

STORM WATER MANAGEMENT PLAN (SWMP)



THE NARRAGANSETT BAY COMMISSION
FIELD'S POINT WASTEWATER TREATMENT FACILITY
TWO ERNEST STREET
PROVIDENCE, RHODE ISLAND 02905
(401) 461-8848

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Spill Prevention and Emergency Response Team (MSGP, Section V.F.1)

The NBC has assembled a team that is responsible for the development and implementation of the SPCC and SWMP for the Field's Point facilities. The team consists of the following positions:

Contact Order	Position	Overall Responsibilities	Shift at Facility
1	Plant Manager	The Plant Manager has the primary responsibility for the operations of the treatment plant as well as facility compliance with all RIPDES and Storm Water Permits.	First shift but on call 24 hrs/day, 365 days/yr
2	Operations Manager	The Operations Manager assists the Plant Manager in the day-to-day responsibilities of the treatment plant. In addition, this person has the primary responsibility for the treatment plant when the Plant Manager is not available.	First shift but on call 24 hrs/day, 365 days/yr
3	Maintenance Manager	The Maintenance Manager is responsible for the maintenance and housekeeping at the facility. The maintenance includes the maintenance of structures and spill containment facilities.	First shift but on call 24 hrs/day, 365 days/yr
4	Asset Management Administrator	The Asset Management Administrator is responsible for ensuring the operations and maintenance staff have the equipment needed to perform their day-to-day activities as well as the necessary equipment for spill control and response.	First shift but on call 24 hrs/day, 365 days/yr
5	Operations Supervisor	The Operations Supervisor is responsible to ensure the proper operation of the plant and address issues including spills as they occur.	One on site on each shift

All staff listed above are familiar with all aspects of the treatment operations, the layout of the plant and surrounding NBC property, the SWMP and methods to evacuate the treatment plant. In case of an oil or chemical spill or other emergency, the Plant Manager or their designee will be responsible for implementing the following actions:

1. Identifying the cause of the incident (i.e. oil spill, chemical spill, etc)
2. Assessing the situation and the potential impacts on the health of employees and the environment
3. Isolating and protecting all storm drains that have the potential to be impacted by the spill/release using sandbags and/or absorbent materials
4. Determining the level of response required (can the spill be handled by plant personnel or will an outside contractor be needed)
5. Notifying NBC staff as appropriate
6. Notifying regulatory agencies if required and appropriate
7. Evacuating the facility if necessary
8. Overseeing the clean up
9. Submitting all necessary reports within 15 days of the initial incident. (A Notification form is provided in Appendix 12).

In addition to the staff listed above, the following staff have been assigned to assist the Spill Prevention and Emergency Response team.

Director of Operations & Maintenance
Director of Environmental Science & Compliance
Pretreatment Manager
Environmental Monitoring Manager

The Executive Director and Deputy Director will be contacted as necessary.

The names and contact information for the individuals filling the aforementioned positions are provided in Appendix 5.

Storm Water Pollution Prevention Team (MSGP, Section V.F.1)

The NBC has assembled a team that is responsible for the development, implementation, maintenance and revisions of the Storm Water Management Plan for the Field's Point facilities. The team consists of the following positions:

Position	Overall Responsibilities	Shift at Facility
Pretreatment Manager	The Pretreatment Manager is responsible for the development, implementation, maintenance and revisions of the SWMP. This position can conduct routine inspections.	First shift, on call 24 hrs/day, 365 days/yr
Assistant Pretreatment Manager	The Assistant Pretreatment Manager assists the Pretreatment Manager in the development, implementation, maintenance and revisions of the SWMP. This position can conduct routine inspections	First shift, on call 24 hrs/day, 365 days/yr
Environmental Monitoring Manager	The Environmental Monitoring Manager is responsible for ensuring the benchmark and impaired waters monitoring as well as the visual storm water assessments are conducted in accordance with the MSGP.	First shift, on call 24 hrs/day, 365 days/yr
Assistant Environmental Monitoring Manager	The Assistant Environmental Monitoring Manager assists the Environmental Monitoring Manager in ensuring the benchmark and impaired waters monitoring as well as the visual storm water assessments are conducted in accordance with the MSGP.	First shift, call 24 hrs/day, 365 days/yr
Environmental Monitoring Supervisors	The Environmental Monitoring Supervisors are responsible for conducting the benchmark and impaired waters monitoring events as well as the visual storm water assessments in accordance with the MSGP.	First shift, on call 24 hrs/day, 365 days/yr
Senior Process Monitor	The Senior Process Monitor can conduct quarterly and annual inspections and collect samples in accordance with the MSGP	First shift
Operations Process Monitors	The Process Monitors can conduct quarterly and annual inspections and collect samples in accordance with the MSGP	One on each shift
Director of Environmental Science & Compliance	The Director of Environmental Science & Compliance oversees staff responsible for the development and implementation of the SWMP.	First shift, on call 24 hrs/day, 365 days/yr
Plant Manager	The Plant Manager has the primary responsibility for the operations of the treatment plant as well as facility compliance with all RIPDES and Storm Water Permits.	First shift, on call 24 hrs/day, 365 days/yr
Operations Manager	The Operations Manager assists the Plant Manager in the day-to-day responsibilities of the treatment plant and has the primary responsibility for the treatment plant when the Plant Manager is not available.	First shift, on call 24 hrs/day, 365 days/yr

The names and contact information for the individuals filling the aforementioned positions are provided in Appendix 6

Site Description (MSGP, Sections V.F.2.(a through d), V.F.3)

The NBC Field's Point Campus which includes the Wastewater Treatment Facility (FP), the Ernest Street –CSO Tunnel Pump Station site, the Water Quality Science Building (WQSB), Corporate Office Building (COB), Interceptor Maintenance Building (IM) and storage building, is located in Providence. The plant is located at Two Ernest Street and is connected to the ES-TPS site by a parcel of land located on Terminal Road which will be developed by the NBC in the future. The WQSB, COB, IM and the storage building are located on Service Road in Providence. The sites are considered to be contiguous. Therefore, this plan has been developed for the campus and is referred to as Field's Point. Field's Point is the largest wastewater treatment plant in Rhode Island and the second largest in New England. It receives industrial, commercial and residential wastewater from Providence, North Providence, Johnston, and portions of Lincoln, Smithfield and Cranston. Hazardous waste is not treated at or discharged from or trucked to Field's Point. Industrial and commercial facilities are strictly prohibited from discharging hazardous waste to Field's Point in the Wastewater Discharge Permits issued by the Pretreatment Section. Field's Point provides preliminary and primary treatment for up to 200 million gallons per day (MGD) of wastewater, secondary treatment for up to 91 MGD. On average 48.8 MGD of dry weather flow is treated at Field's Point and discharged to the Providence River (WBID RI0007020E-01B) which is a salt water body. Currently, the Providence River does not have TMDLs established for it. However, it has been determined to be impaired for Total Nitrogen, Dissolved Oxygen and Fecal Coliform.

The NBC has determined there is potential for various types of pollutants to impact the storm water drainage system. Pollutants that could spill and significantly impact the storm water drainage system include the following:

- Fuel Oils including diesel and gasoline
- MicroC 2000
- Sodium Hydroxide
- Sodium Hypochlorite
- Sodium Meta-Bisulfite
- Conventional Pollutants from Wastewater Treatment Operations

A list detailing the descriptions of the buildings and structures at Field's Point is provided in Attachment 2. A further description of the chemicals stored in each building and the secondary containment for each area is provided in Attachment 3.

The location of each building and structure and the storm water drainage system have been plotted on site maps of the facility. Three Field's Point site maps are provided in Appendix 1.

The site maps that are included are as follows:

- Field's Point Topographical Map
- Field's Point Plant Overall Facility Site Plan
- Field's Point Storm Water Drainage System Plan
- ES-TPS Overall Site Plan
- ES-TPS Storm Water Drainage Site Plan

The estimated overall runoff coefficient is provided on the Storm Water Drainage System Plans.

Summary of Potential Pollutant Sources (MSGP, Sections II.A.2.1, V.F.4.(a through e) and V.F.5)



The NBC stores significant quantities of sodium hypochlorite (hypo), sodium meta-bisulfite (bisulfite), sodium hydroxide (caustic), MicroC 2000, diesel fuel and liquid ice melt at Field's Point.

The bulk of the hypo is stored in three tanks at Field's Point with the capacity of 13,500-gallons each. These tanks are stored in a tank farm which is bermed. The tank farm can contain 49,000 gallons which is far in excess of 110% of the capacity of the largest tank in the area. If hypo was to spill or

be released from one of the tanks it would be contained in the bermed area. Spilled material would be pumped out and contained for reuse or disposal. The storm water system would not be impacted from spills/releases in the tank farm. The fill pad for the hypo tank farm is in a bermed area with a containment trench that has a valve which would direct spilled material to the tank farm. Spills in this area would be handled in the same manner as spills/releases in the tank farm and would not impact the storm water system. Hypo is also used in five other locations at the facility. The first area is the chlorine contact tank. There are two containers of hypo at this location. The first is a 500-gallon back up tank of hypo. It is contained in a bermed area with a capacity of 652 gallons. Spills in this area would remain in the bermed area and would be pumped out for reuse or disposal. The second container is a 350-gallon tote, used as a back-up for the 500-gallon tank. The tote is contained on a spill pallet with a storage capacity of 536-gallon. Spills in this area would not impact the storm water system. The second location is at the wet weather bypass channel. There is a 350-gallon tote of hypo that is used for disinfection of wet weather flow which is contained on a spill pallet. If the tote were to fail, the spilled material would be contained in the spill pallet and pumped out for reuse or disposal. The storm water system would not be impacted. The third location where hypo is used is over the wet weather splitter box where there is a 450-gallon tank. Any spills from this tank would discharge to the splitter box. The gates to the wet weather tanks would be closed so that the spilled material could be pumped out for disposal. The fourth location where hypo is stored is behind the tunnel screenings building where there is a 350-gallon tote of hypo used for odor control. The tote is on a spill pallet. Any spill would be contained in the spill pallet and pumped out for reuse or disposal. Spills from this tote would not impact the storm water system. The final location of bulk storage of hypo is the Gravity Thickener pump station. There is a 270-gallon tank in this building. The building is equipped with a trench network to hold spilled material. Any spills in this building would remain in the building and be cleaned up accordingly. Spills in this area would not impact the storm water drainage system.



350-gallon tote on spill pallet at the Chlorine Contact Tank

In addition, to the hypo tanks listed above, there is a 6,500-gallon tank of hypo located next to the Solids Handling Building. This tank is stored in a secondary containment structure with a capacity of 8,049 gallons which is equipped with a valve used to release accumulated storm water. This valve is normally closed. The valve is only opened once it has been determined the storm water is not contaminated. Any spilled material would be collected for reuse or disposal. Spills in this area would not adversely impact the storm water drainage system.

Bisulfite is stored in two 10,000-gallon tanks inside the de-chlorination building. This building has a containment capacity of 27,764 gallons which is far in excess of 110% of the volume of the largest tank in the area. Spills inside the building would remain in the building and would be pumped out for reuse or disposal. Spills occurring in the building would not impact the storm water drainage system. The fill pad for bisulfite is in a bermed area with a containment trench that has a valve which would direct spilled material to the building. Spills in this area would be handled in the same manner as spills/releases in the tank farm and would not impact the storm water system.

