expires on April 30, 2029.**

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 18, 2024  
Date

**NOTE:** The NBC will accept the person(s) named on this permit as the **Permittee's** authorized agent(s) until notified otherwise.

An authorized agent or authorized company representative is a person who is a principal executive officer or other corporate officer with signatory powers as per the **Permittee's** by-laws or per a vote of the directors if the **Permittee** is a corporation; a general partner or proprietor if the **Permittee** is a partnership or sole proprietorship respectively; or a duly authorized representative of an individual designated above if such representative is responsible for the overall operation of the facility and has the authority to sign contracts, permits, permit applications, monitoring results and other documents in the company's name and otherwise bind the **Permittee**. The **Permittee** may designate additional or new authorized agents by completing and submitting the enclosed Designation of Authorized Agent form.

The NBC will not accept documents signed by persons other than the Company's authorized agent(s) or authorized representative(s).

## CONDITIONS TO PERMIT

### **A. Effluent Discharge Limitations:**

1. The permittee shall at all times comply with the effluent limitations specified in Table 1 on page 12, attached hereto and incorporated herein.
2. The permittee shall comply with all discharge limitations and prohibitions contained in Section 1.5 of the Rules and Regulations, as well as all other provisions of those Rules, and any other applicable State or Federal standards, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C. §1251 et seq. and R.I.G.L. §46-12-1 et seq. The permittee shall at all times comply with 40 CFR §403.5 and may not introduce into the NBC facilities any pollutants which shall violate the general or specific prohibitions including but not limited to discharges resulting in pass through or interference situations at the NBC facilities.
3. The permittee shall not increase the use of process water or dilute a discharge in any way as a partial or complete substitute for adequate treatment to achieve compliance with the above standards.

### **B. Permitted Discharges:**

1. The permittee is authorized to discharge the following waste, solutions, or process wastewater streams to the NBC facilities:
  - a. Treated Food Preparation Wastewater;
  - b. Treated Dish, Pot, and Equipment Wash Water.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances detailed in the Rules and Regulations. Prohibited discharges include, but are not limited to, the following:
  - a. Fryolator/Cooking Oils and Grease;
  - b. Ground Food, Food Products, or Solid Kitchen Waste;
  - c. Degreasing Solutions;
  - d. Solvents;
  - e. Sludges;
  - f. Fuel and Lubricating Oils.

2. The permittee is strictly prohibited from discharging any process wastewater streams other than those specified in Section B(1) of this permit or wastestreams containing pollutants with concentrations in excess of the effluent limitations specified in Table 1, attached hereto and incorporated herein.
3. The permittee is prohibited from discharging any solution or chemicals which might interfere with the proper operation of the automatic grease removal unit or may cause a violation of the Rules and Regulations.
4. The use of garbage grinders, food macerators, or other equipment used for the purpose of discharging solid waste to the sewer system is strictly prohibited.

#### **D. Pretreatment Requirements:**

1. The permittee must provide and maintain an easily accessible sample location downstream of each process discharge specified in Section B(1) of this permit. A total of one (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge pipe from the automatic grease removal unit, collecting all process discharges specified in Section B(1)(a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit at all times.

2. The permittee has installed an automatic grease removal unit in conformance with the plans approved by the NBC. The grease removal unit shall be fully operational on a twenty-four (24) hour basis whenever kitchen operations are being conducted.
3. The permittee is responsible for operating and maintaining the automatic grease removal unit so that the effluent limitations are met at all times. The permittee shall also be responsible for maintaining all records pertaining to the operation of the grease removal unit including, but not limited to, the following:
  - a. The automatic grease removal unit with all associated strainers must be inspected every workday to determine whether the system is functioning normally or in need of cleaning, grease disposal or any corrective measures;

- b. A grease removal unit logbook must be maintained at the permittee's facility and must be located near the grease removal unit. The logbook must include such information as outlined under Section F, Record Keeping Requirements. The logbook must be kept on the premises at all times and available to NBC personnel for their review;
  - c. Only kitchen wastewater from pot sinks, wok stations, and dinnerware/utensil prerinsing operations may be discharged into the automatic grease removal unit. Sanitary waste, dishwasher wastewater and other wastewater may not be discharged to the grease removal unit.
4. The permittee must install additional grease removal equipment that conforms with Section 1.8.8 of the Rules and Regulations if determined necessary by the NBC to ensure that effluent limitations are met at all times. Plans of the pretreatment system must be submitted to the NBC for approval before beginning construction, should installation of additional grease removal system be required.

#### **E. Monitoring Requirements:**

No regularly scheduled wastewater monitoring reports are required of the permittee. The NBC may, at any time, change the monitoring requirements specified in this permit. Conditions that may result in the imposition of monitoring requirements include, but are not limited to, the following:

- a. Inspections or samplings performed by NBC personnel;
- b. An increase in the seating capacity of the facility;
- c. An increase in flow to the grease removal unit;
- d. Discovery of additional information unavailable to the NBC at the time this permit was prepared;
- e. Improper maintenance of a grease removal unit;
- f. Failure to meet the NBC effluent discharge limitations.

#### **F. Record Keeping Requirements:**

1. The permittee must inspect and maintain the automatic grease removal unit at least once per day and record in a logbook the time and date (month, day, and year) of the inspection, each grease removal activity, and the name of the individual conducting the activity. Maintenance activities which must be documented in a logbook include the following:
- a. Cleaning and emptying of the solids basket;
  - b. Cleaning of the wiper blades;
  - c. Cleaning of the trough;
  - d. The estimated amount of grease removed;
  - e. Wet vacuuming of the grease removal unit.



2. Records which substantiate any information supplied in permit applications, Self-Monitoring Compliance Reports and any other informational requirements of the Rules and Regulations or any applicable state or federal law are to be kept by the permittee for a period of at least three (3) years unless a dispute or litigation involving the subject of those records is pending, in which case these records are to be kept by the permittee for a period of at least three (3) years following resolution of such litigation or dispute.

## **G. Emergency/Routine Notification Requirements:**

1. Emergency Notification of Accidental/Incidental Discharge

The permittee must maintain all associated facilities to ensure that incidental and accidental spills are not able to enter the NBC sewer system. **In the case of an accidental discharge into the NBC facilities, including any discharge that would violate a Federal prohibition under 40 CFR 403.5(b), it is the responsibility of the permittee to notify the NBC of the incident immediately by calling the Pretreatment Section at 461-8848 or during non-business hours at its 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. Mosley A Gross Inc. d/b/a Fresh Pita Twist shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Mosley A Gross Inc. d/b/a Fresh Pita Twist 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 Mosely A Gross Inc. d/b/a Fresh Pita Twist 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 Mosely A. Gross Inc. d/b/a Fresh Pita Twist 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 all associated fees 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.

MH:NPD:lp

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.

<b>Parameter</b>	<b>Limitation (Max)</b>
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 <sub>5</sub> )	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:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 32, 34, and 36	BOD <sub>5</sub> and TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10***
33	Ammonia	2***

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
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**

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into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Mosely A Gross Inc. d/b/a Fresh Pita Twist

1385 Mineral Spring Avenue #A

North Providence, RI 02904

**PERMIT NUMBER:** P8500-077-0429

**PERMIT EXPIRATION DATE:** April 30, 2029

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 18, 2024  
Initial Date of Issuance

/s/ Kerry M. Britt  
Kerry M. Britt, Pretreatment Manager



***TYPICAL DENTAL OPERATIONS  
WASTEWATER DISCHARGE PERMIT***



# WASTEWATER DISCHARGE PERMIT

Permit Number: B9400-221-0729

Company Name: **BRIGHT DENTS, LLC**

Facility Address: 1288 Newport Avenue, Pawtucket, RI 02861

Mailing Address: 1288 Newport Avenue, Pawtucket, RI 02861

Facility President: Dr. Guilbert Maria

Facility Authorized Agent: Dr. Guilbert Maria

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. Guilbert Maria and Bright Dents, 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 14 pages with conditions A - U and Attachment A.

**This permit becomes effective upon receipt  
and expires on July 31, 2029.**

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 29, 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 Wastewater.
2. No other process wastewater is to be discharged to the sewer unless specifically approved by the NBC in writing.

### **C. Prohibitions:**

1. The permittee is strictly prohibited from discharging any prohibited substances 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 (1) sample location must be provided and must collect wastewater from the process operations indicated as follows:

Sample Location #1 - Sample port on the discharge line of the amalgam separator, collecting all process discharges specified in Section B(1) (a and b) of this permit.

The permittee is prohibited from discharging dilution wastestreams, such as sanitary and non-contact cooling water into any process wastewater sampling location. Dilution wastestreams must discharge downstream of the process wastewater sampling location. The discharge through Sample Location #1 must be in compliance with the effluent limitations specified in Section A and Table 1 of this permit.

2. The permittee is responsible for properly operating and maintaining the pretreatment system to achieve and ensure compliance with the conditions of this permit. Proper operation and maintenance shall include but not be limited to: effective performance, adequate funding, adequate operator staffing and training, adequate laboratory and process controls, including appropriate quality assurance procedures.
3. The permittee shall adhere to all mandatory best management practices of the NBC Best Management Practices for the Management of Waste Dental Amalgam.

4. In accordance with 40 CFR §441.40, Pretreatment Standards for New Sources and the NBC Best Management Practices for the Management of Waste Dental Amalgam, the permittee shall install, operate and maintain an amalgam separator which is ISO 11143 certified to an efficiency of 99% removal in accordance with the plans approved by the NBC. The amalgam separator shall be fully operational whenever discharges from dental procedures are occurring.
5. The permittee shall maintain the amalgam separator. Maintenance activities include but are not limited to the following:
  - a. The permittee must inspect the separator weekly to ensure proper operation;
  - b. The permittee must adhere to all manufacturers specifications for maintenance of the separator;
  - c. The maintenance activities must be documented in a logbook as required by Section G(1) of this permit.
6. The permittee must maintain chair side traps on all dental chairs to capture large amalgam particles from cuspidors and vacuum systems. Chair side traps must be inspected daily and cleaned or replaced as necessary. Disposable traps or material from reusable traps must be placed in a labeled storage container. The permittee may only rinse a trap if necessary and only in a designated sink that is plumbed with appropriate flow restriction to an NBC approved amalgam separator.
7. The permittee shall ensure that all vacuum pumps are equipped with filters. The permittee shall replace the filter at least once per month or more frequently if necessary. Removed filters should be held over a spill tray to capture any accumulated water from the trap. The water should be carefully decanted without losing any visible amalgam. The decant water, if free of visible amalgam, may be discharged to the sewer through an NBC approved amalgam separator. Dry-turbine vacuums must be inspected to ensure there is no built up sludge in the air/water separator. Collected sludge must be disposed of properly as a mercury containing waste.
8. The permittee shall use a NBC approved cleaner for disinfection of amalgam and/or mercury contaminated vacuum lines, instruments, or equipment. The use of oxidizing or acidic cleaners, including but not limited to bleach, chlorine, iodine and peroxide that have pH lower than 6 or greater than 8 is prohibited.
9. The permittee has designated all sinks for sanitary use only. The permittee shall post signs at these sinks stating "Sanitary Use Only". Washing of equipment, instruments, filters, and capsules in these sinks is strictly prohibited.

## **E. Certification of Compliance with Best Management Practice:**

The permittee shall submit written annual certification of compliance with Best Management Practices for the Management of Waste Dental Amalgam for the period from January to December. The certification must be made on the form designated as Best Management Practice Certification, Attachment A, and must be received within thirty (30) days after the period for which the certification is being made.

## **F. Monitoring Requirements:**

No wastewater sampling will be required by this permit. The NBC may, at any time, require more frequent monitoring than specified in this permit. Conditions that may result in the imposition of more frequent monitoring include, but are not limited to, the following:

- a. Failure to meet effluent limitations;
- b. Change in production processes;
- c. Expansion or reduction of production;
- d. Change in water usage;
- e. Discovery of additional information on monitoring or production unavailable to the NBC at the time this permit was prepared.

## **G. Record Keeping Requirements:**

1. The permittee shall be responsible for maintaining onsite physically or electronically the manufactures 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, 434-6350.** Within five (5) days following an accidental discharge, the permittee shall submit to the NBC a detailed written report describing the cause and volume of the discharge and the measures to be taken by the user to prevent similar future occurrences by the permittee.

2. Routine Notification of Operational Changes

The permittee must notify the NBC in writing at least thirty (30) days prior to instituting any changes in operations that may affect the quality or quantity of the process wastestream discharged to the sewer system or may affect the adequacy of spill control measures. Operational changes that may affect the quality or quantity of the process wastestream or the adequacy of spill control measures include, but are not limited to, the following:

- a. Addition, removal, or relocation of process tanks or solutions;
- b. Installation of new wastewater generating process operations;
- c. Relocation of process operation piping or valving resulting in a new or different point of discharge;
- d. Modification of any pretreatment process or procedure;
- e. Installation or modification of pretreatment equipment or associated piping;



Should the permittee be unsure as to whether an operational change requires written NBC notification, it is strongly recommended that the permittee contact the NBC by telephone prior to instituting the proposed change in operations. This will ensure that the proper notification is provided to the NBC. With respect to the thirty (30) day written notification requirement, should the permittee require immediate approval to make an operational change in order to accommodate business, the NBC will make every effort to accommodate the permittee so as to not impede operations at the facility. The discretion used by the NBC with respect to this issue is dependent on the magnitude of the proposed operational changes and the resulting effect on the characteristics of the wastestream and/or the spill control measures at the facility. The permittee may notify the NBC of the following operational changes by telephone rather than in writing as required above:

- f. Change from the hours of facility operation specified in the discharge permit application;
- g. Change in the personnel responsible for the proper operation of pretreatment equipment.

### 3. Routine Notification of Pretreatment Equipment Malfunctions

In the event of pretreatment equipment failure or malfunction, the permittee must notify the NBC of the incident by the close of the next full business day by calling the NBC Pretreatment Section at 461-8848. Pretreatment equipment failure includes, but is not limited to, the following:

#### Amalgam Separator Failure

Any equipment failure or malfunction which results in a spill and/or accidental discharge must be reported immediately in accordance with the NBC Emergency Spill Notification Procedure. Should a pretreatment equipment failure or malfunction occur, the permittee is strictly responsible for complying with all other permit conditions including, but not limited to, maintaining full compliance with effluent limitations and monitoring requirements.

## **I. Right of Entry:**

The NBC, upon presenting identification and appropriate credentials, is authorized to enter the premises of the permittee during working hours and at other reasonable times for the purposes of inspection, sampling, reading water meters, records inspecting and copying and as otherwise authorized under R.I.G.L. §46-25-25.1. Reasonable hours in the context of inspection and sampling include any time the NBC has reason to believe that violation of the permit or of the Rules and Regulations is occurring.