Caustic is used in the Biological Nutrient Removal (BNR) process and is stored in the Caustic Building at the treatment plant in three 14,000-gallon tanks. The tanks are located in a containment pit with the secondary containment capacity of 77,755 gallons which exceeds 110% of the volume of the largest container. Any spill from the tanks would be contained inside of the building and would not impact the storm water system. Any spilled material would be collected for reuse or disposal. The fill points for the three tanks are located on the outside of the building inside a containment cabinet with a capacity of 3.7 gallons. There are storm drains located in the area of the fill points. If there was a spill during delivery the material could impact the storm system. Therefore, a standard operating procedure (SOP) for receiving deliveries of caustic has been developed and requires that all storm drains be protected with chemical resistant mats during all deliveries. The SOP can be found in Appendix 9.



MicroC 2000 is used in the BNR process at the treatment plant. It is stored in four 10,000-gallon tanks. These tanks are stored in a tank farm which is bermed. The tank farm has a containment capacity of 45,887 gallons which exceeds 110% of the volume of the largest container. Any spill in the tank farm would be contained in the bermed area and the material would be collected for reuse or disposal. Any spill in the tank farm would not impact the storm water system. The fill points for the four tanks are outside of the bermed area. There are storm drains in this area that could be impacted if a spill were to occur during a delivery of MicroC 2000. As such, a SOP for receiving deliveries of MicroC 2000 has been

developed and requires that all storm drains in the area be protected with chemical resistant mats during all deliveries. The SOP can be found in Appendix 9.

Diesel fuel is stored in six above ground tanks at Field's Point. Three are located at the treatment plant. There is a 5,100-gallon tank that is stored in a bermed area with a containment capacity of 7,248 gallons. Any spills in this area would be contained and pumped out for offsite disposal or future use. The containment berm is equipped with a valve that is normally closed. The valve would only be opened to discharge storm water in the containment area once it has been determined it is not contaminated with diesel. A 4,000-gallon tank containing diesel fuel is located next to the screw lift building. This tank is double walled and is located on a graveled area. Any spills in this area would discharge to the ground. The spilled diesel fuel and contaminated soil/gravel would be collected and shipped offsite for disposal. The third diesel tank at the plant was installed as part of the plant upgrades for the BNR process. The tank holds 6,800-gallons and is double walled. In addition, it is housed in a structure for a generator. The structure provides an additional 9,874 gallons of containment. Any spills associated with this tank would be contained and the material would be collected for future use or shipped offsite for disposal.



5,100-gallon Diesel Tank



4,000-gallon Diesel Tank



6,800-gallon Diesel Tank

There is 3,500-gallon diesel holding tank located between the COB and the storage building. The diesel stored in this tank fuels a generator used to supply back-up power for the WQSB and COB. This tank is double walled and is housed in a structure for the generator. Any spills associated with this tank would be contained and the material would be collected for future use or shipped offsite for disposal.



3,500-gallon Diesel Tank

The remaining two diesel tanks are located at the Ernest Street-Tunnel Pump Station site. The largest tank is 8,000-gallons and is located adjacent to the Ernest Street Pump Station. The tank is stored in a secondary containment concrete area that is capable of containing 20,340-gallons. The containment area is equipped with a manually operated valve to discharge accumulated storm water after inspection. The second tank is 2,500-gallons and is located outside of the Tunnel Pump Station building. It is a double-walled tank capable of containing 110% of the volume of the tank.



2,500-gallon Diesel Tank for the Tunnel Pump Station



8,000-gallon Diesel Tank for the Ernest St. Pump Station

Liquid ice melt is used for ensuring ice does not build up on the pad used for cleaning out the tunnel. The liquid ice melt is stored in 55-gallon drums in the Interceptor Maintenance building. The building is pitched to contain any spilled material inside and there are no drains in the building. This building has the capacity to contain 110% of the largest container.

In addition to the chemicals, diesel, and liquid ice melt listed above, Field's Point stores and uses other potential pollutant sources such as paints, greases and surfactants. These pollutant sources are stored in buildings throughout the facility. Adequate secondary containment is in place for all chemicals. Any spills of these materials would be collected and disposed of properly.

A review of the products used at Field's Point has determined that some of the products contain per- and polyfluoroalkyl substances (PFAS). The PFAS containing products are typically used as lubricants. These products are not purchased in large quantities. They are stored in buildings and adequate secondary containment is provided for these materials. Any spills of PFAS containing materials would be collected and disposed of properly. The NBC will purchase suitable alternatives whenever possible.

The inventory of the chemicals stored at the facility can be found in Appendix 4. Whether a chemical/product contains PFAS compounds and if it is still used at the facility is indicated on the inventory. A detailed listing of the chemicals stored in each building is provided in Appendix 3. The secondary containment for the materials in each building is also provided in this appendix.

Spill Response Plans for chemicals onsite are provided in Appendix 10.

Minimizing Impacts from Storm Water Discharges from Major Storm Events (MSGP Section II.A.4)

The NBC has developed a Resiliency Plan for the Field's Point facility which is consistent with DEM guidance and its RIPDES permit requirements. The plan was developed using base flood elevations (BFE) that are provided in the 2015 FEMA Flood Insurance Rate Map and Flood Insurance Studies with the addition of freeboard to meet minimum flood protection levels to account for sea level rise and increased extreme rainfall.

It has been determined the Field's Point treatment plant abuts one FEMA AS coastal base flood zone. This flood zone has a BFE of 12.8 ft. The design flood elevation (DFE) to protect the plant is 12.8 ft. with an additional 3 ft. of freeboard, which equates to 15.8 ft. A review of the facility shows that NBC critical structures have a elevation at or above the DFE, which ensures that these structures should not be adversely impacted by major storm events. The Ernest Street/Tunnel Pump Station site is not within a FEMA base flood zone.

There are no semi-stationary structures at either the plant or pump station locations. Therefore, there is no risk of any structures floating during major storm events. The used oil storage containers have been relocated to an area above the DFE to prevent any adverse impact on the storm water system during major storm events.

NBC staff routinely monitors the weather for its potential impact on treatment operations. When a major storm event is anticipated, either a hurricane or snow storm, NBC owned vehicles are relocated to a NBC property with an elevation greater than the DFE to mitigate potential risk associated with the storm event

Prediction of the Direction of Flow (MSGP, Sections V.F.2.c.3 and V.F.4.d)

The Field's Point properties have been inspected and the direction of flow of storm water has been determined at each location. The Field's Point Storm Water Drainage System Plan depicts the six drainage areas at the plant and the EP-TPS Storm Water Drainage System Plan depicts the two drainage areas at this location. These maps show how storm water would flow over the property. The aforementioned maps are provided in Appendix 1.

Significant Spills (MSGP, Section V.F.2)

When a spill/release occurs, the procedures outlined in Section 2-10 of this plan must be followed. As a part of the procedure, the Pretreatment Manager is notified. The Plant Manager along with the assistance of the Pretreatment Manager will make the determination as to the appropriate level of documentation and notification adequate for the type and size of the spill/release. Spills/releases are required to be documented on the NBC Spill/Release Documentation Form which is provided in Appendix 12. Copies of all completed forms are kept at the facility, the Pretreatment office and at the ES&C office.

As of the date of this plan revision, there has been one significant spills or leaks of oil or other hazardous materials in excess of reportable quantities determined under the Clean Water Act or the Comprehensive Environmental Response Compensation and Liability Act.

Non-Storm Water Discharges (MSGP, Section V.F.4.f)

The NBC regularly evaluates the Field's Point facilities for the presence of non-storm water discharges. It has been determined there are no unauthorized discharges to the storm water systems. All evaluations are documented during the quarterly inspections of the facility on the Chemical/Oil Storage Area Inspection Checklist that can be found in Appendix 15.

Summary of Monitoring Reports and Non-Storm Water Discharge Certification (MSGP, Sections IV.B, VF.4.h, V.F.6.b.1, and VI.(A through C))

The NBC is required by Sections IV.B, V.F.6.b1, and VI.(A through C) of the MSGP to conduct monitoring of storm water discharges. There are various locations throughout the campus that are monitored. These monitoring stations are located in well lit areas on storm lines just prior to leaving the property. The monitoring stations have been identified on the Storm Water Drainage Maps that are found in Appendix 1. All monitoring is conducted on measurable storm events. Measurable storm events are defined as storm events that result in an actual discharge from the facility. The monitored storm events occur at least 48 hours from the previous measurable storm event. Sampling events consist of a grab sample collected from each monitoring station within the first 30 minutes of the measurable storm event, with the exception of monitoring of snow melt discharges. In the case of snow melt monitoring, samples are collected when measurable discharges occur.

Section VI.B.1 of the MSGP requires that all facilities conduct benchmark monitoring for Total Suspended Solids (TSS) and Oil & Grease (O&G). Facilities must meet the following benchmark concentrations:

<u>Parameter</u>	<u>Concentration</u>
O&G	15 mg/L
TSS	100 mg/L

The Field's Point facility is in Industrial Sector T – Treatment Works. This sector does not have any additional benchmark parameters.

Benchmark monitoring is conducted at each location four times per year. Two monitoring events are conducted between January 1st and June 30th and the remaining two monitoring events are conducted between July 1st and December 31st. All samples are collected during measurable storms with at least 30 days between monitoring events. If the average of the analytical results for the first four monitoring events for each location is below the benchmark concentrations, the benchmark monitoring requirement will be satisfied for the permit term as stated in Section VI.B.1.c for this location. If the average of the results exceeds the benchmark concentrations, corrective action will be taken in accordance with Section III.A of the MSGP.

The Providence River has been classified as impaired for total nitrogen, dissolved oxygen, and fecal coliform. As stated in Section VI.B.3.b.1 of the permit, facilities discharging to an impaired water body must monitor storm water discharges from the facility for the parameters causing the impairment on an annual basis. Based upon the Providence River water quality impairments, the following parameters have been identified by the NBC for periodic monitoring:

Total Nitrogen
Fecal Coliform

The impaired waters monitoring is conducted four times per year. Two monitoring events are conducted between January 1st and June 30th and the remaining two monitoring events are conducted between July 1st and December 31st. All samples are collected during measurable storms with at least 30 days between monitoring events. If a pollutant is not detected and not expected to be present at any of the monitoring locations after two consecutive monitoring periods, the DEM

will be notified and sampling at that location will be discontinued in accordance with Section VI.B.3.c. If a pollutant for which the Providence River is impaired is detected at any of the monitoring locations, monitoring will continue at that location for that pollutant for the duration of the permit or until the pollutant is not detected for two consecutive monitoring periods.

The samples collected to satisfy benchmark and impaired waters monitoring requirements are collected during the same measurable storm events. The samples are analyzed separately using standard analytical methods outlined in 40CFR136.

The analytical results for both benchmark and impaired waters monitoring and a completed Discharge Monitoring Report (DMR) signed by the appropriate staff is submitted to the DEM and kept on file. The DMRs can be found in Appendix 18. If the average concentrations of the pollutants identified above are not present after the two consecutive monitoring periods at any location, the NBC may petition the DEM to discontinue the monitoring from the location. If a review of the analytical data indicates an exceedance of a numerical limit, the NBC will conduct follow-up monitoring within 30 calendar days or during the next qualifying storm event after implementing corrective measures. An Exceedance Report detailing the cause of the exceedance and the corrective measures will be submitted to the DEM within 30 days of receiving the certified analytical results.

In accordance with Section IV.B the NBC conducts quarterly visual assessments of storm water discharges from each monitoring station. The monitoring is conducted during daylight hours during measurable storm events. At least one of the quarterly monitoring events may take place while discharges of snow melt are occurring. All samples are collected in clean, clear containers within the first 30 minutes of the measurable storm event. The grab samples are to be monitored for the following parameters:

Color	Oil Sheen
Clarity	Settled Solids
Floating Solids	Suspended Solids
Foam	Other Obvious Indicators of Storm Water Pollution
Odor	

Environmental Monitoring (EM) staff conduct the quarterly monitoring. A Storm Water Visual Assessment Report Form is completed for each monitoring event. The Plant Manager reviews and signs the completed form. Copies of the completed form are filed with the Plant Manager, the Pretreatment office and in the ES&C office along with this plan. In addition, the completed forms are uploaded to a shared folder that is available for review by all staff. The NBC Storm Water Visual Assessment Report Form is provided in Appendix 16. The completed quarterly reports serve as certification that non-storm water discharges have not occurred.

A review of the completed Storm Water Visual Assessment forms from 2006 through the present indicated the storm water discharged from the Field's Point facility has not adversely impacted the Providence River. A summary of the data can be found in Appendix 17.

Inspections, Record Keeping and Reporting Procedures and Preventative Maintenance (MSGP, Sections IV(A and B), V.F.6.a and VII.(A through E))

In order to ensure compliance with 40CFR112 and the MSGP, the NBC developed an extensive inspection program. Inspections of all areas of the facility where chemicals, oils, and wastes are stored are conducted on a routine basis. In addition, storm water monitoring is routinely performed at the facility to ensure that discharges do not adversely impact receiving waters. All inspections are performed by NBC staff that are knowledgeable and have been trained to assess the conditions and requirements outlined in all applicable regulations and permits. The following details the frequency of NBC inspections and monitoring activities.

<u>Inspection</u>	<u>Frequency</u>	<u>Justification</u>
Used Oil Storage	Weekly	RIDEM Used Oil Inspection Requirements
Oil Storage	Monthly	EPA SPCC Guidance Document for Regional Inspectors
Site Inspection of Chemical/Oil Storage Areas	Quarterly	Historic Use and Experience and MSGP
Comprehensive Site Inspection	Annually	MSGP
WQSB Storm Water Facility	Annually and after rain events greater than 2.70"	MSGP
Visual Storm Water Monitoring	Four times per year. Twice between January 1 st and June 30 th and twice between July 1 st and December 31 st .	MSGP
Storm Water Benchmark and Impaired Waters Monitoring	Four times per year. Twice between January 1 st and June 30 th and twice between July 1 st and December 31 st .	MSGP
Discharges of Storm Water in Collected Containment Areas	As Needed	Storm Events

The purpose of these inspections is to ensure that all spill control measures are in place and adequate. Needed repairs and upgrades are noted at the time of the inspection. Follow-up inspections of the area are conducted to verify that the required repairs have been completed.

Inspections are documented on corresponding forms. These forms are provided in Appendices 14, 15, 16, 18 and 19. Completed forms are filed at the facility with the SWMP, the Pretreatment office as well as in the ES&C office.

Bulk oil storage containers and associated piping are visually inspected by NBC personnel on a routine basis using an inspection checklist developed in accordance with 40CFR112 Appendix F - 1.8.1.1. The SPCC Tank Inspection Checklist is provided in Attachment 14. Due to the configuration of the two bulk diesel fuel tanks (i.e. elevated shop-built tanks with either secondary containment or double walled construction) integrity tests will be performed only on an as-needed-basis such as when a visual inspection notes a potential tank integrity problem. If and when integrity testing is needed it will be performed by a certified inspector. If a tank and/or piping is required to be replaced, it will be done following the specification detailed in 40CFR112.8(c).

The annual comprehensive site inspection is a requirement of Section IV.A of the MSGP. The purpose of this inspection is to ensure the SWMP is accurate and the NBC is in compliance with the MSGP. It is conducted by Pretreatment staff that are members of the Storm Water Pollution Prevention Team required by Section V.F.1 of the MSGP. This annual inspection incorporates the inspection of all structures and materials on site that can impact storm water. Structures are inspected to ensure that they are in good condition. All areas of the facility are inspected to ensure that spills, releases or leaks have not occurred since the last inspection. If any deficiencies or updates are needed, the plan would be revised accordingly. If any repairs or upgrades are needed, the appropriate personnel would be notified. A follow-up inspection would be conducted to verify the repairs/upgrades have been completed. Pretreatment staff provide a detailed inspection report along with the completed NBC Storage Area Inspection Checklist which is provided in Appendix 15. This checklist is also used to document the quarterly comprehensive inspections. Completed checklists are kept on file at the facility, the Pretreatment and ES&C offices. Inspection reports and checklists are uploaded to a shared folder where they are available for review by all staff.

The NBC is required to conduct visual monitoring of storm water discharges as stated in Section V.B of the MSGP. There are various locations throughout the plant that are monitored. These monitoring stations are located on storm lines just prior to leaving the property. The monitoring is conducted four times per year, twice between January 1st and June 30th and twice between July 1st and December 31st. Grab samples from each station must be collected within the first 30 minutes of a storm event discharge where practicable. Storm events that are to be monitored must result in an actual discharge of storm water from the site. Storm event monitoring must occur at least 48 hours from previously measurable storm event and at least 30 days from the previous monitoring event. The grab samples are to be monitored for the following parameters:

Color	Oil Sheen
Clarity	Settled Solids
Floating Solids	Suspended Solids
Foam	Other Obvious Indicators of Storm Water Pollution
Odor	

EM staff conducts the quarterly monitoring. A Storm Water Visual Assessment Report Form is completed for each monitoring event. Copies of the completed form are reviewed and signed by

the Plant Manager and filed at the facility and in the Pretreatment and ES&C offices. The NBC Storm Water Visual Assessment Report Form is provided in Appendix 16.

The annual and quarterly inspections reports and the Storm Water Visual Assessment reports serve as certification that non-storm water discharges have not occurred. These reports are uploaded to a shared folder where they are available for review by all staff.

Best Management Practices (BMP) (MSGP, Sections II.A.2 and V.F.6.a)

The NBC recognizes that the Providence River is impaired for fecal coliform and nitrogen. Currently there are no TMDLs in place for these parameters. The NBC has developed and implemented the good housekeeping and control measures outlined below to ensure that storm water discharges from the Field's Point facilities do not adversely contribute bacteria and nitrogen loading to the river. Implementation of these measures allows the Field's Point facility to fully comply with requirements of the MSGP and ensure that storm water discharged from the Field's Point facility does not adversely contribute nitrogen or bacteria to the Providence River. Periodic monitoring data from the storm water system has demonstrated that storm water discharged from the Field's Point facility does not contribute to nitrogen or bacteria impairments of the Providence River. If future monitoring should show elevated levels of bacteria or nitrogen, the causes of the elevation will promptly be investigated and corrected, the frequency of inspecting control measures will be increased if necessary and the implementation of "Enhanced Good Housekeeping Measures" will be evaluated.

Good Housekeeping: The NBC takes pride in keeping the facility clean. Areas where chemicals are stored are kept neat and clean. If spills occur in these areas, they are immediately cleaned up and the material disposed of properly. This is done to ensure there is no further impact on the surrounding environment as well as for safety concerns. Garbage at the facility is contained in dumpsters. The doors and covers on the dumpsters are kept closed to prevent garbage from escaping the containers. The facility is routinely inspected and any trash that is found is placed in the dumpsters for proper disposal. The facility is surrounded by a security fence which keeps unauthorized people from entering. This minimizes the impact of trash from off site.

Street Sweeping: Routine street sweeping is a BMP that minimizes the discharge of pollutants to the storm water drainage system. Field's Point staff inspects the facility on a quarterly basis to determine when street sweeping activities should be performed on non-porous areas of the facility. At a minimum, street sweeping activities are conducted on a quarterly basis. If monitoring data shows elevated levels of bacteria or nitrogen or there are other activities such as construction taking place at the facility, the street sweeping frequency is increased. The inspections and street sweeping activities are recorded in a logbook and kept on site. The facility utilizes a street sweeper to collect sand and dirt that has accumulated at the facility. The sand/dirt that is collected may be used for fill for minor construction projects or properly disposed.

Catch Basin Cleaning: Routine catch basin cleaning will minimize the discharge of pollutants to the Providence River. Field's Point Maintenance staff inspects the catch basins on the property on a quarterly basis and Interceptor Maintenance (IM) staff clean them as needed. At a minimum, the catch basins are cleaned out by IM staff on a biannual basis. The scheduling, inspections and cleaning activities are tracked and recorded electronically in a service maintenance tracking system.

Vehicle and Marine Vessel Washing: Vehicle and boat washing activities at the facility are only conducted in an area next to the O&M Support Building. The wash water generated discharges to the headworks of the plant. IM vehicles are washed inside the IM Building. The resultant wash water discharges to the sewer system via an oil/water separator. The wash water generated from these operations does not impact the storm water system at the plant.

Pavement Washing: Pavement is not routinely washed at Field's Point. However, when pavement needs to be washed, the resultant wastewater is either directed to drains that discharge back to the plant or is contained and collected for disposal or treatment. If a spill occurs at the facility and the pavement needs to be decontaminated, the decontamination wastewater is collected and disposed. In both cases, pavement washing and decontamination, the storm water system and Providence River are protected by isolating any catch basins in the area with protective mats or temporary berms.

Minimizing Exposure: The NBC stores all chemicals inside buildings where practicable. Where chemicals and used oils are not stored inside of a building, they are stored inside storm resistant enclosures. These measures prevent exposure to rain, snow, snow melt and runoff and the impact on the storm water drainage system. There are some locations at the facility where chemicals are exposed to the weather. These chemicals are stored in weather resistant tanks and containers. The tanks and containers are either in permanent secondary containment or on spill pallets. Although the tanks and containers are exposed to rain and snow, there is no adverse impact on the storm water drainage system. Storm water captured in the secondary containment is inspected prior to being released. If it is determined that the storm water is contaminated it would be pumped out and disposed of properly.



Used Oil Storage Bins

Preventive Maintenance: The NBC has established an extensive preventive maintenance program.



Valve to discharge storm water in secondary containment at the Chlorine Contact Tank

This program includes performing regularly scheduled inspections to determine if storm water management structures such as berms, secondary containment structures and storage bins are in need of repair or upgrade. If repairs or upgrades are warranted, NBC Maintenance staff is notified. The area is then subsequently reinspected to verify the repairs/upgrades have been completed.

Storm Water Management:

Water Quality Science Building (WQSB): A storm water facility was installed during the construction of the WQSB. This storm water facility consists of a sediment forebay and an open channel. Storm water flows through this facility to the Providence River via a storm water line on New York Avenue.



WQSB Storm Water Facility



WQSB Forebay

The WQSB storm water facility is inspected on an annual basis and after storm events greater than or equal to a 1 year, 24-hour rainfall event (2.70 inches). The inspections assess the condition of the following areas:

- The channel side slopes and bottom for erosion and gulying
- The rip rap pad around the outlet control structure for loose or missing stones
- The weir inlets and top grate of the outlet control structure for clogging
- The emergency overflow spillway for erosion and gulying
- The vegetation in the channel

Deficient areas shall be repaired in a timely manner to ensure the proper functioning of the WSQB storm water facility.

The following preventative maintenance activities will be performed on the storm water facility:

- Sediment shall be removed from the channel when it accumulates to a depth of approximately 3 inches.
- Vegetation in the open channel shall be mowed to maintain grass heights of 4 to 6 inches.
- Dead and dying vegetation within the channel shall be removed, as well as any invasive vegetation that compromises the original design vegetation. Areas with removed vegetation shall be revegetated in a timely manner
- The bottom of the dry swale shall be rototilled or cultivated to break up hard packed sediment and reseeded if the surface of the dry swale has become clogged so that standing water is observed on the surface 48 hours after precipitation events
- The channel bottom shall be scraped to remove sediment and to restore the original cross section every five years. The channel shall then be seeded to restore ground cover.