**J. 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. Bright Dents, LLC shall remain in good standing with the Rhode Island Secretary of State Corporations Division at all times. In the event Bright Dents, 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 Bright Dents, 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 Bright Dents, LLC shall be subject to the terms and conditions of the permit as if named herein.

**L. Closing, Selling, Moving the Business:**

If the permittee intends to close, liquidate, sell or move the permitted premises, located as referenced on page 1 of this permit, the permittee must notify the NBC in writing at least thirty (30) days prior to disposing of any process waste associated with the move or the cessation of business.

**M. Transfer of Permit Prohibited:**

Wastewater Discharge Permits are issued to a specific user for a specific operation. This permit may not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation without the express written permission from the NBC. The permittee shall provide a copy of this permit to any prospective purchaser of said facility referenced on page 1 of this permit at least fourteen (14) days prior to closing on the business or property.

## **N. Permit Violations:**

### 1. Enforcement Costs

The permittee agrees to reimburse the NBC for the cost of enforcing the permit, including reasonable attorneys' fees, if violations of the permit are found by a hearing officer during the course of an administrative hearing or if such decision is appealed, then in a court of competent jurisdiction.

### 2. Damage to the Facilities

The permittee agrees to indemnify and hold harmless the NBC from and against any liability, loss, cost, expense or actual damage (including reasonable attorneys' and accountants' fees incurred in defending or prosecuting any claim for any such liability, loss, cost, expense or damage) suffered by the NBC and caused by discharges from the permittee, either singly or by interaction with other wastes.

### 3. Violations of the NBC Permit

The permittee agrees to reimburse the NBC for any penalty and additional operating expense incurred by the NBC for violations of the NBC NPDES, RIPDES, or any other State or Federal permit which were caused by discharges from the permittee, either singly or by interaction with other wastes.

### 4. Penalties for Violations

Section 1.10 of the Rules and Regulations provides that any person who violates a permit condition is subject to an administrative or civil penalty of up to \$25,000 per violation per day as defined in R.I.G.L. §46-25-25.2. Willful or criminally negligent violations shall be punishable by the aforementioned fine and/or imprisonment as defined in R.I.G.L. §46-25-25.3.

## **O. Revocation/Suspension of Permit:**

### 1. Violations of the conditions of this permit, the Rules and Regulations, Act, and applicable State or Federal regulations may result in the revocation of this permit in accordance with the due process requirements of the Rules and Regulations. Violations that may result in revocation of this permit include, but are not limited to, the following:

- a. Failure to accurately report the wastewater constituents and characteristics of the discharge;
- b. Failure to report changes in operations or wastewater constituents;
- c. Failure to allow NBC personnel statutorily authorized access for the purposes of inspection or monitoring;

- d. Failure to adhere to an approved compliance schedule;
- e. Failure to comply with administrative orders or settlement agreements;
- f. Failure to pay authorized fees and user charges;
- g. Violation of any other applicable permit conditions.

This list is for illustrative purposes and is not intended to be inclusive.

2. The Executive Director may suspend this Wastewater Discharge Permit should the permittee cease operations for any period exceeding one (1) month. The suspension will not act as a revocation of the permit, but rather as a temporary suspension of the user's rights under the permit while operations have ceased. During such suspension, the user's connection to the facilities shall be plugged. The user shall still be required to all associated fees, 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.

THC:NPD:sm

Attachments:

Designation of Authorized Agent Form  
RCRA Handbook

**Table 1**

**NBC Effluent Discharge Limitations**  
**Bucklin Point District**

All parameters in mg/l unless otherwise specified

<b>Parameter</b>	<b>Limitation (Max)</b>
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 <sub>5</sub> )	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:

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/1000 gal)</b>
14	BOD <sub>5</sub> and TSS	5
23 and 29	BOD <sub>5</sub> and TSS	20
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10
32	BOD	570
32	TSS	10
33	BOD <sub>5</sub> and TSS	75
33	Total Nitrogen	10**
33	Ammonia	2**

<b>Industrial User Category/Categories</b>	<b>Parameter(s)</b>	<b>Limitation (lbs/day)</b>
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.

**Attachment A**

**Best Management Practice Certification**

For the previous 12-month period from \_\_\_\_\_, 20\_\_ to \_\_\_\_\_, 20\_\_

Company Name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**RETURN TO:**  
Narragansett Bay Commission  
Pretreatment Program  
2 Ernest Street  
Providence, RI 02905-5502

I, \_\_\_\_\_, as authorized representative of  
\_\_\_\_\_, do hereby decree that the Narragansett Bay  
Commission Best Management Practices for the Management of Waste Dental Amalgam have  
been fully complied with for the past twelve month period.

I certify under penalty of law that this document and all attachments were properly prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for known violations.

\_\_\_\_\_  
Authorized Representative Signature

\_\_\_\_\_  
Date



# CERTIFICATE TO DISCHARGE

the following types of process water:

**TREATED DENTAL WASTEWATER CONTAINING AMALGAM AND DENTAL PROCESS WASTEWATER**

into the facilities of the

## Narragansett Bay Commission

is hereby granted to:

Bright Dents, LLC

1288 Newport Avenue

Pawtucket, RI 02861

**PERMIT NUMBER:** B9400-221-0729

**PERMIT EXPIRATION DATE:** 07/31/2029

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 29, 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 (NBC) Rules and Regulations for Use of the Wastewater Facilities (Section 1.8.9) require each user to provide protection from accidental discharge of prohibited materials and substances to the sewer. The user is required to provide detailed plans showing equipment and a brief description of operating procedures utilized to prevent these discharges.

This document was developed to assist you in determining what measures you need to implement and to properly document the spill prevention control procedures utilized at your facility; therefore, you must complete this document.

**Section A: Description of Discharge Practices and Storage Areas**

1. List all sources of routine sewer discharges and describe the method of discharge:

<b>Source of Discharge</b>	<b>Method of Discharge</b>
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:

<b>Source of Discharge</b>	<b>Method of Discharge</b>
Example: Annual Power Washing of Plating Room Floors	Gravity flow to pretreatment system



2. What procedures are utilized to prevent adverse impacts on the NBC sewage facility due to accidental spills? Examples of these procedures may include periodic inspection and maintenance of storage areas, and special procedures utilized during loading and unloading operations.

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3. List emergency response equipment available and procedures to be utilized in the event of a spill.

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**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.)

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2. Are the fuel tanks above ground \_\_\_\_\_ or below ground \_\_\_\_\_? Provide the capacity of each tank in gallons:

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3. Indicate provisions (i.e., alarms, sight glasses, etc.) and filling procedures that will minimize the risk of overfilling a tank.

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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?

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6. What measures and spill containment equipment are in place to contain spillage from an overfilled tank?

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7. Are boiler treatment or other chemicals stored in the boiler facility or fuel depot areas? \_\_\_ Yes \_\_\_ No

If yes describe chemicals:

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8. Detail spill containment provided for chemicals stored in this area.

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9. If a spill should occur in the fuel depot or boiler facility, how would it be cleaned up and disposed?

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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?

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**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.)

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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?

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**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.

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SIGNATURE AND TITLE OF AUTHORIZED COMPANY REPRESENTATIVE

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DATE

**Attachment A\***

Area/Room: \_\_\_\_\_  
List Chemicals Stored in Area: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

List the Volume of the Largest Container in Area: \_\_\_\_\_

Are there open floor drains or sewer connections in this area? \_\_\_\_\_

List spill control measures in place: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

List capacity of spill containment area(s). Please note, the capacity of the containment area must be a minimum of 110% the volume of the largest container.