In addition to the procedures and best management practices listed above, the NBC has incorporated measures to limit the quantity of storm water discharging to the Providence River via the storm water system. Green roofs and a rain garden were installed when the Administration Building was constructed. In addition, porous pavement has been used in the facility during repaving operations. These measures allow storm water to be beneficially used and recharge the ground water.



Green Roof on Administration Building



Rain Garden at Administration Building



Porous Pavement

Dust Control: The operations conducted at the Field’s Point facility do not generate dust. However, neighboring facilities generate dust that enters the property. The NBC works with these facilities to ensure adequate dust control measures are in place in order to minimize or eliminate the impact on the Field’s Point facility and its storm water drainage system.

Vehicle Tracking of Materials On-Site: The materials that are processed on-site are typically transported throughout the facility via underground piping. There are some operations where materials are transported on the property via trucks. These operations include chemical/oil deliveries, grit disposal, pump-outs of scum wells, and solids handling. All vehicles are inspected to ensure they are not leaking materials throughout the plant. If a leak is detected, Operations staff handles the clean-up and ensures the material does not enter the storm water system. Standard Operating Procedures (SOP) have been developed for bulk chemical and oil deliveries. The SOPs can be found in Appendix 9.

Grit Handling: The handling of grit for disposal is conducted by NBC Interceptor Maintenance staff as well as contractors. Grit is removed from sewer lines as well as in the grit chambers and CSO tunnel. The grit from the grit chambers is mechanically removed from the tanks and discharged in roll off containers housed in the grit building. Any liquid from the roll offs discharges back to the head works of the plant and the grit is trucked to the landfill. Grit from sewer lines and the tunnel is trucked by either NBC vehicles or contractors to the plant and placed on a newly constructed grit pad. This grit pad has been constructed to ensure



that the liquid phase is directed to the head works of the plant. There is an additional grit pad that is used by plant personnel. Prior to dumping the grit on the pad an earthen berm is constructed. The liquid phase discharges to the head works of the plant via a drain in the grit. All solid material is disposed of at the landfill.

Sludge Handling: The sludge processing operation is conducted by a contractor. The sludge is transported to the Solids Handling Building by underground piping. It is dewatered and shipped off site for disposal. The contractor has developed a SOP to ensure that sludge is not tracked through the facility. This SOP can be found in Appendix 11.



Procedures for Responding to Emergencies and Reporting Requirements (MSGP, Sections II.A.2.d and V.F.6.a))

NBC staff is trained to implement common sense practices to prevent spills/releases of oils and chemicals to the environment. However, if a spill/release occurs the NBC has developed policies and procedures to be used by all staff in the event of a spill of oils, chemicals, or hazardous materials. “NBC Hazardous Material Spill Response and Notification Policy”, policy G-S-03 has been distributed to all NBC employees via the NBC Policy Manual. Staff working in the facility are trained annually regarding this procedure. The policy is as follows.

In the event of a spill of an oil, chemical, or hazardous material NBC responders will follow section/facility specific spill control/response procedures which at a minimum include the actions listed below:

1. Identify the material that was spilled/released.
2. Assess the situation for human health and environmental impacts.
3. Call 911 for injured personnel if necessary.
4. Evacuate the impacted area if necessary.
5. Isolate and protect all storm drains that have the potential to be impacted by the spill/release using sandbags and/or absorbent materials.
6. Immediately notify a supervisor.
7. The supervisor will immediately notify the Plant Manager/ Operations Manager and the Pretreatment Manager.
8. Keep unauthorized/unaffected staff out of the area.
9. Contain the spill/release if possible.
10. Stop the source of the spill/release (i.e. shut valves, upright barrels) if possible.
11. Complete a Spill/Release Report which must be filed with the SWMP and in the Pretreatment and ES&C offices.

Based on the type and quantity of material released, Operations staff with the assistance of Pretreatment staff will determine the written reports that must be filed and make all appropriate local, state, and federal notifications and decide on the appropriate actions for the collection, management, and disposal of the spill debris.

Any release of hazardous material that resulted in the actual or potential human health and/or environmental harm must be immediately reported to the Rhode Island Department of Environmental Management (RIDEM). Releases of hazardous material equal to or exceeding established Reportable Quantities (RQ) must be reported to the following agencies:

<u>Agency</u>	<u>Telephone Number</u>
RIDEM	401.222.1360 / 401.222.3070 (after hours)
National Response Center	1.800.424.8802
State Fire Marshal	401.462.4200 / 401.222.2331 (after hours)

A listing of RQs for hazardous materials used at the facility is provided in Appendix 7.

In addition to making the notifications listed above, the NBC supervisor on the scene must complete the NBC Spill/Release Documentation Form which is provided in Appendix 12. Copies of the completed form must be kept at the facility, and in the Pretreatment and the ES&C offices.

Emergency Contingency Procedures

In the event of an emergency, the Plant Manager, Operations Manager and/or the Operations Supervisor must be notified immediately. The manager/supervisor that was notified is to assess the situation and take the appropriate actions. If the emergency requires outside agency notification, the Pretreatment Manager and/or the Director of Operations & Maintenance will be contacted for assistance. The Pretreatment Manager will be contacted for assistance with response procedures and mitigation if possible. The Executive Director will be informed of the emergency and any outside intervention that may be required.

The highest priority will always be employee safety. At no time will an employee be put at risk. If the size or type of emergency exceeds the capabilities of NBC staff, the fire department, an emergency response team or Hazmat team will be called in to handle the emergency.

Fires

There is a potential risk of fires occurring at the Field's Point plant. In the event of a fire the following procedure is to be followed:

1. With an ABC fire extinguisher, attempt to extinguish the fire if possible.
2. If the fire is extinguished, report the incident to Plant Manager, Operations Manager, and/or Operations Supervisor.
3. If unable to extinguish the fire:
 - Pull fire alarm - this will contact the local Fire Department.
 - All personnel will leave the building(s) and meet at the designated assembly area.
 - The Plant Manager, Operations Manager, and/or Operations Shift Supervisor will account for all staff present for that day and will notify the NBC main office of the incident and that the fire department has been called.
 - The Plant Manager, Operations Manager, and/or Operations Shift Supervisor will assign a Field's Point representative to meet the fire department at the corner of Ernest Street and Service Road in order to direct them to the plant main entrance gate.
 - The Manager/Supervisor will notify the Process Monitor to open the employee entrance gate and leave it open for the Fire Department.
 - NBC staff will direct the Fire Department to the location of the fire.

4. The responding manager/supervisor will contact the Pretreatment Manager and/or the Director of Operations & Maintenance for guidance on the appropriate agencies to contact, and submittal of the necessary documents regarding the event. The Executive Director will be contacted and updated on the event.

Explosions

There is a potential risk of a chemical explosion occurring at the plant. This determination is based on the SDS information regarding the flammability of some materials stored Field's Point, and the safety concerns regarding the handling of compressed gases. In the event of an explosion the procedure below is to be followed:

1. Pull fire alarm – this will contact the local Fire Department.
2. Personnel will leave the building(s) and meet at the designated area for emergencies.
3. The Plant Manager, Operations Manager, and/or Operations Shift Supervisor will account for all staff present for that day and will notify the NBC main office of the incident and that the fire department has been called.
4. The Plant Manager, Operations Manager, and/or Operations Shift Supervisor will assign a Field's Point representative to meet the fire department at the corner of Ernest Street and Service Road in order to direct them to the plant main gate.
5. The Plant Manager, Operations Manager, and/or Operations Shift Supervisor will contact the Pretreatment Manager and/or the Director of Operations & Maintenance for guidance on the appropriate agencies to contact, and the submittal of the necessary documents regarding the event. The Executive Director will be contacted and updated on the event.

Hazardous Materials/Chemical Release

There is a potential risk of a chemical release occurring at the plant. This determination is based on the usage of hazardous materials and SDS information regarding chemical hazards of materials stored at the plant. When a spill/release is discovered the procedures for containing, controlling and responding to spills/releases detailed in this plan must be followed:

1. Identify the material that was spilled/released.
2. Assess the situation for human health and environmental impacts.
3. Call 911 for injured personnel if necessary.
4. Evacuate the impacted area if necessary.
5. Isolate and protect all storm drains that have the potential to be impacted by the spill/release using sandbags and/or absorbent materials.
6. Immediately notify a supervisor.
7. The supervisor will immediately notify the Pretreatment Manager.
8. Keep unauthorized/unaffected staff out of the area.
9. Contain the spill/release.
10. Stop the source of the spill/release (i.e. shut valves, upright barrels) if possible.
11. Complete a Spill/Release Report which must be filed with the SWMP and in the Pretreatment and ES&C offices.

Spill Response Plans for sodium hypochlorite and sodium meta-bisulfite are provided in Appendix 10.

Spill Clean-Up

If the spill/release can be safely cleaned up by NBC staff, personal protective equipment (PPE) supplied by the NBC must be utilized. PPE includes but is not limited to the following:

Splash Goggles	Nitrile, Leather and Rubber Gloves
Tyvek Suits	Hard Hats
Long Sleeve Shirts or Coats	

The NBC has extensive spill clean-up equipment stored in the Emergency Spill Control Trailer. This equipment trailer can be promptly transported to the site of the spill and be used to contain and clean up the spill if appropriate. The contents of this trailer are listed below:

Plugs for drain lines	Extension Cords
Manhole Cover Hook	Fire Extinguisher
Oil Absorbent Pads	Rope
Absorbent Pigs	Light Tree
Speedy Dry	Traffic Cones
Sand Bags	Safety Goggles
Sump Pump	Gloves
Hose	Squeegee
Overpack Drum	Shovels
Portable Air Compressor	

The Pretreatment Section also has spill/release mitigation equipment and PPE on site. This equipment includes:

Absorbent Pads	Traffic Cones
Flexible Containment Berms	Safety Goggles
Absorbent Sausage Booms	Gloves
Rubber Boots	Waders
Tyvek Suits	Hard Hats
Air Monitoring Equipment	

In the event a spill/release discharges to the Providence River, the Pretreatment Section has curtain booms to deploy around either or both of the outfalls, Outfall 001 and Outfall 002.

The Plant Manager, Operations Manager, and/or the Pretreatment Manager will determine whether or not the spilled material is hazardous and if an outside contractor is needed. NBC staff should never attempt to clean up a spill if any of the following conditions exist:

- The type of material is unknown
- Proper PPE is unavailable
- The surrounding environment poses a threat or hazard
- The spill occurs near a known ignition source
- The situation involves an uncontrolled release of compressed gas
- Communication with other Field's Point employees is not available

A list of Emergency Response Service Contractors is provided in Attachment 8.

Management of Runoff and Run-On (MSGP, Sections II.A.2.f and V.F.5)

The NBC has assessed the current storm water management practices utilized at Field's Point. Based on this assessment and the materials stored at the facility, the current practices have been determined to be reasonable and appropriate. The practices have been implemented and are being maintained. There are two storm water detention basins at the facility to control runoff from the facility. These detention basins are indicated on the Field's Point Plant Storm Water Drainage System plan which is provided in Attachment 1. An assessment of the facility has determined there are no sources of run-on the property from properties not owned by the NBC.

Sediment and Erosion Prevention (MSGP Sections II.A.2.e and V.F.6.a)

At the Field's Point treatment plant there are two areas where erosion could occur. In order to prevent erosion, rip rap has been installed.



Rip Rap on the South Side of the Plant



Rip Rap on Embankment behind the WQSB

There are no areas at Ernest Street/Tunnel Pump Station where there is a high potential for soil erosion that could impact the storm water drainage systems.



Tunnel Screening Facility – Crane Structure

Staff Training (MSGP, Section II.A.2.i)

The NBC is committed to ensuring compliance with all state, federal and local requirements as well as the safety of its employees. Employees receive extensive training upon beginning employment with the NBC and annually thereafter. The Safety Compliance Coordinator tracks the training of all employees. Employees are required to sign in when taking any training. This documentation is filed with the SWMP and Pretreatment and ES&C offices. Staff working at the facility receive the following training classes at the frequency below:

<u>Training</u>	<u>Frequency</u>
• Spill Prevention, Control & Countermeasures Plan	Annually
• Storm Water MSGP Requirements	Annually
• Spill Prevention and Response	Annually
• Environmental, Health and Safety Awareness	Annually
• Emergency Action Plans	Annually
• Permit Required Confined Space	Annually
• Personal Protective Equipment	Annually
• Hazardous Waste Management	Annually
• Lock Out/Tag Out	Annually
• Fire Prevention Plans / Fire Extinguisher	Annually

Each of the aforementioned trainings is very thorough. All of the requirements of the applicable standards and plan are reviewed annually during the training. These trainings generally are scheduled throughout the year and offered on all three shifts so that all staff members receive the required training.

Specialized training is also provided to various NBC staff working for and at the facility. The specialized training classes provided to some staff include the following:

- Hazardous Waste Operations (HAZWOPER), 40-hr/24-hr initial/8hr annual refresher
- Fork Lift Training
- Spill Tracking
- Boom Deployment
- Infectious Materials Exposure Control (IMEC) Program – Blood Borne Pathogens

Requirements for Salt Storage Piles (MSGP, Sections II.A.2.g and V.F.4.g)



Salt Storage Area

The NBC has a salt pile at Field's Point. The salt pile is covered and not exposed to the weather. Salt is stored appropriately to prevent material from adversely impacting the storm water drainage system.

Requirements for SARA Title III Facilities (MSGP, Section III.B.3)

The NBC complies with all appropriate conditions under Emergency Planning and Community Right-to-Know Act (EPCRA) and Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) requirements.

Requirements with Other Plans (MSGP, Section V.F.8)

The NBC has ensured that this SWMP is consistent with all other requirements for Spill Prevention Control and Countermeasure Plans.

Endangered Species (MSGP, Section V.F.7)

The Field's Point facility is not located within an area or has a discharge to a surface water of the State of Rhode Island that could potentially affect a listed or proposed to be listed endangered or threatened species or its critical habitat.

Appendix 1

Facility Site Maps

The information in this attachment has been deemed restricted in accordance with Section V.H of the MSGP

From Appendix A of the MSGP:

“Restricted Information – for the purpose of this permit, information that is privileged or that is otherwise protected from disclosure pursuant to applicable statutes, Executive Orders, or regulations. Such information includes but is not limited to: classified national security information, protected critical infrastructure information, sensitive security information, and proprietary business information.”

Appendix 2

Buildings & Structures Descriptions

The information in this attachment has been deemed restricted in accordance with Section V.H of the MSGP

From Appendix A of the MSGP:

“Restricted Information – for the purpose of this permit, information that is privileged or that is otherwise protected from disclosure pursuant to applicable statutes, Executive Orders, or regulations. Such information includes but is not limited to: classified national security information, protected critical infrastructure information, sensitive security information, and proprietary business information.”

Appendix 3

Drainage Areas & Secondary Containment

The information in this attachment has been deemed restricted in accordance with Section V.H of the MSGP

From Appendix A of the MSGP:

“Restricted Information – for the purpose of this permit, information that is privileged or that is otherwise protected from disclosure pursuant to applicable statutes, Executive Orders, or regulations. Such information includes but is not limited to: classified national security information, protected critical infrastructure information, sensitive security information, and proprietary business information.”

Appendix 4

Chemical Inventory

The information in this attachment has been deemed restricted in accordance with Section V.H of the MSGP

From Appendix A of the MSGP:

“Restricted Information – for the purpose of this permit, information that is privileged or that is otherwise protected from disclosure pursuant to applicable statutes, Executive Orders, or regulations. Such information includes but is not limited to: classified national security information, protected critical infrastructure information, sensitive security information, and proprietary business information.”

Appendix 5

Spill Prevention & Emergency Response Team

The information in this attachment has been deemed restricted in accordance with Section V.H of the MSGP

From Appendix A of the MSGP:

“Restricted Information – for the purpose of this permit, information that is privileged or that is otherwise protected from disclosure pursuant to applicable statutes, Executive Orders, or regulations. Such information includes but is not limited to: classified national security information, protected critical infrastructure information, sensitive security information, and proprietary business information.”

Appendix 6

Storm Water Pollution Prevention Team

The information in this attachment has been deemed restricted in accordance with Section V.H of the MSGP

From Appendix A of the MSGP:

“Restricted Information – for the purpose of this permit, information that is privileged or that is otherwise protected from disclosure pursuant to applicable statutes, Executive Orders, or regulations. Such information includes but is not limited to: classified national security information, protected critical infrastructure information, sensitive security information, and proprietary business information.”

Appendix 7

Reportable Quantities

Reportable Quantities for Chemicals on site at Field's Point

Gasoline	8006-61-9	100	16	RCRA - Ignitable
Sodium Hypochlorite	7681-52-9 / 10022-70-5	100	10	CERCLA RQ
Sodium Bisulfite	7631-90-5	5,000	450	CERCLA RQ
Sodium Hydroxide	1310-73-2	1,000	95.8	CERCLA RQ
Hydrochloric Acid	7647-01-0	5,000	375	CERCLA RQ
Nitric Acid	7697-37-2	1,000	75	CERCLA RQ
Kerosene	8008-20-6	100	14	RCRA - Ignitable

Any release of hazardous material that resulted in the actual or potential human health and/or environmental harm must be immediately reported to the Rhode Island Department of Environmental Management (RIDEM). Releases of hazardous material equal to or exceeding established Reportable Quantities (RQ) must be reported to the following agencies:

Agency

RIDEM

National Response Center

State Fire Marshal

Telephone Number

401.222.1360 / 401.222.3070 (after hours)

1.800.424.8802

401.462.4200 / 401.222.2331 (after hours)

Appendix 8

List of Emergency Response Contractors

List of Emergency Response Service Contractors

Clean Harbors Environmental Services, Inc
8 Dexter Road
East Providence, RI 02914
401.431.1874
401.431.2154 (fax)

Western Oil, Inc.
One Duchess Way
Lincoln, RI 02865
401.727.8600
401.727.7667 (fax)

Inland Water Pipeline Services
275 Scituate Avenue
Johnston, RI 02919
401.943.5302
877.943.5300 (toll free)
401.943.5714 (fax)

Appendix 9

Standard Operation Procedure Ordering & Receiving Chemicals

STANDARD OPERATING PROCEDURES
ORDERING AND RECEIVING
OIL PRODUCTS IN BULK

When ordering and receiving shipments of fuel and/or other oil products in bulk the following procedures must be followed in order to assure all products are transferred from the delivery vehicle to the appropriate storage tank in a safe and proper manner:

1. Contact the fuel/oil product supplier to place the order.
2. Schedule a delivery date and approximate time.
3. Notify the Process Monitor of delivery time and date.
4. At the time of the delivery, the employee assigned to monitor the delivery must have a form of emergency communication on hand and make arrangements for proper access to adequate spill control equipment.
5. When the vendor arrives at the facility, an employee must meet the vendor at the main gate.
6. Assure that the vehicle is not leaking before granting access to the facility.
7. Escort the vendor to the appropriate off-loading area(s).
8. Verify that the vendor secures the vehicle and shipment from accidental/unanticipated movement (i.e. chock the wheels of the truck).
9. Remain with the vendor to observe off-loading operations to ensure the delivery is made using safe work practices and appropriate precautions so as not to cause leakage or spills.
10. During the delivery of diesel, the tank vent stack must be monitored to ensure that the tank is not overfilled.
11. Inspect the area to ensure there has not been an accidental release.
12. Sign all required paperwork.
13. Escort the vendor off NBC property via the main gate.
14. If a spill occurs, follow all standard operating procedures outlined in the Spill Prevention Control and Countermeasures Plan for the facility.

STANDARD OPERATING PROCEDURES
ORDERING AND RECEIVING
CHEMICALS AND/OR OIL PRODUCTS IN DRUMS

When ordering and receiving shipments of chemicals and/or oil products in drums the following procedures must be followed in order to ensure all products are transferred from the delivery vehicle to the appropriate storage area in a safe and proper manner:

1. Contact the chemical/oil product supplier to place the order.
2. Schedule a delivery date and time.
3. Notify the Process Monitor of the delivery date and time.
4. At the time of the delivery, the employee assigned to monitor the delivery must have a form of emergency communication on hand and make arrangements for proper access to adequate spill control equipment.
5. When the vendor arrives at the facility, an employee must meet the vendor at the main gate.
6. Assure that the shipment is properly secured, and no leakage is occurring.
7. Escort the vendor to the appropriate off-loading area.
8. Verify the vendor secured the vehicle and shipment from accidental/incidental movement.
9. Assure the amount and type of product delivered is what was ordered match the delivery/shipping papers.
10. Remain with the vendor to observe off-loading operations to ensure the delivery is made using safe work practices and appropriate precautions so as not to cause leakage or spills.
11. If additional products remain on the delivery vehicle verify that all products are safely secured, and no leakage is occurring before the vehicle moves.
12. Inspect the area to ensure there has not been an accidental release.
13. Sign all required paperwork.
14. Escort the vendor off NBC property via the main gate.
15. If a spill occurs, follow all standard operating procedures outlined in the Spill Prevention Control and Countermeasures Plan and Appendix 10.

STANDARD OPERATING PROCEDURES
ORDERING AND RECEIVING BULK CHEMICALS
SODIUM HYDROXIDE AND MICROC 2000

When ordering and receiving sodium hydroxide and MicroC 2000, the following procedures must be followed:

1. Contact the chemical supplier to place the order.
2. Schedule a delivery date and time.
3. Notify the Process Monitor of the delivery date and time.
4. When the vendor arrives at the gate to deliver sodium hydroxide or MicroC 2000, dispatch an employee to accompany/meet the vendor at the location where the material is to be off-loaded.
5. The storm drains in the immediate area must be covered to prevent potential spills from entering the storm water system.
6. A NBC employee should stay at the location for the duration of the delivery if possible. If not possible, the delivery should be monitored by staff via the camera system.
7. Once off-loading has ceased, the NBC employee should inspect the area to ensure there has not been an accidental release.
8. Once it has been determined there will be no impact to the storm eater system, the covers on the storm drains may be removed.
9. The NBC employee receiving the material should sign all required paperwork and escort the vendor off the property.
10. If a spill occurs, follow all standard operating procedures outlined in Appendix 10.

STANDARD OPERATING PROCEDURES
ORDERING AND RECEIVING BULK CHEMICALS
SODIUM HYPOCHLORITE AND SODIUM METABISULFITE

When ordering and receiving sodium hypochlorite and sodium metabisulfite, the following procedures must be followed:

1. Contact the chemical supplier to place the order.
2. Schedule a delivery date and time.
3. Notify the Process Monitor of the delivery date and time.
4. When the vendor arrives at the gate to deliver sodium hypochlorite and sodium metabisulfite, dispatch an employee to accompany/meet the vendor at the location where the material is to be off-loaded.
5. A NBC employee should stay at the location for the duration of the delivery if possible. If not possible, the delivery should be monitored by staff via the camera system.
6. Once off-loading has ceased, the NBC employee should inspect the area to ensure there has not been an accidental release.
7. The NBC employee receiving the material should sign all required paperwork and escort the vendor off the property.
8. If a spill occurs, follow all standard operating procedures outlined in Appendix 10.