\_\_\_\_\_  
\_\_\_\_\_

Detail how a spill would be contained during working hours.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Detail how a spill would be contained during non-working hours. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

How will spills from this area be cleaned up and disposed? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

If currently there are no spill containment measures in this area, detail proposed measures to provide spill containment for chemicals and solutions in this area and the timeframe necessary to implement these measures.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\* Please make additional copies of this attachment for all areas of your facility.

***NBC TOXIC ORGANIC/SOLVENT  
MANAGEMENT PLAN GUIDANCE  
DOCUMENT***



**NARRAGANSETT BAY COMMISSION  
TOXIC ORGANIC/SOLVENT  
MANAGEMENT PLAN**

**COMPANY NAME:** \_\_\_\_\_  
**MAILING ADDRESS:** \_\_\_\_\_  
**PHONE NUMBER:** \_\_\_\_\_  
**PLAN PREPARED BY:** \_\_\_\_\_

In accordance with Section 1.7.2(A)(5) of the Narragansett Bay Commission (NBC) Rules and Regulations for Use of the Wastewater Facilities, the NBC may require any user who discharges into the facilities to provide information relating to discharges into the facilities to ensure compliance with prescribed pretreatment methods and regulations. Federal pretreatment standards, including those for metal finishers and electroplaters (40 CFR 413.03 and 433.12), require many industrial users to periodically monitor their wastestream for Total Toxic Organics (TTO's). Federal law allows the Industrial User to develop, implement and maintain a Toxic Organic/Solvent Management Plan, which once approved by the NBC, allows the Industrial User a waiver from performing the expensive and routine TTO monitoring.

In order to provide for the control of solvents and toxic organics which are not permitted to be discharged to the NBC sewerage facilities, the NBC is requiring, as a condition of the industrial sewer user's Wastewater Discharge Permit, that a Toxic Organic/Solvent Management Plan be prepared and submitted to the NBC in lieu of the regular monitoring for toxic organic compounds and solvents.

This form has been developed as a guidance document by the NBC Pretreatment Section to assist sewer users who must prepare a Toxic Organic/Solvent Management Plan. When completed, submitted and approved by the NBC this document will constitute the facility's Toxic Organic/Solvent Management Plan. The user will then be responsible to maintain all items indicated in this plan to ensure that solvents and toxic organic compounds are not discharged into the NBC sewerage system.

**Section A – Estimated Annual Solvent Purchases and Usages:**

Does your firm use any solvents, chemicals or compounds containing any of the toxic organic compounds listed on the EPA table of toxic organics attached to this document, or any other solvents, such as xylene, acetone, etc., not listed on the attached table? \_\_\_\_\_

If yes, you must complete all sections of this Toxic Organic/Solvent Management Plan. If no, you must sign the certification Section F of this plan.

List the type and estimated amount of solvents or toxic organic chemicals purchased and used yearly at this facility and provide a brief description detailing the usage of the chemical. A list of EPA toxic organic compounds is attached for your information. In addition to the compounds on this list, any other solvents purchased or used on the premises must be included (i.e. Acetone, 100 gallons/yr., used for paint removal).

Solvent	Use of Solvent	Estimated Gallons Annually Purchased

**Section B – Estimate of Solvents Stored and Annually Disposed:**

You must account for the total gallons of each solvent or toxic organic chemical listed in Section A. Indicate the estimated volume of each chemical presently stored on site and the estimated volume disposed of annually by each method



of disposal (e.g. reclamation, contract hauler, consumption in product, evaporation, sewer discharge or other) and the total estimated gallons on site and disposed of annually. **The total gallons listed here for each chemical must equal the total gallons listed in Section A for the same chemical.**

Solvent	Gallons Typically Stored On Site	GALLONS DISPOSED ANNUALLY						Total Gallons Stored, Used, or Disposed Annually
		Discharged In Wastewater	Evaporated During Usage	Reclaimed On-site	Shipped Off-site	Consumed or Retained in Product	Other (Indicate Gallons & Disposal Method)	

**Section C – Wastewater Analysis:**

Has your process wastewater ever been analyzed for any or all of the toxic organic compounds or solvents listed in Section A?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, please attach a copy of the analysis. If no, this monitoring must be conducted and the analytical results for each toxic organic compound and solvent listed in Section A must be attached to the plan.

**Section D – Solvent Process Operations:**

1. For each of the toxic organic compounds or solvents listed in Section A, provide a brief description of the process in which the chemical is used and describe in detail the work methods used to prevent and prohibit toxic organic and solvent dragout, drippage and spillage from entering the wastewater discharged from the facility.

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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.

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**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.

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**Section F – Certification Statement:**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry or the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine

and imprisonment for knowing violations. I hereby certify that based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation for Total Toxic Organics (TTO), to the best of my knowledge and belief, no dumping of concentrated toxic organic compounds into the wastewaters has or does occur. I further certify that this facility is implementing and will abide by this Toxic Organic/Solvent Management Plan as submitted to the NBC.

\_\_\_\_\_  
SIGNATURE OF AUTHORIZED COMPANY REPRESENTATIVE

\_\_\_\_\_  
TITLE

\_\_\_\_\_  
DATE

## List of Toxic Pollutants

The following List of Toxic Pollutants has been designated pursuant to Section 307(a)(1) of the Clean Water Act.

### Volatiles

#### EPA Method 624

arolein  
acrylonitrile  
benzene  
bromoform  
carbon tetrachloride  
chlorobenzene  
chlorodibromomethane  
chloroethane  
2-chloroethylvinyl ether  
chloroform  
dichlorobromomethane  
1,1-dichloroethane  
1,2-dichloroethane  
1,1-dichloroethylene  
1,2-dichloropropane  
1,3-dichloropropylene  
ethylbenzene  
methyl bromide  
methyl chloride  
methylene chloride  
1,1,2,2-tetrachloroethane  
tetrachloroethylene  
toluene  
1,2-trans-dichloroethylene  
1,1,1-trichloroethane  
1,1,2-trichloroethane  
trichloroethylene  
vinyl chloride

### Acid Compounds

#### EPA Method 625

2-chlorophenol  
2,4-dichlorophenol  
2,4-dimethylphenol  
4,6-dinitro-o-cresol  
2,4-dinitrophenol  
2-nitrophenol  
4-nitrophenol  
p-chloro-m-cresol  
pentachlorophenol  
phenol  
2,4,6-trichlorophenol

### Base/Neutral

#### EPA Method 625

\* acenaphthene  
\* acenaphthylene  
\* anthracene  
benzidine  
\* benzo (a) anthracene  
\* benzo (a) pyrene  
\* 3,4-benzofluoranthene  
\* benzo (ghi) perylene  
benzo (k) fluoranthene  
bis (2-chloroethoxy) methane  
bis (2-chloroethyl) ether  
bis (2-chloroisopropyl) ether  
bis (2-ethylhexyl) phthalate  
4-bromophenyl phenyl ether  
butylbenzyl phthalate  
2-chloronaphthalene  
4-chlorophenyl phenyl ether  
\* chrysene  
\* dibenzo (a, h) anthracene  
1,2-dichlorobenzene  
1,3-dichlorobenzene  
1,4-dichlorobenzene  
3,3-dichlorobenzidine  
diethyl phthalate  
dimethyl phthalate  
di-n-butyl phthalate  
2,4-dinitrotoluene  
2,6-dinitrotoluene  
di-n-octyl phthalate  
1,2-diphenylhydrazine  
(as azobenzene)  
\* fluoranthene  
\* fluorene  
hexachlorobenzene  
hexachlorobutadiene  
hexachlorocyclopentadiene  
hexachloroethane  
\* indeno (1,2,3-cd) pyrene  
isophorone  
\* naphthalene  
\* nitrobenzene  
N-nitrosodimethylamine  
N-nitrosodi-n-propylamine  
N-nitrosodiphenylamine  
\* phenanthrene  
\* pyrene  
1,2,4-trichlorobenzene

\*- Polynuclear Aromatic Hydrocarbons

### Pesticides

#### EPA Method 625

aldrin  
alpha - BHC  
beta - BHC  
gamma - BHC  
delta - BHC  
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)

***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. \_\_\_\_\_

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(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. \_\_\_\_\_

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(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. \_\_\_\_\_

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**Part II - Pretreatment Equipment and Process Operations**

(a) List all water using process operations and describe each process operation.