Appendix 10

Spill Response Plans

Spill/Release Response Plan Oils and Other Chemicals

If a chemical/oil spill or release is discovered the procedures outlined in the SPCC Plan and the SWMP must be followed. The procedure is as follows:

1. Identify the material.
2. Assess the situation for human health and environmental impacts.
3. Call 911 for injured personnel if necessary.
4. Evacuate the impacted area if necessary.
5. Isolate and protect all storm drains that have the potential to be impacted by the spill/release using sandbags and/or absorbent material.
6. Immediately notify a supervisor.
7. The supervisor will immediately notify the Plant Manager / Operations and the Pretreatment Manager.
8. All personnel working to contain, control and clean-up the spill/release must wear all appropriate personal protective equipment.
9. Keep unauthorized/unaffected staff out of the area.
10. Contain the spill/release using sandbags and/or absorbent materials if possible.
11. Stop the source of the spill/release (i.e. shut valves, upright barrels) if possible.
12. Once the spill/release is stopped, the contained material must be pumped into appropriate containers for proper disposal.
13. Complete a Spill/Release Report which must be filed with the SWMP and in the Pretreatment and ES&C offices.

Spill/Release Response Plan Sodium Bisulfite

If a spill or release of bisulfite is discovered the procedures outlined in the SPCC Plan and the SWMP must be followed. The procedure is as follows:

1. Identify the material that was spilled/released is bisulfite.
2. Assess the situation for human health and environmental impacts.
3. Call 911 for injured personnel if necessary.
4. Evacuate the impacted area if necessary.
5. Isolate and protect all storm drains that have the potential to be impacted by the spill/release using sandbags and/or absorbent materials.
6. Immediately notify a supervisor.
7. The supervisor will immediately notify the Plant Manager / Operations Manager and the Pretreatment Manager.
8. All personnel working to contain, control and clean-up the spill/release must wear all appropriate personal protective equipment.
9. Keep unauthorized/unaffected staff out of the area.
10. Contain the spill/release using sandbags and/or absorbent material if possible.
11. Stop the source of the spill/release (i.e. shut valves, upright barrels) if possible.
12. Once the spill/release has been stopped, the contained material must be pumped into appropriate containers for proper disposal or reuse.
13. Complete a Spill/Release Report which must be filed with the SWMP and in the Pretreatment and ES&C offices.

In addition to following the NBC procedures, the vendor must be contacted as well at the time of discovering the release. The vendor for this material is Univar, USA, Inc. located at 6 Harborside Boulevard, Providence, RI 02905 and the phone number is 401.781.5600.

Spill/Release Response Plan Sodium Hypochlorite

If a spill or release of bisulfite is discovered the procedures outlined in the SPCC Plan and the SWMP must be followed. The procedure is as follows:

1. Identify the material that was spilled/released is bisulfite.
2. Assess the situation for human health and environmental impacts.
3. Call 911 for injured personnel if necessary.
4. Evacuate the impacted area if necessary.
5. Isolate and protect all storm drains that have the potential to be impacted by the spill/release using sandbags and/or absorbent materials.
6. Immediately notify a supervisor.
7. The supervisor will immediately notify the Plant Manager / Operations Manager and the Pretreatment Manager.
8. All personnel working to contain, control and clean-up the spill/release must wear all appropriate personal protective equipment.
9. Keep unauthorized/unaffected staff out of the area.
10. Contain the spill/release using sandbags and/or absorbent material if possible.
11. Stop the source of the spill/release (i.e. shut valves, upright barrels) if possible.
12. Once the spill/release has been stopped, the contained material must be pumped into appropriate containers for proper disposal or reuse.
13. Complete a Spill/Release Report which must be filed with the SWMP and in the Pretreatment and ES&C offices.

In addition to following the NBC procedures, the vendor must be contacted as well at the time of discovering the release. The vendor for this material is Univar, USA, Inc. located at 6 Harborside Boulevard, Providence, RI 02905 and the phone number is 401.781.5600.

Spill/Release Response Plan

Sludge

If a spill or release of bisulfite is discovered the procedures outlined in the SPCC Plan and the SWMP must be followed. The procedure is as follows:

1. Identify the material that was spilled/released is bisulfite.
2. Assess the situation for human health and environmental impacts.
3. Call 911 for injured personnel if necessary.
4. Evacuate the impacted area if necessary.
5. Isolate and protect all storm drains that have the potential to be impacted by the spill/release using sandbags and/or absorbent materials.
6. Immediately notify a supervisor.
7. The supervisor will immediately notify the Plant Manager / Operations Manager and the Pretreatment Manager.
8. All personnel working to contain, control and clean-up the spill/release must wear all appropriate personal protective equipment.
9. Keep unauthorized/unaffected staff out of the area.
10. Contain the spill/release using sandbags and/or absorbent material if possible.
11. Stop the source of the spill/release (i.e. shut valves, upright barrels) if possible.
12. Once the spill/release has been stopped, the contained material must be pumped into appropriate containers for proper disposal or reuse.
13. Complete a Spill/Release Report which must be filed with the SWMP and in the Pretreatment and ES&C offices.

Appendix 11

Standard Operating Procedure Minimizing Sludge Impacts

July 28, 2014

To: All Drivers
Fields Point

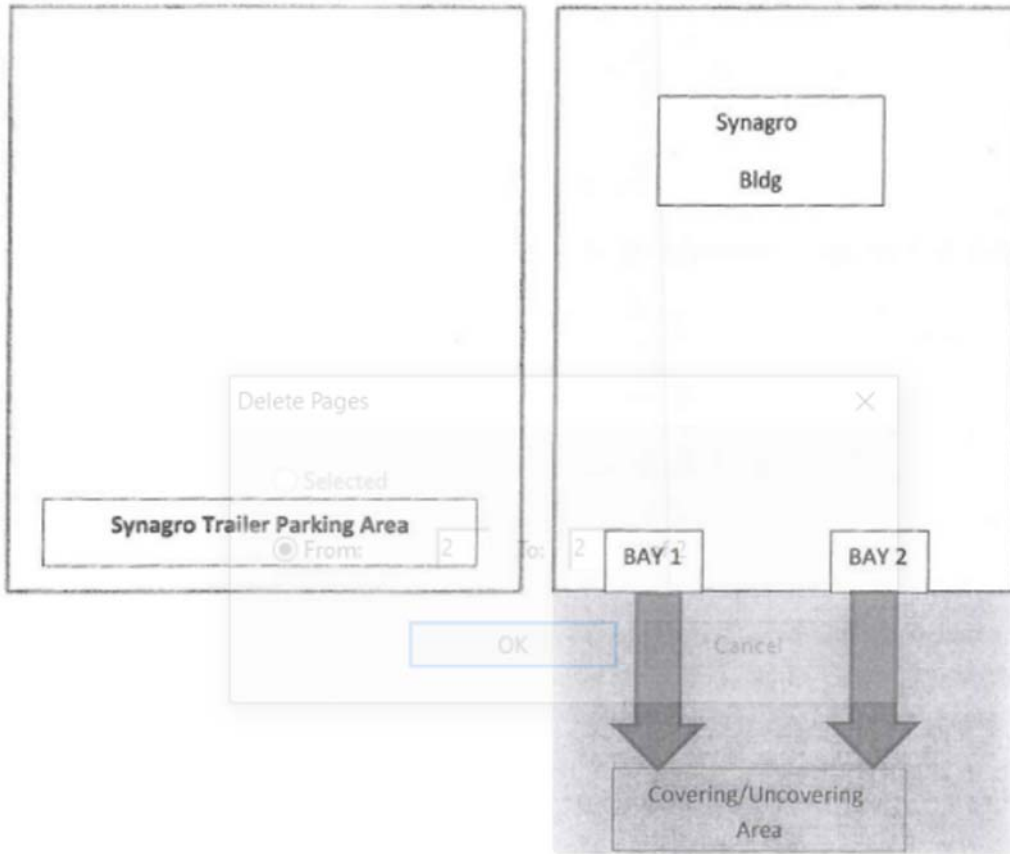
EFFECTIVE IMMEDIATELY

Due to the extent of previous spills/stains Fields Point Operator's washed down the parking lot on Saturday. Going forward, you are to cover and uncover all trailers in front of the garage door (See Attached Picture-Green Area)

If any sludge falls on the ground outside or inside it is to be picked up immediately and put back in the empty trailer (**NOT** in the garbage barrel).

All trailers are to be parked on the side of the building (See Attached Picture-Yellow Area). If the trailer has any kind of leak you will put the yellow tub under the trailer to catch any and all fluids. Any leaks must be documented and **IMMEDIATELY** notify Synagro's Operator on duty.

Be Safe!



Appendix 12

Spill/Release Documentation Form

NBC Spill/Release Documentation Form

Date of Spill/Release: _____ Time: _____ am _____ pm _____

Weather Conditions at the of the Spill/Release: Rain Snow Clear Cloudy

Spilled/Released Material: _____ Quantity*: _____

Source of the Spilled/Released Material: _____

Cause of the spill/release: _____

Are there storm drains in the area? Yes No

Did the material leave the facility and/or enter the environment or storm drains? Yes No

If yes, provide where the material left the facility and/or entered the environment or storm drains:

Were any of the following impacted by the spill/release?

	Yes	No	Comments
Ground			
Pavement			
Air			

Describe any damages or injuries caused by the spill/release:

Did the area need to be evacuated? Yes No

What response measures were taken:

What measures will be taken to prevent future occurrences?

List the names of individuals and organizations** who were contacted as a result of the incident:

Additional Comments:

Name and Title of Reporting Individual: _____

Name of Supervisor: _____

Supervisor Signature: _____ Date: _____

Plant Manager Signature: _____ Date: _____

Phone Number: _____

Definitions:

Spill of National Significance means a spill that due to its severity, location, actual or potential impact on public health and welfare or the environment, or the necessary response effort, is so complex that it requires

extraordinary coordination of federal, state, local, and responsible party resources to contain and clean up the discharge.

Release as defined by Section 101(22) of CERCLA, means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substances, or pollutant or contaminant), but excludes: Any release which results in exposure to persons solely with a workplace, with respect to a claim which such persons may assert against the employer of such persons; emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine; release source, by product, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954, if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under Section 170 of such Act, or for the purposes of Section 104 of CERCLA or any other response action, any release of source, byproduct, or special nuclear material from any processing site designated under Section 102(a)(1) or 302(a) of the Uranium Mill Tailings Radiation Control Act of 1978 (42U.S.C. 7901 et seq.); and the normal application of fertilizer. For the purposes of the NCP, release also means threat of release.

Reportable Quantity is defined as the quantity of a spilled/released hazardous substance that triggers reports under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

Reportable Quantities for Hazardous Materials on site

Material	CAS Number	RQ (lbs)	RQ (gal)	Reason for Listing
Diesel Fuel	68476-34-6	100	14	RCRA - Ignitable
Gasoline	8006-61-9	100	16	RCRA - Ignitable
Sodium Hypochlorite	7681-52-9 / 10022-70-5	100	10	CERCLA RQ
Sodium Bisulfite	7631-90-5	5,000	450	CERCLA RQ
Sodium Hydroxide	1310-73-2	1,000	95.8	CERCLA RQ
Hydrochloric Acid	7647-01-0	5,000	375	CERCLA RQ
Nitric Acid	7697-37-2	1,000	75	CERCLA RQ
Kerosene	8008-20-6	100	14	RCRA - Ignitable

* Releases of hazardous material equal to or exceeding established Reportable Quantities (RQ) must be reported to the following agencies:

<u>Agency</u>	<u>Telephone Number</u>
RIDEM	401.222.1360 / 401.222.3070 (after hours)
National Response Center	1.800.424.8802
State Fire Marshal	401.462.4200 / 401.222.2331 (after hours)

**Spills/releases impacting the environment should be reported to DEM at 401.222.3070 as there is no minimum reporting quantities in the State of Rhode Island.

Appendix 13

Significant Oil Discharge Report Form

**Narragansett Bay Commission
Significant Oil* Discharge Form**

This report is being submitted in conformance with 40CFR112.4.

Field's Point Wastewater Treatment Facility
Two Ernest Street
Providence, RI 02905

Send to:
Region Administrator
EPA New England
5 Post Office Square – Suite 100
Boston, MA 02109-3912

Date of Discharge: _____
Person Preparing Report: _____
Maximum Storage Capacity of the Facility: _____

Cause of discharge including failure analysis of system or subsystem where the failure occurred:

Corrective measures taken including equipment repairs and/or replacements: _____

Additional preventative measures taken to minimize the possibility of future occurrences:

Additional comments: _____

Signature of Plant Manager

Date

Attach a copy of the following: Facility Description
Site Map
Topographical Map
Flow Diagrams

Copies of this completed form are to be sent to the RI Department of Environmental Management and filed with the SPCC Plan, the Pretreatment Manager, and Director of Environmental Science & Compliance.

Appendix 14

Weekly Inspection Log for Used Oil

Weekly Inspection Log for NBC Used Oil Storage Area

NAME: _____ DATE: _____ TIME: _____

- | | | |
|--|-------|----|
| 1) Are the storage sheds currently closed? | YES | NO |
| 2) How many 55 gallon drums are inside the storage sheds? | _____ | |
| 3) Is the area itself secure and protected from storm water? | YES | NO |
| 4) Are "No Smoking" and "Flammable" signs posted in the area? | YES | NO |
| 5) Is the area separated from sources of ignition? | YES | NO |
| 6) Are all containers in good condition? | YES | NO |
| 7) Do ALL containers have labels that properly identify their content(s)? | YES | NO |
| 8) Are all containers labeled with the date when placed in the storage area? | YES | NO |
| 9) Are all waste containers stored with proper secondary containment in case of a spill? | YES | NO |

COMMENTS (leaking/open drums, drums outdoors, safety concerns etc.)

Appendix 15

Chemical/Oil Storage & General Permit Compliance Checklist

**Quarterly Inspection Checklist for
Chemical/Oil Storage & General Storm Water Permit Compliance
NBC Field's Point Wastewater Treatment Facility**

Name of Inspector(s): _____ Title:

Inspection Date:

Time:

Quarter Satisfied: 1st 2nd 3rd 4th

Weather Condition: Sunny Cloudy Rain Overcast Other:

Storm Water Discharge Occurring at the Time of Inspection: Yes No

Purpose of Site Inspection

The purpose of quarterly inspections is to comply with the Spill Prevention Control and Countermeasures and Storm Water Management Plans. Thorough inspections of the facility ensure that chemicals and oils are properly stored and contained in case of a spill, and ensure that storm water systems are functioning properly so that the Seekonk River is not adversely impacted by NBC operations. The quarterly inspections will identify any issues that require corrective actions necessary to ensure facility compliance with EPA and DEM requirements and permits.

Inspection Guidelines for NBC Inspectors

1. Inspect exterior surfaces of tanks, pipes, valves and other equipment for leaks, maintenance deficiencies and any other equipment deficiencies.
2. Inspect spill control and containment structures and equipment for proper containment and to identify any deficiencies.
3. Identify any cracks, areas of wear, corrosion and thinning, poor maintenance and operating practices, excessive settlement of structures, separation or swelling of tank insulation, malfunction of equipment and structural foundation weakness.
4. Inspect leak detecting systems, or cathodic protection equipment, if present, along with any other warning systems that may be in place.
5. If there is wet weather accumulation in a containment area, drain if necessary in accordance with approved NBC procedures to allow for proper inspection of the equipment.
6. One quarterly inspection each year should be conducted during a period when storm water is discharging.
7. Once the inspection is completed, service requests/work orders must be created for items that must be addressed.
8. Copies of completed work orders showing all required activities have been addressed must be attached to this completed checklist.

Quarterly Inspection Checklist for
Chemical/Oil Storage & General Storm Water Permit Compliance
NBC Field's Point Wastewater Treatment Facility

Catch Basin Inspections: Each storm water catch basin is to be inspected to ensure they are properly functioning and to determine if solids need to be removed.

Do any catch basins require repair or need to be cleaned out? Yes
No

If yes, please indicate the location of each catch basin in need of cleaning or repair:

Street Sweeping Inspections:

Do any areas of the facility need street sweeping? Yes
No

If yes, please indicate the areas in need of sweeping:

Litter, Garbage and Solid Debris:

Is there litter, garbage or solid debris observed in any area that can impact the storm water system? Yes
No

If yes, pick up and dispose immediately.

Based upon the inspection, are any corrective actions required? Yes No

If yes, list issue in the summary findings section of this report. Service requests must be generated to address the issue and all completed service requests/work orders must be attached to this inspection report.

Initials:

Date:

**Quarterly Inspection Checklist for
Chemical/Oil Storage & General Storm Water Permit Compliance
NBC Field's Point Wastewater Treatment Facility**

WQSB Storm Water Structure Inspection: This inspection should be conducted during the second quarter inspections and MUST also be conducted after every rain event of 2.70 inches in a 24 hour period.

Is there evidence of erosion of gullyng on the channel side slopes and bottom? Yes No

If yes, list what corrective actions will be taken:

Are there loose or missing stones in the rip rap pad or outlet control structure? Yes No

If yes, list what corrective actions will be taken:

Is the weir inlet and/or top grate of the outlet control structure clogged? Yes No

If yes, list what corrective actions will be taken:

Is there evidence of erosion or gullyng in the emergency spillway? Yes No

If yes, list what corrective actions will be taken:

Is the vegetation in the channel in good condition? Yes No

If no, list what corrective actions will be taken:

Mandatory Maintenance Requirements: The sediment forebay and open channel must be cleaned in accordance with the following triggers:

- Sediment Forebay: Every 5 yrs. or 50% of the total forebay capacity is lost
- Open Channel: Every 5 yrs. the bottom must be scraped to remove sediment and reseeded.
 - Sediment build-up shall be removed when it reached a depth of 3 in.
 - Vegetation shall be mowed to keep the grass height between 4" to 6"
 - Vegetative coverage shall be at least 50% in the planted areas
 - Dead and dying vegetation must be removed
 - If the surface of the dry swale is clogged so that standing water is observed on the surface 48 hrs after a rain event, the bottom must be rototilled or cultivated to break any hard packed sediment.

Based upon the inspection, are any corrective actions required? Yes No

If yes, list the issues in the summary findings section of this report. Service requests must be generated to address the issues and all completed service requests/work orders must be attached to this inspection report.

Initials:

Date:

Quarterly Inspection Checklist for
 Chemical/Oil Storage & General Storm Water Permit Compliance
 NBC Field's Point Wastewater Treatment Facility

	Storage Containers/Vessels Condition	Supports & Foundations Condition	Piping and Valves Condition	Spill Containment Structures Condition	Detection Protection Warning Equipment Condition	Evidence of Leaks & Contamination	Comments
Tunnel Screening Hypochlorite Storage	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
O&M Support	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
O&M Support Elevator Equipment Room	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Maintenance Building	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Grit 5,100 Gallon Diesel Storage Tank	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		

Quarterly Inspection Checklist for
 Chemical/Oil Storage & General Storm Water Permit Compliance
 NBC Field's Point Wastewater Treatment Facility

	Storage Containers/Vessels Condition	Supports & Foundations Condition	Piping and Valves Condition	Spill Containment Structures Condition	Detection Protection Warning Equipment Condition	Evidence of Leaks & Contamination	Comments
Grit Generator	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Grit Generator Transformers	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Wind Turbine C Transformer	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Sludge Processing Hypochlorite Storage	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		

Initials:

Date:

Quarterly Inspection Checklist for
 Chemical/Oil Storage & General Storm Water Permit Compliance
 NBC Field's Point Wastewater Treatment Facility

	Storage Containers/Vessels Condition	Supports & Foundations Condition	Piping and Valves Condition	Spill Containment Structures Condition	Detection Protection Warning Equipment Condition	Evidence of Leaks & Contamination	Comments
Sludge Handling Building Transformer	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Turbine Switchgear Transformer	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Blower Building II	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Blower Building II Transformer	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		

Initials:

Date:

Quarterly Inspection Checklist for
 Chemical/Oil Storage & General Storm Water Permit Compliance
 NBC Field's Point Wastewater Treatment Facility

	Storage Containers/Vessels Condition	Supports & Foundations Condition	Piping and Valves Conditions	Spill Containment Structures Condition	Detection Protection Warning Equipment Condition	Evidence of Leaks and Contamination	Comments
Transformers T3A & T3B next to Final Clarifier 5	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Chlorine Contact Tank Hypochlorite Storage	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Disinfection Building	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Transformer Behind RAS Pump Station #1	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		

Initials:

Date:

Quarterly Inspection Checklist for
 Chemical/Oil Storage & General Storm Water Permit Compliance
 NBC Field's Point Wastewater Treatment Facility

Dechlorination Building	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Wind Turbine B Transformer	GoodPoorNA	GoodPoorNA	GoodPoorNA	GoodPoorNA	GoodPoorNA	YesNo	
Used Oil Storage Bin #1	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Used Oil Storage Bin #2	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Hyphochlorite Tank Farm	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		

Initials:

Date:

Quarterly Inspection Checklist for
 Chemical/Oil Storage & General Storm Water Permit Compliance
 NBC Field's Point Wastewater Treatment Facility

	Storage Containers/Vessels Condition	Supports and Foundations Conditions	Piping and Valves Conditions	Spill Containment Structures Conditions	Detection Protection Warning Equipment Condition	Evidence of Leaks and Contamination	Comments
BNR Generator 6,800 gallon Diesel Storage Tank	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
BNR Generator Transformers	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Screw Lift & Blower Building Generator 4,000 gallon Diesel Storage Tank	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Screw Lift & Blower Building Generator	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		

Initials:

Date:

Quarterly Inspection Checklist for
 Chemical/Oil Storage & General Storm Water Permit Compliance
 NBC Field's Point Wastewater Treatment Facility

	Storage Containers/Vessels Condition	Supports and Foundations Condition	Piping and Valves Condition	Spill Containment Structures Condition	Detection Protection Warning Equipment Condition	Evidence of Leaks and Contamination	Comments
Screw Lift & Blower Building Transformers A & B	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Screw Lift & Blower Building	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Screening & Caustic Building	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Carbon Source Tank Farm	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		

Initials:

Date:

Quarterly Inspection Checklist for
 Chemical/Oil Storage & General Storm Water Permit Compliance
 NBC Field's Point Wastewater Treatment Facility

	Storage Containers/Vessels Condition	Supports and Foundations Condition	Piping and Valves Condition	Spill Containment Structures Condition	Detection Protection Warning Equipment Condition	Evidence of Leaks and Contamination	Comments
Primary Sludge Building	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Wind Turbine A Transformer	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Fuel Depot	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Wet Weather Hypochlorite Storage	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		

Initials:

Date:

Quarterly Inspection Checklist for
 Chemical/Oil Storage & General Storm Water Permit Compliance
 NBC Field's Point Wastewater Treatment Facility