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(b) Is there a pretreatment system in operation? Yes No  
Describe, in full, the pretreatment technology presently being provided for each treated wastestream. \_\_\_\_\_

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(c) Who operates the pretreatment system? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(d) List all water using operations that are **not** pretreated (e.g. casting, tubbing, boiler blowdown, cooling water, etc.). \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(e) Is there an operation and maintenance manual maintained on site for pretreatment system? Yes No N/A

(f) Are there any spare parts maintained on site for the pretreatment equipment? Yes No N/A

If yes, list spare parts. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(g) Has system been installed according the NBC specifications? Yes No N/A

If no, what needs to be corrected? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\* Check pretreatment system piping, decant ports, transfer pumps, pH recording probe location, etc.

(h) Has system been installed according to NBC approved plans? Yes No N/A

If no, what needs to be corrected? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\* Compare plans with existing system.

- (i) Have changes been made to process operations or pretreatment system without NBC notification and approval? Yes No

If yes, detail changes. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- (j) Are any hydroxide sludges or other sludges produced at this facility from pretreatment operations? Yes No

If so, indicate type of sludge, volume, and source (e.g. Hydroxide sludge from clarifier, etc.) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- (k) Is any type of sludge discarded in the trash? Yes No  
If yes, specify. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

- (l) Are any concentrates or other hazardous materials removed by hazardous waste contractors (e.g. spent solvents, etc.)? Yes No

If yes, list types and amounts. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- (m) Does the facility utilize ion-exchange resins? Yes No  
If yes, are ion-exchange columns regenerated on site? Yes No  
If yes, how often are columns regenerated? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

How is regenerate material disposed of? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

How are columns regenerated? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Has the Pretreatment staff observed and sampled during the regeneration procedure? Yes No

If no, be sure to observe and arrange sampling of the regenerant.

**Part III - Maintenance and Record Keeping**

(a) Is pH recording/reporting required? Yes No

(i) Are pH charts being maintained? Yes No N/A

(ii) Do pH charts agree with monthly reports? Yes No N/A  
If no, detail inaccuracies. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(iii) Are the pH charts being dated properly (month, day, and year)?  
Yes No N/A

(b) Provide the following pre-inspection pH calibration data:

NBC pH Pen # \_\_\_\_\_ Date of Calibration: \_\_\_\_\_  
(mm/dd/yy)

(c) Are facility pH probes in calibration at the time of the inspection?  
Yes No N/A

pH readings: NBC \_\_\_\_\_ s.u. Company \_\_\_\_\_ s.u.

\* If discrepancy is greater than 0.5 s.u., and NBC instrument is verified to be in calibration, deficiency should be noted.

(d) How often are pH and/or ORP probes cleaned and calibrated? \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

(e) If discrepancy was observed, check instruments using the company's buffer solutions and complete the following:

	<u>#1</u>	<u>#2</u>	<u>#3</u>
pH of buffer			
pH using NBC instrument			
pH registered by facility instrument			
Expiration date of buffer			

If discrepancy was observed, a post inspection calibration check must be performed at Pretreatment lab on the same day as the inspection and the following must be completed:

- a) NBC Instrument pH in buffer 4.0: \_\_\_\_\_
- b) NBC Instrument pH in buffer 7.0: \_\_\_\_\_
- c) NBC Instrument pH in buffer 10.0: \_\_\_\_\_

(f) Is the facility required to maintain a logbook? Yes No

If yes, is the logbook being maintained? Yes No

Does the logbook properly document the following?

(i) Batch discharges? Yes No N/A

(ii) Chemicals used for pretreatment system? Yes No N/A

(iii) Sludge generated on a daily, weekly, or monthly basis?  
 Yes No N/A

(iv) Maintenance performed on pretreatment system? Yes No N/A

(v) Visual inspecting data for boiler room discharges? Yes No N/A

(vi) Grease interceptor inspection? Yes No N/A



(g) Is spill control in the boiler room satisfactory? Yes No N/A  
 If no, what will be required to ensure proper containment in the boiler room?

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(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? \_\_\_\_\_

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(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

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**Part V - Process Flow Measurement**

(a) How many flow meters are used to measure process wastewater discharges?

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(b) Complete the following table for each process

<u>Location</u>	<u>Process Operation Monitored</u>	<u>Readings</u>	<u>Units</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

- (c) Are these flow meter readings an accurate measurement of process flows?  
Yes No N/A
- (d) If not, list user's estimate of the percent of total flow used for process water.  
\_\_\_\_\_%
- (e) Based upon \_\_\_\_\_, for the period from \_\_\_\_\_ to \_\_\_\_\_, the average daily process flow is \_\_\_\_\_GPD.
- (f) Based upon daily flow calculation, is user properly classified for permit fee billing purposes?  
Yes No N/A

**Part VI - Sampling Procedures**

- (a) Where should representative samples be taken for NBC and self-monitoring?  
\_\_\_\_\_
- (b) Are samples taken here presently? Yes No  
If no, why not? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- (c) Are non-contact cooling water or other dilution streams discharged upstream of the sampling location?  
Yes No
- \* Check degreaser cooling water and steam condensate discharge lines.
- (d) Must the combined wastestream formula be used to determine compliance with EPA categorical pretreatment standards? (e.g. Does wastewater discharge through more than one (1) location?)  
Yes No
- (e) Does the firm conduct its own sample collection? Yes No  
If not, specify: \_\_\_\_\_
- (f) Is method of sample collection acceptable? Yes No  
If no, why not? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- (g) If firm is a metalfinisher, does cyanide sampling satisfy EPA requirements? Yes    No    N/A

If no, what must be changed? \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- (h) Are sample collection procedures adequate?

(i) Samples refrigerated after collection? Yes    No    N/A

(ii) Proper preservation techniques used? Yes    No    N/A

(iii) How long are samples held before delivery to the laboratory for analysis? \_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**PART VII - LABORATORY ANALYSIS**

- (a) Is a commercial laboratory used? Yes    No

If so, which lab? \_\_\_\_\_

- (b) Is commercial lab state certified? Yes    No    N/A

- (c) For in-house analysis:

(i) Are duplicate samples analyzed? Yes    No    N/A

(ii) Are spiked samples used? Yes    No    N/A

(iii) Are equipment and instruments calibrated and maintained?  
Yes    No    N/A

(iv) Is there a quality assurance plan in effect? Yes    No    N/A

(v) Is in-house lab state certified? Yes    No    N/A

(vi) If yes, request and attach copy of in-house lab certification and approved parameters.



**Part VIII - User Education**

(a) Educate users about each of the following:

Significant Non-Compliance (SNC) Criteria: Yes No

NBC Mission Statement: Yes No

Purpose and Types of NBC Inspections: Yes No

Monitoring and Reporting Requirements/Procedures: Yes No

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(b) Was the area outside the facility inspected? Yes No

Was litter observed? Yes No

If yes, educate the user of the impacts of litter on the sewer system.

**Engineers Comments:** \_\_\_\_\_

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**What will be required of firm?** \_\_\_\_\_

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***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 (3) Have all required reports (BMP Certification, SMCRs) been submitted on time? Yes No (4) Has the firm been in compliance for the past 12 month period? Yes No

**Part III – Amalgam Separator Maintenance/Installation Information**

(1) Has the amalgam separator been installed according to NBC approved plans? \* Yes No  
If no, what needs to be corrected? \_\_\_\_\_  
\_\_\_\_\_

\* Compare plans with existing system.

(2) Have changes been made without NBC notification and approval? [ 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? _____<br>_____    |     |    |     |



## **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 <sub>5</sub> )	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 <sub>5</sub> and TSS	5	600
23 and 29	BOD <sub>5</sub> and TSS	20	2400
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10	1200
33	BOD <sub>5</sub> 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 1<sup>st</sup> through October 31<sup>st</sup>,



**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 <sub>5</sub> )	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 <sub>5</sub> and TSS	5	600
23 and 29	BOD <sub>5</sub> and TSS	20	2400
25, 28, 34, and 36	BOD <sub>5</sub> and TSS	10	1200
32	BOD	570	68,400
32	TSS	10	1200
33	BOD <sub>5</sub> 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 1<sup>st</sup> through October 31<sup>st</sup>,



## 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).

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**DESIGNATION OF AUTHORIZED AGENT**

I, \_\_\_\_\_ certify that I am the \_\_\_\_\_ of  
\_\_\_\_\_ and that \_\_\_\_\_  
is authorized to make submittals to the Narragansett Bay Commission on behalf of \_\_\_\_\_  
\_\_\_\_\_ and that said submittals are duly signed for and  
in behalf of said corporation by authority of its governing body, and are within the scope of  
its corporate powers.

\_\_\_\_\_  
Corporate Seal

\_\_\_\_\_  
Signature of Corporation Official

\_\_\_\_\_  
Date

***NBC ONE-TIME COMPLIANCE  
REPORT FOR DENTAL FACILITIES***



Narragansett Bay Commission  
One-Time Compliance Report for Dental Facilities  
40CFR441.50 Dental Point Source Category

The United States Environmental Protection Agency (EPA) finalized the Dental Point Source Category (40CFR441) on July 14, 2017. This form must be completed under 40CFR441.50, which requires all dental facilities to complete and submit a one-time compliance report to the local Pretreatment Program.

Practice Name: \_\_\_\_\_

Premise Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Mailing Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

List all dentists affiliated with this practice:

Name:	Email address:
_____	_____
_____	_____
_____	_____
_____	_____

Primary Contact for Practice: Name: \_\_\_\_\_  
Email Address: \_\_\_\_\_  
Phone Number: \_\_\_\_\_

Type(s) of Dentistry Performed:

General Dentistry	Yes _____	No _____
Orthodontics	Yes _____	No _____
Periodontics	Yes _____	No _____
Endodontics	Yes _____	No _____
Prosthodontics	Yes _____	No _____
Oral and Maxillofacial Surgery	Yes _____	No _____
Other (please detail)	_____	

This practice began operations prior to July 14, 2017      Yes \_\_\_\_\_      No \_\_\_\_\_

This practice places and/or removes dental amalgam on a regular or an infrequent basis:  
Yes \_\_\_\_\_      No \_\_\_\_\_

An ISO 11143 (or ANSI/ADA 108-2009) certified amalgam separator (or equivalent device) has been installed to capture amalgam bearing waste streams. Yes \_\_\_\_\_ No \_\_\_\_\_

Please provide the make and model of the amalgam separator:

Make: \_\_\_\_\_ Model: \_\_\_\_\_

Date the amalgam separator was installed: \_\_\_\_\_

An equivalent device has been installed at the facility: Yes \_\_\_\_\_ No \_\_\_\_\_

Please provide the make and model of the equivalent device:

Make: \_\_\_\_\_ Model: \_\_\_\_\_

Date the device was installed: \_\_\_\_\_

How many chairs are at this facility? \_\_\_\_\_

How many chairs are connected to the amalgam separator or equivalent device? \_\_\_\_\_

How many sinks (used for instrument washing) are connected to the amalgam separator or equivalent device? \_\_\_\_\_

I certify the amalgam separator or equivalent device is designed and is being properly maintained and operated in accordance with NBC Best Management Practices. Yes \_\_\_\_\_ No \_\_\_\_\_

Maintenance is performed by onsite personnel: Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, describe operation and maintenance procedures:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

A vendor has been contracted to operate and maintain the amalgam separator or equivalent: Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, provide the contact person, company name, address and phone number of your vendor:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If the amalgam separator or equivalent device that is presently installed needs to be replaced, an amalgam separator or equivalent device meeting the requirements of the NBC Best Management Practices for the Management of Waste Dental Amalgam (NBC BMP) as well as 40CFR441.30(a)(1) or 40CFR441.30(a)(2) must be installed. The amalgam separator must be ISO 11143 certified with a 99% removal rate or equivalent device must be installed.

The dental practice complies with the best management practices outlined in the NBC BMP and 40CFR441.30(b) or 40CFR441.40. These best management practices include but are not limited to:

- Waste amalgam including but not limited to dental amalgam from chair side traps, screen, vacuum pumps, filters, dental tools, cuspidors, or collection devices is strictly prohibited from being discharged to the sewer system.
- Elemental mercury is strictly prohibited from being discharged to the sewer system.
- All equipment that comes in contact with amalgam must be operated and maintained in accordance with manufacturers specifications.
- Equipment coming in contact with amalgam, including piping, must not be cleaned with oxidizing or acidic cleaners, including but not limited to bleach, chlorine, iodine, and peroxide that have a pH lower than 6.0 standard units (su) or greater than 8.0 su. These types of cleaners may increase the dissolution of mercury.

### Certification Statement

As per 40CFR441.50(a)(2) this one-time compliance report must be signed and certified by a responsible corporate officer, a general partner or proprietor if the dental practice is a partnership or sole proprietorship, or a duly authorized representative in accordance with 40CFR403.12(l).

I am a responsible corporate officer, a general partner or proprietor (if the dental practice is a partnership or sole proprietorship), or a duly authorized representative in accordance with 40CFR403.12(l) of the above named dental practice, and certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Agent:

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Phone Number

\_\_\_\_\_  
Email Address

Date: \_\_\_\_\_

This One-Time Compliance Report must be maintained onsite and be available for review, either in physical or electronic form, during inspections as long as this dental practice is in operation or until there is a change in ownership.

***ATTACHMENT VOLUME I***

***SECTION 4***

***SAMPLE NBC ENFORCEMENT  
LETTERS, NOTICES, AND ORDERS***

**NOTICE OF VIOLATION  
FAILURE TO MEET STANDARDS (USER SAMPLE)**

November 21, 2024

Mr. Charbel Kosseifi  
Vasilios Pizza  
579 Atwells Avenue  
Providence, RI 02909



Dear Mr. Kosseifi

The sample results for November which were received by this office on November 20, 2024 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
11/1/2024	OIL & GREASE-T	Grab	487.000	LOCAL	125.000 mg/L

As a condition of your Wastewater Discharge Permit, these discharge limitations must be met at all times. Failure to meet the standards may result in the Commission initiating enforcement action against your firm and the publication of your company's name in the Commission's annual list of firms in Significant Non-Compliance which is published each year in the PROVIDENCE JOURNAL. Based upon these results, you must immediately resample your process discharge for the parameter(s) in violation noted above. You must continue this weekly sampling until four (4) consecutive weekly reports indicate full compliance with NBC discharge limitations. Results must be submitted for NBC review within three (3) weeks from the sampling date.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact the NBC at 461-8848.