	Storage Containers/Vessels Condition	Supports and Foundations Condition	Piping and Valves Condition	Spill Containment Structures Condition	Detection Protection Warning Equipment Condition	Evidence of Leaks and Contamination	Comments
Wet Weather Emergency Bypass Hypochlorite	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Transformer T8 (wet weather)	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Conex Storage Container	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Gravity Thickener Hypochlorite Storage	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		

Initials:

Date:

Quarterly Inspection Checklist for
 Chemical/Oil Storage & General Storm Water Permit Compliance
 NBC Field's Point Wastewater Treatment Facility

	Storage Containers/Vessels Condition	Supports and Foundations Condition	Piping and Valves Condition	Spill Containment Structures Condition	Detection Protection Warning Equipment Condition	Evidence of Leaks and Contamination	Comments
Transformer in front of PT Building	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
PT Building Elevator Equipment Room	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
WQSB/COB Generator 3,500 gallon Diesel Tank	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
WQSB/COB Transformer	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		

Initials:

Date:

Quarterly Inspection Checklist for
 Chemical/Oil Storage & General Storm Water Permit Compliance
 NBC Field's Point Wastewater Treatment Facility

	Storage Containers/Vessels Condition	Supports and Foundations Condition	Piping and Valves Condition	Spill Containment Structures Condition	Detection Protection Warning Equipment Condition	Evidence of Leaks and Contamination	Comments
Spare Transformer	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Ernest Street Pump Station	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Ernest Street Pump Station Generator Room	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
8,000 gallon Diesel Storage Tank	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		

Initials:

Date:

Quarterly Inspection Checklist for
 Chemical/Oil Storage & General Storm Water Permit Compliance
 NBC Field's Point Wastewater Treatment Facility

	Storage Containers/Vessels Condition	Supports and Foundations Condition	Piping and Valves Condition	Spill Containment Structures Condition	Detection Protection Warning Equipment Condition	Evidence of Leaks and Contamination	Comments
Snow Melt Building	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
IM Storage Building	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Transformer Pad (T5 & T6)	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Tunnel Pump Station	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		

Initials:

Date:

Quarterly Inspection Checklist for
 Chemical/Oil Storage & General Storm Water Permit Compliance
 NBC Field's Point Wastewater Treatment Facility

	Storage Containers/Vessels Condition	Supports and Foundations Condition	Piping and Valves Condition	Spill Containment Structures Condition	Detection Protection Warning Equipment Condition	Evidence of Leaks and Contamination	Comments
Tunnel Pump Station Generator	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
2,500 gallon Diesel Storage Tank	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		
Transformer Pad (T1 & T2)	Good	Good	Good	Good	Good	Yes	
	Poor	Poor	Poor	Poor	Poor	No	
	NA	NA	NA	NA	NA		

Initials:

Date:

Quarterly Inspection Checklist for
Chemical/Oil Storage & General Storm Water Permit Compliance
NBC Field's Point Wastewater Treatment Facility

Comments/Additional Information:

Initials:

Date:

Quarterly Inspection Checklist for
Chemical/Oil Storage & General Storm Water Permit Compliance
NBC Field's Point Wastewater Treatment Facility

Summary of Inspection Findings

Based upon the inspection conducted on _____,
the following items requiring
maintenance or corrective actions have been identified and must be addressed:

1	
2	
3	
4	
5	
6	
7	
8	

This report accurately documents the findings of the quarterly facility inspection of chemical and oil storage areas and for storm water permit compliance. Report findings will be forwarded to the facility manager to address corrective actions.

Signature of Inspector

Date

Acknowledgement of Inspection Findings

I, _____, Field's Point Plant Manager,
acknowledge the findings of the quarterly inspection. All issues noted above that required
maintenance or corrective actions have successfully been completed. All completed service
requests and work orders documenting that the work has been completed are attached.*

Signature of Plant Manager

Date

*The original copy of the completed report is to be filed at the facility with the Storm Water Plan
and a copy is to be forwarded to the Planning, Policy & Regulation Division.

Initials:

Date:

Appendix 16

Visual Assessment Standard Operating Procedure & Report Form

STANDARD OPERATING PROCEDURE
VISUAL ASSESSMENT OF STORM WATER DISCHARGES

Visual assessments of the storm water discharged from the facility must be conducted four times per year, twice between January 1st and June 30th and twice between July 1st and December 31st. These assessments must be conducted on measurable storm events. Measurable events are storm events that result in an actual discharge of storm water from the facility. The following procedure must be used when conducting visual assessments:

1. Monitor the weather to determine when a storm may occur.
2. Once it is determined a storm will occur assess if the storm will meet assessment criteria:
 - a. Will there be a discharge
 - b. When was the last measurable storm event (if less than 48 hrs. before the storm does not qualify)
 - c. When it has been at least 30 days since the last visual assessment.
3. If the storm qualifies, staff is to be dispatched to collect samples within the first 30 minutes of the discharge.
4. Grab samples are to be collected from each designated outfall while discharges are occurring.
5. The samples are to be assessed for the following:
 - a. Color
 - b. Clarity
 - c. Foam
 - d. Odor
 - e. Oil Sheen
 - f. Floating Solids
 - g. Settled Solids
 - h. Suspended Solids
 - i. Other Obvious Indicators of Pollution
 - j. Probable Sources of Pollution if Observed
6. The Storm Water Visual Assessment Form must be completed in its entirety. The following fields must be completed:
 - a. Sample Collector
 - b. Date of Assessment
 - c. Date of Rain Event
 - d. Event Duration
 - e. # of Days Since Last Measurable
 - f. Event Total Rainfall in inches
 - g. Quarter
 - h. Type of Event
 - i. Time each sample is collected
7. The completed Storm Water Visual Assessment Form is to be signed by the staff member who prepares the report and Plant Manager.
8. The original completed form is sent to the Plant Manager to be kept with the SWMP and copies are to be forwarded to the ES&C office and Pretreatment Manager.

NBC Storm Water Visual Assessment Form
Field's Point Wastewater Treatment Facility

		Sample Location						
	Monitoring Station #001-Y Gravity Thickener	Monitoring Station #002-Y Wet Weather	Monitoring Station #003-Y Aeration	Monitoring Station #004-Y Final Clarifier	Monitoring Station #005-Y Storm Water Basin #1	Monitoring Station #006-Y Storm Water Basin #2	Monitoring Station #007-Y Manhole on Terminal Rd Storm Line	Monitoring Station #008-Y ES-TP's Oil/Water Separator
Other Obvious Indicators of Storm Water Pollution								
If Contamination is observed indicate probable source								

Were the samples collected with the first 30 mins of actual discharge? ____ Yes ____ No
 If no, explain why it was not possible to collect the samples with the first 30 mins:

Guidelines for Monitoring:

- Storm event must result in an actual discharge from the facility.
- Grab sample MUST be collected with in the FIRST 30 minutes of discharge where practicable.
- Storm event monitoring MUST occur at least 48 hrs. from the previous measurable event and at least 30 days since the previous assessment.
- Monitoring events for snow melt discharges must be performed when a measurable discharge occurs from the site.

I certify under penalty of law that this document and all attachments were prepared under the direction or supervision 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 fines or imprisonment for knowing violations.

Signature of Preparer of this Report _____

Date _____

Narragansett Bay Commission
 Field's Point Wastewater Treatment Facility
 Two Ernest Street
 Providence, RI 02905
 401.461.8848

Signature of Field's Point Facility Manager _____

Date _____

Appendix 17

Visual Assessment Report Summary

Appendix 18

Standard Operating Procedure Benchmark & Impaired Water Monitoring & DMRs

STANDARD OPERATING PROCEDURE
BENCHMARK & IMPAIRED WATERS MONITORING OF STORM WATER DISCHARGES

Monitoring of the storm water discharged from the facility must be conducted four times per year from each designated location. Two of the monitoring events are to be conducted between January 1st and June 30th and two are to be conducted between July 1st and December 31st. The monitoring must be conducted on measurable storm events. Measurable events are storm events that result in an actual discharge of storm water from the facility. The following procedure must be used when conducting monitoring:

1. Monitor the weather to determine when a storm may occur.
2. Once it is determined a storm will occur assess if the storm will meet assessment criteria:
 - a. Will there be a discharge
 - b. When was the last measurable storm event (if less than 48 hrs. before the storm does not qualify)
 - c. When it has been at least 30 days since the previous monitoring event
3. If the storm qualifies, staff is to be dispatched to collect samples within the first 30 minutes of the discharge.
4. Grab samples are to be collected in the container appropriate for each parameter from each designated monitoring station and brought to the laboratory.
5. The samples are to be analyzed for the following parameters using standard analytical methods as determined in 40CFR136:
 - a. Total Nitrogen (as N)
 - b. Coliform, fecal general
 - c. Total Suspended Solids
 - d. Oil & Grease
6. Once the analytic data has been certified it must be entered in a Discharge Monitoring Report (DMR) for each location.
7. The DMRs must be forwarded to the Director of ES&C for signature.
8. The completed DMRs must be submitted electronically using the NetDMR system to DEM no later than 15 days after the last day of the monitoring period (July 15th and January 15th).
9. If the analytical results exceed a numeric effluent limit, the location must be resampled within 30 calendar days (or during the next qualifying event) of implementing corrective actions.
10. Copies of the DMRs must be kept with the SWMP in the ES&C office and Pretreatment office.

Appendix 19

Standard Operating Procedure Discharge of Storm Water from Secondary Containment

STANDARD OPERATING PROCEDURE
DISCHARGING STORM WATER FROM SECONDARY CONTAINMENT

Storm water accumulates in outside secondary containment areas during rain and snow storms. Prior to discharging storm water accumulated in secondary containment areas the following procedures must be followed:

1. The containers must be inspected to ensure they are in good condition and not leaking.
2. If the containers are not leaking, a visual inspection of the storm water must be performed.
3. If there is a visible oil sheen on the storm water, the sheen may be removed by absorbent pads. If the sheen remains, the storm water must be pumped out for proper disposal.
4. If the container in the secondary containment is used for the storage of hypochlorite, the storm water must be analyzed for the presence of chlorine if the container is not in good condition.
5. If the analysis does not show the presence of chlorine, the storm water may be discharged.
6. If chlorine is present, the storm water must be pumped out for proper disposal.
7. Complete the Discharge of Storm Water from Secondary Containment Inspection Form.

DISCHARGE OF STORM WATER FROM SECONDARY CONTAINMENT
INSPECTION CHECKLIST

	<u>Evidence of Containers / Piping Leaking</u>	<u>Visible Sheen / Signs of Contamination</u>	<u>Chlorine Residual</u>
Tunnel Screening Hypochlorite	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
6,000 gallon Diesel	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sludge Processing Hypochlorite	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Chlorine Contact 500 gal. tank Hypochlorite	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Chlorine Contact 350 gal tote Hypochlorite	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Wet Weather Hypochlorite	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

DISCHARGING STORM WATER FROM SECONDARY CONTAINMENT
INSPECTION CHECKLIST

	Evidence of Containers / Piping Leaking	Visible Sheen / Signs of Contamination	Chlorine Residual
Hypochlorite Tank Farm	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Fuel Depot Kerosene	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Fuel Depot Diesel	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Comments: _____

Signature of Inspector _____ Date _____ Signature of Facility Manager _____ Date _____

Appendix 20

NBC Resiliency Plan

The information in this attachment has been deemed restricted in accordance with Section V.H of the MSGP

From Appendix A of the MSGP:

“Restricted Information – for the purpose of this permit, information that is privileged or that is otherwise protected from disclosure pursuant to applicable statutes, Executive Orders, or regulations. Such information includes but is not limited to: classified national security information, protected critical infrastructure information, sensitive security information, and proprietary business information.”