Sincerely,

*Alejandra Tobon*  
Alejandra Tobon  
Pretreatment Inspector I

**NOTICE OF VIOLATION  
FAILURE TO MEET STANDARDS (NBC SAMPLE)**

February 28, 2024

Mr. Joseph Accaoui  
Tanury Industries  
6 New England Way  
Lincoln, RI 02865



Dear Mr. Accaoui

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 February 12, 2024. 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
2/12/2024	NICKEL	Composite	6.424	EPA	3.98 mg/L
2/12/2024	NICKEL	Composite	6.424	LOCAL	1.620 mg/L
2/12/2024	CYANIDE	Composite	1.210	EPA	1.20 mg/L
2/12/2024	CYANIDE	Composite	1.210	LOCAL	0.500 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



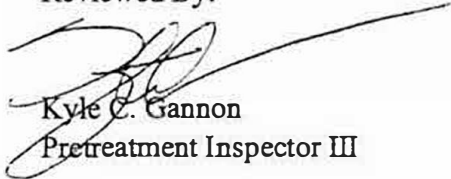
# WASTEWATER SAMPLE ANALYSIS



Company Name: Tanury Industries  
Company Address: 6 New England Way  
Lincoln, RI 02865  
Location Name: Sample Location # 1  
Type of Sample: Composite  
Date of Sample: February 12, 2024

Parameter	Concentration (mg/l)
CADMIUM	0.015
CHROMIUM	2.479
COPPER	0.938
CYANIDE	1.21
LEAD	0.075
NICKEL	6.424
SILVER	0.055
ZINC	0.06

Reviewed By:

  
Kyle C. Gannon  
Pretreatment Inspector III

Notice of Violation  
Failure to Meet Standards (Manhole)



April 23, 2024

Edward A. Johnson III  
Universal Plating Company, Inc.  
25 River Avenue  
Providence, RI 02908

Dear Mr. Johnson:

The Narragansett Bay Commission (NBC) regularly conducts surveillance monitoring of its users. This monitoring is done by installing automatic samplers in manholes isolating that company. The samplers are programmed to collect composite samples of the wastewater discharging through the manhole.

On March 20, 2024 the NBC conducted surveillance manhole sampling of your facility. The analytical results from the upstream manhole indicate full compliance with NBC discharge limitations. The analytical results from the down stream manhole indicate noncompliance with the following parameters:

<u>Parameter</u>	<u>Sampling Type</u>	<u>Results</u> <u>(mg/L)</u>	<u>Daily Maximum</u> <u>(mg/L)</u>
Copper	Composite	3.267	1.20
Nickel	Composite	4.283	1.62
Cyanide	Composite	2.51	0.58

It has been determined that your firm is the sole source of the non-compliant wastewater since the upstream results were in full compliance. You must submit a report by May 30, 2024 detailing the cause of the high concentrations noted above and a proposal to ensure that wastewater from your facility is in compliance at all times.

Please note, the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact the NBC at 461-8848.

If you have any questions regarding this letter, please contact me at 461-8848 ext. 490.

Sincerely,

Caitlyn Vallee  
Pretreatment Inspector III

Enclosure



### Manhole Sample Analysis

Company: Universal Plating Company, Inc.  
Address: 25 River Avenue  
Providence, RI 02908  
Date of Sample: March 20, 2024  
Type of Sample: Composite

<u>Parameter</u>	<u>Upstream Manhole Concentration (mg/L)</u>	<u>Downstream Manhole Concentration (mg/L)</u>
Cadmium	0.01597	<0.015
Chromium	<0.075	<0.075
Copper	5.864	3.267
Cyanide	1.98	2.51
Lead	0.5569	0.1737
Nickel	35.01	4.283
Silver	0.1351	0.03582
Zinc	3.571	0.4964
pH (standard units)	6.6	7.1

Reviewed by:

Kerry M. Britt  
Pretreatment Manager

**NOTICE OF VIOLATION  
FAILURE TO SUBMIT PH MONITORING REPORT**

October 31, 2024



Mr. Mark Fyrer  
Eastern Screw Company  
15 Amflex Drive  
Cranston, RI 02921

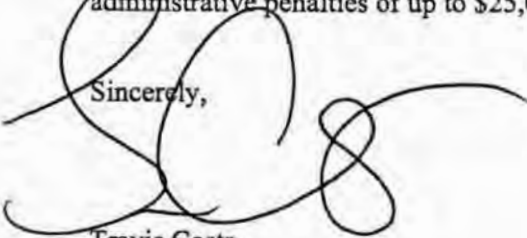
Dear Mr. Fyrer:

In accordance with your Wastewater Discharge Permit, it is necessary for you to submit pH results for the month(s) of:

**Sample Location # 1**  
September 2024

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,

  
Travis Costa  
Pretreatment Inspector II

**NOTICE OF VIOLATION  
FAILURE TO SUBMIT CERTIFICATION**



January 02, 2024

Dr. Sridevi Boppana  
Family Smile Dental Care  
526 Newport Avenue  
Pawtucket, RI 02861

Dear Dr. Boppana:

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:

November-2023

To date, the NBC has not received a copy of the above referenced certification. Until a signed copy of the above referenced certification is received, you are in violation of the terms of your permit. Failure to submit this Certification within thirty (30) days of the due date will result in your firm being in Significant Non-Compliance (SNC) with the NBC and EPA regulations and will automatically result in the publication of the name of your firm in the NBC annual list of violators published in the Providence Journal. Please note that the NBC will bill you for the cost of this public notice. In addition, the Commission may initiate enforcement action against your firm for failing to submit reports on time. Should such an enforcement action be initiated, administrative penalties of up to \$25,000 per violation per day can be assessed.

Sincerely,

A handwritten signature in cursive script that reads "Meghan Healy".

Meghan Healy  
Pretreatment Inspector I

**NOTICE OF VIOLATION  
FAILURE TO SUBMIT COMPLIANCE REPORT**



March 04, 2024

Mr. Silvio Soares  
Whole Foods Market Group, Inc.  
261 Waterman Street  
Providence, RI 02906

Dear Mr. Soares:

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**  
January-2024

To date, the Commission has not received a copy of these analytical results. Until a certified copy of the results and a Self-Monitoring Compliance Report are received, you are in violation of the terms of your permit. Failure to submit compliance monitoring results within thirty (30) days of the due date will result in your firm being in Significant Non-Compliance with the NBC and EPA regulations and will automatically result in the publication of the name of your firm in the Providence Journal. Please note that the NBC will bill you for the cost of this public notice. In addition, the Commission may initiate enforcement action against your firm for failing to submit reports on time. Should such an enforcement action be initiated, administrative penalties of up to \$25,000 per violation per day can be assessed.

Sincerely,

A handwritten signature in black ink, appearing to read "Meghan Healy".

Meghan Healy  
Pretreatment Inspector I

**Notice of Violation  
Failure to Immediately Report Violation**



June 14, 2024

Mr. Jeff Caruso  
Crisloid, LLC  
55 Porter Street  
Providence, RI 02905

Dear Mr. Caruso:

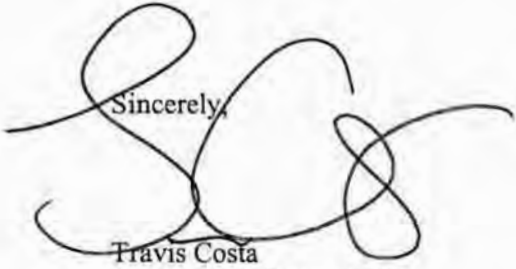
The Self-Monitoring Compliance report which was received by this office on June 07, 2024 indicated non-compliance with the NBC discharge limitations. EPA regulations, 40CFR. 403.12g(2), require that you notify the Narragansett Bay Commission (NBC) within 24 hours of becoming aware of this violation.

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,

  
Travis Costa  
Pretreatment Inspector II

NOTICE OF VIOLATION  
FAILURE TO SATISFY NBC REQUIREMENTS



December 5, 2024

Ms. Kristene Cotter  
Summit Manufacturing Corporation  
248 Pine Street  
Pawtucket, RI 02860

Dear Ms. Cotter:

Per the requirements of letter(s) from this office, the following item was required to be completed and/or submitted by the due date indicated below:

<b>Required Submittal</b>	<b>Notice</b>	<b>Issue Date</b>	<b>Due Date</b>
Letter Regarding Sale of Company	Letter	5/16/2024	6/15/2024
SNC Public Notice Reimbursement	Letter	4/15/2024	5/15/2024

You must satisfy the past due Narragansett Bay Commission (NBC) requirement as detailed in the above referenced document. Your failure to complete the aforementioned requirement within thirty (30) days from the specified due date will place your firm in Significant Non-Compliance (SNC) with Commission regulations and will automatically result in the publication of the name of your firm as a violator in the PROVIDENCE JOURNAL. Your continued failure to complete this requirement may result in the initiation of enforcement action against your firm. Please note that the Commission can assess administrative and civil penalties of up to \$25,000 per violation per day should an enforcement action be initiated.

If you should have any questions regarding this matter, contact me at 461-8848, ext. 490.

Sincerely,

A handwritten signature in black ink, appearing to read "N. Daggett", is written over a circular stamp.

Nathan P. Daggett  
Pretreatment Inspector IV

NPD:rcf





September 30, 2024

Ms. Morgan Gray  
Whisk Me Away Bakehouse  
400 Harris Avenue  
Providence, RI 02903

**Certified Mail**  
**Return Receipt Requested**

91 7108 2133 3937 9679 1980

Dear Ms. Gray:

It has come to my attention from the Narragansett Bay Commission (NBC) pretreatment staff that your company has failed to submit a Self-Monitoring Compliance Report for the month of April 2024, which have been overdue since May 30, 2024.

This default is in violation of both your Wastewater Discharge Permit and 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 Kyle Gannon at 461-8848, ext. 490. Thank you for your anticipated cooperation.

Very truly yours,

Jaclyn Cotter, Esq.  
Associate Legal Counsel

JC:lp

cc: Kyle Gannon

**NOTICE OF VIOLATION  
NOTICE OF PH VIOLATIONS**



August 13, 2024

Mr. Stephen Ricci  
Surface Coatings, LLC  
P.O. Box 27039  
Providence, RI 02907

Dear Mr. Ricci

I have reviewed the June pH Monitoring Report submitted on August 02, 2024. Based upon this report, your facility has exceeded the pH discharge limitation as follows:

**LOW LIMIT VIOLATIONS**  
10

**HIGH LIMIT VIOLATIONS**  
12

Effluent discharge to the Narragansett Bay Commission (NBC) sewer system must have a pH between the range of 5.0 - 11.0 standard units (s.u.) at all times. Discharging effluent with a pH value of less than 5.0 s.u. or higher than 11.0 s.u. is prohibited. pH effluent, that does not fall in the accepted range, may not be discharged to the NBC sewer system, even if the discharge is only for a short period of time. You must immediately take the steps necessary to prevent future violations from occurring. We will review future monitoring reports to ensure compliance with this parameter.

Please note that the NBC is available to provide free technical assistance to your firm. For information regarding how the Pollution Prevention Program can help your firm achieve and maintain compliance, contact the NBC at 461-8848 ext. 262.

Please feel free to contact me at 461-8848 if you have any questions regarding this matter.

Sincerely,

Jared Urban  
Pretreatment Inspector III

**NOTICE OF VIOLATION  
LETTER OF DEFICIENCY**

October 8, 2024



Ms. Kelly Ann Rojas  
Tallulah's Taqueria  
146 Ives Street  
Providence, RI 02906

Dear Ms. Rojas:

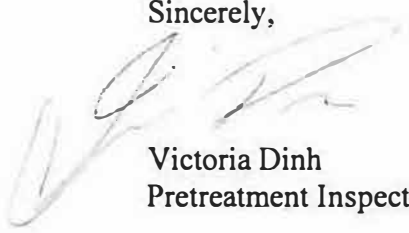
This letter serves to summarize the Narragansett Bay Commission (NBC) inspection of your facility conducted on September 26, 2024. During the inspection, the grease removal unit (GRU) in the kitchen was inspected and the following deficiency was noted:

It was discovered that the Thermaco Big Dipper GRU depicted on NBC approved plans of your facility has been removed, and a passive GRU was installed in its place. This is unacceptable. As stated in Section 1.8.8 of the NBC Rules and Regulations (copy enclosed), all users connected to the NBC sewer system and conducting food preparation operations must install a NBC approved GRU. Therefore, your firm must immediately re-install the 25 gallon-per-minute Thermaco Big Dipper that was depicted on your original NBC approved plans. You must submit written verification that the work has been done to this office by November 8, 2024.

Failure to correct the aforementioned deficiencies can result in the initiation of enforcement action against your firm. Please note that the NBC can assess administrative penalties of up to \$25,000 per violation per day.

If you have any questions regarding this matter or require further assistance, please contact me at 461-8848, Ext. 490.

Sincerely,



Victoria Dinh  
Pretreatment Inspector II

VD:lp

Enclosure

NOTICE OF VIOLATION  
LETTER OF DEFICIENCY



September 11, 2024

Mr. Tony Barber  
271 Tockwotton Partners, LLC  
271 Tockwotton Street  
Providence, RI 02903

**Certified Mail**  
**Return Receipt Requested**

91 7108 2133 3937 9641 7712

Dear Mr. Barber:

This letter serves to summarize the Narragansett Bay Commission (NBC) inspection of your facility conducted on August 23, 2024. During the inspection, the following deficiency was noted:

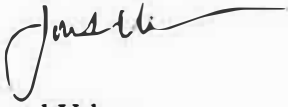
During the inspection, a calibrated NBC pH pen showed that your effluent pH recorder is not properly calibrated. Upon inspection the measured pH was shown to be 6.2 on the pH meter but the NBC pen read 9.6. Immediately, you must calibrate your effluent pH meter to accurately monitor and record the effluent pH of the wastewater discharge 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 Narragansett Bay Commission has developed the following procedure to ensure that all pH probe calibrations are consistently performed. This procedure must be used each time the 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 logbook.

Page 2

Failure to correct the aforementioned deficiency may result in the initiation of enforcement action against your firm. Please note that the NBC can assess administrative penalties up to \$25,000 per violation per day. Please note, the NBC is available to provide free technical assistance. For information regarding how the Pollution Prevention Program can help your firm, contact 461-8848.

If you have any questions regarding this matter, please contact me at 461-8848, ext. 490.

Sincerely,

A handwritten signature in black ink, appearing to read "Jared Urban", with a long horizontal flourish extending to the right.

Jared Urban  
Pretreatment Inspector III

JU:rcf